

LPSP-601

Comment ID	LPSP-601
Person ID	1323898
Include files	LPSP-601-EM-Watson Form 21 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WS 10.1
Title	Provision of Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 the test of soundness? Yes. If so, which test from the NPPF para. 35?

as precise as possible.	<p>This is because the policies presented have not been adequately costed in the evidence base and as such have not been demonstrated to be positively prepared, justified, or effective over the plan period.</p> <p>Why does the policy or evidence fail?</p> <p>Please see enclosed with these representations the appendices containing the Wirral Viability Representations prepared by Roger Hannah which constitute a quantitative critique of the policy, prepared on behalf of the Wirral Consortium, which Leverhulme forms part of.</p> <p>In brief, the report concludes that “The IDP [Infrastructure Delivery Plan] 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.</p> <p>AV [Aspinall Verdi] state that this is accounted for in their appraisals but there is 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.</p> <p>This additional S.106 cost is excluded from all appraisals and is a significant oversight that will result in higher cost and a worsened viability position across all appraisals.</p> <p>There is also an additional funding gap of £335.8m for additional desirable infrastructure over the plan period which is not considered by AV. 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.”</p> <p>As indicated by this robust and quantitative analysis, the policy is demonstrated to be wholly unsound by reason of not being positively prepared, justified or effective over the plan period.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal	N/A

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Regarding Policy WS10.1, we recommend that the council needs to fundamentally reassess and develop a comprehensive and costed plan with regards to infrastructure provision and improvement in Wirral.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	<p>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>My client has a significant interest in the policy listed above and has extensive contextual and expert knowledge which should rightly be heard at such a hearing.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-602
Person ID	1323898
Include files	LPSD-602-EM-Watson Form 22 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified 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>as precise as possible.</p>	<p>The policy is not justified, as per the stipulations of NPPF para. 35 as it creates an additional and unwarranted protection on open spaces which is not supported by national policy.</p> <p>Why does the policy or evidence fail?</p> <p>The policy creates an entirely new and unprecedented barrier to development of existing open spaces in addition to the existing categories by which they are defined and protected; that is to say through Green Belt policies and green space policies. These existing categories are well defined and safeguarded by national and local policies. Each has rigorous and robust conditions and definitions attached (see NPPF paragraphs 101-102, and paragraphs 137-139) which ensure that the policies are justified and, fundamentally, they define that these spaces cannot have arbitrary and excessively onerous limits imposed which prevent potential new sustainable development in the interests of delivering the needs of residents.</p> <p>By contrast, the proposed policy seeks, apparently, to circumvent these policies and to impose its own standard upon additional open spaces, or more accurately undeveloped land, which have not been shown to qualify for green belt or green space protections by creating a new category - 'open space' - which is not defined in national policy and is not adequately justified in the local plan evidence base. Additionally, the new category impinges the presumption in favour of sustainable development by preventing potentially legitimate development in sustainable locations which does not meet the criteria for these existing green belt and green space categories, and in so doing inhibits the soundness of the plan by undermining its ability to meet extensive and assessed local needs.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>N/A</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	<p>N/A</p>

<p>relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Regarding Policy WS10.6, we recommend that the policy is withdrawn from the local plan.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	<p>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 significant interest in the policy listed above and has extensive contextual and expert knowledge which should rightly be heard at such a hearing.</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-603

Comment ID	LPSP-603
Person ID	1323898
Include files	LPSP-603-EM-Watson Form 23 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WS 12
Title	Monitoring and Review
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 12
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	1. We acknowledge that the Council's intention to monitor the implementation of the Local Plan and infrastructure provision on an annual basis aligns with national requirements. While there is nothing fundamentally unsound about the wording of policy WS 12, we question the Council's ability to meet the requirements of their own policy given past performance in relation to plan preparation and monitoring. In other words, when it has taken over two decades for a new Local Plan to be brought forward, which of course is still subject to examination, it does not give one much confidence that the local authority will effectively and consistently monitor and, where necessary, update their Local Plan should it be found sound and subsequently adopted.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	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	1 Policy WS 12 does not, on face value, require modification. However, we welcome a view from the examining Inspector(s) as to whether the policy is realistic and justified given Wirral Council's past under-performance in relation to plan preparation and monitoring.

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

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

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

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

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

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 policies in the Local Plan, Leverhulme wishes to be heard.

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

LPSP-604

Comment ID	LPSP-604
Person ID	1323898
Include files	LPSP-604-EM-Watson Form 24 of 29 2507_Redacted.pdf LPSP-604 & 606-EM-Watson Attach 2 of 7_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WP 8.1
Title	Green Belt
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP8.1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is	1) The Submission Draft Plan includes a spatial strategy which deals with the Rural Area homogenously, via Settlement Area SA8. There is no hierarchy of settlements identified, and there are no proposals to recognise any policy distinction between the 10 main Wirral settlements within Area SA8. 2) The effect of this approach is that the Plan does not propose any housing or employment in Area SA8 (by far the largest part of the Plan area) for the plan period to 2037.

<p>unsound. Please be as precise as possible.</p>	<p>3) Leverhulme's representations on other matters (notably on WS 1.1) address the shortcomings of the Plan in looking to meet current and future needs in Wirral. There can be no doubt that if the Local Plan is to address sustainable development in accordance with national policy, Wirral must plan for an appropriate contribution from modest growth at suitable villages, including the 10 main rural settlements within Wirral as identified in the Appended Leverhulme Rural and Visitor Economy Overview.</p> <p>4) The Plan's approach is inconsistent with paragraph 144 of the NPPF. The Council has failed to justify its position in this respect. It has not shown that it is necessary to restrict development in each of the 10 main rural settlements on the basis of any important contribution which the open character of each village makes to the Green Belt. The Submission Draft Local Plan's approach would prevent sustainable development in these settlements, with significant adverse social and economic consequences in the longer term. The failing is compounded by the approach to agricultural land more generally, as challenged in our representation on WP8.2.</p> <p>5) The Council's approach is inconsistent with the stated objectives of the Plan. It indicates that the Plan has not been positively prepared, nor is the approach justified by evidence. The Plan's policies will not prove to be effective in meeting its stated objectives.</p> <p>6) The NPPF now recognises that local planning authorities should plan positively for their Green Belts. They have an important part to play in achieving a sustainable future.</p> <p>7) The draft Local Plan adopts a blanket approach to the rural Settlement Area which ignores the needs of local people, the prosperity of the main rural settlements and the associated rural economy.</p> <p>8) Green Belt land has the potential to play an important part in achieving a sustainable future. Leverhulme's starting point is that the Plan cannot credibly leave the Green Belt unaltered. It must change to accommodate the additional development needed now and in the future.</p> <p>9) Suitable villages in Settlement Area SA8 must be inset from the Green Belt to provide scope for them to play their part in meeting development needs. Moreover, this will facilitate potential modest growth which will in turn help support the role of these settlements individually and in combination as rural service centres. Wirral's main rural settlements have suffered from a loss of services and facilities over the year a trend that inseting villages should help to slow and eventually reverse through appropriate sustainable development.</p> <p>10) Leverhulme control the significant land interests at some of these main settlements, and would support Inset Boundaries for Barnston, Brimstage, Raby and Thornton Hough as indicated on the set of plans below. (please refer to attachment)</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability</p>	<p>N/A</p>

Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ol style="list-style-type: none"> 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'. 2 Notwithstanding that conclusion, the Plan should include a hierarchy of settlements in the rural area, recognising the differing roles played and the way in which they may act (individually and collectively) as service centres. Leverhulme controls land at Barnston, Brimstage, Raby and Thornton Hough and proposes settlement inset boundaries for these villages. Inset boundaries for other main villages would be consistent with this approach. 3 Further support is provided in the Leverhulme Rural and Visitor Economy Overview.
If your representation is seeking a	Yes, I wish to participate in hearing session(s)

<p>modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<ol style="list-style-type: none"> 1 Leverhulme considers that the Council's overall approach to policy for the rural area is fundamentally inconsistent with the objectives of the plan. This conclusion applies across several topic areas. 2 As the principal rural landowner impacted by the draft policies (owning 30% of Wirral's Green Belt land), Leverhulme wishes to be heard.
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-605

Comment ID	LPSD-605
Person ID	1323898
Include files	LPSD-605, 1041, 1043 & 1044-EM-Watson Form 25 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WD 3
Title	Biodiversity and Geodiversity
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Policy WD3 - Biodiversity and Geodiversity 1.1 We are very concerned that the draft Local Plan seeks to allow major development sites to be proposed adjacent or in close proximity to Internationally Designated European Sites without adequate, appropriate, deliverable or viable mitigation, compensation or controls, contrary to its own aims. The strategy will fail in protecting the remarkable biodiversity and geodiversity which exists throughout the Wirral and conflicts with national and international environmental policy. The expectations set out within the policies are very open-ended and

as precise as possible.

unlikely to effectively and successfully protect the breadth of biodiversity and geodiversity in the Wirral. Consequently, the draft Local Plan's approach to protecting biodiversity and geodiversity is inappropriate. The result is a plan that will potentially put at risk the biodiversity and geodiversity in Wirral, which fundamentally goes against the principle of the policy WD3 A 'development which may adversely affect the integrity of internationally important sites will only be permitted where there are no alternative solutions, there are overriding public interest, suitable mitigation is in place and compensatory provision is secured'.

