

LPSP-51

<b>Comment ID</b>	LPSP-51
<b>Person ID</b>	1312320
<b>Include files</b>	<a href="#">LPSP-51-EM-Hine-A1 0706_Redacted.pdf</a> <a href="#">LPSP-51-EM-Hine-Form 0706_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Philip Hine
<b>Position</b>	Chairman
<b>Company / Organisation</b>	Marine Specialised Technology Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 4.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b>	Site
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	RES SA 4.7 [MPA SA4.1]

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.	See attached representations
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	See attached representations

<b>as precise as possible.</b>	
<b>omplies with the Duty to co-operate</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	See attached representations
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	See attached representations
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local</b>	We are not opposed in principle to the use of the majority of the adjoining site for housing, but we strongly believe that it is essential for a buffer zone is established on our boundary which should remaining zoned for industrial use. This should extend to at least 100m from our boundary. Any future industrial development on this land could be designed to act as a physical barrier between the shipyard and houses. See attached representations

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>To explain and expand on the activities of our company and why the plan for redesignating the Industrial/Employment land (RES SA4.7/MPA-SA4.1) to housing as presently drawn would be seriously detrimental to us.</p>

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

<b>Comment ID</b>	LPSD-53
<b>Person ID</b>	1323055
<b>Include files</b>	
<b>Consultee Name</b>	Emeritus Professor Charles Hubbard
<b>Position</b>	Full Member and member of House and Premises Committee.
<b>Company / Organisation</b>	Royal Mersey Yacht Club, Bedford Road East, Rock Ferry, Wirral CH42 1LS
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 9.2
<b>Title</b>	Accessibility and Sustainable Transport
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policies Map
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	Submission Draft Policies Map Birkenhead North East (2 of4)
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	See the representation at question 6 below. This representation has been approved by and is submitted on behalf of; The Royal Mersey Yacht Club, (RMYC) Bedford Road East, Birkenhead, WIRRAL. CH42 1LS Background The RMYC has a distinguished record of facilitating recreational sailing on the Mersey since 1844 from its listed premises in Bedford Road East. It currently sails a fleet of Royal Mersey Mylnes, classic boats designed for the Club and dating from 1935, also a fleet of modern Etchells racing yachts and a number of Squib yachts. The yachts are placed on summer moorings

	<p>in the river off Rock Park and maintained in the Bedford Road boat yard in the winter months. The Clubs premises are also used for social activities throughout the year and provides changing, support and maintenance facilities. The RMYC is open for new members wishing to join and provides sail training courses and sailing experience for those wishing to learn the valuable skills of sailing. Adjacent to the RMYC's premises is the yard and premises of Tranmere Sailing Club (TSC), and the very popular and successful Refreshment Rooms Restuarant in the former Admiral Public House. Also at the river end of Bedford Road East is the former Vestor Oil Tank cleaning premises and dock area now owned by the Rock Ferry Waterfront Trust (RFWT) with its highly important and ambitious regeneration plans. The historic Rock Ferry slipway (where formerly the ferry berthed) is used actively by the RMYC and its members, together with the public, and provides one of the very few public accesses to the Mersey estuary for water sports and recreation.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	Yes
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	



<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p><b>Proposal</b></p> <p>The Wirral Local Plan 2021-2037, Submission Draft Policies Map - Birkenhead North East, shows the RMYC land and premises, together with the TSC site, the Refreshment Rooms, the RFW Trust land and a small area of land to the north of the refreshment rooms and an area of silted dock basin, all defined as "Primarily Employment Land", tinted dark purple. This designation is in spite of the very long established and unique recreational uses and ownerships of much of the subject lands in conjunction with sailing and other water sports on the River Mersey and operated from the Rock Ferry slipway. The water based activities and the modest Rock Ferry beach attract many visitors to the Refreshment Rooms too. It would be appropriate and logical, given the long established ownerships and recreational uses, for all the land referred to to be defined/allocated for Urban Sport and Recreation and coloured green on the Policies Map. Such a correction would also complement the Rock Park Conservation Area with its historic waterfront houses, the generally interesting maritime setting with expansive views across the river and of significant active commercial shipping activity.</p> <p>Accordingly Wirral Borough Council is respectfully asked to amend the Draft Policies Map to define the subject land and premises including the RMYC land and buildings, the TSC's premises, the Refreshment Rooms and its gardens, the RFW Trust's land, the small strip of land to the north of the Refreshment rooms and the cut of silted up water to the north of the RFW Trusts lands all for use for Urban Sport and Recreation (coloured Green with the SR designation) in stead of the now inappropriate and very out of date Primarily Employment Area designation.(tinted dark purple on the Map.)</p> <p><b>Reasons</b></p> <p>The redesignation will assist the regeneration of the area and location generally and, in particular, support the already long established recreational organisations and the local commercial activities. Such redesignation would also assist in bringing renewed long term market confidence to the Rock Park Conservation Area within which RMYC's premises, those of TSC and the Refreshment Rooms are all already located. It would also have the potential to assist the existing water based recreational organisations to enhance their facilities and grow their memberships and would support the important regeneration plans of the RFW Trust in its ambitious agenda and has potential to bring further employment to the area. All this would be wholly consistent with the thrust of the Draft Local Plan striving to regenerate the Birkenhead waterfront to the Mersey.</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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-54
<b>Person ID</b>	1323072
<b>Include files</b>	<a href="#">LPSD-54-EM-Amin F1_Redacted.pdf</a>
<b>Consultee Name</b>	Dr. Suzanne Amin
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 10.6
<b>Title</b>	Open Space
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	LGS - SA6.3

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	<p>I fully support the draft local plan designation of Greenfields West Kirby as Local Green Space (denoted as LGS-SA 6.3 in the West Kirby Inset Map) as legally compliant and sound.</p> <p>The importance of the designation of Greenfields (Sheep fields) within the local plan as Local Green Space cannot be overstated.</p> <p>First, the urbanisation of Greenfields would introduce an additional significant volume of traffic egressing onto Grange Road, a road that has seen a steady increase of traffic flow over the years, exacerbating traffic standing time, pedestrian and vehicular danger, congestion and back up through Grange Hill.</p> <p>Second, West Kirby is an important driver for tourism and the economy of the Wirral. The Greenfields estate with sheep grazing, pine trees and views of the sea and the Welsh hills is significant in identifying the character and attractiveness of West Kirby. The site is also a resource of the bio diversity of Wirral, with its well-established ant hills which attract bird life, tree lined boundaries and hedgerows,</p> <p>The urbanisation of Greenfields would obliterate the setting of West Kirby and deplete the bio diversity of Wirral.</p>
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be</b>	

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

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

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

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

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

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

<b>Comment ID</b>	LPSD-55
<b>Person ID</b>	1312452
<b>Include files</b>	
<b>Consultee Name</b>	Mr. Paul Storey
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1
<b>Title</b>	The Development and Regeneration Strategy for Wirral 2021 - 2037
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	<p>Dear Sir/ Madam</p> <p>I've found it hard to navigate around the plan and equally I'm not sure if my representation is in the right part, however I wish to make comment regarding the green belt land behind Rigby Drive Greasby, specifically in relation to the protection of the green belt land and the assumed future planning application from the leverhulme estate.</p> <p>Whilst the following is reference this piece of land- on which sits a farm commonly known as Appleby's Farm, no doubt other residents facing similar planning worries on green belts by them will also feel the same, so my follwoing comments apply to ALL green belt land subject to planning applications from the aforementioned estate.</p> <p>The Council has demonstrated the Borough's housing needs can be met via the housing supplied on brownfield sites across the Borough. There is no need to release any Green Belt land.</p> <p>Please protect our greenbelts against the likes of Leverhulme who only have greed at the heart of their plans.</p> <p>This is a copy of the email I sent to the estate last August, to which I have had no reply. i have also seen the proganda spin by the estate in local news publications, to whom i also emailed the following and have had no reply:</p> <p>Good Afternoon</p> <p>I write as a concerned and frustrated resident in Greasby. I am no expert in Greenbelts, nor am I a conservationist, scientist or an expert on wildlife. I do have a family member though who worked many years in the labs at Unilever, and I am aware of the respect many people of the Wirral, particularly those residing in Port Sunlight, hold in regards to 'Levers' and what Mr. Lever did for the people in terms of providing work and a place to live for the workers, creating a community and a legacy, as well of course the company as it is now and the various associated brand names.</p> <p>However, it came to my attention a couple of weeks ago that surveyors, commissioned by the Leverhulme Estate, attended Appleby Farm on Arrow Road, Greasby a couple of weeks ago. Furthermore, I have learnt that the Leverhulme Estate, which owns a vast area of greenbelt land in the Greasby and Irby areas as well as neighbouring parts of the Wirral, plan to sell off the land to developers.</p>

The vast majority of people who choose to work, do so to make money to feed their family and put a roof over their heads. If they are wise or earn enough money or are very lucky, trips within the UK are a bonus as are ventures abroad and materialistic items such as gadgets and nice cars.

