

<b>Comment ID</b>	LPSD-551
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 3.1
<b>Title</b>	Housing Design Standards
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.1
<b>Please state which Site ID/Reference this</b>	

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

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

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

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

<b>Comment ID</b>	LPSD-552
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 3.2
<b>Title</b>	Housing Density
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.2
<b>Please state which Site ID/Reference this</b>	

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

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

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

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

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<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 3.3
<b>Title</b>	Affordable Housing Requirements
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.3
<b>Please state which Site ID/Reference this</b>	

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

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary to make the Local	<p>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p> <p>It is recommended that WBC undertake a robust assessment of its affordable housing need however, as the fundamental issues with draft Policy WS 3.3 relate to the Council's urban intensification strategy, it will not be possible to address these soundness issues through the main modifications process.</p>

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

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<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

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<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 3.4
<b>Title</b>	Housing Mix
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.4
<b>Please state which Site ID/Reference this</b>	

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

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

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

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

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<b>Person ID</b>	1323731
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<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.1
<b>Title</b>	Green and Blue Infrastructure Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.1
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	Taylor Wimpey have previously commented on Green and Blue Infrastructure in representations submitted in March 2021. These representations set out Taylor Wimpey's general support of the Council's proposed strategic approach to GBI and it is anticipated that the site would contribute towards GBI in some capacity, the details of which will be agreed with Officers at the appropriate time. Taylor Wimpey is fully committed to working collaboratively with the Council and other developers / landowners where appropriate to achieve this however would not support any unnecessarily burdensome requirements or standards for green and blue infrastructure on developments to the point that viability and deliverability is impacted.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you</b>	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.

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

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

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

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

**If you wish to participate in the**

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

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

<b>Comment ID</b>	LPSD-556
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.4
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	The evidence base does not provide robust justification for why a 20% BNG requirement is set on Council owned land and given that the Environment Act considers 10% to be appropriate, so should Wirral. Furthermore it has not been demonstrated in the Council's evidence base that the main body of the site is a sensitive receptor or one that is required to maintain the function of the NIA.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.

<p><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>draft policy WS 5.4 is not considered to be sound as it is not justified, effective or consistent with national policy. It is recommended that the BNG requirement on Council owned land is reduced from 20% to 10%. Furthermore, the NIA designation on Taylor Wimpey's Saughall Massie site is reduced. This currently covers the entirety of the eastern parcel of the site however, this is not required to be designated within the NIA due to this being agricultural land and this not being integral to the delivery of the objectives of the NIA.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

<p>please outline why you consider this to be necessary:</p>	
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<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.9
<b>Title</b>	Evidence of approach
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.9
<b>Please state which Site ID/Reference this</b>	

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

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

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

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

<b>Comment ID</b>	LPSD-558
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.1
<b>Title</b>	Energy Hierarchy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.1
<b>Please state which Site ID/Reference this</b>	

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

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary to make the Local	<p>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p> <p>It is Taylor Wimpey's view that a bespoke package of sustainable measures should be developed on a site-by-site basis, rather than setting out a 'one size fits all' approach. A robust and flexible mechanism should be added to the policy requirements whereby additional requirements and / or other requirements can be relaxed if viability is threatened.</p>

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

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

<b>Comment ID</b>	LPSD-559
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.2
<b>Title</b>	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.2
<b>Please state which Site ID/Reference this</b>	

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

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

<p><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>As set out under draft Policy WS 3.1, the evidence base does not robustly justify the requirement to be 'zero carbon ready by design' and as such should be removed from the drafted policy.</p> <p>The Local Plan Submission Draft makes reference in draft Policy WS 8.2 to new buildings meeting Passivhaus standard, but then at draft Policy WS 8.8 under paragraph 3.192, it refers to meeting Future Homes Standards. It is unnecessary to refer to both set of standards and results in ineffective policy.</p> <p>It is recommended that reference to Passivhaus Standards is omitted from the Local Plan to enable an effective, sound policy.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

<b>Comment ID</b>	LPSD-560
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.4
<b>Title</b>	On site Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.4
<b>Please state which Site ID/Reference this</b>	

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

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

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

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

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

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

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

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

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

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

<b>Comment ID</b>	LPSD-561
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.5
<b>Title</b>	Carbon Compensation through Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.5
<b>Please state which Site ID/Reference this</b>	

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

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

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

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

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

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

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

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

<b>Comment ID</b>	LPSD-562
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.8
<b>Title</b>	Climate Change and Energy Statement
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.8
<b>Please state which Site ID/Reference this</b>	

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

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

<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	<p>N/A</p>
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p> <p>The draft policy needs to provide further clarity on circumstances where regulations and standards referenced are superseded by new versions and should omit reference to going beyond standards which are yet to be adopted.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-563
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 10.1
<b>Title</b>	Provision of Infrastructure
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 10.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to Consortium response and attachment (Land at Saughall Massie) (from para 5.83)

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

<p><b>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 will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  *      <b>No, I do not wish to participate in hearing session(s)</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-564
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 3
<b>Title</b>	Biodiversity and Geodiversity
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to Consortium response and attachment (Land at Saughall Massie) (from para 5.95)

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

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

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

<b>Comment ID</b>	LPSD-565
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 4.3
<b>Title</b>	Sustainable Drainage Systems (SuDS) and Natural Flood Management
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 4.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to attachment (Land at Saughall Massie) and Consortium response (from para 5.96) Taylor Wimpey is supportive in general of the use of SuDS where possible within new developments.

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

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

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

<b>Comment ID</b>	LPSD-566
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 18
<b>Title</b>	Health Impact Assessment
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 18
<b>Please state which Site ID/Reference this</b>	

<b>representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be</b>	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to Consortium response and attachment (Land at Saughall Massie) (para 5.99-101)

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

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

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

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

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

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

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

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

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

<b>Comment ID</b>	LPSD-567
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf</a> <a href="#">LPSD-567-EM-Barton Attach 9 of 13_Redacted 2207.pdf</a> <a href="#">LPSD-567-EM-Barton Attach 2 of 13_Redacted 2207.PDF</a> <a href="#">LPSD-567-EM-Barton Attach 3 of 13_Redacted 2207.PDF</a> <a href="#">LPSD-567-EM-Barton Attach 10 of 13_Redacted 2207.pdf</a> <a href="#">LPSD-567-EM-Barton Attach 5 of 13_Redacted 2207.pdf</a> <a href="#">LPSD-567-EM-Barton Attach 1 of 13_Redacted 2207.PDF</a> <a href="#">LPSD-567-EM-Barton Attach 4 of 13_Redacted 2207.PDF</a> <a href="#">LPSD-567-EM-Barton Attach 7 of 13_Redacted 2207.PDF</a> <a href="#">LPSD-567-EM-Barton Attach 6 of 13_Redacted 2207.pdf</a> <a href="#">LPSD-567-EM-Barton Attach 8 of 13_Redacted 2207.PDF</a> <a href="#">LPSD-567-EM-Barton Attach 12 of 13_Redacted 2207.pdf</a> <a href="#">LPSD-567-EM-Barton Attach 11 of 13_Redacted 2207.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WP 5.1
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b>	Policy
* Paragraph(s)	
* Policy	
* Site	
* Policies Map	
* Sustainability Appraisal	

<b>* Habitat Regulations Assessment</b>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 5.1
<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<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</b>	Not Positively Prepared Not Justified

<p><b>indicate the reason(s) why:</b></p> <p>* <b>Not Positively Prepared</b></p> <p>* <b>Not Justified</b></p> <p>* <b>Not Effective</b></p> <p>* <b>Not Consistent with National Policy</b></p>	<p>Not Effective</p> <p>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>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p> <p>The site at Saughall Massie is not included in draft Policy WP 5.1 as it is currently included within Settlement Area 8 'Rural Areas'. As discussed at length in these representations, there is serious concern with regards to the Council's approach to housing requirements, delivery and claimed supply. The Consortium's analysis has concluded that the total residential supply from the sources set out in draft Policy WS 1.1 is less than 8,000 dwellings, as opposed to the 16,332 claimed by the Council.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* <b>Yes</b></p> <p>* <b>No</b></p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>N/A</p>
<p><b>If you wish to make a separate representation,</b></p>	<p>N/A</p>

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p> <p>The Council would therefore need to identify a significant number of additional deliverable and developable sites to address this shortfall. As such, Green Belt sites are required to meet the identified overall need in Wirra land provide a distribution of development that would properly meet those needs across the Borough, and not just in the East.</p> <p>The Local Plan Submission Draft in its current form cannot be found sound and fundamental changes are required including the identification of additional supply from the Green Belt. Overall, additional sites will be required to meet the housing requirements and the site should be included in draft Policy WP 5.1.</p> <p>(Land at Saughall Massie) should be included in draft Policy WP 5.1.</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>Yes, I 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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-568
<b>Person ID</b>	1323858
<b>Include files</b>	<a href="#">LPSD-568-LE-Gates Form 2407_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mike Gates
<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
<b>Title</b>	Infrastructure Delivery
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 10
<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 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>I do not see anything within the proposed plan that states that the council will seek approval for its plans from NHS service providers. Local services are already under strain and I believe it is irresponsible to engage in a significant house building program and likely population increase without ensuring there is capacity within the health system to cope with the extra demand.</p> <p>The price of many newly built houses are out of the price range of many local people and will be bought by people who currently reside outside of the a1-ea. Rather than providing a strategy to improve health I believe the proposed plan is actually ENDANGERING LIVES.</p> <p>Also it appears the council estimated a population increase of 1% between 2011 and 2021 when the figure according to ONS data (released 4 days after the original deadline for representations against the plan) was actually 0.1%. Of that figure it did show that the number of older people living in the borough had increased by 15%, it is absolutely critical that capacity within the healthcare system is not compromised further.</p>

	<p>In terms of the proposed plans it is unclear whether the amount of social housing built by Magenta has been incorporated into the figures produced.</p> <p>I believe there should be a moratorium on all significant housebuilding programs until all relevant parties are brought together to determine a proactive and agreed joint approach which is sustainable moving forward and not detrimental to the current and future residents of the Wirral.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	No
<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>I became aware of the plan by accident and very few people I have spoken to were aware of the plan, I do not believe it has not been widely and effectively publicised.</p> <p>Whilst it may have been on the council website many older people do not use the internet and many residents do not receive a copy of the free local paper (where there has been minimal coverage).</p> <p>If leaflets can be distributed to households during a council election campaign, why not on something as important as this.</p> <p>I suggest that if you went to a random area and stopped and asked individuals if they were aware of the plan you would find that the vast majority are not.</p> <p>The apparent lack of publicity inevitably leads to a lack of trust in the council and it's elected representatives.</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</b></p>	

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

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

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

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

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

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

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

<b>Comment ID</b>	LPSD-569
<b>Person ID</b>	1247304
<b>Include files</b>	<a href="#">LPSD-569-LE-Downward 0906_Redacted.pdf</a>
<b>Consultee Name</b>	Dr Donald C Downward
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 6.3
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA6.9

<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>	RE LAND ADJACENT TO SUNDIAL 61 CALDY ROAD CALDY THE LAND SURROUNDING THE ABOVE PROPERTY IS IN THE OWNERSHIP OF THE NATIONAL TRUST,WITH A PUBLIC FOOTPATH TO THE NORTH OF THE PROPERTY. THE NATIONAL TRUST LAND EXTENDS TO 13 ACRES LEADING UP TO STAPLEDON WOODS.THE SITE OF THE POTENTIAL DEVELOPMENT IS VERY CLOSE TO THE CALDY CONSERVATION AREA AND WOULD BE DETRIMENTAL TO THE VISUAL AMENITY OF THE AREA.THE NATIONAL TRUST IS THE TRUSTEE OF THIS LAND THIS WAS CREATED IN 1897 TO SAFEGAURD THIS AREA FROM DEVELOPMENT
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	RE LAND ADJACENT TO SUNDIAL 61 CALDY ROAD CALDY THE LAND SURROUNDING THE ABOVE PROPERTY IS IN THE OWNERSHIP OF THE NATIONAL TRUST,WITH A PUBLIC FOOTPATH TO THE NORTH OF THE PROPERTY. THE NATIONAL TRUST LAND EXTENDS TO 13 ACRES LEADING UP TO STAPLEDON WOODS.THE SITE OF THE POTENTIAL DEVELOPMENT IS VERY CLOSE TO THE CALDY CONSERVATION AREA AND WOULD BE DETRIMENTAL TO THE VISUAL AMENITY OF THE AREA.THE NATIONAL TRUST IS THE TRUSTEE OF THIS LAND THIS WAS CREATED IN 1897 TO SAFEGAURD THIS AREA FROM DEVELOPMENT

<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>THE LA NEEDS TO COMPLY WITH THE STATUTORY RIGHTS OF THE NATIONAL TRUST IN PROTECTING ITS' PROPERTY AND LAND RIGHTS</p> <p>deallocate RES SA 6.9</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-570
<b>Person ID</b>	1246351
<b>Include files</b>	<a href="#">LPSD-570-LE-Kearley Form 3005_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jane Kearley
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 6
<b>Title</b>	Policy for West Kirby and Hoylake
<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 Grange Road West Kirby

<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 feel that the plan is sound in that the greenfields Site Grange Road West Kirby has been designated as a local green space. I was concerned that plans had been submitted to develop this land. I hope it will now be protected.</p> <p>Reasons I support the greenfield sites being designated as a local green space:</p> <p>a) traffic on the hill is already heavy particularly at peak periods and the road is narrow and bendy near to the point where additional traffic from the new development would come in (46 houses could potentially add a further 80 vehicles plus service vehicles). Road safety would be compromised.</p> <p>b) the field is an attractive visual amenity, bestowing beauty, tranquility and a haven for wild life on the area.</p>
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *     Not Positively Prepared *     Not Justified *     Not Effective *     Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

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

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

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

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

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

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

\*      **Yes**  
\*      **No**

## LPSP-571

<b>Comment ID</b>	LPSP-571
<b>Person ID</b>	1323883
<b>Include files</b>	<p>LPSP-571, 1409, 1412-1417-EM-Storey Form 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 5 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 3 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 1 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 12 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 10 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 4 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 2 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 9 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 8 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 11 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 14 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 13 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 6 of 14 2507_Redacted.pdf</p> <p>LPSP-571, 1409, 1412-1417-EM-Storey Attach 7 of 14 2507_Redacted.pdf</p>
<b>Consultee Name</b>	Mr. Philip Palmer
<b>Position</b>	
<b>Company / Organisation</b>	Elan Homes Ltd
<b>Agent ID</b>	1248751
<b>Agent Name</b>	Mr Jonathan Storey
<b>Position</b>	Senior Planner
<b>Company / Organisation</b>	Pegasus Group
<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>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> </ul>	

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

<p><b>indicate the reason(s) why:</b></p> <p>* <b>Not Positively Prepared</b></p> <p>* <b>Not Justified</b></p> <p>* <b>Not Effective</b></p> <p>* <b>Not Consistent with National Policy</b></p>	<p>Not Effective</p> <p>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>Please refer to attachment</p> <p>The Council have not provided any evidence that this policy is positively prepared and that the homes planned in Settlement Area 7 will meet the objectively assessed needs of this Settlement Area including affordable housing needs over the plan period. To address this issue, the Council should provide evidence on how the identified supply of homes in SA7 will address these needs over the plan period. If found to be unsound, more sites would be required in the housing supply to address housing needs, including affordable housing needs which could be delivered during the middle and latter end of the plan period. This is an exceptional circumstance to alter Green Belt boundaries in this area and identify sites which currently lie on the edge of the Settlement Area to boost the supply of homes</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* <b>Yes</b></p> <p>* <b>No</b></p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>N/A</p>
<p><b>If you wish to make a separate representation,</b></p>	<p>N/A</p>

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please find attached Regulation 19 response on behalf of Elan Homes outlining the main modifications we consider necessary.</p> <p>To address this issue, the Council should provide evidence on how the identified supply of homes in SA7 will address these needs over the plan period. If found to be unsound, more sites would be required in the housing supply to address housing needs, including affordable housing needs which could be delivered during the middle and latter end of the plan period. This is an exceptional circumstance to alter Green Belt boundaries in this area and identify sites which currently lie on the edge of the Settlement Area to boost the supply of homes.</p> <p>allocate land at Thingwall Road Irby</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>Yes, I 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><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>For the reasons outlined in the attached Elan Homes find that the current plan is unsound. A large portion of this relates to weakness in the Council's evidence base which have formulated the policies that are considered to be 'unsound'. Our previous representation to consultations have not been implemented. As such, we request that we are involved in any discussions relating to the identified policies and strategy.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-573

<b>Comment ID</b>	LPSP-573
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSP-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf</a> <a href="#">LPSP-573-EM-Harris Form 1 of 7 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attached representations 1.6 We consider that the Submission Draft has a number of critical failings: • The overall housing requirement of 13,360 dwellings over the plan period (2021-2037) is too low. The circumstances in Wirral provide clear justification for planning for a higher housing need figure on a standard method at the base date of 803 dwellings per annum. There is also a need for a higher requirement to the standard method. These are as follows:

<b>as precise as possible.</b>	<p>The impacts of previous housing under-delivery are quantifiable and significant. The period of extreme under-delivery coincides with the following stark statistics which show that there are 5,201 households in critical housing need:</p> <ul style="list-style-type: none"> <li>• overcrowding - a total of 3,621 households living in overcrowded conditions (2.5% of all households); and,</li> <li>• homelessness - a total of 750 households who are either homeless or living in temporary accommodation. It should be noted that the 2019 SHMA states that there were 1,580 homeless households.</li> </ul> <p>The identified need for affordable housing will not be met. The Draft SHMA (January 2020) concluded that there are 12,705 existing household in affordable need which was 705 per annum. This is now 374 per annum due to a mathematical calculation to reduce the shortfall over 10 years rather than 5 years. Even the 5,201 households in critical housing need equates to 32.7% of the total requirement. Therefore, the Wirral has and will continue to face an unprecedented affordability crisis that requires urgent and radical policy responses through the Local Plan. This now relies on the Secretary of State as the LPA has not sought to address this key issue.</p> <p>These affordable housing need figures show that the mathematical formula (standard method) is not appropriate to derive the housing requirement and those real people in housing need now will be failed by the Local Plan unless changes are made through the Examination. Whilst the standard method is the starting point, under such circumstances there should be an increase in the housing requirement in accordance with the PPG.</p> <ul style="list-style-type: none"> <li>• Insufficient housing land has been identified in the short term, and overall, to meet the identified requirement (let alone a higher figure). There is a significant overreliance upon intensification and rescheduling of deliverable and developable site; conversions, windfall sites; changes of use and empty homes. In short the overall evidence base in relation to housing land supply is severely lacking and unrealistic.</li> <li>• The housing land supply has been artificially inflated through the application of unrealistic density rates, and is reliant upon the establishment of new residential markets for major apartment developments. There is insufficient evidence to demonstrate that such an approach is suitable, viable and capable of meeting identified housing needs. The market could have brought these sites forward without a local plan for the last 18 years when the review process started so we see no logical reason why their allocation in the local plan will have any material impact.</li> <li>• Due to no Green Belt release, the plan has insufficient flexibility to respond to change, for example the non-delivery of the development in the urban areas. In the absence of such flexibility, there is a real risk that the Local Plan will simply exacerbate the current housing crisis across Wirral.</li> <li>• The proposed strategy would not deliver the proposed target of 374 affordable homes per annum. There is an overreliance upon locations and sites where affordable housing is unlikely to be viable.</li> <li>• The plan fails to provide safeguarded land to meet longer term development needs, and to provide permanence to the Green Belt.</li> </ul>
<b>omplies with the Duty to co-operate</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<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,</b>	