1.2 Wirral Council's own evidence base, as referenced below, makes it very clear that the draft Local Plan gives rise to significant impacts on European Sites. However, despite this, the draft Local Plan fails to provide a corresponding approach to ensure that its policies provide appropriate protection.

1.3 Further to the above, even if appropriate policy protection were provided, which it is not, the draft Local Plan's approach of allocating unviable major development sites, the delivery of which is entirely reliant upon unproven public subsidies, is unsupported by any evidence in respect of how the development of the allocated land could viably protect biodiversity and geodiversity of national and international importance.

1.4 The Habitats Regulations Assessment of the Wirral Local Plan 2021-2037 states that 'given its proximity to the Liverpool City Region, the European Sites around Wirral, especially the coastal sites that are designated for their non-breeding birds, are likely to be subjective to significant recreational pressure from the Wirral Local Plan, including from its policies, housing targets and associated proposed allocations for housing land'.

1.5 Additionally the Habitats Regulations Assessment of the Wirral Local Plan 2021-2037 also concludes 'given strong draw of estuarine sites on the public, it is likely that people will be travelling from adjacent authorities to visit these sites. Therefore its recreational pressure arising from Wirral needs to be set into the context of urban growth in other Merseyside authorities. The same conclusion was reached in the HRA's of other Local Plans, such as the Plans for Liverpool and Halton. Both HRA's determined that there was a potential for adverse effects from recreational pressure, especially when considering in-combination'.

1.6 The above leaves no doubt in respect of the significant impacts placed on the biodiversity and geodiversity of the Wirral by the draft Local Plan. In our view, it is also important to consider the disturbance during the construction and operational phases of these proposed residential developments. The draft Local Plan fails to provide a deliverable, viable and appropriate policy framework for dealing with potential adverse effects. This is a serious omission and renders the draft Local Plan unsound on this basis alone.

1.7 As an aside, it is noted that this section of the draft Local Plan is slightly awkward to read as it sets out the aims of each policy, then states the policies, then explains how these may be implemented. In accordance with Paragraph 16 of the NPPF and in the interests of clarity, it would be more appropriate to include all text that relates to a policy in one place, such an approach would help a decision maker to come to a decision on any particular application, rather than having to go through multiple documents simultaneously, noting that whilst the current approach provides for obfuscation, it does not obscure the flaws with Policy WD3.

1.8 Policy WD3 is a development management policy that seeks to support the protection and enhancement of biodiverse and geodiverse assets, and ecological networks, and the provision of Biodiversity Net Gain. It is in addition to Policy WS5 (Blue and Green Infrastructure) and seeks to respond to the Council's statutory duties to have regard to the purpose of conserving biodiversity and encouraging the management of features of the landscape which are of major importance for wild flora and fauna.

1.9 The preamble to Policy WD3 acknowledges (as agreed with Natural England) that the coastal European sites in the wider Liverpool City Region are under increasing pressure from recreation associated with housing and tourism growth. To avoid adverse in-combination effects of the draft Local Plan, it is suggested that a Recreational Disturbance Avoidance and Mitigation Strategy (RMS) will be completed during the early part of the plan period. Prior to the possible undertaking of the RMS at some unknown time in the future, the Council seeks to set out an Interim Approach with the aim of avoiding and mitigating recreation pressure in Wirral.

1.10 This Interim Mitigation Approach (IMA) attempts to set out the Council's interim strategic approach to dealing with the potential recreational disturbance associated with the proposed housing growth and the mitigation measures to be implemented in the Wirral.

1.11 The IMA is projected to be in place until the adoption of the RMS. There is no certainty in respect of when the RMS might be produced or adopted. In this regard, it is noted that Wirral Council has failed to adopt a Local Plan this century. Consequently, the interim approach is, to all effect and purposes, the only approach. It must be relied upon and no reliance can be placed upon something that doesn't exist. Consequently, the HRA / AA for the Local Plan will not be able to be concluded favourably relying on the RMS.

1.12 However, despite all of this, even the content of the IMA does not appear to have been finalised with Natural England (NE) (paragraph 5.52 of the HRA). This is a very serious flaw. If this was not enough, the IMA does not deal with any other impacts on the European sites which may arise from the housing allocations, including, but not limited to, loss of habitat, visual disturbance, increased noise and so on. As mentioned earlier, given the proximity of many of the housing allocations to the European sites, it is also important to consider the disturbance during the construction and operational phases of these residential developments and not solely focus on the impact from recreational pressures. This oversight is another significant flaw in the Local Plan that again contradicts with the objectives of policy WD3. Consequently, the HRA / AA for the Local Plan will not be able to be concluded favourably relying on the IMA.

1.13 Paragraph 4.4.3 of the Duty to Cooperate Statement of Compliance Regulation 19 Submission Draft (March 2022), set out that the Council "is actioning" the initial response provided by NE in February 2022. Paragraph 4.4.4 confirms that the Council will need to continue working with NE to seek to resolve issues relating to the IMA prior to submission, and thereafter during the draft Local Plan examination. This is simply work in progress. It demonstrates that the draft Local Plan, in this regard, is premature. The fact that there are "issues" in need of resolution is one of many red flags in respect of the draft Local Plan.

1.14 Regulation 63 of the Conservation of Habitats and Species Regulations 2017 prohibits the competent authority from agreeing to a plan without first ascertaining that it would not adversely affect the integrity of any protected European Site. Unless the effectiveness of the mitigation can be shown to be certain beyond reasonable scientific doubt, then the draft Local Plan cannot be legally adopted (unless the tests in regulation 64 of the Habitats Regulations are met). Refer to Paragraph 1.22- 1.24 below for further detail on how relevant European Sites may be impacted.

1.15 Wirral Council should not be progressing with a draft Local Plan that cannot be legally adopted.

1.16 Point F of Policy WD 3 states “Development proposals must demonstrate that adequate provision has been made over the lifetime of the development for appropriate ongoing access management, habitat management, monitoring, maintenance and enhancement of biodiversity or geodiversity interests which can be secured by planning conditions or legal agreement”. In contrary, the Environment Act only requires the associated habitat to be secured for at least 30 years via planning obligations or conservation covenants. Therefore this aspect of Policy WD3 is not an appropriate policy and is inconsistent with the new Environment Act, making the Wirral Local Plan unsound on this basis.

1.17 Paragraph 6.21 of the draft Local Plan sets out that Policy WD3 will apply to “all planning applications with potential to affect a designated biodiversity or geodiversity asset”. However, the strategy for the delivery of new homes and employment growth in the Wirral is based on consolidating the urban area and focusing on regeneration of sites, particularly in the east of the Borough.

1.18 This spatial approach fails to allow for the full implementation of the requirements of Policy WD3 and as such, this will hinder biodiversity net gain (BNG) provision. The draft Local Plan’s blind focus on urban regeneration areas for the entire spatial strategy, regardless of viability and deliverability, fails fundamentally to provide for the appropriate enhancement of biodiversity and geodiversity interests. This is in direct conflict with the provisions of the NPPF. A different approach incorporating residential development away from urban regeneration sites would offer far better outcomes in protecting biodiversity and geodiversity. The Leverhulme Vision would allow for biodiversity and geodiversity not only to be protected but significantly enhanced on site and off site whilst protecting the Internationally Designated European Sites located near the majority of the draft allocations in the Wirral Local Plan. A more balanced approach within the Local Plan in terms of a mixture of brownfield regeneration and allocations on greenfield sites would result in improved biodiversity and geodiversity outcomes.