I get it that it is Leverhulme Estate land and the Estate should be able to do what it wants with it- maybe the Estate urgently requires money. But this is greenbelt land and is classified as such for a reason. For instance, you have the farmer at Appleby Farm who has refused a substantial amount of money to leave the land as generations of that family have worked there and continue to work on the farm and it is still his wish that he can pass the work down to his children. Not only is the farm the only one on Wirral which produces unpasteurised milk, it is home to all sorts of wildlife and is a great and important part of the community. We should be encouraging as many farms as possible to sell produce- not destroy them. If this land is sold, it would adversely affect the livelihoods of the farmer's family and potentially their state of mind. Surely him refusing to go tells you all you need to know about their characters and mindset- i urge you to adopt the same view.

Clearly money is not the be all and end all in their minds, otherwise the farmer and his family would have long gone. Developing the land and adding houses and roads will have an adverse impact on the environment. If, say, 500 houses were built, there would be at least an extra 500 cars on the roads in the area. Then of course there would be at least an extra 500 people minimum who would require the use of GP's and schools. Although selling would be of monetary benefit to you and the developers, It would be disastrous for the infrastructure of the area, and in my view would turn it into a 'concrete jungle.'

I ask you to consider this. What would Mr. Lever think? A speculative question I know but, surely having built his legacy which continues to last to this present day, he would have been happy with what he had and maybe have imparted his entrepreneurial skills onto others or advised or assisted with development in other parts of the Wirral which clearly require it?

I'm sure you'll be asking 'but there's no money to be made in such a scenario for the Estate' - true, but surely we just need to take a step back, take stock of what we have, be happy with what we have, and help others? I know lockdown has allowed a lot of people to reflect in such a way.

I implore you to do the same- please don't damage the legacy Mr. Lever has created- why not visit deprived areas of the Wirral and help regenerate those instead- such areas quite often stay in the cycle of depravity- but with your expert knowledge this is a great chance to build on the legacy.

I hope you do read this- it would be appreciated- and I am welcome to meet up or chat over the phone to discuss a way forward that is going to keep the people of Greaby happy.

Please do the right thing.

Yours faithfully,

Paul Storey

Please do the right thing WBC and create a great legacy. I'd like to think that WBC is fair and transparent and free from alleged corruption we have heard about in other not so distant councils (e.g. cash for contacts).

We cannot take money to the grave but we can create opportunity and a prosperous area for future generations.

I am happy to assist where I can to prevent development on the land I have described and also similar land elsewhere that may be subject to planning applications.

Yours faithfully

Paul Storey

19th June 2022

If you consider that the Local Plan is not sound, please indicate the reason(s) why:

- \* Not Positively Prepared
- \* Not Justified
- \* Not Effective

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

<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>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>	

* 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	Yes

<b>Comment ID</b>	LPSD-56
<b>Person ID</b>	1246339
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Rosey Paul
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 13
<b>Title</b>	Local Green Space
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	LGS-SA6.3

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	The site with its rural nature as a remnant sheep field is important to the character of west kirby. The view from Grange road, across the site to the hills of wales and the estuary is highly valued by the local community. It signals an arrival to the town and is part of the towns charm. The site provides a vital wildlife corridor between Grange Hill and Ashton park and the wirral way.
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

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



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

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

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-58
<b>Person ID</b>	1246339
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Rosey Paul
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 13
<b>Title</b>	Local Green Space
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	LGS SA6.4

<p><b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b></p>	
<p><b>Legally compliant</b>  *        Yes  *        No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b></p>	
<p><b>Sound</b>  *        Yes  *        No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b></p>	<p>The St Bridgets school field is an important greenspace within the conservation area and provides a setting for St Bridgets Church and the former rectory. In addition it is a vital recreational asset for St Bridgets school and a community asset used for Earth festival and Summer fetes.</p>
<p><b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b>  *        Not Positively Prepared  *        Not Justified  *        Not Effective  *        Not Consistent with National Policy</p>	
<p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>	

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

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

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

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-59
<b>Person ID</b>	1246339
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Rosey Paul
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 13
<b>Title</b>	Local Green Space
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	LGS SA6.2



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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The recroty road paddocks are an important greenspace within the conservation area having visual , ecological and heritage value
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><b>omplies with the Duty to co-operate</b></p> <p>*     Yes</p> <p>*     No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	

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

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

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	
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<b>Comment ID</b>	LPSD-60
<b>Person ID</b>	1312045
<b>Include files</b>	<a href="#">LPSD-60-62, 173 &amp; 174-EM-Stevens Attach 2 of 3_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Graham Stevens
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 3
<b>Title</b>	Strategic Policies
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	3.15 and related Paragraphs and Policies
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Graham Stevens – Housing Need Representation to Reg 19 Stage – Para 3.15  The 'Housing Need' figure employed in the Draft Local Plan is vastly exaggerated over the real Need. It has been derived through the out-of-date and discredited Standard Method and 2014ONS Data. Employing the latest Standard Method and Data to produce a "starting point" has not been done nor has an 'Objectively Assessed Housing Need' exercise been undertaken or explained, using the wealth of available local administrative data and other sources available to the Council and permitted in view of there being several sound grounds for 'Exceptional Circumstances' to employ an 'alternative methodology and data sources', notwithstanding Liverpool University's flawed report concluding to the contrary.

	<p>The attached Report is my work and gives commentary on this issue, suggestions and calculations aimed at a better representation of a sound way forward and the basis of a 'Main Modification' designed to better reflect the actual 'Housing Need' of Wirral, to make the Local Plan more deliverable and to reduce conflict and Risk, including to Green Belt and the success of the very belated Regeneration of the deprived and depressed East of Wirral.</p> <p>The generality of the Draft Local Plan is strongly supported (and I would like this recorded), being based upon Regeneration and limited further development within existing urban areas. If this approach by the Council in its Draft Local Plan is successful, there will be multiple benefits to the Area and to its Residents, particularly those suffering deprivation, poor health outcomes and substandard housing, which have all existed for decades – the disparity across the Peninsula is disgraceful and must be ended, which would not be delivered through the development of yet more luxury housing in leafy surroundings.</p> <p>This Regeneration-led approach would also be in line with the Purposes of Green Belt, particularly the fifth Purpose, and as a by-product would also help protect one of Wirral's greatest but fragile Assets, namely the wonderful Green Belt which, apart from being a delight to view and walk through, contains much productive and potential agricultural land (to assist with essential future food security) and is functionally linked to the nationally and internationally recognised, important and protected coastal wildlife zones.</p> <p>Paragraph 3.15 and these Comments and attachment relate to much of the Draft Local Plan (directly and indirectly), and to its 'soundness' and potential success; and I trust that it will not take multiple repetitions of this Representation to register its applicability to those other sections. This is an individual position and submission but I have liaised over the last few years with the Wirral Society and WGSa (Wirral Green Space Alliance) in particular and support their work and similar conclusions: a good Local Plan based on much hard work but misled as regards the 'Housing Need' (or more properly the 'Housing Requirement') that is really required and which would render it 'sound' and deliver on its stated aims.</p>
<b>omplies with the Duty to co-operate</b> *     Yes *     No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal</b>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Given in 4(b)3 above and the attached Report/File</p> <p>The housing need should be 550 (2018 Projection) + 6 (economic uplift) = 40 (demolitions allowance). exceptional circumstances exist to use the 2018 projections.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>No, I do not wish to participate in hearing session(s)</p>