<p>soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 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</b></p>	<p>Please see attached representations</p> <p>plan period should be minimum to 2039</p> <ul style="list-style-type: none"> <li>• The housing requirement needs to be increased to align housing and economic growth and to meet the identified need for affordable housing. 835 dpa min 18,425 to 2039</li> <li>• The supply of housing land should be boosted significantly and diversified through the allocation of additional deliverable sites, which are not burdened by significant infrastructure requirements or viability constraints.</li> <li>• Additional Green Belt land is required to be released to provide much needed family market and affordable housing in a range of locations across the Wirral. Our client's site was previously identified for allocation as part of SP046 and should be reinstated.</li> <li>• A significant amount of safeguarded land should be identified, to meet development needs post 2037.</li> <li>• The site selection methodology needs to be reviewed and revised, with a clearer focus upon meeting housing needs and the purposes of the Green Belt.</li> </ul>

or text. Please be as precise as possible.	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	We have significant concerns with the Local Plan and on WS 1.1, the plan period set out, the housing requirement and housing supply
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	Yes

LPSP-574

<b>Comment ID</b>	LPSP-574
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSP-574-EM-Harris Form 2 of 7 2507_Redacted.pdf</a> <a href="#">LPSP-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<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>	Para 1.3
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attached representations 4.1 The Council is proposing to allocate a range of sites for housing in the built-up area as set out in the Settlement Areas and regeneration Areas in Table 3.1. Paragraph 1.3 of the Plan states:

<p><b>as precise as possible.</b></p>	<p>"The spatial strategy focusses on the regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the River Mersey stretching from New Brighton to Bromborough. Sufficient brownfield land and opportunities exist within the urban areas of the Borough to ensure that objectively assessed housing and employment needs can be met over the plan period. The Council has therefore concluded that the exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do not exist in Wirral.</p> <p>4.2 Whilst we do not object to the principle of redeveloping longstanding previously developed sites, subject to the concerns expressed in section 3 regarding the council's assessment of supply, further sites are required to address Wirral's housing needs, and these will have to be releases from the Green Belt. Therefore, we consider that the Development and Regeneration Strategy will not meet the housing needs in the plan period and should be altered. It will also not deliver the housing to meet the needs without correctly assessing and meeting housing needs and adopting a variety and mix of sites for development, particularly housing across the Wirral. This inevitably will involve the release of Green Belt land and exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do exist in Wirral.</p>
<p><b>omplies with the Duty to co-operate</b>  *        Yes  *        No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><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</b></p>	

<p><b>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 will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please see attached representations</p> <p>Release Green Belt land to meet housing need in the Local Plan.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

hearing session(s)	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>We have significant concerns with the Local Plan and on WS 1.1, the plan period set out, the housing requirement and housing supply</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

LPSP-575

<b>Comment ID</b>	LPSP-575
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSP-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf</a> <a href="#">LPSP-575-EM-Harris Form 3 of 7 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<b>Number</b>	
<b>Title</b>	Overview of the Borough
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	Para 3.12 inc. Table 3.1
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attached representations 4.1 The Council is proposing to allocate a range of sites for housing in the built-up area as set out in the Settlement Areas and regeneration Areas in Table 3.1. Paragraph 1.3 of the Plan states: "The spatial strategy focusses on the regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the River Mersey stretching from New Brighton to Bromborough. Sufficient brownfield land and opportunities exist within the urban areas of the Borough to ensure that objectively assessed housing and employment needs can be met

<b>as precise as possible.</b>	<p>over the plan period. The Council has therefore concluded that the exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do not exist in Wirral.</p> <p>4.2 Whilst we do not object to the principle of redeveloping longstanding previously developed sites, subject to the concerns expressed in section 3 regarding the council's assessment of supply, further sites are required to address Wirral's housing needs, and these will have to be releases from the Green Belt. Therefore, we consider that the Development and Regeneration Strategy will not meet the housing needs in the plan period and should be altered. It will also not deliver the housing to meet the needs without correctly assessing and meeting housing needs and adopting a variety and mix of sites for development, particularly housing across the Wirral. This inevitably will involve the release of Green Belt land and exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do exist in Wirral.</p>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	

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

<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>We have significant concerns with the Local Plan and on WS 1.1, the plan period set out, the housing requirement and housing supply</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

LPSP-576

<b>Comment ID</b>	LPSP-576
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSP-576-EM-Harris Form 4 of 7 2507_Redacted.pdf</a> <a href="#">LPSP-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<b>Number</b>	Appendix 4
<b>Title</b>	Housing Trajectory
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	Appendix 4
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attached representations 2.36 With a requirement of 13,360 dwellings and a supply of 16,322, the plan proposes to provide a flexibility factor of 22%. Notwithstanding our concerns in relation to the identified housing land supply, we consider that this should be sufficient even if the supply identified is robust. As we examine in Appendix 4 it is not robust. Wirral is an authority which has not had a 5 year supply or

<b>as precise as possible.</b>	an adopted development plan for a prolonged period, yet the sites in the trajectory have not come forward to date. These are sites that do not need an allocation to come forward as would traditionally be the case where greenfield and Green Belt land is required to be allocated to boost supply. In Wirral, allocation of these sites or identification in a SHLAA will not overcome the barriers as to why they have not come forward to date. The only way for the housing requirement to be met is the release of Green Belt land, a point accepted by the LPA in 2018.
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary</b>	Please see attached representations  Housing trajectory is not robust - Release Green Belt land for development in the Local Plan.

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

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

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

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

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

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

We have significant concerns with the Local Plan and on WS 1.1, the plan period set out, the housing requirement and housing supply

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

LPSD-577

<b>Comment ID</b>	LPSD-577
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSD-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf</a> <a href="#">LPSD-577-EM-Harris Form 5 of 7 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<b>Number</b>	Policy WP 4
<b>Title</b>	Policy for Bebington, Bromborough and Eastham
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 4
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attached representations Deliverability issues with some of the following sites: • RES-SA4.1 Land at Civic Way, Bebington 60 2024/25 onwards;

<b>as precise as possible.</b>	<ul style="list-style-type: none"> <li>• RES-SA4.2 / MPA-SA4.2 Former MOD, Old Hall Road, Bromborough 250 2024/25 onwards;</li> <li>• RES-SA4.3 / MPA-SA4.2 Riverside Office Park, Riverwood Road, Bromborough 200 2024/25 onwards;</li> <li>• RES-SA4.5 Eastham Youth Centre, Lyndale Road 15 2024/25 onwards;</li> <li>• RES-SA4.6 Former Croda, Prices Way, Bromborough Pool, Bromborough 100 2024/25 onwards</li> <li>• RES-SA4.7/ MPA-SA4. 1 - Former D1 Oils, Dock Road South, 1,225 2024/25</li> <li>• RES-SA4.11 Unilever Research, Quarry Road East, Bebington 120 2023/24 onwards</li> </ul>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<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</b>	

<p><b>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 will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please see attached representations</p> <p>Allocate additional sites to meet housing need.</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</p>	<p>Yes, I wish to participate in hearing session(s)</p>

hearing session(s)	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>We have significant concerns with the Local Plan and on WS 1.1, the plan period set out, the housing requirement and housing supply</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>

LPSPD-578

<b>Comment ID</b>	LPSPD-578
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSPD-578-EM-Harris Form 6 of 7 2507_Redacted.pdf</a> <a href="#">LPSPD-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<b>Number</b>	Policy WP 4.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 4.2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attached representations Omission from Policy WP4.2 - Land off Brookhurst Avenue, Eastham, Bromborough 5.3 In our representations in 2018 we supported our client's site's inclusion in the 'proposed Green Belt Sites for Further Investigation (September 2018)' document which formed part of the evidence base and concluded that the site should be removed in its entirety from the Green Belt to assist the Council to meet its housing requirement.

<b>as precise as possible.</b>	5.4 A site location plan is enclosed as part of this submission. The site is located within Parcel 4.12 of the ARUP Study (GB1.1). However it is a small part of Parcel 4.12 and should be assessed individually as it is 75% contained by the M53 and the urban area. Indeed it has very close similarities to Site 1 (South of Mill Park, Eastham).
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local</b>	Please see attached representations Allocate land off Brookhurst Avenue, Eastham in the Local Plan.

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

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

<b>Comment ID</b>	LPSD-579
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSD-579-EM-Harris Form 7 of 7 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please see attached representations Ecology and arboriculture 5.25 We are not aware of any ecological or arboricultural issues that would prevent the site from coming forward as a residential allocation. The site is at the southern end of the Nature Improvement Area (NIA-7) (Policy WS5.4). We consider Policy WS5.4 and the evidence base is not clear as to the reasoning for the designation of the NIAs. Provided development and allocations can come forward as set out in paragraph 3.132 then that is acceptable, and the policies should clarify this rather than being in the explanatory text.

<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	Please see attached representations  Clarify the reasoning for the designation of NIAs in Policy WS5.4 and relationship to para 3.123

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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LPSP-580

<b>Comment ID</b>	LPSP-580
<b>Person ID</b>	1249015
<b>Include files</b>	<a href="#">LPSP-580,778,780-784-EM-Robinson Form 2507_Redacted.pdf</a> <a href="#">LPSP-580,778,780-784-EM-Robinson Attach 1 of 3 2507_Redacted.pdf</a> <a href="#">LPSP-580,778,780-784-EM-Robinson Attach 3 of 3 2507_Redacted.pdf</a> <a href="#">LPSP-580,778,780-784-EM-Robinson Attach 2 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	North West Construction
<b>Position</b>	
<b>Company / Organisation</b>	North West Construction
<b>Agent ID</b>	1249017
<b>Agent Name</b>	Mr Phil Robinson
<b>Position</b>	Director
<b>Company / Organisation</b>	Pegasus Group
<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>	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1, WS 3, WS 5, WS 12

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

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

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

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

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

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

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

To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector

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

LPSP-581

<b>Comment ID</b>	LPSP-581
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSP-581-EM-Watson Attach 7 of 7 2507_Redacted.pdf</a> <a href="#">LPSP-581-EM-Watson Attach 5 of 7 2507_Redacted.pdf</a> <a href="#">LPSP-581-EM-Watson Attach 6 of 7 2507_Redacted.pdf</a> <a href="#">LPSP-581-EM-Watson Attach 3 of 7 2507_Redacted.pdf</a> <a href="#">LPSP-581 &amp; 946-EM-Watson Form 1 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b>	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this</b>	WS 1.1

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

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

1. Strutt & Parker acts on behalf of the Leverhulme Estate. We have made a number of representations to the Regulation 19 consultation into Wirral Council's Submission Draft Local Plan, specifically in relation to the draft planning policies and strategy therein, including Policy WS 1.1 which this representation relates to. However, Leverhulme's overarching position in relation to the Submission Draft Local Plan is as follows:

i. Leverhulme considers the dwelling numbers proposed in the Local Plan are too low to represent or meet both housing and economic needs and that is also a position supported by the consortium (which Leverhulme forms part of) and their evidence (which has been submitted alongside our representations). The consequence is that there will need to be release of sustainable Green Belt sites.

vii. To do this we have identified three phases –

Phase 1: up to 1,038 dwellings across eight sites to assist with addressing the current housing shortfall, which should be recognised as commitments within the Local Plan;

Phase 2: circa 3,500 dwellings across eight sites to be allocated in the Wirral Local Plan having been released from the Green Belt to contribute during the plan period; and

Phase 3: circa 1,000 dwellings near Raby Mere and Bromborough Golf Club to be released from the Green Belt and safeguarded for development in future Local Plan periods, i.e. beyond the current plan period.

viii. Together with these are a suite of Green Belt enhancements / compensatory improvements in accordance with paragraph 142 of the National Planning Policy Framework.

ix. To have a sound spatial strategy and hence plan, these three Phases need to be incorporated if the plan is to deliver the development needed in Wirral. Leverhulme recognises that additional greenfield / Green Belt release is also likely to be required. The current draft development strategy is so flawed that it is likely to require the plan to be withdrawn following an indication from the Inspector(s) that the plan would otherwise be found unsound as drafted. The changes required are likely to be too extensive to be appropriate to be brought forward as main modifications.

x. In addition, the wider estate needs support as part of the rural economy, as set out in the representations we have made regarding the Local Plan's rural area policies. Without which, the plan would be unsound.

2. We now move onto providing our specific comments regarding Policy WS 1.1.

3. We fundamentally disagree with the development and regeneration strategy for Wirral set by policy WS 1.1 and submit that the policy is significantly flawed and unsound.

4. While we acknowledge that the sensitive, appropriate and realistic regeneration of brownfield land in Birkenhead and the surrounding area can and should play a part in building economic, social and environmental prosperity within the Borough, we firmly believe that the Local Plan cannot succeed in fulfilling its wildly aspirational objectives by solely focusing on the hoped-for regeneration of brownfield land and directing development to within 'Settlement Areas' – regardless of the fact that regeneration has failed to occur in these areas despite continuous attempts, including undelivered and undeliverable related planning permissions, over the previous decade.

5. Firstly, we have the following concerns in relation to the housing requirement set by WS 1.1, specifically the figure of a minimum of 13,360 net additional dwellings between 2021 and 2037.

6. Lichfields has produced a technical paper titled 'Wirral Local Plan: Assessing the Housing Requirement – Technical Paper 1' on behalf of the Wirral Consortium, which Leverhulme Estate forms part of, which accompanies this representation and which provides a comprehensive critical analysis of the approach taken by the Council and their consultants in identifying the development needs for Wirral.

7. The following concerns are raised in relation to this component of the draft Local Plan:

i. 785 dpa + 50dpa for demolition replacement is insufficient to meet housing needs: the 785 dpa target is now identical to the figure derived from the Standard Method, which represents the minimum starting point only. It represents around half the level of housing needed to take Wirral's 'fair share' of the aspirational 300,000 national housing target by the mid-2020s. The PPG states that an uplift should be applied where funding is in place to promote and facilitate growth. The Council claims that the Wirral Waters regeneration project has the potential to create up to 20,000 jobs but has applied no uplift to its housing target to account for this. The Council claims that it secured £78.5m from Central Government in 2021 alone, including almost £20m from the first round of the new Levelling Up Fund. In terms of determining an appropriate housing requirement, this significant economic potential represents a departure from the 'business as usual' trend based demographic growth and meets the exceptional circumstances test set in the Framework. Therefore, it would be appropriate to plan for a higher housing need figure than the standard method indicates.

ii. The 'exceptional circumstances' test which the University of Liverpool applied to Wirral is unnecessarily restrictive, focused entirely on demographic analyses and avoids engaging with any of the other justifications for pursuing a higher housing requirement as set out in the PPG. The fact that the Council disregarded the Standard Method figure in any case and pursued an employment growth scenario (flawed as it is) somewhat undermines its central argument.

iii. Housing delivery has been suppressed - to suggest (as arc4 has done) that a housing requirement over and above the 785 dpa target is unnecessary as delivery has improved in recent years is misconceived. Whilst recent net completion rates have not reached the level of the 2006-2008 peak this has not been due to a lack of developer appetite. The reason for this can be mainly attributed to the lack of an up to date and adopted development plan in place for Wirral over recent years. It is unsurprising that housing has slowed, not least because the Council's current UDP is now 21 years out of date. This has undoubtedly inhibited the delivery of readily-available sites.

iv. Key data is unavailable for review: The 2021 SHMA is clear that the 785 dpa target is based on a scenario apparently modelled separately by Edge Analytics which modelled the impact of an average annual employment growth of +82 per year, detailed in an Oxford Economics (OE) Forecast. The forecast is apparently underpinned by demographic assumptions from the

ONS 2014-based SNPP projection. However, reference to the source document for this calculation indicates that the scenario is nowhere to be found. It is difficult to critique the approach taken in formulating the Council's housing target if it is not made available.

v. Failure to align with employment land needs: The Council is targeting the provision of 52.9 ha of B-Class employment land. This is based on a calculation in the 2021 ELPS entitled the economic capacity scenario, which equates to a net growth of between 4,000-5,000 net jobs growth over the plan period. The OE 82 jobs growth in the SHMA which justifies the 785 dpa could only sustain 1,312 jobs over the 16-year plan period, which appears to be a discrepancy.

vi. Errors in the calculation of the 2014-based SNPP: It is difficult to see how the LHN of 785 dpa could sustain significant levels of employment growth, given that the 2014-based SNPP on which it is founded suggests that the working age population will fall by almost 8,000 residents over the period 2020-2039. The 2021 ELPS suggests that the working age population will actually grow by 15,840 over the period 2020-2040. It is difficult to see how this can be the case if the 2014-based SNPP has been used as stated in the 2021 ELPS. Our view is that the Council's job forecasts and economic aspirations cannot be sustained by the do-minimum 2014-based SNPP /Standard Method figure of 785 dpa + 50 dpa demolition replacement.

vii. The Council risks ignoring the housing affordability crisis: the emerging WLP fails to take affordability issues into account. If insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation to meet their needs. The WLP does not acknowledge that by providing the bare minimum housing figure risks worsening the housing crisis in Wirral, which is the least affordable area on Merseyside, with recent LQ affordability ratios outstripping even national growth rates.

viii. The Housing Target needs to be significantly increased – Lichfields' demographic modelling in their previous representations indicates that if the Council's economic capacity job growth rate were to be properly aligned with housing need, then a figure of at least 1,159 dpa would be required. If the Council is serious about going for growth in light of the Wirral Waters EZ and the LCR growth aspirations, then an even higher figure could be appropriate, which would also enable the very high affordable housing need to be meaningfully addressed. This would be driven by significantly higher levels of economic migrants moving into the Borough, without whom the Council's economic strategy would be fatally undermined.

ix. An uplifted housing target in the order of around 1,159 dpa allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using a figure in excess of the 785 dpa + 50 dpa for replacing demolitions would ensure compliance with the Framework by significantly boosting the supply of housing and ensuring that the planning system does everything it can to support sustainable development.

ii. Leverhulme considers that even if the proposed dwelling numbers are judged to be appropriate, the proposed allocations in the Local Plan are not appropriate and/or viable. Again, this is a matter supported by the consortium, with which we agree. As a result, these proposed allocations either won't deliver the numbers anticipated or won't deliver those numbers in the timescale anticipated and as a consequence there will need to be release of sustainable Green Belt sites.

iii. In any event, what the Local Plan is proposing through its spatial strategy and residential allocations will not deliver appropriate housing outcomes, particularly in terms of the amount of affordable housing that is required across the Borough, and the need for a varied mix and tenure of housing options to meet the needs of all demographic groups and Wirral residents.

iv. Furthermore, there is a substantial funding gap in relation to the Local Plan, which means that the financial viability of the Plan is of such considerable doubt that there can be no degree of certainty in respect of its policies being deliverable.

v. In other words, the plan in its current form is unjustified, it is not sound and it is likely to fail without the release of sustainable Green Belt land.

vi. Leverhulme believes that it, as landowner of 2,000 ha on the Wirral, is in a unique position to assist the Council in the search for sustainable Green Belt releases and the delivery of Green Belt enhancements.