1.19 Criteria G refers to the policy applying where “development proposals in Wirral may directly or indirectly affect sites with known conservation value in a neighbouring authority area”. This wording is inappropriately vague, unsupported by any substantive justification and seeks to protect sites beyond any reasonable distance.

Assessment

1.20 After a careful analysis of the interactive Wirral Local Plan 2021-2037 Submission Draft, various issues have been discovered in relation to the consistency of draft Local Plan policies, the proposed housing allocation sites put forward by the draft Local Plan and the impact this will have on important biodiversity and geodiversity landscapes/sites.

1.21 Point A of Policy WD3 emphasises the need to protect internationally important sites and states that development which may adversely affect the integrity of internationally important sites will only be permitted where there are no alternative solutions and there are superior reasons of overruling public interest. Remarkably, in direct contradiction to this policy, the draft Local Plan allocates housing sites in close proximity to Ramsar Sites, which are wetlands of international importance for biodiversity and wildlife. As stated in Paragraph 1.18 a different approach consisting of the Leverhulme Vision would be substantially more useful and beneficial in the provision and protection of biodiversity, geodiversity and the Internationally Designated European Sites.

1.22 Site RES-SA4.7 (Former D1 Oils, Dock Road South, Bromborough) allocated with a capacity of 1,225 dwellings, is adjacent to RAM-2 (Mersey Estuary).

1.23 Sites RES-SA1.2 (Gibson House, Seabank Road, Egremont) / RES-SA1.3 (Rear of Gibson House, Maddock Road, Egremont), allocated for 102 dwellings combined, are adjacent to RAM3 (Mersey Narrows & North Wirral Foreshore).

1.24 The plan allocates sites in inappropriate places without suitable protection or viable/deliverable scope for appropriate protection of the remarkable biodiversity and geodiversity in the Wirral, when there are viable/deliverable alternatives, for example the Leverhulme Vision.

1.25 Point B of Policy WD3 highlights that development will only be permitted on Sites of Natural Importance, Special Scientific Interest, National Nature Reserves, Local Nature Reserves, Local Wildlife Sites and Regionally Important Geological Sites where the benefits of the development outweigh the impact on the protected/designated area. Point D of Policy WD3 states where “significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or, as a last resort, compensated for, then planning permission will be refused”. This policy does not take into consideration that if various housing allocations are refused planning permission which is possible given the proximity to protected/designated sites, this will significantly impact the housing delivery of Wirral Metropolitan Borough Council and may potentially lead to Wirral not achieving an adequate housing supply, a significant issue for the adoption of a New Local Plan.

1.26 This results in fundamental delivery problems and in turn results in a draft Local Plan which is not sound.

1.27 The proposed allocation of all of the sites below results in direct conflict with Policy WD3.

1.28 RES-SA4.7 (Former D1 Oils, Dock Road South, Bromborough) for a capacity of 1,225 dwellings is adjacent to SPA-2 (Special Protection Area), SSI-SA3.1 (Site of Special Scientific Interest) and NIA-5 (Nature Improvement Area). Secondly, RES-SA7.5 (Willowbank, 33 Oldfield Road, Heswall) is located inside SSI-SA7.1 (Site of Special Scientific Interest) and NIA-3 (Nature Improvement Area). Thirdly RES-SA4.2 (Former MOD, Old Hall Road, Bromborough) for 250 dwellings is adjacent to NIA-7 (Nature Improvement Area) and LWS-SA8.35 (Local Wildlife Site). Fourthly RES-SA1.2 (Gibson House, Seabank Road, Egremont) / RES-SA1.3 (Rear of Gibson House, Maddock Road, Egremont) for a capacity of a combined 102 dwellings is adjacent to SSISAI1.1 (Site of Special Scientific Interest), NIA-5 (Nature Improvement Area) and SPA-3/4 (Special Protected Area).

1.29 These sites are faced with fundamental viability and deliverability issues, not even taking into account environmental requirements. There is no substantive evidence at all to demonstrate that they could avoid, mitigate or compensate the very significant biodiversity harm arising in addition to overcoming the overwhelming viability and deliverability issues identified elsewhere in Leverhulme’s representations and in representations made by the majority of the development industry, amongst others.

	<p>1.30 Further to the above it is clear, having regard to national policy, that there are viable, deliverable alternative sites in Wirral that can provide for development in a way that meets environmental requirements. Wirral Council has failed to take these into account and has instead, chosen to allocate sites, regardless of the fundamental environmental constraints and the conflict with national and international environmental policy.</p> <p>1.31 For example, the vision proposed by Leverhulme would allow significant housing development away from and not in close proximity to protected/designated sites in Wirral. Importantly, the development of these sites will viably and appropriately contribute to the provision and to the delivery of the notable improvement of biodiversity/geodiversity in Wirral. Point 6.22 mentions "Clauses A and B identify that all development is expected not to adversely affect a SSSI, harm the integrity of a European Site, or result in the loss or deterioration of irreplaceable habitats". This is a further contradiction. Locating major development, such as site RES-SA4.7 (Former D1 Oils, Dock Road South, Bromborough) for a capacity of 1,225 dwellings, next to a site of European Importance will, without clear substantive evidence to demonstrate how development can be delivered, viably, in a manner that will not result in damage to biodiversity/geodiversity conflict with this policy. The draft Local Plan runs the very real risk of allocating land for development that has no realistic prospect of development; and further, the very real risk of supporting development that will harm and fail to provide appropriate compensation and mitigation in respect of biodiversity sites of national and European importance. This is a significant issue as the environmental impact and the disturbance from the construction and operational phases of the allocated residential sites, which are in close proximity to the sites of European Importance will undoubtedly have a significant impact in terms of air, water and noise pollution. As previously emphasised in Paragraph 1.18, the Leverhulme Vision would allow undoubtable improvements in the biodiversity/geodiversity whilst moving development away from consequently harming sites of European Importance which should be a critical objective of the Local Plan in line with National Policy. This is a much better approach in safeguarding the protected bird species, which would be subject to a significant impact from residential development adjacent to their designated habitats.</p> <p>Points 6.23, 6.24 and 6.26 state the need for a separate statutory document for developments that may have a detrimental impact on European Designated Sites and the need for nonbreeding bird surveys during the autumn, winter and spring months. Construction within 300m of the SPA's/Ramsar sites or functionally linked habitat parcels should also be carried out during the months between April and August, due to the impact also on European Designated sites.</p> <p>1.34 In addition to all of the above, the timescale of the delivery of developments in close proximity to European Designated States as emphasised in paragraph 1.23 will be adversely impacted due to seasonal restrictions of construction and surveys required prior to development.</p> <p>1.35 These surveys should, in any case, have been conducted prior to the Call for Sites. This was not done, possibly due to the fundamental impacts highlighted above.</p> <p>1.36 The only logical result of this is more major delays and impediments to delivery. There can be little, if any doubt, that this would impact on the timescale of the delivery of the proposed residential developments even if it was somehow proven and there is no substantive evidence at all in this regard that viable delivery was indeed possible. This is an additional factor undermining the soundness of the draft Local Plan.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the	No comment

<p>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>For all the reasons given in this representation, 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>
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy</p>	<p>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'. In this instance, it is considered that the allocation of housing sites in close proximity to protected European sites directly contradicts with the objectives of policy WD3.</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>	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. Therefore, as one of the principal rural landowners impacted by the draft Local Plan, Leverhulme wishes to be heard.
<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-606

Comment ID	LPSD-606
Person ID	1323898
Include files	LPSD-604 & 606-EM-Watson Attach 2 of 7_Redacted.pdf LPSD-606-EM-Watson Form 26 of 29 2507_Redacted.pdf LPSD-604, 606, 607 & 609-EM-Watson Attach 4 of 7 2507_Redacted
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WP 8.1
Title	Green Belt
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 8.1A

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
Please give details of why you consider the Local Plan is	1) Leverhulme fundamentally disagrees with the development and regeneration strategy for Wirral. 2) Leverhulme's overarching position is as follows:

<p>unsound. Please be as precise as possible.</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 a position supported by the consortium (of which Leverhulme forms part) and their evidence (which has been submitted separately but alongside our representations). The consequence is that there will need to be release of sustainable Green Belt sites.</p> <p>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 land.</p> <p>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.</p> <p>iv. Furthermore, there is a substantial funding gap in relation to the Local Plan, which means the financial viability and soundness of the Plan is in considerable doubt. In other words, the plan in its current form is unjustified and likely to fail without the release of sustainable Green Belt land.</p> <p>v. 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 Green Belt enhancements.</p> <p>vi. 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 brought forward as applications now and 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 to housing supply 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). 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>vii. 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>3) Leverhulme is approaching the future of the Wirral positively, having developed its own Leverhulme Vision concept, itself reflecting work undertaken in reviewing the effectiveness of the function of the Green Belt across the Estate. The proposals in the Vision (and which form the three phases of its evolution) are set out in phasing plans. All these documents (the Vision, the Green Belt Review and the phasing plans) accompany our representations.</p> <p>4) The wider Leverhulme estate also 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.</p> <p>5) For all these reasons, the Plan cannot credibly leave the Green Belt unaltered. It must be altered to accommodate the additional development needed now and in the future, and suitable villages in Settlement Area SA8 must be inset from the Green Belt to provide scope for them to play their part in meeting development needs.</p> <p>6) Beyond the need for Green Belt boundaries to be redrawn, it is notable that the Submission Draft Plan policy for the Green Belt consists of a single line: “National Policy for the Green Belt will apply in the determination of proposals within the Rural Settlement Area in addition to the other relevant policies in this Local Plan” (WP 8.1 A)</p> <p>7) Paragraph 145 of the NPPF urges Councils to plan positively to enhance the beneficial use of Green Belts.</p> <p>8) Given the significant area of land subject to Green Belt designation and the laudable aims of the plan to achieve net zero carbon status, this simplistic approach does not constitute positive planning as required by statute and policy.</p> <p>9) The Plan would be better able to deliver on its Objectives if it were to provide further policy guidance beyond the self-evident statement about meeting the tests of national Green Belt policy. In order to plan positively in accordance with NPPF Paragraph 145, the Plan should identify the sort of matters that might contribute towards demonstrating very special circumstances in order to support schemes such as microgeneration, biofuels development, carbon sequestration projects and developments within the Green Belt which target a net zero future for Wirral.</p> <p>10) Policy WP 8.1 A does not integrate with the aims and objectives of the Plan and fails to recognise the positive benefits that the rural areas can offer in this regard.</p> <p>11) The Council's approach is inconsistent with the stated objectives of the plan. It indicates that the Plan has not been positively prepared, nor is the approach justified by evidence. The Plan's policies will not prove to be effective in meeting its stated objectives.</p> <p>12) Further background is provided in the appended Leverhulme appended Leverhulme Rural and Visitor Economy Overview.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	

Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
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 Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please	<ol style="list-style-type: none"> 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'. The Green Belt must change. 2 Notwithstanding that conclusion, Leverhulme considers that Policy WP 8.1 A should be substantially re-cast to reflect the benefits that land use in the Green Belt can bring to meeting the Plan's objectives, and to set out the range of matters that might establish very special circumstances to support a zero carbon future for Wirral. 3 Further background is provided in the appended Leverhulme Rural and Visitor Economy Overview.

<p>note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<ol style="list-style-type: none"> 1 Leverhulme considers that the Council's overall approach to policy for the rural area is fundamentally inconsistent with the objectives of the plan. This conclusion applies across several topic areas. 2 As the principal rural landowner impacted by the draft policies (owning 30% of Wirral's Green Belt land), Leverhulme wishes to be heard.
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept</p>	<p>Yes</p>

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

* Yes
* No

LPSD-607

Comment ID	LPSD-607
Person ID	1323898
Include files	LPSD-604, 606, 607 & 609-EM-Watson Attach 4 of 7 2507_Redacted LPSD-607-EM-Watson Form 27 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WP 8.2
Title	Agricultural Land
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 8.2

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is	1) The Submission Draft Plan policy for agriculture consists of detailed provisions for protecting BMV (WP 8.2). 2) There are no policies whatsoever concerning development to support the needs of agriculture (despite being an appropriate land use in Green Belts), or concerning the reuse of agricultural buildings. The latter is particularly surprising giving the acknowledged loss of smaller farm holdings through amalgamation.

<p>unsound. Please be as precise as possible.</p>	<p>3) Moreover, given the acknowledgement at 3.100 that the Council “recognises the pressures on agricultural businesses following Brexit and restructuring of subsidy for food production, together with a move toward encouragement to farmers to act as stewards of the land and water for wider biodiversity and public access purposes’ it is difficult to see how this concern can be manifest in a single policy which is focused on protecting BMV.</p> <p>4) Wirral includes a significant area of land subject to Green Belt designation (predominantly farmland) and the Plan includes laudable aims to achieve net zero carbon status. The focus on the protection of BMV appears incongruous within that context.</p> <p>5) Rural land is not just a resource for food production through agriculture. It has an important role to play in achieving net zero carbon targets through land use. Microgeneration can be an important contributor, and rewilding, carbon sequestration projects and schemes to encourage Biodiversity Net Gains will increasingly dominate the rural landscape of the future. Furthermore, rural land is likely to have an important role in offsetting development impacts elsewhere, supporting sustainable development patterns.</p> <p>6) Paragraph 145 of the NPPF urges Councils to plan positively to enhance the beneficial use of Green Belts.</p> <p>7) The negative focus on protecting BMV for food production in isolation does not constitute positive planning as required by statute and policy. It fails to recognise that the most productive farm land tends to be the land most damaged by intensive farming practices, and the land which is being removed from agricultural production at the fastest rate.</p> <p>8) Policy WP 8.2 does not integrate with the aims and objectives of the Plan and fails to recognise the positive benefits that the rural areas can offer in this regard. The failing is compounded by the approach to the rural Settlement Area (SA8), challenged in our representation on that matter.</p> <p>9) The Council's approach is inconsistent with the stated objectives of the plan. It indicates that the Plan has not been positively prepared, nor is the approach justified by evidence. The Plan's policies will not prove to be effective in meeting its stated objectives.</p> <p>Further background is provided in the appended Leverhulme Rural and Visitor Economy Overview.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>N/A</p>

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	<p>N/A</p>
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ol style="list-style-type: none"> 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'. The Green Belt must change. 2 Notwithstanding that conclusion, Leverhulme considers that Policy WP 8.2 A should be substantially re-cast to reflect the benefits that land use in the Green Belt can bring to meeting the Plan's objectives, and to set out the range of matters that might establish very special circumstances to support a zero carbon future for Wirral. 3 Further background is provided in the appended Leverhulme Rural and Visitor Economy Overview.
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<ol style="list-style-type: none"> 1 Leverhulme considers that the Council's overall approach to policy for the rural area is fundamentally inconsistent with the objectives of the plan. This conclusion applies across several topic areas. 2 As the principal rural landowner impacted by the draft policies (owning 30% of Wirral's Green Belt land), Leverhulme wishes to be heard.
<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-608

Comment ID	LPSP-608
Person ID	1323898
Include files	LPSP-608-EM-Watson Form 28 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Part 5
Title	Settlement Area Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Para 5.71 - 5.73
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	1) The Submission Draft Plan does not include any policies concerning development in the rural area. 2) There are no policies whatsoever concerning development which supports the needs of agriculture (despite being an appropriate land use in Green Belts), or concerning the reuse of agricultural buildings. The latter is particularly surprising giving the acknowledged loss of smaller farm holdings through amalgamation. 3) This is symptomatic of the neglect the Council shows to both the rural economy and the fate of farmsteads and local communities within rural settlements.

as precise as possible.	<p>4) Moreover, given the acknowledgement at 3.100 that the Council “recognises the pressures on agricultural businesses following Brexit and restructuring of subsidy for food production, together with a move toward encouragement to farmers to act as stewards of the land and water for wider biodiversity and public access purposes’ it is inconsistent for the Plan to be silent on rural development.</p> <p>5) Rural land is not just a resource for food production through agriculture. It has an important role to play in achieving net zero carbon targets through land use. Microgeneration can be an important contributor, and rewilding, carbon sequestration projects and schemes to encourage Biodiversity Net Gains will increasingly dominate the rural landscape of the future. Furthermore, rural land is likely to have an important role in offsetting development impacts elsewhere, supporting sustainable development patterns.</p> <p>6) Paragraph 145 of the NPPF urges Councils to plan positively to enhance the beneficial use of Green Belts. The omission of any policy context for appropriate rural development does not reflect the aims and objectives of the Plan and fails to recognise the positive benefits that the rural areas can offer in this regard. This does not constitute positive planning as required by statute and policy.</p> <p>7) The Council's approach is inconsistent with the stated objectives of the plan. It indicates that the Plan has not been positively prepared, nor is the approach justified by evidence. The Plan's policies will not prove to be effective in meeting its stated objectives.</p> <p>8) Further background is provided in the appended Leverhulme Rural Areas General Statement</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	No comment
If you wish to make a separate representation, relating to legal compliance, soundness or the	No comment