<p>* 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>

<b>Comment ID</b>	LPSD-61
<b>Person ID</b>	1312045
<b>Include files</b>	<a href="#">LPSD-60-62, 173 &amp; 174-EM-Stevens Attach 2 of 3_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Graham Stevens
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	See later comments
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>WS1.1 Housing/Homes</p> <p>The local plan specifies a requirement of 12,464 dwellings in the 16- year period, 2021 – 2037, or 779 pa. This is based on the DLUHC standard method and using the 2014 household projections, for the ten- year period 2020- 2030, and includes an affordability uplift. These data are well out of date, with successive projections based on 2016 and 2018, the latter having been available in September 2020. Further, the 2020 projections will be available by September, during the course of this local plan process. Later ONS projections make a material difference to the “housing need”, varying between 29% and 42% lower than the Local Plan’s stated need.</p> <p>The Council has failed to examine whether there are circumstances to depart from the 2014 projections and also failed to accommodate the advice of its own commissioned research from Manchester University (“An Objective assessment of the latest ONS Household projections for Wirral Metropolitan Borough” by Prof L Simpson, University of Manchester, 21/12/2018)</p>

which explained the requirement to use the most recent projections available for Wirral. The guidance for local plan inspection is that the plan must be based on up-to-date evidence (para 5.2). This submission draft of the local plan has not done that. Further, the SHMA October 2021 dismisses the projections other than the 2014-based ones (para 4.29). There is no full explanation why and the SHMA appears predicated on using the 2014-based projections because the DLUHC expects them to be used. This approach appears to take the 2014 projections as “pre-conceived” and organise the report around that.

However, the plan gives an estimated supply of 16,522 units which exceeds the “need” (13,360 in para 3.15) by about 3,200. Further, the plan increases the “need” to nearly 18,000 dwellings because “sites may not come forward at the pace expected”. This includes an arbitrary jump of 10% in parts of supply not specified in the NPPF. In the event of issues with the supply of deliverable sites for development, the NPPF argues for allocations to be brought forward, or for careful monitoring and subsequent action plans – not arbitrary additions.

In effect, the plan’s “housing need” is overstated due to out-of-date demographic evidence, and arbitrary extra supply and additions not required by the NPPF.

The main point of a substantial paper appended to this box/form is that the 2014 based projections for 2020 to 2030 are based on old demographic changes in population (up to 2014), and headship rates prevailing at the time. The later 2018 based projections utilise estimates of population change up to 2018. In the later period, the components of natural change (births less deaths) and internal migration (flows of people between LAs) – either exhibit a change in trend or continue in a trend to result in a different impact on projected change in population overall – 2020 to 2030. Competent projection would take the later demographic change into account. These changes impact on the overall “housing need” substantially, reducing the projected need by at least 29%.

The local plan adds to the 2014 based projection of 779 pa, an economic uplift of 6 pa, and a demolition uplift of 50 pa. The result is 835 pa, or 13,360 dwellings in the 16 years of the plan.

The appended paper demonstrates that the 2018 based population (and household) projection extends the recent demographic change more realistically than those based on 2014 which mislead the levels and trends of recent change, particularly on natural change.

The ONS 2018 based projection based on ONS’s estimation using 5 years of recent internal migration data gives a projected need of 550 pa (8,800 in 16 years). Call this the ONS 2018 (5 year) projection. Further, the allowance for demolitions is overstated, and is more realistic at 40 pa. The consequent housing need, 596 pa, varies substantially from the plan. The 16-year need would then be 9,536 dwellings – some 29% lower than the plan’s 13,360.

Projections come with assumptions and methods of estimation. Some demographers would argue that ten years of internal migration data reduces the impact of economic cycles on population projections and makes for very stable estimation. The resulting ONS 2018 (10 year) projection is for 435 dwellings pa (with affordability uplift). Addition of the economic and demolition uplifts (6+40) gives 481 dwellings pa or 7,696 in 16 years. This level is 42% less than the plan’s “housing need”.

The range of “housing need” – 7,696 to 9,536 - gives flexibility to accommodate other material changes in circumstances while being based on recent demographic change.

The appended paper explains the benefits and issues with these projections in more detail. What is clear is that the 2014 based projections are misleading for Wirral and make statistically unrealistic projections. The recent population changes and consequent later 2018 population and household projections give a substantial variation to merit a departure from the 2014 basis.

Such variation (reduction) is likely to continue, reflecting longer term changes in England’s population. The projected change in England’s population between 2020 and 2030 is 3.66 million (2014 based); 2.84 million (2016 based); 2.50 million (2018 based); and 1.99 million (2020 based). ONS published preliminary 2020- based population projections for England in January 2022.

The projected increases in England’s population (2020 to 2030) get progressively lower with each new set of projections, reflecting longer term demographic change. This is likely to be reflected in the next set (2020- based) of projected population changes (and household change) for Wirral.

The appended paper also demonstrates that the 2018 -based projected number of households (5 year and 10 year) are close to the recent numbers of observed households in occupied dwelling stock: whereas those of 2014-based overstate household numbers in dwellings even when retro-fitted back to 1991. The projected number of households for 2020 from the 2014 based projections is over 2,000 more than the actual number from the local authority records.

**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.**

<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You</b></p>	<p>See Comments to Q? 4b(3) above. plan should use 2018 projections and explain properly how it has arrived at need. refer attachment</p>

<p>will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Ensuring a minimum housing need is critical to many aspects of the local plan – preservation of greenbelt and greenspace for community use and mental well-being, the overall environment, ensuring conservation areas are not under attack by land hungry developers, and generally ensuring Wirral is the green leisure peninsula that the Council wishes to portray. I have an interest in the official ONS projections and that they are used properly whatever faults they may have, alongside the use of the most relevant up-to-date projection evidence.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the</p>	<p>Yes</p>

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

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

<b>Comment ID</b>	LPSD-62
<b>Person ID</b>	1312045
<b>Include files</b>	<a href="#">LPSD-60-62, 173 &amp; 174-EM-Stevens Attach 2 of 3_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Graham Stevens
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 3.4
<b>Title</b>	Housing Mix
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.4
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	See Comments below
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>WS3.4 Housing - Housing Mix</p> <p>Examination of the projected changes in numbers of households by type and age, suggest that any new dwellings should be weighted towards adult households and the elderly: that is towards 1 or 2 bed dwellings, bungalows and flats. Over 70% of the projected change in households in 2020 to 2037 will be from those with just one or two people. And these smaller households are dominated by households headed by people aged 60+. This holds for 2014 and 2018 based projected households.</p> <p>The 2018 based household projections (5 year and 10 year) suggest also that the need for 3- bedroom houses may not be as great as suggested in the various scenarios given by the SHMA. This reflects the projected reduction in households with children.</p>