8. Lichfields has produced another technical paper titled 'Wirral Local Plan: Assessing Affordable Housing Need – Technical Paper 3' which also accompanies this representation. The paper builds on the point above that the current Local Plan and the verall quantum of residential development envisaged by policy WS 1.1 threatens to severely exacerbate the existing affordability issues and housing crisis in the Wirral, resulting in significant harm.

9. While some of the key concerns raised in this Technical Paper best relate to Policy WS 3.3, the following points are still pertinent to the overall development and regeneration strategy set by policy WS 1.1:

i. The steadily declining affordable housing target is a function of a changing methodology rather than falling needs: the 374 dpa affordable housing target calculated by arc4 has fallen significantly from the 705 dpa calculated by them just a year previously, despite there being no discernible improvements to affordability in the Borough. In fact, the reverse is true, with LQ affordability ratios increasing at a rapid rate in recent years, even when compared to the national figures, and house prices continuing to rise across the Borough. A multitude of changes to arc4's methodology has artificially reduced the level of need.

ii. Future growth of households in need underplays future challenges: by using national gross household formation rates rather than actual 2014-based SNHP rates specifically for Wirral Borough, and by applying a low proportion of households who are likely to be in need at levels well below the equivalent figure for existing households, this has suppressed affordable housing need.

iii. Likely future levels of affordable housing supply are significantly over-inflated: by changing how social re-lets have been factored into the analysis, arc4 has increased the supply of affordable housing compared to how this element was calculated in its 2019 SHMA. The new approach also involves double-counting first lets, by also banking these new completions at an earlier stage.

- iv. By increasing the timeframe for disposing of the backlog from 5 to 10 years, arc4 is assuming that hundreds of households will be without suitable accommodation to meet their families' needs for many years to come. This is entirely unsatisfactory and cannot be justified on the basis of the Standard Method, which was available at the time of the 2019 SHMA (when it was not referred to by arc4 for this element of the calculation).
- v. Based on addressing the backlog in full over the first 5 years of the WLP (which would be the target in an ideal world) and by making suitable amendments to arc4's approach, we estimate that the annual affordable housing need could be as high as 1,430 dpa.
- vi. Whilst we would not suggest that this level of need could be addressed in full, the sheer scale of the level of affordable housing need would suggest that an uplift to the overall housing figure of 785 dpa + demolitions would be entirely appropriate.
- vii. Despite claims by the Council to be consistently delivering over 300 affordable units per year which is at variance with the evidence, the total number of affordable units on sites over 20 units is just 464. This is sufficient to meet a little over 1-year worth of affordable housing need. Not only that but a significant proportion of the affordable units with permission are being delivered by Registered Providers and a significant increase in the supply would require a stepped change in public investment in affordable housing delivery in Wirral. There is currently no indication that this is on the horizon particularly given the amount of public sector funding which will be required to deliver the Council's fanciful regeneration aspirations within the time period of the plan.
- viii. The total supply in Birkenhead Regeneration Zones alone accounts for more than 50% of the total claimed supply (8,874 units). Therefore, without public investment, the Council cannot viably deliver any affordable housing unit from half its claimed supply as it wholly within Viability Zones 1 and 2. When coupled with the minimal if any affordable housing units which will be derived from the Council's conversions, windfalls and return to use allowance, effectively over 70% of the Council's claimed supply will deliver no affordable housing units without public investment.
10. As set out comprehensively by the Lichfields technical papers accompanying this representation, the evidence underpinning the Local Plan and policy WS 1.1 are flawed and, consequently, the proposed strategy is also unjustified.
11. Perhaps of greatest importance is that policy WS 1.1 will not be effective, i.e. the strategy will not be deliverable over the plan period. The third Lichfields technical paper accompanying this representation – 'Wirral Local Plan: Assessing the Housing Land Supply' – conducts a thorough examination of the Council's claimed deliverable and developable housing land supply during the plan period. It essentially analyses the supply envisaged under criterion C. of policy WS 1.1.
12. Leverhulme and the Consortium have considerable concerns with the majority of the sites included in the Council's proposed supply. Setting aside the potential for flooding the market with low-demand apartment-type high density development in one specific part of the authority area, the Council's assumptions on a large number of sites are flawed and do not meet the tests of deliverable and developable as set out in Annex 2 of the Framework. The members of the Consortium comprise the country's most experienced developers, with experience of delivering sites in Wirral, the delivery of all types of housing and the delivery of green field and brownfield urban and suburban development. Having assessed the supply with their experience and local knowledge, they have all categorically come to the conclusion that the draft Local Plan's supply is significantly less than that envisaged by the Council.
13. As detailed in the accompanying Viability Technical Paper prepared by Roger Hannah on behalf of the Consortium, there are significant issues with the viability evidence presented by the Council to underpin the Local Plan. It is demonstrated in the Technical Paper that the Council underestimates the extent of viability issues in the area and as a consequence with the development sites they have identified.
14. The Viability Technical Paper demonstrates the vast viability gap on all strategic sites to the extent that it is very unlikely that enormous amount of public funds required could possibly be secured to bridge the level of deficit. The overall subsidy gap amounts to several hundred million pounds, with just one example, the Wirral Water Vittoria Studios allocation, showing a viability deficit of approximately £322,500,000. This is typical across all the Council's strategic sites, and it is unlikely that there is enough grant funding to bridge such significant deficits across the Council's claimed supply.
15. The Inspector(s) may be aware that the company "delivering" House, the most recent housing scheme at Wirral Waters – a Joint Venture between Peel Holdings and Urban Splash – which itself was the beneficiary of high levels of public funding – entered administration in May 2022. This is indicative of the viability problems not properly addressed by the draft Local Plan – heavily publicly subsidised schemes in the area struggled financially even during the low interest, low inflation housing boom times enjoyed up until the second Quarter of 2022.
16. The Council's own evidence (Wirral Local Plan 2021 to 2037 CIL & Viability Assessment, June 2022, prepared by Aspinall Verdi) also acknowledges that schemes with any level of affordable housing provision on brownfield sites are unviable in Viability Zones 1 and 2 (para ES 13 of the above Assessment). The evidence the Consortium presents demonstrates that the situation is actually much worse than acknowledged by the Council.
17. Despite this, the majority of the Council's supply is located in these Zones and there is no certainty that grant funding will be secured to ensure the delivery of this quantum of development.
18. Levels of grant funding would also need to increase very significantly beyond those identified by the Consortium if interest rates rise above their historic lows, as is likely.
19. Leverhulme and the Consortium have significant issues with a sizable proportion of the Council's large sites and consider that their ability to deliver units over the plan period is significantly less than the Council envisages.
20. In terms of housing supply, a target of at least 13,360 dwellings is set over the 16-year plan period. Leverhulme and the Consortium consider that the Council has a developable supply during the plan period of 7,795 units which equates to a 9.3-year supply at best – noting that even this requires setting aside the considerable viability issues in the majority of the Borough.

	<p>21. In other words, there will be no supply of new housing after the ninth year of the Plan. Therefore, the Council needs to immediately identify additional capacity for 5,565 units to meet the housing requirement within the Plan.</p> <p>22. Even this is, of course, on the assumption that the minimum housing requirement set by policy WS 1.1 remains unchanged, a matter with which we firmly disagree for all of the reasons set out earlier in this representation.</p> <p>23. Similarly, we consider that the Council is unable to demonstrate a five-year housing land supply.</p> <p>24. The housing requirement for this five-year period is 5,010 units. The Council's Housing Deliver Strategy (May 2022) states that the Wirral can demonstrate a 5-year supply of housing land (para 4.46) of 5,110 units. However, detailed work undertaken by Lichfields on behalf of the Wirral Consortium (see Technical Paper 4 accompanying this representation) has identified a number of sites that did not meet the test of deliverability as set out in Annex 2 of the Framework.</p> <p>25. As such, a number of sites must be moved back in the trajectory as there is no certainty that they will be delivered in the first five years of the Plan. As a best-case scenario, we submit that the Council can only demonstrate an equivalent 5-year housing land supply position of 3.03 years (include our projected supply as a figure) with a 20% housing land supply buffer applied.</p> <p>26. Consequently, the Council has significant housing land supply issues and if this plan is pursued without significant additional allocations of viable and deliverable sites, it cannot be found sound in its current guise.</p> <p>27. In summary, the Local Plan and the development strategy set by policy WS 1.1 will not provide enough homes, neither affordable nor market, of the right size in the right places to meet the Borough's needs and will not deliver the benefits that truly sustainable development can bring in economic, social and environmental terms.</p> <p>28. The exceptional circumstances required by national planning policy to release land from the Green Belt clearly exist and the Council's Local Plan can only become effective by amending its strategy to supplement the allocation of previously developed sites in urban areas with the release of weakly performing Green Belt land within the Borough. This includes land under Leverhulme's control which can be brought forward to meet the clearly defined needs of Wirral over the next 16 years whilst providing for Green Belt enhancement and retaining the integrity of strongly performing Green Belt land across the Borough.</p> <p>29. However, given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go well beyond what could be considered 'Main Modifications'.</p> <p>30. The sustainable development envisaged by the National Planning Policy Framework with its three overarching and interdependent objectives – economic, social, and environmental – can only truly be realised in the Wirral with a fundamental change of approach and a multi-faceted solution that does not solely rely upon the predominantly unviable and unrealistically aspirational regeneration of brownfield land.</p> <p>31. A sound Local Plan must include proportionate and carefully selected Green Belt release. Without this component of development, Wirral Council's strategy and objectives will never fulfil the definition of sustainable development and will continue to be inconsistent with national policy in this regard.</p> <p>Duty to Cooperate</p> <p>32. As a final and somewhat separate point, which nevertheless could affect the overall strategy of the Local Plan, we note that the Council has prepared a Duty to Cooperate Statement of Compliance 2022 (DtC CS). Within this statement, it is noted that the Council is still working on Statements of Common Ground (SoCG) with several parties and therefore Leverhulme reserves the right to make further comments on the DtC leading into the Examination.</p> <p>33. Leverhulme and the Developer Consortium is however concerned that the absence of SoCG indicates there the requirements of the Duty to Cooperate have not been complied with. We have identified several fundamental deficiencies in the Council's evidence base, including a failure to robustly assess the needs of different groups of the community, such as the needs of students and those in the private rented sector (paragraph 2.9). If the Council is unable to define the extent of its own need for these groups, we are concerned that it will not be in a position to cooperate with other Liverpool City Region authorities on these matters.</p>
<b>omplies with the Duty to co-operate</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	

<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>1. Strutt &amp; Parker acts on behalf of the Leverhulme Estate. We have made a number of representations to the Regulation 19 consultation into Wirral Council's Submission Draft Local Plan, specifically in relation to the draft planning policies and strategy therein, including Policy WS 1.1 which this representation relates to. However, Leverhulme's overarching position in relation to the Submission Draft Local Plan is as follows:</p> <p>i. Leverhulme considers the dwelling numbers proposed in the Local Plan are too low to represent or meet both housing and economic needs and that is also a position supported by the consortium (which Leverhulme forms part of) and their evidence (which has been submitted alongside our representations). The consequence is that there will need to be release of sustainable Green Belt sites.</p> <p>vii. To do this we have identified three phases –</p> <p>Phase 1: up to 1,038 dwellings across eight sites to assist with addressing the current housing shortfall, which should be recognised as commitments within the Local Plan;</p> <p>Phase 2: circa 3,500 dwellings across eight sites to be allocated in the Wirral Local Plan having been released from the Green Belt to contribute during the plan period; and</p> <p>Phase 3: circa 1,000 dwellings near Raby Mere and Bromborough Golf Club to be released from the Green Belt and safeguarded for development in future Local Plan periods, i.e. beyond the current plan period.</p> <p>viii. Together with these are a suite of Green Belt enhancements / compensatory improvements in accordance with paragraph 142 of the National Planning Policy Framework.</p> <p>ix. To have a sound spatial strategy and hence plan, these three Phases need to be incorporated if the plan is to deliver the development needed in Wirral. Leverhulme recognises that additional greenfield / Green Belt release is also likely to be required. The current draft development strategy is so flawed that it is likely to require the plan to be withdrawn following an indication from the Inspector(s) that the plan would otherwise be found unsound as drafted. The changes required are likely to be too extensive to be appropriate to be brought forward as main modifications.</p> <p>x. In addition, the wider estate needs support as part of the rural economy, as set out in the representations we have made regarding the Local Plan's rural area policies. Without which, the plan would be unsound.</p> <p>2. We now move onto providing our specific comments regarding Policy WS 1.1.</p> <p>3. We fundamentally disagree with the development and regeneration strategy for Wirral set by policy WS 1.1 and submit that the policy is significantly flawed and unsound.</p> <p>4. While we acknowledge that the sensitive, appropriate and realistic regeneration of brownfield land in Birkenhead and the surrounding area can and should play a part in building economic, social and environmental prosperity within the Borough, we firmly believe that the Local Plan cannot succeed in fulfilling its wildly aspirational objectives by solely focusing on the hoped-for regeneration of brownfield land and directing development to within 'Settlement Areas' – regardless of the fact that regeneration has failed to occur in these areas despite continuous attempts, including undelivered and undeliverable related planning permissions, over the previous decade.</p> <p>5. Firstly, we have the following concerns in relation to the housing requirement set by WS 1.1, specifically the figure of a minimum of 13,360 net additional dwellings between 2021 and 2037.</p> <p>6. Lichfields has produced a technical paper titled 'Wirral Local Plan: Assessing the Housing Requirement – Technical Paper 1' on behalf of the Wirral Consortium, which Leverhulme Estate forms part of, which accompanies this representation and which provides a comprehensive critical analysis of the approach taken by the Council and their consultants in identifying the development needs for Wirral.</p> <p>7. The following concerns are raised in relation to this component of the draft Local Plan:</p> <p>i. 785 dpa + 50dpa for demolition replacement is insufficient to meet housing needs: the 785 dpa target is now identical to the figure derived from the Standard Method, which represents the minimum starting point only. It represents around half the level of housing needed to take Wirral's 'fair share' of the aspirational 300,000 national housing target by the mid-2020s. The PPG states that an uplift should be applied where funding is in place to promote and facilitate growth. The Council claims that the Wirral Waters regeneration project has the potential to create up to 20,000 jobs but has applied no uplift to its housing target to account for this. The Council claims that it secured £78.5m from Central Government in 2021 alone, including almost £20m from the first round of the new Levelling Up Fund. In terms of determining an appropriate housing requirement, this significant economic potential represents a departure from the 'business as usual' trend based demographic growth and meets the exceptional circumstances test set in the Framework. Therefore, it would be appropriate to plan for a higher housing need figure than the standard method indicates.</p> <p>ii. The 'exceptional circumstances' test which the University of Liverpool applied to Wirral is unnecessarily restrictive, focused entirely on demographic analyses and avoids engaging with any of the other justifications for pursuing a higher housing requirement as set out in the PPG. The fact that the Council disregarded the Standard Method figure in any case and pursued an employment growth scenario (flawed as it is) somewhat undermines its central argument.</p> <p>iii. Housing delivery has been suppressed - to suggest (as arc4 has done) that a housing requirement over and above the 785 dpa target is unnecessary as delivery has improved in recent years is misconceived. Whilst recent net completion rates have not reached the level of the 2006-2008 peak this has not been due to a lack of developer appetite. The reason for this can be mainly attributed to the lack of an up to date and adopted development plan in place for Wirral over recent years. It is unsurprising that housing has slowed, not least because the Council's current UDP is now 21 years out of date. This has undoubtedly inhibited the delivery of readily-available sites.</p> <p>iv. Key data is unavailable for review: The 2021 SHMA is clear that the 785 dpa target is based on a scenario apparently modelled separately by Edge Analytics which modelled the impact of an average annual employment growth of +82 per year, detailed in an Oxford Economics (OE) Forecast. The forecast is apparently underpinned by demographic assumptions from the</p>
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ONS 2014-based SNPP projection. However, reference to the source document for this calculation indicates that the scenario is nowhere to be found. It is difficult to critique the approach taken in formulating the Council's housing target if it is not made available.

v. Failure to align with employment land needs: The Council is targeting the provision of 52.9 ha of B-Class employment land. This is based on a calculation in the 2021 ELPS entitled the economic capacity scenario, which equates to a net growth of between 4,000-5,000 net jobs growth over the plan period. The OE 82 jobs growth in the SHMA which justifies the 785 dpa could only sustain 1,312 jobs over the 16-year plan period, which appears to be a discrepancy.

vi. Errors in the calculation of the 2014-based SNPP: It is difficult to see how the LHN of 785 dpa could sustain significant levels of employment growth, given that the 2014-based SNPP on which it is founded suggests that the working age population will fall by almost 8,000 residents over the period 2020-2039. The 2021 ELPS suggests that the working age population will actually grow by 15,840 over the period 2020-2040. It is difficult to see how this can be the case if the 2014-based SNPP has been used as stated in the 2021 ELPS. Our view is that the Council's job forecasts and economic aspirations cannot be sustained by the do-minimum 2014-based SNPP /Standard Method figure of 785 dpa + 50 dpa demolition replacement.

vii. The Council risks ignoring the housing affordability crisis: the emerging WLP fails to take affordability issues into account. If insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation to meet their needs. The WLP does not acknowledge that by providing the bare minimum housing figure risks worsening the housing crisis in Wirral, which is the least affordable area on Merseyside, with recent LQ affordability ratios outstripping even national growth rates.

viii. The Housing Target needs to be significantly increased – Lichfields' demographic modelling in their previous representations indicates that if the Council's economic capacity job growth rate were to be properly aligned with housing need, then a figure of at least 1,159 dpa would be required. If the Council is serious about going for growth in light of the Wirral Waters EZ and the LCR growth aspirations, then an even higher figure could be appropriate, which would also enable the very high affordable housing need to be meaningfully addressed. This would be driven by significantly higher levels of economic migrants moving into the Borough, without whom the Council's economic strategy would be fatally undermined.

ix. An uplifted housing target in the order of around 1,159 dpa allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using a figure in excess of the 785 dpa + 50 dpa for replacing demolitions would ensure compliance with the Framework by significantly boosting the supply of housing and ensuring that the planning system does everything it can to support sustainable development.

ii. Leverhulme considers that even if the proposed dwelling numbers are judged to be appropriate, the proposed allocations in the Local Plan are not appropriate and/or viable. Again, this is a matter supported by the consortium, with which we agree. As a result, these proposed allocations either won't deliver the numbers anticipated or won't deliver those numbers in the timescale anticipated and as a consequence there will need to be release of sustainable Green Belt sites.

iii. In any event, what the Local Plan is proposing through its spatial strategy and residential allocations will not deliver appropriate housing outcomes, particularly in terms of the amount of affordable housing that is required across the Borough, and the need for a varied mix and tenure of housing options to meet the needs of all demographic groups and Wirral residents.

iv. Furthermore, there is a substantial funding gap in relation to the Local Plan, which means that the financial viability of the Plan is of such considerable doubt that there can be no degree of certainty in respect of its policies being deliverable.

v. In other words, the plan in its current form is unjustified, it is not sound and it is likely to fail without the release of sustainable Green Belt land.

vi. Leverhulme believes that it, as landowner of 2,000 ha on the Wirral, is in a unique position to assist the Council in the search for sustainable Green Belt releases and the delivery of Green Belt enhancements.