<p>duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ol style="list-style-type: none"> 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'. 2 Notwithstanding that conclusion, the Plan should include a policy for development in rural areas consistent with its aims and objectives, including the re-use of agricultural buildings and land 3 Further background is provided in the appended Leverhulme Rural and Visitor Economy Overview.
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	<p>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>	<ol style="list-style-type: none"> 1 Leverhulme considers that the Council's overall approach to policy for the rural area is fundamentally inconsistent with the objectives of the plan. This conclusion applies across several topic areas. 2 As the principal rural landowner impacted by the draft policies (owning 30% of Wirral's Green Belt land), Leverhulme wishes to be heard.
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-609

Comment ID	LPSD-609
Person ID	1323898
Include files	LPSD-609-EM-Watson Form 29 of 29 2507_Redacted.pdf LPSD-604, 606, 607 & 609-EM-Watson Attach 4 of 7 2507_Redacted
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WS 4.4
Title	Tourism
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 4.4

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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	1) The Submission Draft Plan policy for tourism development provides that any visitor facilities in the “rural area” – defined as Settlement Area SA8 are to be supported “where they meet the tests of national Green Belt policy”.

<p>unsound. Please be as precise as possible.</p>	<p>2) Such a statement is not problematic in itself – indeed one would expect it to be selfevident. It is nevertheless important to consider the strategic context. All of the rural area of Wirral lies within the Green Belt, including the many settlements (which are of a range of sizes from agglomerations of properties around remote farms, to the nationally-known village Thornton Hough. This means that - absent the inseting of some settlements - the many statements in the Plan that identify the importance of the visitor economy and which recognise that the rural areas have much to offer in this regard, ring hollow.</p> <p>3) Paragraph 145 of the NPPF urges Councils to plan positively to enhance the beneficial use of green belts.</p> <p>4) If Wirral does believe that rural tourism is something that its planning policies should support, then a combination of changes to the Plan would be needed.</p> <p>a) Firstly, key settlements within Settlement Area SA8 need to be inset from the Green Belt. This is the subject of a separate representation, but if the rural area is to be able to deliver on the Council's aspiration for the visitor economy, then the villages and settlements must be permitted to play their role in supporting appropriate development projects without being saddled with the tests of national Green Belt policy as currently proposed.</p> <p>b) Secondly, not all settlements in Area SA8 are likely to be suitable for inseting. This means that the Plan would be better able to deliver on its Objectives if it were to provide further policy guidance beyond the self-evident statement about meeting the tests of national Green Belt policy. In order to plan positively in accordance with NPPF Paragraph 145, the Plan should identify the sort of matters that might contribute towards demonstrating very special circumstances in order to support tourism-related development within the Green Belt.</p> <p>5) The Council's current approach does not properly reflect the stated objectives of the Plan. It indicates that the Plan has not been positively prepared. Nor is the approach justified by evidence. The Plan's policies will not prove to be effective in meeting its stated objectives.</p> <p>6) Further background is provided in the appended Leverhulme Rural and Visitor Economy Overview.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>N/A</p>
<p>If you wish to make a separate</p>	<p>N/A</p>

representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ol style="list-style-type: none"> 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'. 2 Notwithstanding that conclusion, the focus of the Plan for Settlement Area SA8 needs to be recast. Firstly, some of the rural settlements should be inset from the Green Belt, in accordance with our separate representations on SA8. Secondly, specific policy guidance for tourism within the rural area is required, to properly reflect the focus of this as an important element of the rural economy. 3 Further background is provided in the appended Leverhulme Rural and Visitor Economy Overview.
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<ol style="list-style-type: none"> 1 Leverhulme considers that the Council's overall approach to policy for the rural area is fundamentally inconsistent with the objectives of the plan. This conclusion applies across several topic areas. 2 As the principal rural landowner impacted by the draft policies (owning 30% of Wirral's green belt land), Leverhulme wishes to be heard.
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-610

Comment ID	LPSD-610
Person ID	1323504
Include files	LPSD-540-542,546,610-Jones Attach 1307_Redacted.pdf
Consultee Name	Mr Chris Jones
Position	Senior Advisor - Development Planning
Company / Organisation	Natural Resources Wales
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5
Title	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.8
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment We note that the boundary of the Clwydian Range and Dee Valley AONB lies 13km to the south-west of Neston. Planning Policy Wales edition 11 (February 2021) requires the setting of designated landscapes in Wales to be considered within strategic planning and site specific development management considerations. If, for example, the Wirral Local Plan were to include provision for onshore wind development within the county area, then we consider that the visual setting of the AONB would be a relevant planning issue. We note that the draft Local Plan indicates the potential for onshore wind development is heavily constrained by settlement, green belt and the National Planning Policy Framework. Given these constraints we consider the risk of a wind farm being proposed within the setting of the Clwydian Range and Dee Valley AONB is likely to be very low. We therefore have no landscape concerns to raise.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is	

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

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

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

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

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

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

LPSP-611

Comment ID	LPSP-611
Person ID	1245996
Include files	LPSP-611-EM-Wilkinson Form 2507_Redacted.pdf
Consultee Name	Mr Gary Wilkinson
Position	
Company / Organisation	B I Builders Ltd
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 7
Title	Policy for Irby, Thingwall, Pensby, Heswall and Gayton
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 7
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	Dear sir / madam after looking at the easy read version of the proposed version of the local plan regarding the irby,thingwall,Pensby area were the plan says it only requires 34 houses in one area, surely this must be an error as there has been very little building over the last 20 years with the council implementing a moratorium for 6years. I believe this doesn't comply with what the secretary. of state requires of the council.
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 as precise as possible.	Dear sir / madam after looking at the easy read version of the proposed version of the local plan regarding the irby,thingwall,Pensby area were the plan says it only requires 34 houses in one area, surely this must be an error as there has been very little building over the last 20 years with the council implementing a moratorium for 6years. I believe this doesn't comply with what the secretary. of state requires of the council.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>Dear sir / madam after looking at the easy read version of the proposed version of the local plan regarding the irby,thingwall,Pensby area were the plan says it only requires 34 houses in one area, surely this must be an error as there has been very little building over the last 20 years with the council implementing a moratorium for 6years. I believe this doesn't comply with what the secretary. of state requires of the council.</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>more homes to be built in Settlement Area 7</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-612
Person ID	1323939
Include files	LPSD-612-EM-Muir Form 1 of 2 2507_Redacted.pdf
Consultee Name	Mr. David Thompson
Position	
Company / Organisation	Peel L&P (Ports) Ltd and Peel L&P Investment Ltd
Agent ID	1323871
Agent Name	Mr Darren Muir
Position	Associate Planner
Company / Organisation	Pegasus Group
Number	Policy WP 4.3
Title	Employment Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policies Map
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	EMP-SA4.5
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>EMP-SA4.5 - NORTH ROAD BUSINESS PARK, NORTH ROAD, EASTHAM</p> <p>Peel L&P (Ports) Limited and Peel L&P Investments (North) Limited, herein referred to as 'Peel', owns land included within employment allocation reference EMP-SA4.5 and located off North Road in Eastham / Ellesmere Port.</p> <p>Approximately half of the site remains allocated for employment development within the Unitary Development Plan (UDP) as allocation reference EM3/11. Peel supports the retention and expansion of this allocation.</p> <p>Peel has represented the site through previous stages of the Local Plan preparation, and through call for sites exercises. These previous consultation responses welcomed the intention to allocate the site for employment use. Comments submitted in response to the Local Plan Issues and Options consultation can be summarised as follows:</p> <ul style="list-style-type: none"> • The site is highly accessible, with road access available to Junctions 6 and 7 of the M53 via North Road and West Road; a conclusion consistent with the Wirral Employment Land and Premises Study (WELPS). • The surrounding area is characterised by large scale industrial uses such as the Vauxhall Motors car plant and is a well established, accessible employment location. • The site has long been identified for employment use from a planning policy perspective. • Development of the site is in accordance with wider regional aspirations as identified within the Strategic Housing and Employment Land Market Assessment (SHELMA). <p>The vacant site sits within an established port / employment area and is considered entirely suitable for the currently proposed employment allocation in the emerging Local Plan.</p> <p>Outline planning permission and a subsequent non-material amendment were granted on the 10th of October 2020 and the 28th February 2022, respectively (references OUT/19/01633 and NMA/21/02420) by Wirral Council for up to 500,000sq.ft of employment development on the proposed allocation area and adjoining land. The description of development is:</p> <p>"Development of up to 500,000ft2 (46,450m2) of B2 / B8 Use Class floorspace, with ancillary B1(a) Use Class floorspace, service yards, and all associated works including landscaping and car parking with all matters reserved for future consideration."</p> <p>Outline planning consent has also been granted by Cheshire West for the small part of the site which falls within their administrative area.</p> <p>Although submitted in outline, with all matters of detail reserved for future consideration, the application was supported by a range of supporting documents, including:</p> <ul style="list-style-type: none"> • Transport Assessment and Framework Travel Plan • Landscape and Visual Impact Assessment • Arboriculture Impact Assessment • Air Quality Assessment • Ecological Survey and Assessment • Geo-Environmental Desktop and Contaminated Land Matters Summary • Flood Risk Note • Sustainability Checklist • Statement of Community Involvement • Economic Benefits Statement • HSE Hazard Assessment