	<p>In the plan's period, 2021-37, both population projections, 2014 based and 2018 based, project an increase of over 13,000 in the number of older households (Household Representative Person is 60+). Both projections also project a drop in the number of households below 60. Elderly households dominate the projected change. A point on accuracy here is that the Local Plan refers to 14,316 households headed by someone aged 65+ (para 3.44, p62 and refers to the SHMA para 5.8, p98). This figure is clearly inconsistent with the projected change in households aged 60+ in the Technical Appendix D, table D2A, p34, which gives a projected change of 13,041 such households 60+. This discrepancy brings into question other facts which, alongside the sparsity of detail of the household survey, casts doubt on how the results can be interpreted.</p> <p>The 2014 projections give an increase in households with children while those of 2018 give a reduction.</p> <p>The 2014 household projection appears out of line against the gradual reduction in number of births since about 2008 &amp; 2009 in Wirral. The latest evidence points to more accommodation for the elderly, and households with one or two people. In order to project forward the mix of households by type and size, it is critical to use the latest demographic evidence – the 2018 household projections for now – whatever overall target number is used.</p> <p>The appended paper gives the detailed argument that the recommendation on household mix by size of dwelling seems inconsistent with the increase in households headed by 60+ people, and the reduction in households with children from the later household projections. While, a refined mix cannot be calculated because of the sparsity of detail in the SHMA Technical Appendix D, it is clear that the mix should prioritise more 2- bedroom properties, flats and bungalows. The SHMA states that elderly households wish to remain in their own homes but those who wish to move require smaller and easier to maintain dwellings and bungalows (para 3.44, p62) (SHMA Technical Annex F, para F43, p95).</p> <p>Further, across Wirral, figure F3 (p93 of the appendix F) shows: 68.5% of older households (65+) live in houses, 12.9% in bungalows, and 18.1% in flats. If most want to remain in their homes but those who wish to move, want to move to smaller dwellings, then the broad implication is a need for 2 -bedroom flats, and more bungalows for ease of mobility. Paragraph F31 states that 60.2% of older households (65+) live in 3- bedroom houses which contradicts figure F3 where the percentage is given as 40.5%. if these statistics are taken by users then misinterpretation may occur.</p> <p>Further, it raises the issue that the SHMA October 2021 should give full detail of the analysis on which its recommendations on dwelling size are based. At least, this means providing the full relationship between households and dwellings. The SHMA relies on a survey of households in 2019. The SHMA gives insufficient case detail and statistics from this survey in order to inform interpretation of the selected results given in the SHMA report. More justification is required.</p> <p>In addition, the SHMA fails to give the average household size for Wirral from the 2019 household survey. It would be instructive to compare the average household size from the survey with the projected average household sizes for 2019 from the ONS household projections (2014 and 2018 based).</p>
<b>omplies with the Duty to co-operate</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the</b>	

<p>accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>See earlier Comment Box and attached file</p> <p>in short housing mix inconsistent with evidence and SHMA should explain further how it has reached conclusions. Change in housing mix needed</p>

<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Ensuring a minimum housing need is critical to many aspects of the local plan – preservation of greenbelt and greenspace for community use and mental well-being, the overall environment, ensuring conservation areas are not under attack by land hungry developers, and generally ensuring Wirral is the green leisure peninsula that the Council wishes to portray. I have an interest in the official ONS projections and that they are used properly whatever faults they may have, alongside the use of the most relevant up-to-date projection evidence.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-63
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 1
<b>Title</b>	Introduction and Background
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	1.7 (also 1.6,1.8,1.9)
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	We support all the climate change measures in the Plan, because to do otherwise would be `unsound` and not `effective` in view of the urgent need to address the climate and ecological emergencies, and international obligations to do all possible to limit global climate change. Therefore to be `sound` and `effective` the Plan must keep all the climate change and ecological policies proposed, or make them more stringent. Whether Wirral can reach net-zero carbon in time will depend largely on actions under this Plan. Any proposals by others to reduce climate action e.g. by building houses to less than Passivhaus standards, or commercial buildings to less than BREEAM excellent, must therefore be resisted.
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

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

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



<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-64
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	2.14
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	2.14 Refers to 5 NIAs: the Mersey Estuary; the Dee Estuary; the River Birket Corridor; Dibbinsdale, Raby Mere and Eastham Country Park; and the East Wirral Heathlands. Policy WS 5.4, L.1 has seven: change 2.14 to add in North Wirral Coast and Liverpool Bay, and West Wirral heathlands and Arrowe Park.  Unsound (not effective) because as at present proposed, there is a significant gap in NIAs between the southern and north-western ones, which could lead to lack of wildlife connectivity across the borough.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>We propose that the NIAs should be extended from the north end of NIA-3 across westwards via Prenton Dell &amp; Claypit and the Barnstondale LWS complex to join the south end of NIA-6. This would create the corridor for wildlife movement, needed from the southern borough boundary (where it joins rural land in CW&amp;C), up the centre of Wirral and across to join the western group of NIAs (1,4,5) and thence along the coast. Such corridors are vital as the peninsular nature of Wirral means that for terrestrial wildlife there is only one way in and out, via the southern boundary.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-65
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	2.39
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	We support the Vision (A,B,E,F) and 2.39 Strategic Objectives (1,4,5,6). But need to add to SO5 'protect and enhance nature'.



<b>omplies with the Duty to co-operate</b> *     Yes *     No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	<p>Nature is already depleted in Wirral (as everywhere) and needs restoration and enhancement not just protecting the current resource.</p> <p>Fig 2.6: neither here nor in the glossary is there any explanation of the relationship between Sites of Biological Importance and Local Wildlife Sites. Neither SBIs nor RIGS are in the Glossary.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-66
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 3
<b>Title</b>	Strategic Policies
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	3.6
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<p><b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b></p>	
<p><b>Legally compliant</b>  *      Yes  *      No</p>	
<p><b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b></p>	
<p><b>Sound</b>  *      Yes  *      No</p>	No
<p><b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b></p>	
<p><b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b>  *      Not Positively Prepared  *      Not Justified  *      Not Effective  *      Not Consistent with National Policy</p>	Not Effective
<p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>	Some brownfield sites, especially where long-abandoned, have wildlife value. The Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>3.6 We support 'brownfield first' development, because the Green Belt contains so many LWS and SSSIs, and the necessary wildlife corridors and connections between them. As we found in the 2018 Green Belt review, there is little Green Belt in Wirral that does not have wildlife importance (out of its 54 parcels, 41 had serious wildlife implications and another 7 wildlife-related concerns). However, some brownfield sites, especially where long-abandoned, have wildlife value. See <a href="http://www.gov.uk/guidance/natural-environment">www.gov.uk/guidance/natural-environment</a> about Brownfield land of high environmental value. Therefore the Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield. This necessitates good ecological studies, as the biodiversity value of brownfield sites often includes value to invertebrates. Hind Street (4.85, MPA-RA5.1)and Rose Brae (RES-RA3.4)re-development areas are examples, as the satellite photos show vegetation on parts of the sites.</p>

<p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Similarly MPA-RA6.3 Bidston Dock will need to take into account the high biodiversity of the western part of the sidings, where surveys have found rare plants and lizards. BNG here could include making the narrow western part of the sidings, of little use for built development, into a suitable-managed nature park.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-67
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1.4
<b>Title</b>	Flooding and Drainage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS1.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Use of Sustainable drainage systems 'where technically possible and viable'. This is ineffective because too weak in the face of changing weather patterns.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Should say `Sustainable Drainage systems will be expected unless the applicant can show that any form of sustainable drainage is currently technically impossible'. Knowledge in sustainable drainage is developing rapidly, so sites that face problems in the short term may well be developable in the medium term.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-68
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 3.1
<b>Title</b>	Housing Design Standards
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS3.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	We support the thrust of this section on energy and water efficiency. We support 'zero carbon ready by design' for the short term, but to be effective the policy ought to expect new housing to be constructed as 'zero carbon in use' from 2025 when the ban on new gas boilers comes in.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>New housing should be constructed as `zero carbon in use' from 2025. This to meet our carbon reduction targets. Wirral's existing housing stock needs huge amounts of work on insulation etc to reduce its carbon footprint and reduce fuel poverty. New housing should be built not to need any physical work on energy efficiency, so as to leave the building trade and material suppliers to concentrate on refitting older stock.</p>



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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-69
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.2
<b>Title</b>	Open Space Provision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS5.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	All development to contribute to open space (no size floor) is good – we support. BUT ineffective because nothing about quality of that open space except a vague ‘appropriate quality’ in 3.118.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>We support 3.108 to 3.112, Fig 3.5, 3.118 and 3.121. Policy WS5.2 should say that open space will be of high quality, with naturalistic areas wherever possible, or refer to Policy WS 5.1 about quality. Naturalistic areas give greater benefits to physical and mental health especially in children (as said in 3.116). Such areas can also help with provision of Biodiversity Net Gain and Ecological Networks.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-70
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	3.122-3.129
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	



Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Policy WS 5.4 needs to add something about including effects of development on neighbouring land, when assessing Biodiversity Net Gain.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>We support 3.122-3.129 and Policy WS5.4, but should add that when assessing Biodiversity Net Gain, effects of a development on adjacent land must be considered where that land has value for biodiversity. Appropriate buffer zones may be needed (see Policy WD 3).</p> <p>Figure 3.8 has SBIs and LWS marked, but there is no explanation anywhere in the Plan about the relationship between these. LWS is defined in the Glossary, SBI is not. This must be explained.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-71
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.1
<b>Title</b>	Green and Blue Infrastructure Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS5.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	B developers will try to avoid these payments. C last sentence needs changing to match that in Landscape WD 1.1 C.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>B Replace `financial contributions will be sought' with a stronger wording e.g. `will be required'</p> <p>C To emphasize using native and other wildlife-friendly species (to support biodiversity gain) and UK&amp;NI provenance (to lessen disease and pest importation risks).</p>