8. Lichfields has produced another technical paper titled 'Wirral Local Plan: Assessing Affordable Housing Need – Technical Paper 3' which also accompanies this representation. The paper builds on the point above that the current Local Plan and the verall quantum of residential development envisaged by policy WS 1.1 threatens to severely exacerbate the existing affordability issues and housing crisis in the Wirral, resulting in significant harm.

9. While some of the key concerns raised in this Technical Paper best relate to Policy WS 3.3, the following points are still pertinent to the overall development and regeneration strategy set by policy WS 1.1:

i. The steadily declining affordable housing target is a function of a changing methodology rather than falling needs: the 374 dpa affordable housing target calculated by arc4 has fallen significantly from the 705 dpa calculated by them just a year previously, despite there being no discernible improvements to affordability in the Borough. In fact, the reverse is true, with LQ affordability ratios increasing at a rapid rate in recent years, even when compared to the national figures, and house prices continuing to rise across the Borough. A multitude of changes to arc4's methodology has artificially reduced the level of need.

ii. Future growth of households in need underplays future challenges: by using national gross household formation rates rather than actual 2014-based SNHP rates specifically for Wirral Borough, and by applying a low proportion of households who are likely to be in need at levels well below the equivalent figure for existing households, this has suppressed affordable housing need.

iii. Likely future levels of affordable housing supply are significantly over-inflated: by changing how social re-lets have been factored into the analysis, arc4 has increased the supply of affordable housing compared to how this element was calculated in its 2019 SHMA. The new approach also involves double-counting first lets, by also banking these new completions at an earlier stage.

- iv. By increasing the timeframe for disposing of the backlog from 5 to 10 years, arc4 is assuming that hundreds of households will be without suitable accommodation to meet their families' needs for many years to come. This is entirely unsatisfactory and cannot be justified on the basis of the Standard Method, which was available at the time of the 2019 SHMA (when it was not referred to by arc4 for this element of the calculation).
- v. Based on addressing the backlog in full over the first 5 years of the WLP (which would be the target in an ideal world) and by making suitable amendments to arc4's approach, we estimate that the annual affordable housing need could be as high as 1,430 dpa.
- vi. Whilst we would not suggest that this level of need could be addressed in full, the sheer scale of the level of affordable housing need would suggest that an uplift to the overall housing figure of 785 dpa + demolitions would be entirely appropriate.
- vii. Despite claims by the Council to be consistently delivering over 300 affordable units per year which is at variance with the evidence, the total number of affordable units on sites over 20 units is just 464. This is sufficient to meet a little over 1-year worth of affordable housing need. Not only that but a significant proportion of the affordable units with permission are being delivered by Registered Providers and a significant increase in the supply would require a stepped change in public investment in affordable housing delivery in Wirral. There is currently no indication that this is on the horizon particularly given the amount of public sector funding which will be required to deliver the Council's fanciful regeneration aspirations within the time period of the plan.
- viii. The total supply in Birkenhead Regeneration Zones alone accounts for more than 50% of the total claimed supply (8,874 units). Therefore, without public investment, the Council cannot viably deliver any affordable housing unit from half its claimed supply as it wholly within Viability Zones 1 and 2. When coupled with the minimal if any affordable housing units which will be derived from the Council's conversions, windfalls and return to use allowance, effectively over 70% of the Council's claimed supply will deliver no affordable housing units without public investment.
10. As set out comprehensively by the Lichfields technical papers accompanying this representation, the evidence underpinning the Local Plan and policy WS 1.1 are flawed and, consequently, the proposed strategy is also unjustified.
11. Perhaps of greatest importance is that policy WS 1.1 will not be effective, i.e. the strategy will not be deliverable over the plan period. The third Lichfields technical paper accompanying this representation – 'Wirral Local Plan: Assessing the Housing Land Supply' – conducts a thorough examination of the Council's claimed deliverable and developable housing land supply during the plan period. It essentially analyses the supply envisaged under criterion C. of policy WS 1.1.
12. Leverhulme and the Consortium have considerable concerns with the majority of the sites included in the Council's proposed supply. Setting aside the potential for flooding the market with low-demand apartment-type high density development in one specific part of the authority area, the Council's assumptions on a large number of sites are flawed and do not meet the tests of deliverable and developable as set out in Annex 2 of the Framework. The members of the Consortium comprise the country's most experienced developers, with experience of delivering sites in Wirral, the delivery of all types of housing and the delivery of green field and brownfield urban and suburban development. Having assessed the supply with their experience and local knowledge, they have all categorically come to the conclusion that the draft Local Plan's supply is significantly less than that envisaged by the Council.
13. As detailed in the accompanying Viability Technical Paper prepared by Roger Hannah on behalf of the Consortium, there are significant issues with the viability evidence presented by the Council to underpin the Local Plan. It is demonstrated in the Technical Paper that the Council underestimates the extent of viability issues in the area and as a consequence with the development sites they have identified.
14. The Viability Technical Paper demonstrates the vast viability gap on all strategic sites to the extent that it is very unlikely that enormous amount of public funds required could possibly be secured to bridge the level of deficit. The overall subsidy gap amounts to several hundred million pounds, with just one example, the Wirral Water Vittoria Studios allocation, showing a viability deficit of approximately £322,500,000. This is typical across all the Council's strategic sites, and it is unlikely that there is enough grant funding to bridge such significant deficits across the Council's claimed supply.
15. The Inspector(s) may be aware that the company "delivering" House, the most recent housing scheme at Wirral Waters – a Joint Venture between Peel Holdings and Urban Splash – which itself was the beneficiary of high levels of public funding – entered administration in May 2022. This is indicative of the viability problems not properly addressed by the draft Local Plan – heavily publicly subsidised schemes in the area struggled financially even during the low interest, low inflation housing boom times enjoyed up until the second Quarter of 2022.
16. The Council's own evidence (Wirral Local Plan 2021 to 2037 CIL & Viability Assessment, June 2022, prepared by Aspinall Verdi) also acknowledges that schemes with any level of affordable housing provision on brownfield sites are unviable in Viability Zones 1 and 2 (para ES 13 of the above Assessment). The evidence the Consortium presents demonstrates that the situation is actually much worse than acknowledged by the Council.
17. Despite this, the majority of the Council's supply is located in these Zones and there is no certainty that grant funding will be secured to ensure the delivery of this quantum of development.
18. Levels of grant funding would also need to increase very significantly beyond those identified by the Consortium if interest rates rise above their historic lows, as is likely.
19. Leverhulme and the Consortium have significant issues with a sizable proportion of the Council's large sites and consider that their ability to deliver units over the plan period is significantly less than the Council envisages.
20. In terms of housing supply, a target of at least 13,360 dwellings is set over the 16-year plan period. Leverhulme and the Consortium consider that the Council has a developable supply during the plan period of 7,795 units which equates to a 9.3-year supply at best – noting that even this requires setting aside the considerable viability issues in the majority of the Borough.

	<p>21. In other words, there will be no supply of new housing after the ninth year of the Plan. Therefore, the Council needs to immediately identify additional capacity for 5,565 units to meet the housing requirement within the Plan.</p> <p>22. Even this is, of course, on the assumption that the minimum housing requirement set by policy WS 1.1 remains unchanged, a matter with which we firmly disagree for all of the reasons set out earlier in this representation.</p> <p>23. Similarly, we consider that the Council is unable to demonstrate a five-year housing land supply.</p> <p>24. The housing requirement for this five-year period is 5,010 units. The Council's Housing Deliver Strategy (May 2022) states that the Wirral can demonstrate a 5-year supply of housing land (para 4.46) of 5,110 units. However, detailed work undertaken by Lichfields on behalf of the Wirral Consortium (see Technical Paper 4 accompanying this representation) has identified a number of sites that did not meet the test of deliverability as set out in Annex 2 of the Framework.</p> <p>25. As such, a number of sites must be moved back in the trajectory as there is no certainty that they will be delivered in the first five years of the Plan. As a best-case scenario, we submit that the Council can only demonstrate an equivalent 5-year housing land supply position of 3.03 years (include our projected supply as a figure) with a 20% housing land supply buffer applied.</p> <p>26. Consequently, the Council has significant housing land supply issues and if this plan is pursued without significant additional allocations of viable and deliverable sites, it cannot be found sound in its current guise.</p> <p>27. In summary, the Local Plan and the development strategy set by policy WS 1.1 will not provide enough homes, neither affordable nor market, of the right size in the right places to meet the Borough's needs and will not deliver the benefits that truly sustainable development can bring in economic, social and environmental terms.</p> <p>28. The exceptional circumstances required by national planning policy to release land from the Green Belt clearly exist and the Council's Local Plan can only become effective by amending its strategy to supplement the allocation of previously developed sites in urban areas with the release of weakly performing Green Belt land within the Borough. This includes land under Leverhulme's control which can be brought forward to meet the clearly defined needs of Wirral over the next 16 years whilst providing for Green Belt enhancement and retaining the integrity of strongly performing Green Belt land across the Borough.</p> <p>29. However, given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go well beyond what could be considered 'Main Modifications'.</p> <p>30. The sustainable development envisaged by the National Planning Policy Framework with its three overarching and interdependent objectives – economic, social, and environmental – can only truly be realised in the Wirral with a fundamental change of approach and a multi-faceted solution that does not solely rely upon the predominantly unviable and unrealistically aspirational regeneration of brownfield land.</p> <p>31. A sound Local Plan must include proportionate and carefully selected Green Belt release. Without this component of development, Wirral Council's strategy and objectives will never fulfil the definition of sustainable development and will continue to be inconsistent with national policy in this regard.</p> <p>Duty to Cooperate</p> <p>32. As a final and somewhat separate point, which nevertheless could affect the overall strategy of the Local Plan, we note that the Council has prepared a Duty to Cooperate Statement of Compliance 2022 (DtC CS). Within this statement, it is noted that the Council is still working on Statements of Common Ground (SoCG) with several parties and therefore Leverhulme reserves the right to make further comments on the DtC leading into the Examination.</p> <p>33. Leverhulme and the Developer Consortium is however concerned that the absence of SoCG indicates there the requirements of the Duty to Cooperate have not been complied with. We have identified several fundamental deficiencies in the Council's evidence base, including a failure to robustly assess the needs of different groups of the community, such as the needs of students and those in the private rented sector (paragraph 2.9). If the Council is unable to define the extent of its own need for these groups, we are concerned that it will not be in a position to cooperate with other Liverpool City Region authorities on these matters</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>No comment</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>No comment</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>1. As set out at the start of section 5, Leverhulme's overarching position is that the Submission Draft Local Plan is unsound for a number of reasons. Reference should be made to section 5 for our reasoning.</p> <p>2. Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'. The sustainable development envisaged by the National Planning Policy Framework with its three overarching and interdependent objectives – economic, social, and environmental – can only truly be realised in the Wirral with a fundamental change of approach and a multi-faceted solution that does not solely rely upon the largely unviable regeneration of brownfield land. A sound Local Plan must include proportionate and carefully selected Green Belt release. Without this component of development, Wirral Council's strategy and objectives will never fulfil the definition of sustainable development and will continue to be inconsistent with national policy in this regard.</p> <p>3. In short, we do not believe that the current Local Plan can be found sound, even with modifications.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. As one of the principal rural landowners impacted by the draft policy, Leverhulme wishes to be heard.</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-582
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-582-EM-Watson Form 2 of 29 2507 _Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 1.2
<b>Title</b>	Employment
<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 1.2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	1. While we do not raise fundamental objections to the level of employment growth sought under policy WS 1.2 - consisting of 65.6 ha of employment allocations based on a need or target for 52.9 ha of B-Class employment land according to the Wirral Employment Land and Premises Study 2021 ("ELPS") – we believe there is a significant disconnect between the aspired level of economic growth in the Borough during the plan period and the level of housing creation required to accompany and support this growth. 2. Lichfields has produced a technical paper titled 'Wirral Local Plan: Assessing the Housing Requirement – Technical Paper 1' which has been produced on behalf of the Wirral Consortium, which Leverhulme Estate forms part of. The technical paper accompanies this representation.

<b>as precise as possible.</b>	<p>3. Lichfields note in their paper that ensuring a sufficient supply of homes within easy access of employment opportunities represents a central facet of an efficiently functioning economy and can help to minimise housing market pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions). If the objective of employment growth is to be realised, then it will need to be supported by an adequate supply of a suitable range of housing types and tenures across the Borough.</p> <p>4. While the draft Local Plan and the housing requirement set by policy WS 1.1 includes a modest uplift to address economic growth, with a further adjustment for demolitions, Leverhulme and the Consortium believe that the economic growth adjustment is not robust.</p> <p>5. Firstly, the Council's preferred forecast for net job growth of 82 per annum equates to just 1,321 jobs during the 16-year plan period. However, the 52.9 ha of B-Class employment land sought by policy WS 1.2 is based on a calculation in the Wirral Employment Land and Premises Study 2021 ("ELPS") entitled the economic capacity scenario, which equates to a net growth of between 4,000-5,000 net jobs growth over the plan period. There is therefore a significant discrepancy between the evidence relating to the level of job growth, bringing into question how justified policy WS 1.2 is and, in turn, whether a proportionate level of housing growth will be delivered by the Local Plan to ensure the economic growth aspirations are realised. In this regard, we believe that policy WS1.2 is not justified and proportionate housing growth will not be delivered.</p> <p>6. Secondly, the level of economic growth may not be supported by Wirral's resident population of working age. Lichfields estimate that this section of the Borough's population is projected to decline by over 6,660 residents over the next 16 years. As a result, a step change in housebuilding to encourage new economic migrants to move to the area will be required. This in-migration will be inhibited by the inadequately low housing requirement set by policy WS 1.1.</p> <p>7. While there is some scope to encourage local residents to take up local jobs rather than commuting into the City of Liverpool every day, clearly this is entirely outside the Council's control. While it might be a reasonable aspiration, in demographic modelling terms one cannot assume that a reversal in commuting patterns that have been well established for hundreds of years (and likely to continue to follow these entrenched patterns given the ongoing success of Liverpool as an employment destination) will take place in just 15 years.</p> <p>8. There is therefore very limited scope to expect significant increases in the labour force to meet any jobs growth target. Any efforts to do so will clearly over-estimate the growth in economically active residents, thus suppressing housing need.</p> <p>9. It is unclear how the economic growth aspirations and housing targets can be mutually reinforcing when the basic building block of both models is misaligned. The two cannot be reconciled without a significant increase in the housing target.</p> <p>10. Policy WS 1.2 will therefore be ineffective, contrary to paragraph 35 of the National Planning Policy Framework, in the current form of the Local Plan and policy WS 1.1. The latter of these policies requires a fundamental rethink if the Council's growth aspirations and objectives are to be viewed as positively prepared.</p> <p>11. We believe that an uplifted housing target in the order of at least 1,150 dwellings per annum may allow for the improvement of negatively performing market signals through the provision of additional supply, as well as supporting the economic growth envisaged by policy WS 1.2.</p>
<b>complies with the Duty to co-operate</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance,</b>	No comment

<p>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>No comment</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</b></p>	<p>1. As set out at the start of section 5, Leverhulme's overarching position is that the Submission Draft Local Plan is unsound for a number of reasons. Reference should be made to section 5 for our reasoning.</p> <p>2. Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'. The sustainable development envisaged by the National Planning Policy Framework with its three overarching and interdependent objectives – economic, social, and environmental – can only truly be realised in the Wirral with a fundamental change of approach and a multi-faceted solution that does not solely rely upon the largely unviable regeneration of brownfield land. A sound Local Plan must include proportionate and carefully selected Green Belt release. Without this component of development, Wirral Council's strategy and objectives will never fulfil the definition of sustainable development and will continue to be inconsistent with national policy in this regard.</p> <p>3. In short, we do not believe that the current Local Plan can be found sound, even with modifications.</p>

or text. Please be as precise as possible.	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed extension to the Thornton Hough LLD affects Leverhulme land. As one of the principal rural landowners impacted by the draft landscape designation, Leverhulme wishes to be heard.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	Yes

<b>Comment ID</b>	LPSD-583
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-583-EM-Watson Form 3 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 1.3
<b>Title</b>	Infrastructure
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	1. Paragraph 34 of the National Planning Policy Framework ("the Framework") requires Local Plans to set out the contributions expected from development, including the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). It is acknowledged that policy WS 1.3 of the Wirral Local Plan seeks to fulfil this requirement, but in our view the policy is flawed and it would undermine the deliverability of the plan, contrary to paragraph 34 of the Framework.

as precise as possible.