	<p>In granting the permission Wirral Council noted that the proposed development is in accordance with the development plan and national planning policy. The planning authority also stated that the development will bring forward modern employment floorspace in a location with an established precedent for employment generating development, and that the site benefits from an existing employment allocation.</p> <p>This further confirms the suitability of this location for employment purposes and aligns with the intentions of the emerging Local Plan.</p> <p>Peel L&P (Ports) Ltd and Peel L&P Investments (North) Ltd are satisfied that they do not need to participate in the hearing sessions relating to this Policy allocation. However, should any objection be raised against the allocation of this site, they would seek to participate in support of the Council.</p>
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	<p>EMP-SA4.5 - NORTH ROAD BUSINESS PARK, NORTH ROAD, EASTHAM</p> <p>Peel L&P (Ports) Limited and Peel L&P Investments (North) Limited, herein referred to as 'Peel', owns land included within employment allocation reference EMP-SA4.5 and located off North Road in Eastham / Ellesmere Port.</p> <p>Approximately half of the site remains allocated for employment development within the Unitary Development Plan (UDP) as allocation reference EM3/11. Peel supports the retention and expansion of this allocation.</p> <p>Peel has represented the site through previous stages of the Local Plan preparation, and through call for sites exercises. These previous consultation responses welcomed the intention to allocate the site for employment use. Comments submitted in response to the Local Plan Issues and Options consultation can be summarised as follows:</p> <ul style="list-style-type: none"> • The site is highly accessible, with road access available to Junctions 6 and 7 of the M53 via North Road and West Road; a conclusion consistent with the Wirral Employment Land and Premises Study (WELPS). • The surrounding area is characterised by large scale industrial uses such as the Vauxhall Motors car plant and is a well established, accessible employment location. • The site has long been identified for employment use from a planning policy perspective. • Development of the site is in accordance with wider regional aspirations as identified within the Strategic Housing and Employment Land Market Assessment (SHELMA). <p>The vacant site sits within an established port / employment area and is considered entirely suitable for the currently proposed employment allocation in the emerging Local Plan.</p> <p>Outline planning permission and a subsequent non-material amendment were granted on the 10th of October 2020 and the 28th February 2022, respectively (references OUT/19/01633 and NMA/21/02420) by Wirral Council for up to 500,000sq.ft of employment development on the proposed allocation area and adjoining land. The description of development is:</p> <p>"Development of up to 500,000ft2 (46,450m2) of B2 / B8 Use Class floorspace, with ancillary B1(a) Use Class floorspace, service yards, and all associated works including landscaping and car parking with all matters reserved for future consideration."</p> <p>Outline planning consent has also been granted by Cheshire West for the small part of the site which falls within their administrative area.</p> <p>Although submitted in outline, with all matters of detail reserved for future consideration, the application was supported by a range of supporting documents, including:</p> <ul style="list-style-type: none"> • Transport Assessment and Framework Travel Plan • Landscape and Visual Impact Assessment • Arboriculture Impact Assessment • Air Quality Assessment • Ecological Survey and Assessment • Geo-Environmental Desktop and Contaminated Land Matters Summary • Flood Risk Note • Sustainability Checklist

	<ul style="list-style-type: none"> • Statement of Community Involvement • Economic Benefits Statement • HSE Hazard Assessment <p>In granting the permission Wirral Council noted that the proposed development is in accordance with the development plan and national planning policy. The planning authority also stated that the development will bring forward modern employment floorspace in a location with an established precedent for employment generating development, and that the site benefits from an existing employment allocation.</p> <p>This further confirms the suitability of this location for employment purposes and aligns with the intentions of the emerging Local Plan.</p> <p>Peel L&P (Ports) Ltd and Peel L&P Investments (North) Ltd are satisfied that they do not need to participate in the hearing sessions relating to this Policy allocation. However, should any objection be raised against the allocation of this site, they would seek to participate in support of the Council.</p>
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</p> <p>* Not Positively Prepared</p> <p>* Not Justified</p> <p>* Not Effective</p> <p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	<p>EMP-SA4.5 - NORTH ROAD BUSINESS PARK, NORTH ROAD, EASTHAM</p> <p>Peel L&P (Ports) Limited and Peel L&P Investments (North) Limited, herein referred to as 'Peel', owns land included within employment allocation reference EMP-SA4.5 and located off North Road in Eastham / Ellesmere Port.</p> <p>Approximately half of the site remains allocated for employment development within the Unitary Development Plan (UDP) as allocation reference EM3/11. Peel supports the retention and expansion of this allocation.</p> <p>Peel has represented the site through previous stages of the Local Plan preparation, and through call for sites exercises. These previous consultation responses welcomed the intention to allocate the site for employment use. Comments submitted in response to the Local Plan Issues and Options consultation can be summarised as follows:</p> <ul style="list-style-type: none"> • The site is highly accessible, with road access available to Junctions 6 and 7 of the M53 via North Road and West Road; a conclusion consistent with the Wirral Employment Land and Premises Study (WELPS). • The surrounding area is characterised by large scale industrial uses such as the Vauxhall Motors car plant and is a well established, accessible employment location. • The site has long been identified for employment use from a planning policy perspective. • Development of the site is in accordance with wider regional aspirations as identified within the Strategic Housing and Employment Land Market Assessment (SHELMA). <p>The vacant site sits within an established port / employment area and is considered entirely suitable for the currently proposed employment allocation in the emerging Local Plan.</p>

	<p>Outline planning permission and a subsequent non-material amendment were granted on the 10th of October 2020 and the 28th February 2022, respectively (references OUT/19/01633 and NMA/21/02420) by Wirral Council for up to 500,000sq.ft of employment development on the proposed allocation area and adjoining land. The description of development is:</p> <p>“Development of up to 500,000ft2 (46,450m2) of B2 / B8 Use Class floorspace, with ancillary B1(a) Use Class floorspace, service yards, and all associated works including landscaping and car parking with all matters reserved for future consideration.”</p> <p>Outline planning consent has also been granted by Cheshire West for the small part of the site which falls within their administrative area.</p> <p>Although submitted in outline, with all matters of detail reserved for future consideration, the application was supported by a range of supporting documents, including:</p> <ul style="list-style-type: none"> • Transport Assessment and Framework Travel Plan • Landscape and Visual Impact Assessment • Arboriculture Impact Assessment • Air Quality Assessment • Ecological Survey and Assessment • Geo-Environmental Desktop and Contaminated Land Matters Summary • Flood Risk Note • Sustainability Checklist • Statement of Community Involvement • Economic Benefits Statement • HSE Hazard Assessment <p>In granting the permission Wirral Council noted that the proposed development is in accordance with the development plan and national planning policy. The planning authority also stated that the development will bring forward modern employment floorspace in a location with an established precedent for employment generating development, and that the site benefits from an existing employment allocation.</p> <p>This further confirms the suitability of this location for employment purposes and aligns with the intentions of the emerging Local Plan.</p> <p>Peel L&P (Ports) Ltd and Peel L&P Investments (North) Ltd are satisfied that they do not need to participate in the hearing sessions relating to this Policy allocation. However, should any objection be raised against the allocation of this site, they would seek to participate in support of the Council.</p>
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	<p>The Sustainability Appraisal (SA) identifies the options for the distribution of employment growth considered by the Council when preparing the Local Plan. The preferred approach is to seek to meet the Borough's employment needs within existing urban areas. Peel considers this to accord with the Strategic Objectives of the Plan to deliver comprehensive regeneration and support sustainable locations for development to help secure a rapid reduction in carbon emissions to reach net zero carbon locally by 2041. The Wirral Employment Land and Premises Study 2021 (WELPS) identified sufficient land for allocation in sustainable locations within existing industrial and port and maritime areas to meet the objectively assessed need for new employment land. In relation to the site at Bankfields Drive, Peel considers the allocation of the site as part of the Port and Maritime Zone aligns with the preferred approach set out in the SA for the distribution of employment land to be consistent with the findings of the (WELPS), and relevant guidance set out in the National Planning Policy Framework.</p>
If you wish to make a separate representation,	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>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	N/A
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	No, I do not wish to participate in hearing session(s)