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



<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-72
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS5.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	We support policy WS 5.4, but some changes are needed to be effective in the face of continuing climate and ecological emergencies and the need to enhance as well as retain biodiversity. Functionally linked land (linked to estuary European sites) is referred to here (WS5.4) and in 3.122, but not mapped anywhere.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>For effectiveness the maps from the Natural England report should be included: Identification of Functionally Linked Land supporting Special Protection Areas (SPAs) waterbirds in the North West of England (October 2021) Natural England Commissioned Report NECR361, Appendix 9. For instance, this affects the area of Hoylake Langfields pLWS, including the former Gilroy scrape, which is shown on Figs 2.6 and 3.8, but not listed in Appx 17. We are told that landowner consultations are still in progress, but for soundness the pLWS should be finalised as soon as possible. We support the pLWS here, also its inclusion in the Functionally linked land and the Nature Improvement Area 4, and retention of the Green Belt. Either this Plan or work on the Nature Recovery Strategy should examine extending the River Birkett wetland opportunity (Fig3.6, GBI #6) upstream along the Birkett and its tributaries through the Hoylake Langfields to the former Gilroy scrape area, which could be restored as part of the Wetlands scheme.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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## LPSD-73

<b>Comment ID</b>	LPSD-73
<b>Person ID</b>	1237546
<b>Include files</b>	<a href="#">LSPD-73-134-PDF-ASH-ATTACHMENT-22.06_REDACTED.pdf</a>
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

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.	Last sentence of M (about sites recently damaged, an ongoing problem - see atatched file). Lack of a definition will be ineffective as it will lead to disputes about what is `recent`



<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>For effectiveness, this needs to define `recent` as in the Environment Act 2021 (Schedule 14 section 6), which defines it as after January 30th 2020. Also needs to define `appropriate habitat typology` as the assessment will be as in the DEFRA Biodiversity Metric 3 (and subsequent updates to that methodology). See DEFRA Biodiversity Metric 3.0 User Guide p24, Step 3e and p27e about recently-cleared sites. Plan must commit to assessing such recently-cleared sites according to their pre-clearance state.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-74
<b>Person ID</b>	1275959
<b>Include files</b>	
<b>Consultee Name</b>	Mr Martin Jungnitz
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 13
<b>Title</b>	Local Green Space
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	LGS - SA6.3

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	<p>I am writing to comment on the proposed designation of the Greenfields West Kirby as a Local Green Space (LGS-SA6.3). I would like to support the proposed designation of this important site as a Local Green Space. The site sits alongside the main road into the centre of West Kirby and is a green space which is valuable to the local community. It provides an important 'green lung' and is an important and long-standing part of the character of the area. It forms part of the views across the town and out to sea enjoyed by visitors as they enter the town. Such visitors are an important element of the local economy. The fields provide an important visual amenity for Grange Road which is a critical pedestrian route both for children attending local schools and residents walking to and from local amenities. The trees and wildlife on the site are vital to the biodiversity of the area.</p> <p>I am aware that a developer has proposed building a large number of houses on the site but has failed to acknowledge the proposed designation as a Local Green Space in its (therefore flawed) consultation document. This development highlights the sensitivity of the site , which is a historic green space which is critical to the character of the area. Such a development would also create additional traffic hazards and pollution on an already busy route.</p>
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be</b>	

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

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

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

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

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

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

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



## LPSD-75

<b>Comment ID</b>	LPSD-75
<b>Person ID</b>	1248571
<b>Include files</b>	
<b>Consultee Name</b>	Mr David Butler
<b>Position</b>	Principal Planning Officer
<b>Company / Organisation</b>	Cheshire West and Chester Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 3
<b>Title</b>	Strategic Policies
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

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

<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	Cheshire West and Chester Council supports the overall strategy proposed in the Local Plan, with a focus on the regeneration of brownfield land within urban areas. Cheshire West agrees with Wirral's strategy to meet its housing and employment needs entirely within the Borough. Furthermore, Cheshire West agrees that Wirral and Cheshire West and Chester are located within separate housing markets and separate functional economic areas, and there is no need for Wirral to accommodate any of Cheshire West's needs within its area.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-76
<b>Person ID</b>	1248571
<b>Include files</b>	
<b>Consultee Name</b>	Mr David Butler
<b>Position</b>	Principal Planning Officer
<b>Company / Organisation</b>	Cheshire West and Chester Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 9.4
<b>Title</b>	Impact on Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 9.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Cheshire West and Chester Council supports policy WS 9.4, in particular the statement that development proposals must demonstrate that the resulting cumulative impacts on the efficient operation of the highway and wider transport network, within and outside the Borough, will not be severe. It will be important to retain this text so that the impact on Cheshire West's network can be fully considered for proposals located within the Eastham Dock Estate, for example, which can only be accessed via Cheshire West and Chester's highways network.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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



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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-77
<b>Person ID</b>	1248571
<b>Include files</b>	
<b>Consultee Name</b>	Mr David Butler
<b>Position</b>	Principal Planning Officer
<b>Company / Organisation</b>	Cheshire West and Chester Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 9
<b>Title</b>	Strategy for transport
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	3.208
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Cheshire West and Chester Council supports paragraph 3.208, in particular the statement that Transport Assessments, where appropriate, will also be submitted for approval to neighbouring authorities where development may impact on wider transport networks. It will be important to retain this text so that the impact on Cheshire West's network can be fully considered for proposals located within the Eastham Dock Estate, for example, which can only be accessed via Cheshire West and Chester's highways network.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-78
<b>Person ID</b>	1248571
<b>Include files</b>	
<b>Consultee Name</b>	Mr David Butler
<b>Position</b>	Principal Planning Officer
<b>Company / Organisation</b>	Cheshire West and Chester Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WM 6
<b>Title</b>	Waste Management
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WM 6
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *     Yes *     No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *     Yes *     No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *     Not Positively Prepared *     Not Justified *     Not Effective *     Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Policy WM 6 refers to the Joint Waste Local Plan for Merseyside and Halton adopted in July 2013. Cheshire West suggests that it would be helpful to set out how/when this will be reviewed or whether there is sufficient waste management provision within the area to meet the Local Plan period up to 2037.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Policy WM 6 refers to the Joint Waste Local Plan for Merseyside and Halton adopted in July 2013. Cheshire West suggests that it would be helpful to set out how/when this will be reviewed or whether there is sufficient waste management provision within the area to meet the Local Plan period up to 2037.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-79
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.7
<b>Title</b>	Maintenance of Green Infrastructure and Open Space Provision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS5.7
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	Ineffective because clauses not consistent. Policy R says management and maintenance `for the lifetime of the development`, para 3.142 says `for a 30 year period`.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>We propose `for the lifetime of the development or a 30—year period, whichever is longer'. `For the lifetime of the development' does carry a risk if the development fails e.g. the office development at Riverbank Road, Bromborough RES-SA4.3, now seeking to be changed to housing. 30 years is not long for a biodiversity asset e.g. a woodland planting would still be semi-mature. The maintenance should continue for as long as the development does because the biodiversity effects of the development will persist throughout its life.</p>

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

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

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

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



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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-80
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 7.1
<b>Title</b>	Design Principles
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS7.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	We support in general, but with ref to B8, 'Provide for the protection of trees of greatest visual or wildlife value and other vigorous healthy trees, and hedgerows;' This is ineffective because it will lead to arguments over what is of greatest value and what is healthy. The wording 'of visual and wildlife value' is dubious – most trees and hedges have some wildlife value!