2. Roger Hannah has produced a technical paper titled 'Technical Paper 5 – Viability Wirral Local Plan' on behalf of the Wirral Consortium, which Leverhulme Estate forms part of. The Technical Paper accompanies this representation.
3. Roger Hannah's Paper represents a comprehensive assessment of the Council's viability and infrastructure work and it raises the following areas of concern, among many others:
  - i. The range of Section 106 assumptions for the Local Plan site allocations exclude any contributions towards health and education. This is a major omission in every sense, not least the very clear requirements of national planning policy in respect of the promotion of healthy communities.
  - ii. The Council wishes to concentrate the vast majority of new development in Birkenhead where there will be a need for enormous investment in local infrastructure, transport, schools, healthcare and public realm – none of which are currently included in any S.106 contributions in the appraisals. Effectively, the Council is promoting regeneration without putting in place anything to viably deliver its comprehensive and meaningful delivery.
  - iii. We therefore believe that the expected S.106 contributions are being very significantly understated. This results in the Council's gross overestimation of Local Plan viability.
  - iv. Any additional S.106 monies identified at the application stage would be grounds for the applicant to submit a viability assessment as the additional contributions are currently untested.
  - v. The Council's Infrastructure Delivery Plan ("IDP") sets out a funding gap of £42.14m for essential transport infrastructure over the plan period, stating that this will be funded through developer contributions. The Council's viability consultant, Aspinall Verdi ("AV"), state that this is accounted for in their appraisals – but, contrary to this statement, there is absolutely no cost allowance for transport in the S.106 breakdowns. Based on the need for 13,360 homes over the plan period, the £42.14m that needs to be recovered equates to £3,154 per dwelling on average. Given that the appraisals already show shortfalls and that the Council itself, remarkably, acknowledges that its own allocations are not viable, this considerable shortfall can only serve to exacerbate the fact that the draft Local Plan is unviable and undeliverable.
  - vi. In a nutshell, this additional S.106 cost is excluded from all appraisals and is a significant oversight that will result in higher costs and an even-worse viability position across all appraisals.
  - vii. There is also an additional funding gap of £335.8m for additional desirable infrastructure over the plan period which is not considered by AV. Such additional desirable infrastructure is not to be taken lightly in an area that needs to be comprehensively regenerated if it is ever to become a location where people might choose to live. Rather, it is a necessity. Successful regeneration depends upon skills, experience and consistent transformational investment, something that appears lost on the fanciful projections of Wirral Council.
  - viii. In this case, this equates to £25,135 per dwelling over the plan period and needs to be tested on viability grounds should the Council seek to fund this through developer contributions.
  - ix. There is currently no allowance by AV for Future Homes Standards which will be effective from 2025. These are significant regulatory requirements and the associated cost of £8,000 per dwelling needs to be included in the appraisals. It is noted that this additional £8,000 per dwelling will have an enormous negative impact on the already negative appraisals.
  - x. In a nutshell, this is a very significant costs oversight. The reality is that it will increase overall costs considerably and it will result in even less viable appraisal outcomes across all typologies and strategic sites.
4. Evidently, there are clearly many significant issues that need to be urgently addressed in order for the viability assessment to be appropriate. In the absence of these and sight of the resultant, appropriate viability assessments – as opposed to the incomplete ones presented – the draft Local Plan cannot be considered sound. It is also apparent that the completion of the appropriate viability assessments will, for the reasons set out above, simply serve to further undermine the viability assessments and consequently, the draft Local Plan will remain unsound.
5. Engagement from the Council with the Consortium's viability consultant has been very poor despite repeated requests from the latter for additional evidence, explanation and meaningful involvement at numerous stages of the consultation process. In our view, this has only compounded the very poor viability and cost estimate output from the Council, which it is respectfully put, must ultimately result in the Local Plan being found unsound.
6. Roger Hannah has identified considerable funding gaps in the Council's IDP (hundreds of millions of pounds (£377,944.00) in addition to the essential transport infrastructure shortfall acknowledged by the Council) which feeds into policy WS 1.3 of the Local Plan. These funding gaps and the resulting problems that will be encountered in delivering the infrastructure necessary to support the Local Plan's development strategy and site allocations means that the Local Plan is unjustified and will be ineffective.
7. There is no certainty that grant funding will be secured to ensure the delivery of this infrastructure and the associated quantum of development. Furthermore, the Council's failure to adequately appraise the infrastructure costs and viability of new development in the Borough will have negative knock-on effects to any windfall or unplanned developments coming forward during the plan period. Or put more simply, the Council's poor overall approach to infrastructure will place a major obstacle in the way of sustainable development, with the viability of the Local Plan remaining a major concern for Leverhulme and the Consortium.
8. It is not irrelevant to note that we have just emerged from the longest and most significant housing boom of all time, combined with the longest and lowest rates of borrowing of all time. This situation has changed. The Council's fanciful regeneration "plans" failed to materialise over this boom period and the prospects for unviable regeneration projects over the coming years are not strong. The need for development plans to be viable and deliverable is not without reason.
9. Leverhulme has also obtained expert transport consultancy advice from Curtins regarding the wording of policy WS 1.3. Curtins' view, which we support, is that policy WS 1.3 is largely broad and unspecific, with the exception in part of policy WS 1.3, which specifically references a new mass transit system and new multi-purpose greenway within Birkenhead.
10. While the principle of delivering active travel networks and a green and blue infrastructure network is logical, there is no clear indication or substantive evidence within policy WS 1.3 as to how this could possibly be achieved.

	<p>11. The Infrastructure Delivery Plan Baseline Report is linked to policy WS 1.3, which sets out the real implementation measures. Due to the overarching Local Plan strategy which concentrates new development in and around Birkenhead, there would be little to no financial support for delivery of much needed infrastructure in those areas outside of Birkenhead. In other words, the rest of the Borough is 'forgotten', or at the very least, has not been given due consideration.</p> <p>12. The Borough is in dire need of improved east/west linkages (including bus, cycle and vehicular links) to facilitate a real choice in travel and encourage uptake in sustainable/active travel choices. Leverhulme is a willing landowner in an excellent position to assist in the provision of sustainable development given its role, its history and its extensive land holding across the Borough. However, policies WS 1.3 and WS 10.1 along with the vast majority of proposed Local Plan sites being situated within Birkenhead and its surrounding areas means the Local Plan is placing obstacles in the way of sustainable development by purposely obstructing opportunities to enhance the provision of infrastructure through development contributions from viable and deliverable development.</p> <p>13. On this basis, it is Curtins' view that policy WS 1.3 fails to meet the following NPPF soundness tests:</p> <p>i. Positively Prepared – Policy WS 1.3 does not seek to meet the area's objectively assessed needs. The policy in conjunction with the rest of the draft Local Plan severely limits the opportunity to suitably improve highway infrastructure in areas outside of eastern areas in the Borough, and specifically outside of Birkenhead.</p> <p>ii. Justified – Policy WS 1.3 does not facilitate an appropriate strategy for infrastructure improvements across the Borough as a whole. Areas forecast to experience congestion at current and/or future years along the A551/A552 corridor and Barnston Road have not been properly addressed within the IDP Baseline Report, and by extension policy WS 1.3 given its link to the IDP.</p> <p>iii. Consistent with National Policy – Policy WS 1.3 severely limits the ability to deliver sustainable travel enhancements outside of the Borough, and specifically outside of Birkenhead. The Local Plan is considered at odds with the sustainable travel objectives in the NPPF, namely those identified in paragraph 105 of the Framework.</p> <p>14. The failure of the IDP Baseline Report to address key infrastructure improvements across the Borough means policy WS 1.3 fails completely as a sound Local Plan policy.</p> <p>15. It is our view that Wirral Council would either need to rely on Compulsory Purchase to deliver the infrastructure improvements required elsewhere or, as is considered more likely, areas that do not benefit from having draft Local Plan sites will not receive the improvements to current or future infrastructure that they need and the Council is content for the Borough's residents to bear the consequences.</p> <p>16. In its current form, we submit that the Local Plan and policy WS 1.3 are unsound.</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>	No comment

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.	No comment
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<ol style="list-style-type: none"> <li>1 Leverhulme's overarching position is that the Submission Draft Local Plan is unsound for a number of reasons. An overarching representation accompanies our submissions that sets out our case in this regard.</li> <li>2 The flaws in the Council's evidence and plan-making approach are substantial. It is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'. The sustainable development envisaged by the National Planning Policy Framework with its three overarching and interdependent objectives – economic, social, and environmental – can only truly be realised in the Wirral with a fundamental change of approach and a multi-faceted solution that does not solely rely upon the frequently unviable regeneration of brownfield land. The gap in infrastructure funding identified by Roger Hannah clearly demonstrates that the current strategy is unviable.</li> <li>3 A sound Local Plan must include proportionate and carefully selected Green Belt. Without this component of development, Wirral Council's strategy and objectives will never fulfil the definition of sustainable development and will continue national policy in this regard.</li> <li>4 In short, we do not believe that the current Local Plan can be found sound, even with modifications.</li> </ol>

<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>1 Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. As one of the principal rural landowners impacted by the draft policy, Leverhulme wishes to be heard.</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-584
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-584, 585, 942 &amp; 946-948-EM-Watson Form 4 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 2
<b>Title</b>	Social Value
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS 2 – Social Value 3.1 Paragraph 3.34 of the draft Local Plan states that the Council have adopted a definition of Social Value as: a commitment to using our influence and resources to help deliver the Wirral Plan: to drive economic growth, improve the local environment and support vulnerable people – while ensuring the best possible value for money while providing goods and services for the people of Wirral. However, the vast majority of allocated 'major development' sites have been focused to one area; Birkenhead and it is unlikely that any major development will be

<b>as precise as possible.</b>	<p>delivered in other areas such as the Green Belt or elsewhere besides the allocated sites and regeneration areas. As a result, the remaining areas within the borough have been neglected and therefore there is insufficient allocated development to stimulate local communities and improve social value through providing new facilities, opportunities and improved environments in other areas, besides Birkenhead. These areas will be unable to benefit from the proceeds of growth. Under this policy, the council focuses on regenerating the borough however, the allocated development will primarily only help to regenerate Birkenhead.</p> <p>3.2 With reference to the Wirral Compendium of Statistics 2021 it is evident that Birkenhead is not the only area suffering from deprivation. The demographics detail that other areas off the riverside such as Upton, Leasowe &amp; Moreton (east and west) and Eastham etc are also in need of economic stimulation and improved social wellbeing which is generated through major development.</p> <p>3.3 It is also understood that the HS1 - Wirral Local Plan Interim Health Impact Assessment 2019 acknowledges that there are key issues of deprivation, unemployment, crime, health issues and social housing need across the borough, not just Birkenhead. It is considered that it would be a failure to seek to address these issues in only one area though regeneration, housing and employment when the issues are prevalent across the wider borough.</p> <p>3.4 Overall, this policy has been proposed based on an issue in the borough; to improve and deliver social value from development. However, it is considered that the Council has failed on its own evidence base, which underpins this policy, as there is a district wide need to deliver and improve social value, which cannot be addressed in this localised way through focusing development to one specific area.</p> <p>3.5 Taking all of the above into account, it is also relevant to point out that the Council's approach is very unlikely even to benefit Birkenhead. The Council has already sought to "regenerate" this area during an extended period. During this time, which has coincided with a housing boom and low interest rates, regeneration has succeeded across many parts of England, Wales and Scotland, including in lower value locations. However, despite the Council's efforts, Birkenhead and Wirral Waters have failed to regenerate to any significant degree. It is clear that the Council's focus on the area has not worked, is not working and will not work, no matter the size of the PR budget.</p> <p>3.6 To continue to focus on a failed approach to regeneration, especially at a time when the housing boom and extended period of low interest rates is changing, appears at best, foolhardy. At worst, it fails to do anything for the people of Birkenhead – who have not expressed any desire to live in private flats at Wirral Waters. Rather, there is a very clear need for a wide range of housing types and tenures, including affordable family homes.</p> <p>3.7 To genuinely deliver social value, Wirral Council should be focusing on a District-wide Local Plan that provides for appropriate sustainable development – including integrated and effective regeneration – whereby a holistic and viable approach can deliver a range of benefits across the whole of the Borough. Only in this way can Wirral Council deliver social value in an effective manner. Instead, the draft Local Plan suggests that Wirral Council is simply driving forward a political agenda, regardless of social value.</p> <p>3.8 The policy is considered unsound, as it is not justified by the evidence produced and reasonable alternatives have not been fully considered such as those, which would have delivered social value across a much greater geography of the Wirral.</p>
<b>complies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal</b>	N/A

<p>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>N/A</p>
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised</b></p>	<p>1 The overall housing and employment strategy needs to be revisited to provide social value across the borough and not in only one area (which even then won't be effected under the current proposed policy).</p>

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

## LPSD-585

<b>Comment ID</b>	LPSD-585
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-584, 585, 942 &amp; 946-948-EM-Watson Form 4 of 29 2507_Redacted.pdf</a> <a href="#">LPSD-585, 942 &amp; 946-948-EM-Watson Form 5 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 3.1
<b>Title</b>	Housing Design Standards
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.1

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is</b>	WS 3.1 - Housing Design Standards 1.1 The supporting text for WS3.1 (paras. 3.37 - 3.39) provides some explanation for the policy and is quite brief. It explains the purpose of the Policy to ensure that homes should 'enable flexibility to change' and 'adapt as the occupiers needs change' stating that the Building for a Healthy Life Standard is 'important to designers of housing developments' (3.37).

**unsound. Please be as precise as possible.**

1.2 The desire for flexibility and adaptability are presumably met, as far as the Council are concerned, within policy WS3.1-A.4 via the application of building regulations for wheelchair adaptable and accessible dwellings.

1.3 Para 3.38 states the desire to meet the NDSS, which are applied by Policy WS3.1A(1).

1.4 Para 3.39 concerns water supply and is met through WS3.1-A(2).

1.5 We are concerned that policy WS3.1 is a poor oversimplification of the evidence prepared to inform the policy, failing to provide genuine flexibility or adaptability of homes. It also seeks to address the demand for adaptable homes entirely through new homes, even though the evidence suggests that: demand is mainly to adapt existing housing stock; the demand is largely made up of past undersupply which should not be met through new development; the actual demand for adaptable homes over the plan period is far fewer than required by the policy. This results in an unjustified position for the policy. We do not disagree with the purpose of the policy but the approach taken in the Wirral Local Plan (WLP) will only partially address the needs identified in the evidence base and does not even address the issues stated in the supporting text for the policy that it purports to resolve.

1.6 We also consider it predictable that some of the major developments identified in the draft LP may find it difficult to deliver against the policy due to the high proportion of apartments in lower value areas. To properly meet the demand for flexibility and the type of homes sought, as explained below, an alternative spatial strategy would be more likely to deliver successfully.

1.7 The SHMA highlights at para 5.25 – 5.26 that the average self-reported health position in Wirral is worse than the average for England (21.2% compared to 18.3%), and 11.3% of people report their daily lives are limited 'a lot' compared to 8.3% for England.

1.8 The SHMA goes into more detail on physical disabilities, and learning disabilities and autism, with para 5.32 citing a stakeholder report that shows (among other matters) a lack of housing options for people with learning difficulties, particularly for younger people; no housing planning from age 14; an issue with supported accommodation for those with learning difficulties, and a desire for new developments to be 'framed around the concept of residents having their own front door' (SHMA 5.32).

1.9 Para 5.33 states the number of people with a common mental health disorder is around 35,000 in 2020 and 'rising' to 34,000 by 2034. This needs correcting as either the figure is incorrect or the language is wrong.

1.10 Para 5.35 – 5.45 provides a reasonable amount of detail on wheelchair accessible standards

Para. 5.39 states that 1,236 households needed wheelchair adaptations in 2019 (0.8%) and a need over the plan period for an additional 242 adapted homes. This is also shown at Table 5.9. The additional need for 242 dwellings represents around 1.5% of the c.16,000 homes proposed. However, the SHMA calculates the entire existing (2019) and projected (2020-34) need to be met by new development (and not adapting existing dwellings). This results in a demand for 1,478 accessible households over the plan period, 2021-37.

1.11 The SHMA (2021) highlights a range of adaptations and improvements needed to homes (Table 5.5) which includes (for example) insulation, security, better heating, glazing, ventilation, downstairs WC, additional entrances, increasing the size of the property, adaptations to bathrooms and kitchens, improved access, wheelchair improvements, and rooms for carers. These are required for a range of reasons, such as varying illnesses, disability and mental health.

1.12 Given the evidence, it is questioned whether the application of building regulations correctly addresses the matters raised in the SHMA. It is not clear that Building Regulations in any way reflect the range of needs within the population or the types of adaptations sought. The application of building regulations, which are in any case controlled outside of planning, is a poor interpretation of the issues and aims stated at para.3.37 of the WLP. Applying Buildings Regulations to new development in relation to one narrow consideration (wheelchair accessibility) completely overlooks any other consideration for what adaptations may be needed to make a home more suitable for certain individuals.

1.13 The supporting text also refers to the Building for a Healthy Life Standards but this does not appear in the Policy. It is therefore unclear what an applicant is expected to do with this guidance, which is not adopted by the LPA.

1.14 Furthermore, the development strategy seeks to deliver higher density developments that will inevitably result in smaller dwellings with less outdoor private space, with which it would appear to be difficult to achieve the expectations of the Healthy Life Standards. Rather, Wirral Council's strategy of limiting housing choice to high density housing and flats on brownfield land in commercially unviable areas, without significant supporting infrastructure, including appropriate levels of new high quality public and private open space, is in direct conflict with the Healthy Life Standards. There is no evidence that any assessment of applying those Standards to the allocations has been carried out.

1.15 None of the above appears to have been considered when drafting the Local Plan. We acknowledge that the Healthy Life Standards are an update to the Buildings for Life Standards, which are endorsed by the NHS and Homes England. However, they are not national guidance and they are not the same as Building Regulations. The single mention of them in the supporting text with no reference in the policy suggests this is superfluous and will not be delivered except by those developers that have themselves adopted the Standard, and even in those cases it will be for the developer to consider the costs and other implications of applying them.

1.16 Looking at the Healthy Life Standards, the design toolkit covers the priorities for creating healthier communities including improved walking, cycling and public transport links, with reduced carbon emissions and better air quality. Master plans should be based on an assessment of local health and care needs, with the creation of integrated neighbourhoods based on 'tenure neutral' housing and well-defined public spaces. None of this is reflected in the design standards of WS3.1.

1.17 We question whether the need for adaptable dwellings has been calculated correctly. The evidence identifies a need from 2021 – 37 of 242 dwellings but Policy WS3.1 seeks at least 6% of homes to be wheelchair accessible. This has been calculated based on meeting the existing need, identified in 2019, for adapting existing dwellings. It is questioned whether this requirement has been given excessive attention in the Policy against a relatively low projected demand. No matter how well-meaning, this raises questions about how the evidence has been reflected in the draft policies and specifically how accurately they reflect the evidence.

1.18 In addition there is a jump from the 242 (or 1478) identified dwelling need in Table 5.9, to the assumptions in Table 5.10 for 6.3% (50 dwellings) per annum, which is an average of the four 'assumptions', only one of which is specific to Wirral (and is based on the unmet need in 2019 plus the need over the plan period).