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

LPSP-613

Comment ID	LPSP-613
Person ID	1323939
Include files	LPSP-613-EM-Muir Form 2 of 2 2507_Redacted.pdf
Consultee Name	Mr. David Thompson
Position	
Company / Organisation	Peel L&P (Ports) Ltd and Peel L&P Investment Ltd
Agent ID	1323871
Agent Name	Mr Darren Muir
Position	Associate Planner
Company / Organisation	Pegasus Group
Number	Policy WS 4.3
Title	The Port and Maritime Zone
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	DKS-SA4.1

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>POLICY WS 4.3 – THE PORT AND MARITIME ZONE</p> <p>Peel L&P (Ports) Limited ('Peel') owns 13.5 acres of land off Bankfields Drive, Eastham (plan attached).</p> <p>Peel has represented this site through previous stages of the Local Plan preparation and through 'Call for Sites' exercises. Previous representations at the Issues and Options stage of the Local Plan preparation stated that the site was suitable for a variety of uses, including employment, residential, community, and open space.</p> <p>Peel supports the continued inclusion of this site within the 'Port and Maritime Zone' Policy WS 4.3. (Site DKS-SA4.1 on the Policies Map).</p> <p>The site is located within an established port / employment area and is considered suitable for the proposed allocation. The Policies Map references the site location as "Port Wirral, Eastham". However, Peel request this is amended to more accurately describe the location as the Eastham Dock Estate to be consistent with the description provided in the Strategic Policy section of the emerging Local Plan.</p> <p>Part F of Policy WS 4.3 states that "...Port Wirral, Eastham (DKS-SA4.1) ...will normally be safeguarded from non-port related development". Part G provides the criteria that must be met for non-port related development to be permitted. Peel supports this approach, with the minor alteration to change "Port Wirral, Eastham" to "The Eastham Dock Estate".</p> <p>The Strategic Policies identify the site within Settlement Area 4 – Bebington, Bromborough & Eastham ('SA4'). The Settlement Area Policies identify nine prioritise for SA4. Priority 6 is relevant to the site at Bankfields Drive. It states a priority to:</p> <p>Maximise the economic contribution of the Eastham Dock Estate as a low carbon inland transport corridor, for port-related storage, processing and distribution uses, waterborne freight and rail transport through land allocations and Policy WS 4 Strategy for Economy and Employment, while continuing to reduce the impact of traffic on Eastham Village Conservation Area.</p> <p>Peel supports the overall strategy (as proposed within Policy WS 4.3 and SA4) and considers the strategic and settlement area policies relevant to the site at Bankfields Drive to be legally compliant and sound, in accordance with test of soundness set out in Paragraph 35 of the National Planning Policy Framework.</p> <p>The Sustainability Appraisal (SA) identifies the options for the distribution of employment growth considered by the Council when preparing the Local Plan.</p> <p>The preferred approach is to seek to meet the Borough's employment needs within existing urban areas. Peel considers this to accord with the Strategic Objectives of the Plan to deliver comprehensive regeneration and support sustainable locations for development to help secure a rapid reduction in carbon emissions to reach net zero carbon locally by 2041.</p> <p>The Wirral Employment Land and Premises Study 2021 (WELPS) identified sufficient land for allocation in sustainable locations within existing industrial and port and maritime areas to meet the objectively assessed need for new employment land. In relation to the site at Bankfields Drive, Peel considers the allocation of the site as part of the Port and Maritime Zone aligns with the preferred approach set out in the SA for the distribution of employment land to be consistent with the findings of the (WELPS), and relevant guidance set out in the National Planning Policy Framework.</p> <p>Peel L&P (Ports) Ltd are satisfied that they do not need to participate in the hearing sessions relating to this Policy. However, should any objection be raised against the allocation of this site, they would seek to participate in support of the Council.</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes

<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	<p>POLICY WS 4.3 – THE PORT AND MARITIME ZONE</p> <p>Peel L&P (Ports) Limited ('Peel') owns 13.5 acres of land off Bankfields Drive, Eastham (plan attached).</p> <p>Peel has represented this site through previous stages of the Local Plan preparation and through 'Call for Sites' exercises. Previous representations at the Issues and Options stage of the Local Plan preparation stated that the site was suitable for a variety of uses, including employment, residential, community, and open space.</p> <p>Peel supports the continued inclusion of this site within the 'Port and Maritime Zone' Policy WS 4.3. (Site DKS-SA4.1 on the Policies Map).</p> <p>The site is located within an established port / employment area and is considered suitable for the proposed allocation. The Policies Map references the site location as "Port Wirral, Eastham". However, Peel request this is amended to more accurately describe the location as the Eastham Dock Estate to be consistent with the description provided in the Strategic Policy section of the emerging Local Plan.</p> <p>Part F of Policy WS 4.3 states that "...Port Wirral, Eastham (DKS-SA4.1) ...will normally be safeguarded from non-port related development". Part G provides the criteria that must be met for non-port related development to be permitted. Peel supports this approach, with the minor alteration to change "Port Wirral, Eastham" to "The Eastham Dock Estate".</p> <p>The Strategic Policies identify the site within Settlement Area 4 – Bebington, Bromborough & Eastham ('SA4'). The Settlement Area Policies identify nine prioritise for SA4. Priority 6 is relevant to the site at Bankfields Drive. It states a priority to:</p> <p>Maximise the economic contribution of the Eastham Dock Estate as a low carbon inland transport corridor, for port-related storage, processing and distribution uses, waterborne freight and rail transport through land allocations and Policy WS 4 Strategy for Economy and Employment, while continuing to reduce the impact of traffic on Eastham Village Conservation Area.</p> <p>Peel supports the overall strategy (as proposed within Policy WS 4.3 and SA4) and considers the strategic and settlement area policies relevant to the site at Bankfields Drive to be legally compliant and sound, in accordance with test of soundness set out in Paragraph 35 of the National Planning Policy Framework.</p> <p>The Sustainability Appraisal (SA) identifies the options for the distribution of employment growth considered by the Council when preparing the Local Plan.</p> <p>The preferred approach is to seek to meet the Borough's employment needs within existing urban areas. Peel considers this to accord with the Strategic Objectives of the Plan to deliver comprehensive regeneration and support sustainable locations for development to help secure a rapid reduction in carbon emissions to reach net zero carbon locally by 2041.</p> <p>The Wirral Employment Land and Premises Study 2021 (WELPS) identified sufficient land for allocation in sustainable locations within existing industrial and port and maritime areas to meet the objectively assessed need for new employment land. In relation to the site at Bankfields Drive, Peel considers the allocation of the site as part of the Port and Maritime Zone aligns with the preferred approach set out in the SA for the distribution of employment land to be consistent with the findings of the (WELPS), and relevant guidance set out in the National Planning Policy Framework.</p> <p>Peel L&P (Ports) Ltd are satisfied that they do not need to participate in the hearing sessions relating to this Policy. However, should any objection be raised against the allocation of this site, they would seek to participate in support of the Council.</p>
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</p> <ul style="list-style-type: none"> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy 	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>omplies with the Duty to co-operate</p>	<p>Yes</p>