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and</b></p>	<p>We propose remove this wording as likely to lead to disputes over the health and wildlife value of trees and hedges.</p> <p>`Healthy' trees should be defined It could be claimed that a tree with minor vandal damage is `unhealthy'. Mature trees provide many benefits in carbon fixation, air quality, soil health etc. It takes at least a decade for newly-planted young trees to contribute significantly to these ecosystem services. Similarly biodiversity value increases with age and in particular with features such as holes and branch splits which can be regarded as signs of being `unhealthy'– though they are not. It should also be noted that standing dead wood is of great value to biodiversity, and should be retained if safe to do so. It would be better to remove the word `healthy' altogether, as it is likely to cause disagreements.</p>

<p><b>sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Policy could say that 'Trees in classes A, B and C (as assessed in surveys done to BS5837:2012 Trees in Relation to Design, Demolition and Construction and any future updates) should be retained.' However, no standard exists for hedgerows. To align with the Wirral Tree, Woodland and Hedgerows Strategy, we suggested a new text: <i>protect all trees and hedgerows, recognising their value for visual amenity, wildlife, pollution control, noise reduction, climate amelioration and other value, unless the trees are already failing and have an expected life span of less than a decade.</i></p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></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).**

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-81
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 8.2
<b>Title</b>	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS8.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>(See 3.172) For greater clarity and effectiveness, we propose that all new buildings should meet recognised climate standards e.g. BREEAM Excellent for commercial and public buildings, and Passivhaus or equivalent for housing.</p> <p>(See 3.173) Carbon accounting should include the existing carbon fixation of the land. Where any building is built on land that is currently fixing carbon, even if just amenity grassland, then the new build should take this into account and make sure the built development fixes at least as much carbon.</p>



<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>(See 3.172) For greater clarity and effectiveness, we propose that all new buildings should meet recognised climate standards e.g. BREEAM Excellent for commercial and public buildings, and Passivhaus or equivalent for housing.</p> <p>Add: `carbon fixation by the existing site will be included in assessing the environmental net gain of any new development'. This has particular relevance to greenfield sites. These alterations are proposed to strengthen the effectiveness of the Plan in tackling climate change.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-82
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 8
<b>Title</b>	Strategy for Sustainable Construction, Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	3.183
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Hydrogen Net. It is unsound to place reliance on this unless its plans change. Generating hydrogen from natural gas is energy inefficient and carbon inefficient. Therefore this paragraph conflicts with the policies in the Plan on climate change.</p> <p>The project also relies on Carbon Capture and Storage, still an unproven technology at scale. Hydrogen generated by excess wind power at night would be a sustainable option for specialist uses such as industry that needs a burning flame e.g. some metal processing.</p>

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Replace with "intention to take advantage of Hynet if it moves to `green hydrogen` generated from renewable energy at times of low energy demand."</p>

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

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

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

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

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

\*      **Yes**  
\*      **No**



<b>Comment ID</b>	LPSD-83
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 8.2
<b>Title</b>	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS8.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	WS8.1, 8.2 apply to new buildings and are good. But will be ineffective if the Plan does not extend all clauses to major refits and conversions which require planning permission. B2 `where possible and viable' should take into account the medium-term viability of the proposed development in operation, not just short-term construction costs. This is to further the major campaign needed in Wirral to improve the energy efficiency of our housing stock and reduce fuel poverty. It is to avoid refits on buildings built under this plan, but also to free resources to treat Wirral's many buildings that are poorly energy-efficient. 3.189/ B3 is a very good clause, as it addresses a major problem in quality of construction.

<p><b>omplies with the Duty to co-operate</b></p> <p>*     Yes</p> <p>*     No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>WS8.1, 8.2 apply to new buildings and are good. But will be ineffective if the Plan does not extend all clauses to major refits and conversions which require planning permission.</p> <p>B2 `where possible and viable' should take into account the medium-term viability of the proposed development in operation, not just short-term construction costs.</p>

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-84
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 10.1
<b>Title</b>	Provision of Infrastructure
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS10.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The Plan does not consider that energy industry estimates that, to support the electrification of heat and transport in housing areas, the number of street substations will need to double.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Add: Development needs to set aside space for energy infrastructure such as new substations, or it could be very difficult to fit them in a decade after development.</p>



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

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

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	
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<b>Comment ID</b>	LPSD-85
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 1.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA1.2

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.	Needs an extra clause to protect existing biodiverse habitat

<b>omplies with the Duty to co-operate</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	RES-SA1.2 Land at Gibson House- RES-SA1.3 Rear of Gibson House, Maddock Road Egremont The construction for both will involve levelling off some of the slope to the Prom to allow the construction thus reducing the embankment. The steep embankment presently is grassland with a tarmac path across. There is also a pedestrian access from Blenheim Road to the prom which needs reinstating and maintenance. There is a moderately diverse grassland on the mown slope. Plans should retain this grassland and manage appropriately.

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

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

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-86
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 4.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA4.2, RES-SA4.3



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Unsound because as proposed retains the inadequate and inappropriate 5m buffer zone between the development and the ancient woodland adjacent (Eastham Country Park LWS), which is insufficient to protect this irreplaceable habitat. This buffer was as approved for the development of offices on this site, though we said at the time it was inadequate. A much better buffer is needed for housing because of the greater impacts.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Because this is woodland, there needs to be enough space between any building and the woodland to avoid risk of householder demands to fell trees on grounds of 'safety' at the first sign of any aging in the trees. Therefore buildings should be at least 40m from the nearest trees (the height of most UK trees when mature – Ash and Lime can grow taller). Garden space could extend nearer, but to buffer the LWS against effects of pesticides, fertilisers and human activity generally, there should be a maintained buffer of semi-natural vegetation of at least 20m and preferably 30m width between gardens and the LWS. There should be no access points into the woodland except for those already present from the public footpath, and suitable fencing to prevent householders making any new access. Extra access points would lead to more trampling, destroying the bluebells and other ground flora. Restrictions are needed on exterior lighting because bats feed along this woodland edge.</p>

<p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Similar considerations apply to the boundary with Old Hall Road Wood LWS, which has important bat roosts. The road helps with buffering, but it is vital that aging trees are kept in that LWS, as they support the bat roosts. The bats feed over the scrub and woodland edge on the housing site, so Biodiversity Net Gain on both sites will have to take that into account and maintain feeding areas. Lighting will need to be strictly controlled (refer Policy WD 14 Pollution and Risk)</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></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).**

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-87
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 5
<b>Title</b>	Policy for Leasowe, Moreton, Upton, Greasby and Woodchurch
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policies Map
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	Fig 5.6
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Fig 5.6 is ineffective because the status of land at the corner of Leasowe Road/Pasture Road Moreton is unclear. This is included in the colour for 'existing built-up area' but is greenfield. This land was proposed as housing land under a previous version of the Plan as housing area 4022. However it was assessed then as:</p> <p>"Site is entirely within Flood Zone 3, it is identified for flood water storage in the UDP and contains a priority habitat (Coastal and floodplain grazing marsh) so suitability is uncertain. No developer has come forward to support residential development on this site, therefore, achievability is uncertain."</p> <p>The Environment Agency assessment is</p>

	<p>According to our flood map, the square of land north of Ditton Lane at SJ 259 914 has a “low” likelihood of flooding, i.e. at risk from a flood event of between 1 in a 100 years (1%) and 1 in a 1000 years (0.1%). The reason flood risk is low is because this area benefits from:</p> <p>the Wirral Council Wallasey Embankment, protecting the square of land from the sea during a tidal storm surge.</p> <p>the EA flood embankment immediately to the south of Ditton Lane, protecting the square of land from the River Birket.</p> <p>the EA flood embankment running north to south from Leasowe Common, behind and immediately west of Pasture Farm, all the way to the River Birket. This protects the square of land from the River Birket and flooding from the sea during an extreme tidal storm surge (over the Wallasey Embankment).</p> <p>Of course, these defences can fail or be overtopped, which is why this square of land at SJ 259 914 remains at risk of flooding.</p> <p>However, the land now frequently has a shallow water body on it for much of the year.</p> <p>Since the land immediately south of Ditton lane (now Ditton Lane LWS is an EA flood relief basin, any development on this field would need to be very careful about fulfilling flood measures including Policy WS 5.4 section 3.2.</p> <p>The field is valued by local people for wildlife watching, as it is clearly visible from roads on two sides.</p>
<b>omplies with the Duty to co-operate</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the</b>	

<p>duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>This land was proposed as housing land under a previous version of the Plan as housing area 4022.</p> <p>This field should be taken out of the built-up area designation and made an urban Green Space. Ecological studies should be done to see if it qualifies for inclusion in Ditton Lane Nature Area.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  *       No, I do not wish to participate in</p>	<p>No, I do not wish to participate in hearing session(s)</p>



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

<b>Comment ID</b>	LPSD-88
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 5.2
<b>Title</b>	Employment Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	EMP-SA5.2,EMP-SA5.3

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 Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	These sites are adjacent to the R. Birkett and greater protection and enhancement of biodiversity are needed.