1.19 It is not clear why new development should provide for the entire demand, nor whether any of this demand will actually be met through the adaptation of existing homes, as this is how much of it is currently delivered and would meet the aim of allowing people to remain in their existing homes (SHMA para.5.60). The detriment of applying an excessive demand for accessible or adaptable dwellings is the potential effect on viability and design limitations on projects. Adaptable dwellings are more expensive to deliver (for example, additional strengthening to accommodate a hoist, wider halls, stairs and larger bathrooms, bedrooms and kitchens to accommodate a wheelchair), and typically require slightly larger plots. An unnecessary requirement may reduce the available finance for other obligations such as affordable housing, health, education, or public realm improvements. Given that the evidence already shows that some housing allocations in the draft Local Plan are unviable, unnecessary burdens such as this should be scrutinised in detail to ensure they are necessary and are not harming the success of the Plan. Such an exercise does not appear to have been carried out.

1.20 Policy WS3.1 seeks to apply NDSS as a minimum. There is nothing unique in this and we support the application of the Standards. It will not, however, result in flexibility for occupiers or a marked improvement in the quality of buildings, especially at the densities required by the Plan which will inevitably lead to apartments in many areas. The application of NDSS simply provides a baseline minimum. A strategy that allocated a greater number of unconstrained and more viable sites would be more likely in our view to deliver over and above the NDSS standards.

1.21 In summary, we consider that WS3.1 must be subjected to an assessment of the evidence on which it is based. This will establish whether it is justified and effective in delivering flexible, accessible dwellings, and whether or not a disproportionate approach has been taken to one aspect of housing design (wheelchair accessibility) over and above those that would better meet the needs of residents. Although the evidence in the SHMA considers mental health, the desire for a front door, accommodation for carers, security and technology, shared spaces, consideration of younger people with needs, shared supported living, hearing impairments, visual impairments, etc, this is boiled down to a rather bland housing design policy that simply applies building regulations for wheelchair users. This is a woefully simplistic reduction of the needs of individuals and poorly reflects the evidence gathered. Further, the numerical demand for such flexibility in new build homes does not appear to be born out in the evidence, where adaptation of existing homes is more typical while a significant backlog of need is being fully addressed through new build, with the associated financial implications on new developments. Where viability is already an issue, the requirement is poorly conceived and does not represent a justified or effective solution.

5.21 In summarising the Housing Policies under WS3 it appears to be a consistent theme within the draft Local Plan that a relatively crude approach has been taken towards the drafting of policies – resulting in policies which have only a cursory, if any, relationship with the supporting text and the evidence prepared. They lack detail and fail completely to withstand scrutiny in respect of delivery and outcomes that would be achieved when decision makers attempt to apply them.

5.22 As presented in this draft Local Plan, the required homes, their design, character, tenure and supporting facilities offered by their location will simply fail against the economic, social and environmental aims of the plan and the improvements sought. The draft Local Plan is not sound.

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

**Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.**

**Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.**

**If you wish to make a separate representation, relating to legal**

No comment

<p>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>No comment</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</b></p>	<p><b>WS3.1 – Housing Design Standards:</b></p> <ol style="list-style-type: none"> <li>1 Based on the evidence provided, the needs identified in Table 5.5 of the SHMA (2021) could be included in the Policy, if the Plan genuinely seeks to meet those needs within new housing developments to provide flexibility. The practical implications and requirements will need to be assessed.</li> <li>2 At WS3.1-A(4) the requirement for all new dwellings to meet Building Regulations M4(2) as a particular issue in The Wirral has not been proven by evidence and should be removed. Building Regulations are applied nationally and do not need repeating or exceeding unless specific circumstances are identified to justify this.</li> <li>3 At WS3.1-A(4) the allowance not to provide all dwellings as M4(2) compliant if 'site specific factors' indicate otherwise should be removed. If M4(2) applies to all dwellings, this situation should be treated as a departure from the plan and not as according with the Plan.</li> <li>4 At WS3.1-A(4) and 4(i)(ii), the allowance for dwellings not to be M4(2) compliant if at least 6% of dwellings are either M4(3)(2)(a) or (b) respectively should be amended to 1.5% to reflect the evidence prepared.</li> <li>5 The Building for a Healthy Life Standards should be included in the Policy if the Council genuinely seeks to apply these criteria. Otherwise, reference to it in the supporting text should be removed. An assessment of the impacts of such criteria on new developments will need to be assessed.</li> </ol> <p><b>Should the Inspector agree that the above changes should be made to make the policy Sound, an assessment of the impact of these requirements should be carried out. We anticipate that some major allocations will be less viable and deliver fewer homes if the aims of the Plan are applied accurately. The Plan will therefore likely remain unsound with the above amendments.</b></p>

wording of any policy or text. Please be as precise as possible.	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>The matters raised by Leverhulme are a complex array of interrelated planning issues that identify failings in the strategy and the detail of the Plan, its preparation, drafting and effectiveness. These are matters of interpretation and understanding of the evidence produced by the Council, and of evidence prepared to assist the Council at earlier stages of plan making.</p> <p>It will require the consideration and cross-examination of evidence and the range of representations made in order to assist the Inspector in coming to a view on the soundness of the policies with particular regard to their compliance with national planning policies, their effectiveness and justification.</p> <p>To assist the Inspector with the examination we consider it essential that Leverhulme attend any Hearing Session on Housing.</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-586
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 5
<b>Title</b>	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS5 – Strategy for Green and Blue Infrastructure, Open Space, Biodiversity and Landscape protection 1.1 We are concerned that, as drafted, the Wirral Local Plan will allow major development sites to be proposed which would not provide for the appropriate delivery of Green and Blue Infrastructure, Open Space and Biodiversity/Landscape Protection. The disturbance on Internationally Designated European Sites through the allocation of major development sites adjacent to these sites will have a significant impact on the habitats of protected bird species, which is discussed in greater depth in Paragraph 1.42. The strategy of the HRA is attempting

<p><b>as precise as possible.</b></p>	<p>to protect Policy WS5 by changing the behaviour of residents in the Wirral, although this will be an extremely challenging endeavour and rather an easier, more effective approach would be to locate the alternative provision of greenspace offsite to accommodate and enhance Wirral's Green and Blue Infrastructure, Open Space, Biodiversity and Landscape protection through the significant improvements proposed in the Leverhulme Vision whilst protecting the environment. The proposed strategy will therefore fail in protecting the remarkable Biodiversity/Landscape which exists throughout the Wirral. The strategy will fail to improve Open Space provision and will not enhance Green and Blue Infrastructure. This is a serious failing of the draft Local Plan.</p> <p>1.2 The expectations set out within the policies are very open-ended and as such, are extremely unlikely to effectively and successfully provide for protection or enhancement and consequently, the main objectives of Policy WS5 will not be met.</p> <p>1.3 Crucially, as this detailed representation goes on to demonstrate, the draft Local Plan will potentially put at risk Wirral's Biodiversity and Landscape. In this way and by not providing adequate Open Space or enhancing Green and Blue Infrastructure, the policy contradicts itself by going against the principle set out in WS5.1 where the policy states that 'the loss of green and blue infrastructure is unacceptable and would only be considered in exceptional circumstances</p> <p>1.4 Further to the above, it is noted that the draft Local Plan is poorly presented. Rather than set out clear policies in line with national guidance and advice, the draft Local Plan sets out the aims of each policy, then states the policies, then tries to explain how these may be implemented, in a jumbled and overly-complex manner. It would be more helpful to include all text that relates to a policy in one place, thus assisting a decision maker in coming to a decision on any particular proposal, rather than the jumbled and unduly complex process demanded by the draft Local Plan's poor layout. The draft Local Plan conflicts with Paragraph 16 of the NPPF in this respect.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>No comment</p>
<p><b>If you wish to make a separate representation,</b></p>	<p>For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.</p>

relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<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>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</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>Yes, I 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><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</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-587
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-587-EM-Watson Form 7 of 29 2507_Redacted.pdf</a> <a href="#">LPSD-587-EM-Watson Attach 1 of 7 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 5.8
<b>Title</b>	Landscape Character
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.8

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is</b>	Please see attached Landscape Representation titled 'Wirral LLD Review 2020 – Landscape Representation' (ref. M2738-LPREP-07.22-V2) prepared by Barnes Walker on behalf of Leverhulme for our comments in relation to policy WS 5.8 and, more specifically, the Areas of Special Landscape Value (ASLVs) that have been identified on the Policies Map of the Local Plan.

<b>unsound. Please be as precise as possible.</b>	
<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>	No comment
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	No comment
<b>Please set out the modification(s) you consider necessary</b>	We do not believe the proposed extension contained within the Thornton Hough Estates Candidate Local Landscape Designation qualifies as a 'valued' landscape in the context of the NPPF, or warrants inclusion within the LLD going forward. This extension should therefore be omitted from the Local Plan.

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

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

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

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

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

<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed extension to the Thornton Hough LLD affects Leverhulme land. As one of the principal rural landowners impacted by the draft landscape designation, Leverhulme wishes to be heard.</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-588
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-588-EM-Watson Form 8 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 6.1
<b>Title</b>	Placemaking Principles
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 6.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS 6.1 – Placemaking Principles 4.1 The above policy requires that development proposals must demonstrate that a number of placemaking principles listed within the policy have been adhered to in a manner which is commensurate with the scale and nature of development and which responds well to the local context and character of the area.

**as precise as possible.**

- 4.2 Part 1 of this policy requires development proposals to promote healthy and active lifestyles. However, there is no evidence to suggest that the proposed allocated housing sites will be able to do so.
- 4.3 For example, the Wirral Waters sites are very closely located to a range of industrial and commercial uses, which generate significant noise levels and as a result have the significant potential to affect future residents' health and lifestyles. The 'HS1 - Wirral Local Plan Interim Health Impact Assessment 2019' identifies that Wirral Waters is close to the industrial areas of the port, and there may be health impacts arising from proximity to heavy traffic in the vicinity of the ferry terminal, or from industrial processes on the docks. Indeed, some forms of risk mitigation are identified within the assessment, but crucially, these have not been tested and cannot therefore be regarded as potential solutions, or costed solutions.
- 4.4 The 'ECC16.2 - Wirral Environmental Sensitivity Study Map Appendix 2021' shows that the roads and areas surrounding the Wirral Waters sites have some of the highest day time noise exposure in the whole of the Borough - reaching 70-75 decibels in some areas. Further, the night-time noise exposure has levels of between 60-70 decibels around these sites, which amount to the highest noise levels in the Borough in the evening; a time when prospective residents could reasonably anticipate peace and quiet and the opportunity for sleep.
- 4.5 However, the above can be no surprise given the proximity of the sites to a working dock and surrounding heavy and light industrial uses and all of the activities and associated noise and disturbance.
- 4.6 Despite the serious potential for significant harm to residential amenity and the equal prospect of potential residents complaining about legitimate and established noise creating commercial uses, there has been absolutely no evidence provided by Wirral Council in respect of how these noise impacts would be sufficiently mitigated or even if they are capable of being mitigated to an appropriate extent in a viable and deliverable manner.
- 4.7 Further, no substantive evidence has been produced to demonstrate that the noise levels will not affect the health and lifestyles of future residents.
- 4.8 Noise mitigation measures in these locations may simply not be achievable given the limited land space and dense built form of the area and there is nothing to demonstrate that this is not the case. All noise mitigation measures, which may be needed to prevent noise pollution, will incur additional costs. This will in turn, further impact on the viability of sites already demonstrated to be unviable. It is a concern that when the allocated housing sites are brought forward to application that they could be in conflict with this part of the policy. This will serve to delay or add to the long list of matters that will prevent the delivery of the sites, and/or that the draft allocations are inappropriately misallocated.
- 4.9 Taking all of the above into account, it is clear that the policy is unrealistic and not achievable.
- 4.10 In addition, the policy is therefore not compliant with Paragraph 92 of the NPPF whereby planning policies should enable and support healthy lifestyles.
- 4.11 Part 7 of this policy states that development should conserve and positively enhance trees, landscapes, habitats and biodiversity and provide appropriate green and blue infrastructure including landscaping and amenity space including giving consideration to the use of communal space for growing food. However, the allocated sites within the local plan for residential and employment in particular, seek to replace a number of sites, some of which include existing areas of green space, vegetation and biodiversity-rich land; and to do so without an identified and appropriate form of conservation or enhancement identified.
- 4.12 For example housing allocation RES-SA4.7 is proposed to replace an existing woodland/shrubland and will not ensure the loss of biodiversity and green space at this site. Further, there is no evidence to suggest that this loss of biodiversity and green space will be mitigated or conserved. Given that all of the proposed residential sites are located in urban areas, it is considered that there is insufficient space to be able to provide the necessary biodiversity enhancements and green/blue infrastructure required under this policy.
- 4.13 This is especially the case where sites already contain green space, which will need replacing. For example, Policy WP 4.2 relates to RES-SA4.7 for which there is no specific requirement or figure for amenity space, green space, biodiversity or planting provision. There are no draft masterplans or site layouts for the residential and commercial sites to demonstrate that an appropriate level of green space, vegetation and biodiversity enhancement can be achieved. Without evidence, there is nothing to demonstrate that this can be achieved on the sites allocated for dense urban development.
- 4.14 Given the above, it is apparent that there is insufficient evidence to demonstrate that the requirements of Policy WS 6.1 can be met by all of the proposed allocations.
- 4.15 It is also a concern that the 'ECC3.1 - Merseyside Environmental Advisory Service RAG Screening Housing Allocations 2021' document refers to site RES-SA4.7 as comprising industrial development within the ecology tab, however this is not the case as the site is predominantly woodland/shrubland.
- 4.16 However, the site is described in the summary as containing part of an existing waste management facility, which is again different to the description provided in the ecology tab. It is evident that there are inaccuracies within this document.
- 4.17 Land and ecology issues need to be addressed through the planning process. The overall SAG rating of the site is red. Evidence must be provided to demonstrate that the site can be delivered in terms of ecological and waste impact before an application is submitted. If there are issues found at application stage this would inevitably lead to delays and could prevent sites being delivered. It should be noted that this is also only one example and we are therefore concerned that given the above, it may well be the case that other proposed sites will have the same inaccuracies and will not be able to adhere to this part of the policy.
- 4.18 As this part of the policy cannot be adhered to, the policy is also therefore not compliant with Paragraph 174 of the NPPF whereby planning policies should contribute to and enhance the natural and local environment.
- 4.19 Although Policy WS 6.1 is a general policy seeking to set out placemaking principles, it is essential that it works together with the allocated sites in the draft Local Plan in order for the policy to be sound. Based on the above however, it is evident that the policy is unsound, as the requirements simply cannot be met by sites that the draft Local Plan seeks to allocate. In effect, future development proposals for allocated residential sites cannot comply with the draft Local Plan's Placemaking policy, which is entirely inappropriate.

Objection: Not effective; not consistent with national policy

4.20 Policy WS 6 of the SDWLP is intended to encompass "The characteristics of successful places..." (para 3.145) and therefore the assumption is that it applies to all scales and types of development (from residential extensions/infill to regeneration areas). As written, it is not robustly backed by evidence, or appropriately linked to national policy and guidance, or deliverable.

4.21 Critically, the opportunity for Policy WS 6 to set out Borough wide placemaking principles is completely missed. As written, the Policy covers similar ground and level of detail to Policy WS7 Design Principles. By jumping to the detail, it fails to provide the strategic spatial and placemaking rationale necessary to underpin the Key Diagram and Policies Map, or to provide the context for Policy 6.2 Gateway Areas and Policy 6.3 Masterplan Areas.

4.22 The NPPF paragraph 127 states: "Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with

local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics."

4.23 Policy WS6 is not supported by a Borough wide characterisation study. The policy is generic and it does not respond to Wirral's defining characteristics or set out a clear design vision for the Borough.

4.24 Policy WS6 fails to reference the relevant paragraphs of the NPPF, the National Model Design Code and National Design Guide or Building for a Healthy Life, nor does it make clear how National Guidance will be applied at the local level through local design guidance.

4.25 Not only does it fail to reference national policy and guidance, it also fails to make any reference to supporting and related policies in the SDWLP.

Policy WS 6.1 fails to provide an appropriate placemaking policy to underpin the Policy Map. As written, it is woolly and generic, and adds nothing of substance to national policy and guidance. It should be rewritten to address strategic placemaking principles which are specific to Wirral, with detailed design principles covered under WS7.

#### WS 6.1 Placemaking Principles

A. Development proposals, must demonstrate that the following placemaking principles have been adhered to in a manner which is commensurate with the scale and nature of development and which responds well to the local context and character of the area.

Developments are required to:

1. provide high quality and well designed development to promote healthy and active lifestyles, vibrant communities, and contribute positively to the efficient revitalisation and regeneration of existing neighbourhoods"

4.26 Comment: It is unclear in the absence of any detail, how WBC intends to define well designed development, or what is meant by efficient revitalisation and regeneration. The latter statement is inappropriate as a blanket policy.

2. enhance the key features, visual amenity, character, and distinctiveness of existing settlements;

4.27 Comment: this statement is not consistent with the NPPF Para 130 "Planning policies and decisions should ensure that developments: ... c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)". Furthermore, it assumes that all development during the Plan period will be of sufficient scale to have a significant impact beyond the site boundary, which is simply not supported by any substantive evidence.

3. ensure permeability within the site through the provision of a choice of safe, direct and attractive routes, and provide for positive integration with adjacent communities and services, and public realm, and where relevant and safe to do so, waterfront access;

4.28 Comment: poorly worded and overlaps with item 5. What is meant by services in this context – utilities or community facilities? The Policy fails to mention the importance of creating links to open spaces, ProW network or the rural landscape of Wirral. By encouraging waterfront access, it has the potential to increase recreational pressure on sensitive coastal SPA/RAMSAR sites, a significant matter which is not addressed and which amounts to a serious omission.

4. contribute to and where relevant provide for the strategic provision of facilities for open space and recreation, shops, schools and health services;

4.29 Comment: poorly worded and does not reference WS 10 Infrastructure Delivery and Appendix 10 'Developer Contributions'.

5. provide high quality, sustainable connections and access internally and externally to the site, with priority given to walking, cycling and public transport within the design, ensuring that people of different ages, abilities and characteristics can move around internally and externally without difficulty over the lifetime of the development;

4.30 Comment: poorly worded and directly overlaps with item 3. The requirement to ensure "that people of different ages, abilities and characteristics can move around internally and externally without difficulty over the lifetime of the development" is undeliverable and impossible to demonstrate or manage. The Policy is undeliverable.

6. be flood resilient throughout its lifetime and incorporate sustainable drainage and water management systems and adaptability to address climate change;

4.31 Comment: it is not possible for development proposals to demonstrate flood resilience throughout its lifetime and there is no substantive evidence to the contrary. The Policy is undeliverable.

	<p>7. conserve and positively enhance trees, landscapes, habitats and biodiversity and provide appropriate green and blue infrastructure including landscaping and amenity space including giving consideration to the use of communal space for growing food;</p> <p>4.32 Comment: this is already covered in detail in Policy section WS 5 and yet this is not referenced.</p> <p>8. conserve, sustain and enhance the character, integrity and setting of the historic environment, including designated and non designated heritage assets;</p> <p>4.33 Comment: unnecessarily restrictive. Policy should be consistent with paras 189-208 of the NPPF.</p> <p>9. create natural surveillance and prevent the opportunity for crime and anti-social behaviour in a way that enhances community cohesion and the character of the area;</p> <p>4.34 Comment: Poorly written and muddled. There is no substantive evidence to demonstrate that this can be achieved in a viable and deliverable manner.</p> <p>10. deliver appropriate public art in the public realm; and</p> <p>4.35 Comment: what is meant by appropriate public art? No further guidance is given. This is a vague Policy, with no evidence of deliverability.</p> <p>11. provide for the long term management of the shared public realm and community space throughout the lifetime of the development proposed.</p> <p>4.36 Comment: it is unrealistic for a development proposal to provide for the long-term management beyond the provision of a management strategy including for adoption where relevant. This is especially the case given that the majority of allocated housing land is, by Wirral Council's own admission, unviable. How will the resources to provide for the long-term management of the shared public realm magically appear?</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>	N/A
<p><b>If you wish to make a separate representation,</b></p>	N/A

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><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>More evidence needs to be provided to demonstrate that the allocated sites can adhere to part 1 and 7 of this policy. If the policy cannot be adhered to for the councils' allocated sites the sites need to be adjusted so the policy can be.</p> <p>There is also a lack of clarity and evidence behind the criterion with the policy, which should be revisited.</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>Yes, I 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>Leverhulme has an interest and stake in the development and implementation of the policy and wishes to be heard in its development.</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-589
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-589-EM-Watson Form 9 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 6.2
<b>Title</b>	Gateway Areas
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 6.2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is	Policy WS 6.2 Gateway Areas Objection: Lack of justification

<p><b>unsound. Please be as precise as possible.</b></p>	<p>8.1 Policy states: "B. Major development within the gateways and within 100m of the gateways shown on the Policies Map, will only be permitted where its design is of a high quality, appropriate to the location and context of the gateway. New landmark buildings of exceptional quality will be supported in these locations where they help to define or emphasise the significance of the gateway."</p> <p>8.2 The rationale for the designation of the Gateway Areas is not set out in the supporting text to this policy or elsewhere in the SDWLP. Potential "Gateways to Wirral" outside Birkenhead do not appear to have been considered, reflecting the lack of Borough-wide placemaking vision as discussed in relation to Policy WS 6.1.</p> <p>8.3 The requirement for high quality development under this policy is unnecessary, as it is covered by WS 6.1 and applicable across the Borough.</p> <p>8.4 The policy does not provide clarity on what is meant by either landmark buildings, or exceptional quality.</p> <p>8.5 The Policy is unsound due to a lack of justification and consideration of reasonable alternatives.</p>
<p><b>omplies with the Duty to co-operate</b>  *        Yes  *        No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	N/A
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</b></p>	N/A

<p><b>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 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>Further clarity and justification behind the policy is required.</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</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSP-590

<b>Comment ID</b>	LPSP-590
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSP-590, 1042 &amp; 1046-EM-Watson Form 10 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 6.3
<b>Title</b>	Masterplan Areas
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 6.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS 6.3 – Masterplan Areas  2.1 Paragraph 3.160 states that Masterplans will be required to either be produced and submitted as part of an Outline planning application to be approved by the Council, or as a Supplementary Planning Document to be adopted by the Council. It is considered that such an approach is not proportionate for all Masterplans and certainly not for all of the allocated sites. Although this policy enables a greater degree of flexibility for the developer/landowner to decide how the Masterplan is adopted, it could potentially delay the delivery of the Masterplan

<p><b>as precise as possible.</b></p>	<p>sites. It is understood and accepted that a quicker approach to delivering a Masterplan would be through an outline application submission as opposed to creating an SPD, however an SPD would not be suitable for some of the smaller Masterplan sites, as they are less complex. It is considered that uniquely, each site should be allocated a specific process under this policy for how the Masterplan should be adopted to prevent smaller sites delivering a masterplan through an SPD or a larger site trying to agree a Masterplan through an outline application; both of which are disproportionate processes. This will ensure all the Masterplan sites agree Masterplans through the most efficient process and are delivered within an acceptable timescale and not delayed by the Masterplan adoption process.</p> <p>2.2 It is also considered that the allocation of some of the smaller sites as Masterplan areas is disproportionate and would unnecessarily delay the delivery of these sites. It is believed that there are alternative processes, which are more suitable and efficient to ensure some of the smaller sites are delivered sufficiently to a high standard than through submitting and agreeing Masterplans. In particular sites: MPA-RA2.1, MPA-RA2.2 and MPA-RA11.1, are considered of an insignificant scale to require a Masterplan as the same control and detail can be addressed through the planning application process i.e. outline planning applications and agreeing parameters plans. These sites could alternatively be allocated for their intended specific uses instead which would prevent Masterplans being required and speed up the delivery of the sites. It is anticipated that the local authority must acknowledge that these small scale sites need Masterplans due to constraints with the site and therefore there is a question of whether these smaller sites can be delivered.</p> <p>2.3 It is also noted that the Local Development Scheme for the Wirral 2022 does not identify the intention to prepare such SPDs or Masterplans and clearly, because of time and resource constraints, these are not being considered as part of the emerging Local Plan. It is considered that if the local authority endorsed the procedure of preparing and adopting SPDs and Masterplans concurrently with the emerging Local Plan this would speed up the delivery of the sites when the plan is adopted, particularly as SPDs may also necessitate the preparation of a Strategic Environmental Assessment.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	N/A
<p><b>If you wish to make a separate representation,</b></p>	N/A

relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<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>Each masterplan area should have processes for Masterplan adoption through either outline application or an SPD. Some of the smaller sites should be removed from the Masterplan allocation.</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>Yes, I 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>Leverhulme has an interest and stake in the development and implementation of the policy and wishes to be heard in its development.</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-591
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-591-EM-Watson Form 11 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<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>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Policy WS 7.1 – Principles of Design Objection: Lack of justification

**unsound. Please be as precise as possible.**

7.1 Policy WS 7.1 covers similar ground to WS 6.1. It is poorly written, jumping from strategic and site layout considerations to detailed design issues. It relates poorly to the structure and content of national policy and guidance include para 130 of the NPPF and the National Design Guide. Many of the statements overlap with, and in some cases water down, commitments made in Policies elsewhere in the Plan (which are not referred to). It is not backed by an appropriate evidence base such as a Borough wide characterisation study or design guide.

7.2 Detailed comments on the policy are provided below:

"Policy WS 7.1 Design Principles

A. Development proposals will be required to demonstrate that the development has been planned so that its function and appearance will enhance the character of the area and provide a high standard of amenity for existing and future occupiers, having regard to:

Policy WS 8 Strategy for Sustainable Construction, Renewable and Low Carbon Energy; published advice in the Council's Supplementary Planning Documents and Design Codes; and the National Design Guide or any superseding guidance.

7.3 Comment: NPPF Para 130 provides a more appropriate basis for an overarching policy.

B. Development proposals should in particular demonstrate how they have, where appropriate, addressed the following design principles and requirements:

1. be inclusive, enabling use by all, irrespective of their physical ability and other characteristics such as, but not limited to, age and gender;
2. be visually attractive and positively enhance the character, appearance and setting of the surrounding area;
3. ensure that the density, height, scale, massing and siting is appropriate in context;

7.4 Comment: clauses 2 and 3 are not consistent with the NPPF Para 130 "Planning policies and decisions should ensure that developments: ... c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)".

4. incorporate high quality materials which complement and enhance surrounding areas and adjacent development;

7.5 Comment: the SDWLP provides no detail on appropriate materials. There is no Borough characterisation study or commitment to a Borough wide Design Code or Design Guide in the SDWLP.

5. provide a high standard of internal and external amenity that creates comfortable places to live, work and visit - addressing thermal and acoustic comfort;

7.6 Comment: lack of justification or detail.

6. use active design principles to make active travel and physical activity an easy, practical and attractive choice;

7.7 Comment: supporting text includes the reference to Sport England Active Design guidance. This should be included in the policy.

7. contribute to the creation of adaptable, safe and accessible places with active frontages;

7.8 Comment: poorly written, compounds various urban design principles.

8. provide for the protection and enhancement of existing healthy trees and hedgerows of visual and wildlife value;

9. provide or protect high quality landscaping including unifying features such as gates, piers, walls, boundary treatment between public and private areas;

7.9 Comment: relates poorly to Policies under WS5 Green and Blue Infrastructure.

10. ensure that extensions to existing buildings will match or complement the design and materials of the existing buildings;

7.10 Comment: unnecessary – dealt with under WS 5 Residential Extensions

11. provide underground service ducts to enable future connections for open source cable, broadband and electronic communications, electric car charging, waste collection and district heating networks, where relevant, and minimise the need for external apparatus;

7.11 Comment: inappropriate as a blanket policy which is relevant to all scales and types of development.

12. provide an appropriate standard of sustainable transport and highway access, including for emergency services, delivery and waste collection vehicles;

7.12 Comment: Lacks reference to WS 9.2 Accessibility and Sustainable Transport.

13. provide integrated waste storage and on site provision for collection, recycling and management of waste likely to be generated by the development;

7.13 Comment: inappropriate as a blanket policy which is relevant to all scales and types of development.

14. provide level access and appropriate internal and external space for lifetime needs;

7.14 Comment: vague requirement. Residential accessibility is dealt with under Policy WS 3.1.

15. address any issues related to public health and where relevant submit an appropriate Health Impact Assessment;

7.15 Comment: vague – what does 'any issues related to public health' mean?

	<p>16. in flatted development to provide for communal space for social purposes and for the storage of belongings where appropriate.</p> <p>7.16 Comment: vague and undeliverable.</p> <p>7.17 The Policy is unsound due to a lack of justification and consistency with national policy.</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>	N/A
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	N/A
<p><b>Please set out the modification(s) you consider necessary</b></p>	<p>The policy needs to be rewritten with greater consideration to other Local Plan policies and the evidence, which underpins it.</p>

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

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

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

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

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

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

Leverhulme has an interest and stake in the development and implementation of the policy and wishes to be heard in its development.

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

<b>Comment ID</b>	LPSD-592
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-592-EM-Watson Form 12 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 7.2
<b>Title</b>	Privacy and Amenity
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS 7.2 – Privacy and Amenity 6.1 The above policy requires that development proposals must take account of the privacy and amenity of the development's users and neighbours based on a number of criterion. 6.2 Part 1 of this policy requires similar demonstrations as Policy WS 7.3 – Agent of Change and it is therefore considered that both are not necessary as they ultimately ensure the same outcome.

**as precise as possible.**

6.3 Based on some of the allocated residential, employment and masterplanned areas it is understood that there is no evidence that the council have applied this policy and demonstrated that the proposed allocated sites will be harmonious with neighbouring uses. All the proposed allocations are urban based with a large proportion of residential sites allocated on the working dock where there are an array of existing industrial uses. The conflict from noise, highways and pollution is inevitable on some of these sites from surrounding uses, which could impede on the delivery of development yet they have been allocated for residential use and are not compliant with this policy.

6.4 For example, there is no evidence to justify that the existing surrounding Class-E uses is compatible with the proposed housing allocation RES-RA2 (Land East of Birkenhead Road). As a result, given the proximity of some of the residential sites to industrial uses there is a likelihood that there could be conflict with this part of the policy when proposals are submitted which will compromise the delivery of the development.

6.5 Part 5 of this policy requires that development proposals adequately address issues of vibration, noise, dust, fumes, odour, light pollution, air quality and waste collection. However, there is no evidence to suggest that the proposed allocated housing sites will be able to do so.

6.6 For example, the Wirral Waters sites are very closely located to a range of heavy and light industrial uses and commercial operations, including working industrial docks, major HGV distribution points, household waste disposal, commercial waste disposal, recycling and major landfill sites. All of these generate significant noise levels and noise pollution, light pollution, dust, smells and air pollution.

6.7 Residential development will not sit comfortably alongside these uses and major investment will be required to even begin to create living environments that can meet the aspirations of the Policy. The allocations in these areas are already commercially unviable and there is no substantive evidence to demonstrate that further public subsidies, on top of those already required, will be available to begin to address these fundamental issues.

6.8 The 'HS1 - Wirral Local Plan Interim Health Impact Assessment 2019' identifies that Wirral Waters is close to the industrial areas of the port, and there may be health impacts arising from proximity to heavy traffic in the vicinity of the ferry terminal, or from industrial processes on the docks. Although some forms of risk mitigation are identified within the assessment, these have not been tested and they are therefore only potential solutions.

6.9 Further, these have not been costed, despite recognition of the health impacts by Wirral Council itself. Any additional costs will simply add to the significant viability issues identified in representations elsewhere.

6.10 The 'ECC16.2 - Wirral Environmental Sensitivity Study Map Appendix 2021' shows that the roads and areas surrounding the Wirral Waters sites have some of the highest day time noise exposure in the Borough reaching 70-75 decibels in some areas. Again, the night time noise exposure still has levels between 60-70 decibels around these sites which is the highest in the Borough at this time. This is however no surprise given the proximity of the sites to the working dock and the nature and immediate proximity of the surrounding heavy and light industrial uses and major commercial operations.

6.11 There has been no evidence provided by the local authority that these noise impacts can be sufficiently mitigated or that the noise levels will not affect the health and lifestyles of future residents. This is a fundamental flaw in the draft Local Plan.

6.12 Noise mitigation measures in these locations may also not be achievable given the limited land space and dense built form of the area and there is no evidence to the contrary.

6.13 All noise mitigation measures, which may be needed to prevent noise pollution, will incur additional costs affecting the viability of these sites. It is a concern that when the allocated housing sites are brought forward to application that they are highly likely to be in direct conflict with this part of the policy, which will delay or prevent the delivery of the sites. The absence of appropriate evidence, testing and costing renders this policy unrealistic. This policy is not achievable or deliverable.

6.14 The 'ECC18 - Wirral Local Plan Air Quality Study 2021' details that the screening identified a number of locations with a risk of exceedance of the annual mean and World Health Organisation NO2 objective including Dock Road, central Birkenhead and the A59 Kingsway. These are the prominent areas where large housing allocations are proposed and the study advises that monitoring and further assessments are required.

6.15 In addition as per 'HS1 - Wirral Local Plan Interim Health Impact Assessment 2019' the Wirral's greatest cause of death is respiratory causes and therefore air pollution should be taken with a great caution. This is obviously not a matter to simply ignore or to take lightly. If Wirral Council is serious about proper regeneration, these matters need to be addressed, fully, from the outset. The draft Local Plan fails to do so.

6.16 It should also be noted that there the air quality levels in Wirral significantly improve elsewhere away from the dock and central Birkenhead. It is considered that the Leverhulme Proposal, which allocates housing away from industrial-focused areas and towards areas where housing is more appropriate, should be given proper consideration. Not least given the seriousness of any matters relating to the air that we breathe and the ability for people to choose to live in places where they can look to enjoy the benefits of a healthy lifestyle.

6.17 Likewise, the noise concerns, it is a concern that when the allocated housing sites are brought forward to application that they will be in conflict with this part of the policy, which will, again, delay or prevent the delivery of the sites. There is no evidence to suggest that when the applications come forward for these housing sites that they will be able to sufficiently demonstrate they are safe locations for residential use. This is a serious flaw in the draft Local Plan and we suggest that there is no viable and deliverable remedy other than for plan-makers to take a more appropriate approach to planning for sustainable development across the Borough – as is the whole purpose of a Local Plan.

6.18 Although Policy WS 7.2 is a general policy for privacy and amenity, it must also be compliant with the allocated sites in the Local Plan for this policy to be sound. Based on the above however, it is evident that the policy is unsound. There is no evidence that the proposed housing sites can be satisfactorily delivered in accordance with this policy.

6.19 Overall, the council's strategy to housing must be questioned given the seriousness of the health issues likely to arise from Wirral Council's highly inappropriate approach to housing allocations. The draft Local Plan should not progress, or it runs the very real risk of generating unhealthy living environments at the same time as taking away choice.

<b>omplies with the Duty to co-operate</b> *     Yes *     No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	More evidence needs to be provided to demonstrate the allocated sites within the plan can adhere to part 5 of this policy. If the policy cannot be adhered to for, the councils allocated sites, the housing sites to be adjusted so they can. Alternatively, the housing strategy needs to be reconsidered so that this policy can be compliant. Part 1 of the policy or Policy WS7.3 needs to be altered or removed as they have the same impact.