<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>Site EMP-SA5.2 Land north of Premier/ Typhoo access Road, Reeds Lane, Moreton is currently mostly greenfield, adjoins the River Birkett, which is an important wildlife corridor for bats, probably water voles, and other wildlife and should therefore be subject to biodiversity survey.</p> <p>For effectiveness, add to point 2: <b>the River Birkett edge should include a sufficient semi-natural landscaped buffer (determined by ecological advice) to provide a wildlife corridor along the river.</b></p> <p>Site EMP-SA5.3 Land south of Premier/ Typhoo access Road, Reeds Lane , Moreton. Adjoins the River Birkett, which is an important wildlife corridor for bats, probably water voles, and other wildlife.</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>For effectiveness add : <b>the River Birkett edge should include a sufficient semi-natural landscaped buffer (determined by ecological advice) to provide a wildlife corridor along the river.</b></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>	

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

\*      **Yes**

\*      **No**

<b>Comment ID</b>	LPSD-89
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 6.3
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA6.4

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Policy WP 6.3, Site RES-SA6.4 Land at Grange Hill Farm, Grange Old Road, West Kirby. Conditions on supporting development are ineffective because they do not mention that the site is surrounded on 3 sides by Grange Hill LWS, which supports lizards, badgers and breeding birds.



<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Add condition that the development will have to take careful account of impacts on the LWS and provide appropriate avoidance, mitigation and a sufficient buffer zone.</p>

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

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

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-90
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 7.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA7.5

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	RES-SA7.5 Housing by Heswall Dales.33 Oldfield Road, Heswall Land is adjacent to Heswall Dales SSSI, where development has already partially dried out the damp heathland, damaging the SSSI.

<p><b>omplies with the Duty to co-operate</b></p> <p>*     Yes</p> <p>*     No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>This should have conditions attached that the housing does not impact on Heswall Dales SSSI, which is below it in drainage terms and whose damp heathland has suffered from drainage done by housing above. The BNG assessment for this site must include effects on the SSSI and an adequate buffer zone – see our representations on Policy WD3.</p>

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

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

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

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

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

\*      **Yes**  
\*      **No**



<b>Comment ID</b>	LPSD-91
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 8.2
<b>Title</b>	Agricultural Land
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	5.69.5.72
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	5.69 point 6: Biomass production. Ineffective unless made clear that this is biomass from bringing neglected or new woodland into management, not the use of food-growing land for biomass. 5.72 important typo: best and most versatile land is listed as grades 1, 2 and subgrade 3B – should be sub-grade 3A. (Or just all grade 3 )

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Growing crops on food-producing land is discredited as a carbon reduction tool, except where genuine agricultural wastes are processed. Bringing woodland into management is good for climate and ecological reasons.</p> <p>Very little of Wirral's land has been classified to subgrade within class 3, therefore the safe route is to include all class 3 until land is re-classified.</p>

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

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

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-92
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 1.1
<b>Title</b>	Landscaping proposals
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD1.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	For effectiveness should have a reference to how sites cleared before submitting a planning application will be assessed and re-landscaped.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Policy WD1.1 is good and we support it, and welcome the including of natural regeneration in point A. .</p> <p>Add reference to Policy WS 5.4 M Ecological Networks, regarding the way recently damaged sites will be assessed. See our comment on that policy. It needs to be made abundantly clear that developers who clear sites before ecological surveys are done or a planning application submitted will incur major penalties, that will cost them more than going through the proper route of Biodiversity Net Gain would do. We need to stop this practice before more harm to biodiversity is done.</p>



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

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

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	
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<b>Comment ID</b>	LPSD-93
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 1.2
<b>Title</b>	Trees
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD1.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>For this response we draw on expertise from Wirral Initiative on Trees, who helped to write the Wirral tree, Woodland and Hedgerow Strategy.</p> <p>WD 1.2 point F2 and Policy WS7.1, B8.</p> <p>`Provide for the protection of trees of greatest visual or wildlife value and other vigorous healthy trees, and hedgerows;' This is ineffective because will lead to arguments over what is of greatest value and what is healthy.</p> <p>The wording `of greatest visual and wildlife value' is dubious – nearly all trees and hedges have some wildlife value! We propose remove this wording as likely to lead to disputes over the wildlife value of trees and hedges, or to selecting only a very few trees of `greatest value' and downgrading the rest.</p>

	<p>F 5. Protecting trees on adjacent land. For effectiveness this should include some indication of the buffer required to prevent premature felling.</p> <p>G: will be ineffective unless arboricultural assessments are made mandatory wherever there are trees on the application site</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local</b></p>	<p>If this wording is retained, 'healthy' trees should be defined. It could be claimed that a tree with minor vandal damage is 'unhealthy'. Mature trees provide many benefits in carbon fixation, air quality, water management etc. It takes at least a decade for newly-planted young trees to contribute significantly to these ecosystem services. Similarly biodiversity value increases with age and in particular with features such as holes and branch splits which can be regarded as signs of being 'unhealthy'– though they are not. It should also be noted that standing dead wood is of great value to biodiversity, and should be retained if safe to do so. It would be better to remove the word 'healthy' altogether, as it is likely to cause disagreements.</p>

<p><b>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Policy could say that 'Trees in classes A, B and C (as assessed in surveys done to BS5837:2012 Trees in Relation to Design, Demolition and Construction and any future updates) should be retained.' However, no standard exists for hedgerows. To align with the Wirral Trees, Woodlands and hedgerows Strategy, we suggested a new text: <b>protect all trees and hedgerows, recognising their value for visual amenity, wildlife, pollution control, noise reduction, climate amelioration and other ecosystem services, unless the trees are already failing and have an expected life span of less than a decade.</b></p> <p>F5: Buildings should not be allowed within falling distance of the trees concerned at their mature sizes (so about 40m from trunk for most species). Root Protection Zones of trees on adjacent land must be protected as for retained trees on the development site.</p> <p>G: For effectiveness, replace 'Applicants <u>should</u> include an arboricultural assessment' with 'Where there are existing trees or hedges on site, applicants <u>must include</u> an arboricultural assessment' This is to avoid cases such as RES-SA1.5 Old Manor Club, Withens Lane. Planning approval is already given, but the application said nothing about trees on site or adjacent, except to mark some trees on the existing site plan. Nor was any landscaping plan included. This site matters because next door is The Delph and one road away the open space with the Tiny Forest so it is an important link. So Policies WD1.1 Landscaping and WD 1.2 Trees must be retained and strengthened to avoid such a case in future.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why</b></p>	

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

<b>Comment ID</b>	LPSD-94
<b>Person ID</b>	1237546
<b>Include files</b>	<a href="#">LPSD-94-PDF-ASH-2406-redacted.pdf</a>
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 3
<b>Title</b>	Biodiversity and Geodiversity
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 3
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Policy WD 3: Biodiversity and Geodiversity, and 6.21. We support the overall thrust of this policy, but there are omissions that make it ineffective in certain regards:1)Unclear about effects of developments adjacent to a protected site, habitat, species etc 2)buffer zones between development and protected sites/habitats.3) wider aspects of human impacts 4) irreplaceable habitats are just that – irreplaceable 5) make clear in all cases compensation is a last resort 6) Local Wildlife Site review process