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Leverhulme has an interest and stake in the development and implementation of the policy and wishes to be heard in its development.</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-593
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-593-EM-Watson Form 13 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 7.3
<b>Title</b>	Agent of Change
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS 7.3 - Agent of Change 5.1 Please note that there are two grammar errors at Paragraph 3.167 of the Draft Submission Local Plan. 5.2 Overall, whilst the aims of the policy are respected it is considered that the policy is imprecise. There is one small paragraph of additional text at 3.167 to support and justify the policy, which gives no additional help to an applicant or officer applying the policy accurately. It is considered that the policy itself does not give clarity on the extent of what needs to be demonstrated

<p><b>as precise as possible.</b></p>	<p>and more precision is required regarding the extent of the 'establish activities/uses' which need to be assessed and considered. It is believed that this could frustrate the development process if the intention of the policy is continually misinterpreted and not sufficiently demonstrated.</p> <p>5.3 It is also believed that there is no evidence to support this policy. Based on our understanding there is no clear conflict evidenced within the Local Plan evidence base, which justifies that the proposed policy is needed to prevent new development affecting the growth and/or viability of established uses without unreasonable restrictions being placed upon them. It is also considered that the policy is unnecessary due to the number of other proposed policies, which prevent proposed developments affecting and having conflict with surrounding uses e.g. Policy WS 7.1 – Design Principles, WS 7.2 Privacy and Amenity and Policy WD 14. It is considered that these policies seek to establish the same principles, which are required under Policy WS 7.3 – Agent of Change.</p> <p>5.4 Based on some of the allocated residential, employment and masterplanned areas it is understood that there is no evidence that the council have applied this policy and demonstrated that the proposed allocated sites will not have a detrimental impact on the growth of adjacent uses. All the proposed allocations are urban based with a large proportion of residential sites allocated on the working dock where there are an array of existing industrial uses. The conflict from noise, highways and pollution is inevitable on some of these sites from surrounding uses, which could impede on the delivery of development yet they have been allocated for residential use and are not compliant with Policy WS 7.3. For example, there is no evidence to justify that the existing surrounding Class-E uses of the proposed housing allocation RES-RA2 (Land East of Birkenhead Road) will not be impacted by the housing allocation, if they intended to grow. Paragraph 4.10, in relation to RES-RA2, states that residential development will not impact on the normal operation of port related operations or businesses, however we consider that this assessment should have been made and proven prior to the site being allocated.</p> <p>5.5 As a result, given the proximity of some of the residential sites to industrial uses there is a likelihood that there could be conflict with Policy WS 7.3 when proposals are submitted which will compromise the delivery of the development.</p> <p>5.6 It is also a concern that if surrounding businesses or uses to the allocated sites do grow prior to the delivery of the allocated sites this could also cause conflict in them being satisfactorily delivered. This is a particular concern given the geography of the allocated sites, which are urban and surrounded by other uses.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>No comment</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>No comment</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>In order to enable the policy to be sound it is considered that a list of amenity concerns should be given within the policy plus further clarification on what needs to be submitted to evidence that a proposed development is compliant with the policy i.e. is an assessment required? At what proximity will nearby uses need to be considered?</p> <p>It is also considered that an assessment should be conducted which evidences the need for the policy, providing examples of why this policy is needed and how the council's proposed allocated sites are in compliance. If the proposed allocations are not in compliance they need to be reconsidered/removed.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Leverhulme has an interest and stake in the development and implementation of the policy and wishes to be heard in its development.</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-594
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-594-EM-Watson Form 14 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 7.5
<b>Title</b>	Tall Buildings
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.5
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS 7.5 Tall Buildings Comments from Alan Baxter Ltd Objection: Lack of justification

<b>as precise as possible.</b>	<p>8.1 Comment: policy wording is woolly, and acceptable locations for tall buildings (or what constitutes a tall building) are not clearly set out in the policy although they are covered to a degree in para. 3.164.</p> <p>8.2 Paras 3.169/3.170 refer to use of Wirral 3D model as a requirement but this is not referenced in the policy. How can this be used if Wirral decide it is not appropriate to release it?</p> <p>8.3 Paras 169/3.170 refer to the potential appointment of a design review panel however there is no indication that the Council have made any steps towards establishing this.</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>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you</b>	Acceptable areas for tall buildings needs to be identified and justified with accessible evidence. Further details are required on the design review panel to ensure this policy is deliverable.

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

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

**If you wish to participate in the**

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

Leverhulme has an interest and stake in the development and implementation of the policy and wishes to be heard in its development.

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

<b>Comment ID</b>	LPSD-595
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-595-EM-Watson Form 15 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 8.1
<b>Title</b>	Energy Hierarchy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Does the policy fail soundness? Yes. If so, which test from the NPPF para. 35?

<p><b>as precise as possible.</b></p>	<p>The policy is considered to have not been positively prepared as it will in all likelihood impose a substantial impediment to meeting the 'objectively assessed needs' of Wirral, particularly by creating an additional and onerous barrier to delivering much needed new housing. Likewise, the policy is not justified as a 'reasonable strategy' for dealing with the issue due to the policy's potential to have a material detrimental impact on the capacity of Wirral to meet housing need for the area. It therefore also cannot be considered to be effective.</p> <p>Why does the policy or evidence fail?</p> <p>Whilst the policy is admirable in intent, we submit that the policy will impose an unreasonable burden on developers which will in turn adversely affect housing supply as well as eventual cost to consumers of sorely needed new homes in Wirral.</p> <p>Furthermore, the full application of such a hierarchy would impose a de facto requirement on developers to build to a 'net zero' standard which is both unreasonable, unviable and in many cases impossible.</p> <p>Finally, in terms of the hierarchy itself, the policy is onerously inflexible in its approach to carbon reduction, having been apparently structured to maximise carbon reduction outcomes, rather than taking into account more important considerations such as the market-readiness of measures, their deliverability and the subsequent impact on scheme viability. None of these aspects are considered in the policy evidence base.</p> <p>A 2018 Currie &amp; Brown ('Cost of Carbon Reduction in New Buildings') study, for example, found that "to achieve net zero regulated carbon emissions from a combination of energy efficiency on site carbon reductions and allowable solutions for an additional capital cost of between 5-7% for homes and nondomestic buildings. Achieving net zero regulated and unregulated emission is likely to result in a cost impact of 7-11% for homes."</p> <p>The costs will be incurred at least through (a) the creation of a compliance burden, which also risks congesting or, worse, halting supply of new homes, and (b) through increasing the material costs of construction incurred by a requirement to build to a higher energy and lower embodied carbon standard, as well as from offsetting any unabated carbon on completion. All of these costs, failing emergence of a more robust central government subsidy to enable low carbon construction, will ultimately and unfairly be felt by the consumer at market sale.</p> <p>As such, we believe the proposed policy is unsound in that it will limit the ability of developers to deliver sufficient supply of the urgently needed new homes in Wirral, and will consequently have a detrimental inflationary effect on house prices and supply of homes for the area.</p>
<p><b>omplies with the Duty to co-operate</b>  *        Yes  *        No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability</b></p>	<p>N/A</p>

<b>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>	N/A
<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>	We advocate the application of a more moderate approach which affords developers flexibility to pursue market-ready and cost effective low carbon interventions which do not inhibit rapid and large scale delivery of new homes at the most affordable possible prices for Wirral residents who have long needed them
<b>If your representation is seeking a</b>	Yes, I wish to participate in hearing session(s)

<p>modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>My client has a substantial interest in many of the sub-policies represented above as well as relevant expertise and contextual knowledge which should rightly be heard at the hearings.</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-596
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-596-EM-Watson Form 16 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<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>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Does the policy fail soundness? Yes. If so, which test from the NPPF para. 35?

<p><b>as precise as possible.</b></p>	<p>The policy fails the soundness test due to the conflation of key terms and decarbonisation methods which undermine the policy by reason of not be justified or effective. It is also excessively onerous and sprawling and would likely carry a cost burden to developers, architects, engineers etc. alike which has not be adequately accounted for in the evidence base.</p> <p>Why does the policy or evidence fail?</p> <p>The first sentence of the policy is muddled and seems to conflate two pairs of key climate concepts: Firstly, the policy confuses adaptation and mitigation when it uses the phrasing “climate change implications” (emphasis added) which apparently refers to the need for climate change adaptation, but then goes on to list measures for climate change mitigation i.e. reducing emissions from construction, operation and decommissioning.</p> <p>Secondly, the policy conflates embodied and operational carbon, and lacks further nuance, when referring to the construction (embodied), operation (operational) and decommissioning (end of life) phases of a buildings lifecycle. A more precise and applicable method would utilise the EN 15978 framework (found at <a href="https://www.greenbooklive.com/filelibrary/EN_15804/PN326-BRE-EN-15978Methodology.pdf">https://www.greenbooklive.com/filelibrary/EN_15804/PN326-BRE-EN-15978Methodology.pdf</a> page 13) to subdivide emissions types and responsibilities between responsible parties, rather than onerously and unreasonably placing the entire burden of mitigation on the shoulders of developers.</p> <p>The policy is excessively onerous and will be likely to impose significant costs on developers which will make new housing substantially more expensive to deliver, and in some cases probably unviable. These impacts will have a detrimental effect on the residents of Wirral, who will have fewer and more expensive homes, whilst the policy could also pose an increased risk to the local plan as a whole if sufficient housing is prevented from coming forward.</p> <p>Finally the policy is ‘sprawling’ in the sense that its constituent parts – Carbon Emissions, Energy Efficiency, Overheating and Cooling, and Water Usage – do not comfortably sit together and in some instances may contradict. For instance, equipping a house with low carbon energy infrastructure on-site may incur a trade-off with energy efficiency, whilst water usage is not closely linked with the other parts of the policy. The contents of this policy would be more legible and applicable if its constituent parts were prioritised in a hierarchy, dovetailed, and where necessary prepared as standalone policies.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>N/A</p>

<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	<p>N/A</p>
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>A full cost-benefit analysis of the measures listed should be carried out in consultation with key delivery partners to ascertain the impact on viability of the policy, and its effect on Wirral's ability to meet residents' needs</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>My client has a substantial interest in the sub-policy represented above as well as relevant expertise and contextual knowledge which should rightly be heard at the hearings.</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-597
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-597-EM-Watson Form 17 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 8.4
<b>Title</b>	On site Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.4
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Does the policy fail soundness? Yes. If so, which test from the NPPF para. 35?

<p><b>as precise as possible.</b></p>	<p>We believe that this policy fails the test of soundness by reason of not having been justified. Likewise, the policy cannot be considered to be effective as defined by the NPPF para. 35 and is therefore deemed unsound due to it being logically inoperable by virtue of being inconsistent with the recognised definition of the term 'residual carbon emissions'.</p> <p>Why does the policy or evidence fail?</p> <p>'Residual carbon emissions' is generally understood to refer to emissions which cannot be abated during project implementation using all technically and economically feasible opportunities, including presumably through the use of on site renewable energy sources. By definition, therefore, 'residual carbon emissions' cannot be 'addressed through the use of on site renewable and low carbon energy supplies', as these measures will already have been implemented as part of the implied prior decarbonisation of the project i.e. they are not 'residual'.</p> <p>Alternatively, if the policy means to refer to unabated embodied carbon as 'residual carbon emissions' these, too, will not be addressable through the measures listed as 'on site renewables', which will have no effect on emissions from embodied sources. Worse, 'low carbon energy supplies' is a term which has often been used to greenwash the inclusion of natural gas for inclusion within development projects. This will have a positively detrimental effect on emissions, far from 'addressing residual emissions', and will be counteractive to the aim of the policy.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	N/A
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</b></p>	N/A

<p><b>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 will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>The policy should be fundamentally reworked to both clarify definitions and aims, and to ensure methods are robust and appropriate.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  *      <b>No, I do not wish to participate in hearing session(s)</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* 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>My client has a substantial interest in the sub-policy represented above as well as relevant expertise and contextual knowledge which should rightly be heard at the hearings.</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-598
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-598-EM-Watson Form 18 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 8.5
<b>Title</b>	Carbon Compensation through Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.5
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Does the policy fail soundness? Yes If so, which test from the NPPF (para. 35)?

<p><b>as precise as possible.</b></p>	<p>The policy is considered to not be justified and not be effective on at least five counts: firstly, if the council wants to impose a policy relating to carbon offsetting it should refer to it as “carbon offsetting”, rather than mischaracterising it as “compensation”, presumably in order to avoid verified and legitimate criteria for its enactment.</p> <p>By advocating offsetting ‘by the back door’ the Council risks greenwashing and potentially irresponsible practices in this space.</p> <p>Furthermore, the wording ‘where feasible’ presents a paper thin barrier in terms of enforcement of the policy; secondly the policy does not define a methodology for establishing the net zero level, leaving the policy liable to be circumvented or manipulated; thirdly the principle of offsetting is not justified by the policy; fourthly the practice of offsetting - that is to say the method recommended - is not consistent with established best practice; and finally, the proper application of the policy will impose an unjustified cost on developers (and by extension consumers) which may also impede the effectiveness of the plan in delivering sufficient number of new dwellings.</p> <p>Consequently, the whole approach to the Policy is inappropriate – the Policy is not justified and is not effective.</p> <p>Why does the policy or evidence fail?</p> <p>(1) The policy is disingenuous in referring to “compensation” for residual emissions rather than using the established terminology “offsetting” and the verified methods which this terminology entails. In doing so, the policy presents the opportunity for manipulation and greenwashing which is unnecessary and dangerous. The policy, as such, is both unjustified and likely to be ineffective. If the use of the terminology “compensation” is established and legitimate the Council should demonstrate why this is preferable to the common parlance “offsetting” in its evidence base.</p> <p>(2) The policy will not be effective given that the ‘feasibility’ of offsetting ‘residual’ emissions leaves too much room for error and subjectivity in terms of process, particularly in lieu of a defined and robust methodology for assessing the net zero level. The failure to demonstrate or sufficiently define a methodology for establishing net zero in the evidence base means that the policy is neither justified nor can it be effective. Net zero assessment is a highly contested area in the environmental sector, which leaves the policy potentially inoperable and moot if it is not reconciled.</p> <p>(3) Next, the principle for why offsetting should be carried out is not established in either the policy or the evidence base. In fact, the evidence base for the plan is critical of offsets as an approach to achieving net zero, with the March 2022 report Setting Climate Commitments for Wirral (Kuriakose, Jones, Anderson, Broderick &amp; McLachlan) noting that “the CCC [Climate Change Committee] note in their advice, the efficacy of carbon offsetting as a contribution to meeting global climate change commitments is not robust enough to incorporate into recommended carbon budgets.” The policy is therefore both unjustified and ineffective.</p> <p>(4) Furthermore, the practice of offsetting advocated by the policy is flawed, and does not align either with the Council's own evidence base, or with established global best practice for compensating for residual emissions. As the 2020 document A strategy for Wirral in the face of the global climate emergency (Cool 2) states, a primary aim of offsetting is to achieve “more carbon storage” with the “Objective: To capture more carbon naturally by increasing woodland cover in line with national recommendations and by protecting soils and natural habitats”. This approach to offsetting is corroborated by the Oxford Principles for Net Zero Aligned Carbon Offsetting (Sept 2020) which advocates a “shift to carbon removal offsetting”. The policy, however, advocates an approach whereby “residual carbon emissions can be addressed with renewable energy sources off site”. Off-site renewable energy generation does nothing to remove carbon from the atmosphere and therefore does not compensate for nor negate emissions from construction or operation of buildings.</p> <p>(5) Finally, the cost of requiring off-site compensation for all emissions which cannot be abated to net zero on projects imposes an excessive, onerous and double burden on developers which is both unjustified and may create viability issues which make the plan as a whole ineffective by preventing delivery of new homes for Wirral. The burden is double because the developer is unreasonably expected to (a) incur the cost of delivering projects to the highest environmental standard possible, and (b), where net zero is not attained, is expected to compensate for the near-inevitable shortfall. These costs will be likely to have an adverse effect on viability, stalling supply of new developments and most importantly depriving Wirral residents of sorely needed new homes.</p> <p>Taking all of the above into account, the Policy is fundamentally flawed and fails the soundness test.</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</b></p>	

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.	No comment
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.	No comment
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	The policy should be removed from the plan.

<p><b>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><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>My client has a substantial interest in the sub-policy represented above as well as relevant expertise and contextual knowledge which should rightly be heard at the hearings.</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</b></p>	<p>Yes</p>

and adoption of the  
Plan).

\* Yes

\* No

<b>Comment ID</b>	LPSD-599
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSD-599-EM-Watson Form 19 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 8.6
<b>Title</b>	Heat and Power Networks
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.6
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Does the policy fail soundness? Yes. If so, which test from the NPPF para. 35?

<p><b>as precise as possible.</b></p>	<p>The Policy has not been positively prepared and therefore cannot be considered effective.</p> <p>Why does the policy or evidence fail?</p> <p>The Policy does not consider the relative merits and moreover viability of delivering energy/heat networks for any schemes which are not tall buildings - perhaps the only feasible and deliverable type of development when considering wide adoption of district heat/energy networks. Costs would be significantly higher and potentially undeliverable for distributed housing developments.</p> <p>There is also a total lack of supporting document and evidence associated with the Policy, demonstrating that the Council has not taken a positive approach to the preparation of the Policy and is not considering the feasibility, viability, and downstream impacts of its implementation.</p> <p>It is extraordinary that such a potentially onerous policy is not supported by a detailed evidence base in respect of deliverability and also in respect of viability. The requirements of the policy are simply inappropriate for most forms of development and appear to comprise a whim, or an aspiration. The paucity of supporting substantive evidence (there is none) renders the policy's approach wholly inappropriate.</p> <p>For these reasons the policy also cannot be considered to be effective in achieving the specified aims</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>No comment</p>
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the</b></p>	<p>No comment</p>

<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 Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>The Policy should be properly evidenced and redeveloped to reflect market realities, deliverability, viability and, importantly, the diverse development typologies and locations at which such a policy might be feasible in Wirral. The Policy should be altered to reflect a more nuanced policy which can be effective without detriment to Wirral's substantial need for delivering new housing.</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>Yes, I 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>My client has a substantial interest in the sub-policy represented above as well as relevant expertise and contextual knowledge which should rightly be heard at the hearings.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-600

<b>Comment ID</b>	LPSP-600
<b>Person ID</b>	1323898
<b>Include files</b>	<a href="#">LPSP-600-EM-Watson Form 20 of 29 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Nigel McGurk
<b>Position</b>	
<b>Company / Organisation</b>	Leverhulme Estate
<b>Agent ID</b>	1323897
<b>Agent Name</b>	Mr Edward Watson
<b>Position</b>	
<b>Company / Organisation</b>	Strutt and Parker
<b>Number</b>	Policy WS 8.8
<b>Title</b>	Climate Change and Energy Statement
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.8
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Does the policy fail soundness? Yes. If so, which test from the NPPF (para. 35)?

<b>as precise as possible.</b>	<p>The policy fails the tests on the basis that it is neither justified nor effective since, as has been shown in our other representations, most of the component parts of policy WS8 are either not justified or not effective or both. Significantly, too, the policy is not justified in and of itself, with no supporting documents provided in the evidence base pertaining to which Whole Life Carbon Assessment methodology would be considered appropriate.</p> <p>Why does the policy or evidence fail?</p> <p>For this reason, the policy itself cannot be justified or effective as it would reflect the flaws shown in the prior elements of the policy as a whole.</p> <p>Furthermore, policy WS8.8 fails to specify how the WLC Carbon Emission Assessment would be carried out, as well as which method would be used, despite the fact that the Wirral Local Plan: Climate Change and Renewable Energy Study Report (2020, Arup) itself stipulates that the Council should develop a roadmap for such an assessment to be carried out (p.15). In the absence of such a roadmap, methodology and documentation in the evidence base, and although the WLC assessment is supported in principle, the lack of specificity and opportunity to interrogate the methodology of such a scheme is a critical problem with the policy which would need to be addressed and scrutinised prior to such a policy becoming adopted.</p>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</b>	N/A

<b>Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b>	<p>The policy is unsound by virtue of the unsoundness of the earlier policies which it relies on and is related to, as well as in its own right. It should be removed from the plan until such time as these other policies have been amended or removed, and until such time as a detailed Whole Life Carbon Assessment methodology has been drawn up, publicised, consulted on and approved.</p>
<b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b> * <b>No, I do not wish to participate in hearing session(s)</b>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>My client has a substantial interest in the sub-policy represented above as well as relevant expertise and contextual knowledge which should rightly be heard at the hearings.</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>