<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</p>	<p>We write this from 48 years of experience making responses to planning applications that affect wildlife in Wirral, including previous Local Plans.</p> <p>1) The policy is unsound because it is unclear about effects of proposed development <i>adjacent to</i> protected sites or habitats, or that could affect such sites e.g. by altering drainage. B refers only to development 'on' such sites or habitats. 6.21 says <i>Policy WD 3 will apply to all planning applications <b>with the potential to affect</b> a designated biodiversity or geodiversity asset; a priority habitat or priority species of conservation concern; legally protected species; and irreplaceable habitats including ancient woodland; and aged or veteran trees.</i> But this does not make it sufficiently clear that this includes applications on adjacent land or where off-site effects will affect a protected site, habitat or species.</p>

<p>sound,in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assesement 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 <b>essential</b> that in assessing an application and particularly its Biodiversity Net Gain, effects of a development on adjacent/nearby land are considered where that land has value for biodiversity. Change policy wording to development <b>`on, adjacent to or likely to affect a designated biodiversity or geodiversity asset; a priority habitat or priority species of conservation concern; legally protected species; and irreplaceable habitats including ancient woodland; and aged or veteran trees.</b></p> <p>2) There is nothing about buffer zones to avoid or mitigate damage from adjacent/nearby development. This will lead to endless disagreements.</p> <p>It is <b>essential</b> that buffer zones are considered, to retain and enhance the wildlife value of protected sites, species and habitats. They are needed to buffer protected sites against effects of pesticides, fertilisers, noise and human activity generally. There is no one size fits all, see <a href="https://www.woodlandtrust.org.uk/media/43634/buffers-an-overview-factsheet.pdf">https://www.woodlandtrust.org.uk/media/43634/buffers-an-overview-factsheet.pdf</a> (attached). However, where the protected site or habitat contains trees, there needs to be enough space between any building and the protected site to avoid risk of householder demands to fell trees on grounds of `safety' at the first sign of ageing in the trees. Therefore buildings should be at least 40m from the protected site boundary (sufficient to cover the height of most UK trees when mature – Ash and Lime can grow taller). At least 30m of this should be seminatural vegetation, not house gardens, to buffer against pollutants, noise, pet animal and human disturbance to wildlife. Sensitive areas such as riparian corridors may require more to filter pollution. Giving some minimum buffer zones in the Local Plan e.g. at least 40m wide because of tree growth, will save endless arguments over how wide such buffers should be and what form they should take. Current experience (see RES-SA4.2,4.3) is that developers will propose buffers that are far too small. Therefore the Plan will not be sound unless this issue is addressed.</p> <p>We propose wording to add to the policy:</p> <p><b>Adequate buffer zones must be incorporated in the design for any development adjacent to or affecting a designated biodiversity or geodiversity asset; a priority habitat or priority species of conservation concern; legally protected species; and irreplaceable habitats including ancient woodland; and aged or veteran trees. Such buffer zones will vary in size according to the ecology, but should for example provide a width between the development and the asset of least 40m where the asset includes mature trees or woodland. Such buffer zones should be maintained as semi-natural vegetation ecologically appropriate to the asset concerned. These buffer zones can form part of the Biodiversity Net Gain for a development and provide other ecosystem services.</b></p> <p>3) Consideration should also be given, in assessing BNG for the application, to other aspects of the development that could affect the protected site or habitat, including but not limited to controlling human access; facilitating wildlife movement e.g. hedgehogs, badgers; effects of artificial light at night, effects of noise, effects of domestic pets. Add a paragraph to this effect.</p> <p>4) B3 says <i>` Sites including Irreplaceable Habitats (as defined in the NPPF and including ancient woodlands and aged or veteran trees) or Priority Habitats where there are wholly exceptional reasons and a suitable mitigation or compensation strategy exists.'</i> This is unsound. No compensation, mitigation or replacement is possible for an irreplaceable habitat, by definition. Loss or damage to irreplaceable habitats must not be allowed.</p> <p>Change policy to:</p> <p><b>Sites including Irreplaceable Habitats (as defined in the NPPF and including ancient woodlands and aged or veteran trees) or Priority Habitats where there are wholly exceptional reasons.</b></p> <p>5) C should be changed to match D to make it clear that damage to biodiversity must be mitigated or, <b>as a last resort</b>, compensated for.</p> <p>Compensation must not be seen as the easy or cheap way out for developers to reduce biodiversity or avoid BNG on the development site. 6.22 does spell this out but it is clearer if also stated in the Policy.</p> <p>6) We support in particular points D,F, G,H which address long-running problems in development control. With regard to point H, this should include a commitment that the Local Wildlife Sites register is reviewed regularly, with the Local Wildlife Sites Partnership meeting at least annually to determine additions, deletions, boundary changes, etc.We already have two new LWS to propose, an extensive hedge corridor across Claremont Farm, Clatterbridge, including Wirral's most species-rich hedge (as far as we know), and a woodland/hedgerow corridor along Limbo Lane, Irby.... REFER ATTACHMENT FOR MORE TEXT FOR PROPOSED MAIN MODIFICATION</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

<b>Comment ID</b>	LPSD-95
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 6
<b>Title</b>	Detailed policy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	6.22,
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	6.22 Clauses A and B identify that all development is expected not to adversely affect a SSSI, harm the integrity of a European Site, or result in the loss or deterioration of irreplaceable habitats. This is poorly phrased.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>We suggest this would be more effective if worded ` <b>Clauses A and B identify that development will not be allowed which would adversely affect a SSSI, harm the integrity of a European Site, or result in the loss or deterioration of irreplaceable habitats.</b></p>

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

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

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

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



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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-96
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 6
<b>Title</b>	Detailed policy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	6.29
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	6.29; 'suitably qualified ecologist' is not sufficiently sound, because any new graduate can set themselves up as a professional ecologist.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>This should be strengthened to `a suitably qualified and experienced ecologist, preferably a member of a professional body'. Membership of a professional body gives some come-back against bad ecological work. Good ecologists gain experience by working with experienced colleagues until able to undertake surveys competently.</p> <p>Add reference to Policies WS 5.4 re recent damage to sites, and WS5.7 re maintenance.</p>

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

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

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-97
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 4.2
<b>Title</b>	Flood Risk
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD4.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>We support this, but for effectiveness needs a clause that about water supply to biodiversity assets.</p> <p>Many biodiversity assets require water supply e.g. to keep marshes and ponds with adequate water. We have seen how developments round assets can badly affect them. Developments at Heswall Dales have steadily dried out the damp heathland on that SSSI. Housing round ponds frequently lowers the water table to that the ponds dry out e.g. Pump Lane Greasby area. Particular care must be taken over Functionally Linked land that is water-dependent e.g. the Hoylake Langfields area.</p>



<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Add to Policy:</p> <p><b>Developments which may affect the water status within a biodiversity asset must show how they will maintain suitable water supply to the asset for the lifetime of the development.</b></p>

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

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

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-98
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 5
<b>Title</b>	Residential Extensions
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 5
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The opportunity should be taken to improve energy efficiency of the dwelling, so as to progress towards zero carbon in use. with reference to extensions.

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

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

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

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

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

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

\*      **Yes**  
\*      **No**



<b>Comment ID</b>	LPSD-99
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 6
<b>Title</b>	Self-Contained Flats
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 6
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Policy WD 6 Self-Contained Flats. Unsound because no mention of energy efficiency for conversions (new builds covered by Policy WS8.1,8.2). For conversions the opportunity should be taken to improve energy efficiency of the building, so as to progress towards zero carbon in use.

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

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

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

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-100
<b>Person ID</b>	1237546
<b>Include files</b>	
<b>Consultee Name</b>	Dr Hilary Ash
<b>Position</b>	Hon Conservation Officer
<b>Company / Organisation</b>	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WM 1
<b>Title</b>	Proposals for minerals development
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WM 1
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Point 8 ` ecological/nature conservation interests will not be permanently harmed.' Given the long term nature of many extractive sites, there could be ecological harm for decades before restoration. Needs better assessment to be effective.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>During a prolonged extraction time there could be adverse effects on local wildlife populations which could affect the viability of those populations. Therefore for effectiveness the duration of harm to ecological and nature conservation interests should be considered, and whether that duration is acceptable in relation to the life cycles and local populations of the interests concerned. As with all development, schemes must show at least 10% Biodiversity Net Gain above the original state of the land.</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.

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\*      **Yes**  
\*      **No**