<p>* Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	<p>POLICY WS 4.3 – THE PORT AND MARITIME ZONE</p> <p>Peel L&P (Ports) Limited ('Peel') owns 13.5 acres of land off Bankfields Drive, Eastham (plan attached).</p> <p>Peel has represented this site through previous stages of the Local Plan preparation and through 'Call for Sites' exercises. Previous representations at the Issues and Options stage of the Local Plan preparation stated that the site was suitable for a variety of uses, including employment, residential, community, and open space.</p> <p>Peel supports the continued inclusion of this site within the 'Port and Maritime Zone' Policy WS 4.3. (Site DKS-SA4.1 on the Policies Map).</p> <p>The site is located within an established port / employment area and is considered suitable for the proposed allocation. The Policies Map references the site location as "Port Wirral, Eastham". However, Peel request this is amended to more accurately describe the location as the Eastham Dock Estate to be consistent with the description provided in the Strategic Policy section of the emerging Local Plan.</p> <p>Part F of Policy WS 4.3 states that "...Port Wirral, Eastham (DKS-SA4.1) ...will normally be safeguarded from non-port related development". Part G provides the criteria that must be met for non-port related development to be permitted. Peel supports this approach, with the minor alteration to change "Port Wirral, Eastham" to "The Eastham Dock Estate".</p> <p>The Strategic Policies identify the site within Settlement Area 4 – Bebington, Bromborough & Eastham ('SA4'). The Settlement Area Policies identify nine prioritise for SA4. Priority 6 is relevant to the site at Bankfields Drive. It states a priority to:</p> <p>Maximise the economic contribution of the Eastham Dock Estate as a low carbon inland transport corridor, for port-related storage, processing and distribution uses, waterborne freight and rail transport through land allocations and Policy WS 4 Strategy for Economy and Employment, while continuing to reduce the impact of traffic on Eastham Village Conservation Area.</p> <p>Peel supports the overall strategy (as proposed within Policy WS 4.3 and SA4) and considers the strategic and settlement area policies relevant to the site at Bankfields Drive to be legally compliant and sound, in accordance with test of soundness set out in Paragraph 35 of the National Planning Policy Framework.</p> <p>Peel L&P (Ports) Ltd are satisfied that they do not need to participate in the hearing sessions relating to this Policy. However, should any objection be raised against the allocation of this site, they would seek to participate in support of the Council.</p>
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>The Sustainability Appraisal (SA) identifies the options for the distribution of employment growth considered by the Council when preparing the Local Plan.</p> <p>The preferred approach is to seek to meet the Borough's employment needs within existing urban areas. Peel considers this to accord with the Strategic Objectives of the Plan to deliver comprehensive regeneration and support sustainable locations for development to help secure a rapid reduction in carbon emissions to reach net zero carbon locally by 2041.</p> <p>The Wirral Employment Land and Premises Study 2021 (WELPS) identified sufficient land for allocation in sustainable locations within existing industrial and port and maritime areas to meet the objectively assessed need for new employment land. In relation to the site at Bankfields Drive, Peel considers the allocation of the site as part of the Port and Maritime Zone aligns with the preferred approach set out in the SA for the distribution of employment land to be consistent with the findings of the (WELPS), and relevant guidance set out in the National Planning Policy Framework.</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the</p>	

<p>duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>It is not considered that a proposed modification is required to make the Local Plan legally compliant and sound, but rather for consistency and clarity. The Policies Map and part F of Policy WS 4.3 references the site location as "Port Wirral, Eastham". However, Peel request this is amended to more accurately describe the location as the Eastham Dock Estate to be consistent with the description provided in the Strategic Policy section and Part F of Policy WS 1.2 of the emerging Local Plan.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

LPSP-614

Comment ID	LPSP-614
Person ID	1323959
Include files	LPSP-614-EM-Thompson Form 2507_Redacted.pdf
Consultee Name	Mr David Thompson
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 4
Title	Policy for Bebington, Bromborough and Eastham
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	One is located off Ferry Road (0.88 acres) and the other off Seaview Avenue (3.13 acres):

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>Please refer to attachment</p> <p>Background : Peel L&P (Ports) Limited [hereafter ‘Peel’] owns two small sites in Eastham. These undeveloped sites are located within the Green Belt. One is located off Ferry Road (0.88 acres) and the other off Seaview Avenue (3.13 acres): (See Map in Attachment)</p> <p>Peel considers that carefully considered and carefully planned small scale development on these sites has the potential to contribute positively towards meeting local housing needs (including affordable or specialist housing) and/or provide new local community related uses and open space.</p> <p>For example, the draft Local Plan identifies the provision of affordable and specialist housing as a priority (see for example: paragraphs 2.17 part vi; the Vision Statement part L.; Strategic Objective 7; Policy WS 1.1; paragraphs 3.53 and 3.55; Policy WS 3.3 and Policy WS 3.6). However, the suitability of these sites has not been considered by the Council within their 2021 SHLAA, as the sites were discounted at an early stage of the SHLAA process due to their Green Belt status.</p> <p>Peel has represented these sites through previous stages of the Local Plan review and in previous Call for Sites exercises. Peel has also represented an adjacent 13 acre employment site (land off Banksfield Drive, which forms part of the Port and Maritime allocation at Eastham under policy EMP-SA4.5) and a nearby 35 acre employment site (North Road Business Park, the majority of which is proposed to be allocated under reference: EMP-SA 4.5).</p> <p>Previous SHLAA's and Green Belt Assessment's</p> <p>The Seaview Avenue and Ferry Road sites were considered in the Council's 2018 ‘Summary of Initial Green Belt Assessment Report’.</p> <p>In this report the Seaview Avenue site (SHLAA ref. 1928) and Ferry Road site (SHLAA ref. 1929) were acknowledged as having infill potential with “... little impact on separation or open countryside.” and that they ‘... could potentially be added to the Infill Village (SP053A) without significantly affecting any strategic separation or introducing discordant development into the open countryside.’” (see page 95 of the Summary of Initial GB Assessment, Wirral Council, Sept 2018). (See Map on Attachment)</p> <p>We also note that sites 1928 and 1929 were later considered in the Council's 2019 SHLAA, but in terms of the tests as to whether the sites were ‘Available’, ‘Deliverable’, ‘Suitable’ and ‘Achievable’ they were both disregarded solely on the basis that they were located in the Green Belt. As noted above, they were also discounted from the 2021 SHLAA for the same reason.</p> <p>In terms of the Green Belt designation, Peel notes that the sites are located within Parcel 4.17 within ARUP's ‘Green Belt Review Assessment Report’ dated 28 November 2019: (See maps on Attachment)</p> <p>ARUP concluded that Parcel 4.17 makes a ‘Weak Contribution’ to the five Green Belt designation purposes: (See table on Attachment)</p> <p>The assessment further identifies that “Given the shape of the built-up area, development of the parcel alongside the adjacent parcels could constitute rounding off the settlement pattern given that the parcels are relatively enclosed by the urban conurbation to the north, east and west.”</p> <p>Site Credentials : The Seaview Avenue and Ferry Road sites are located adjacent to existing homes and are within walking distance of Eastham Village centre and its local facilities. There is a bus stop located on the frontage of the Ferry Road site. The sites are considered to be sustainable, being close to a range of facilities and services, employment opportunities, and public transport opportunities.</p> <p>Whilst the sites do fall within the consultation distance (Middle Zone) of a major hazard site, standing advice from the Health and Safety Executive [1] would not preclude small scale low density housing, suitable community related / open space uses.</p> <p>In terms of other constraints, Peel is not aware of any local, regional or national sites of ecological or geological importance that directly affect the sites. The sites fall within Flood Zone 1 and are therefore considered by the Environment Agency to be at low probability of flooding [2]. The sites do not include listed buildings and are not within a Conservation Area. There are no public rights of way that affect the sites, but they do abut highway. We are not aware of any constraints (other than the sites Green Belt status) which would indicate against and prevent small scale, carefully designed and planned residential / community / open space uses coming forward.</p> <p>These sites are also located in close proximity to proposed high quality employment opportunities as identified by Section 4.6.2 of the Sustainability Appraisal. Locating housing close to the proposed industrial uses offers opportunities to promote further sustainable transport patterns.</p> <p>Further, Peel considers that these sites could be brought forward without prejudice to the core objectives of the Local Plan – which include promoting brownfield regeneration in key urban areas. The small-scale nature of these sites and their location in Eastham determines that they could only ever help meet local needs.</p>

	<p>Conclusion</p> <p>If it is identified that Green Belt release is required as part of the current Local Plan review process, Peel would suggest that parcels which make a weak contribution when assessed against the five purposes of Green Belt should be considered for release first. This is especially the case for sites which would deliver a logical rounding off of the existing settlement. The early assessment work undertaken by the Council in the context of the Local Plan review also gave some indication of the potential of these sites, albeit they were discounted because of their Green Belt status (on a methodological basis).</p> <p>In the instance of a future Green Belt review exercise, the sites identified within this submission could be regarded as small-scale infill opportunities within an established residential area on the edge of an established employment / port / maritime area. These sites sit on the edge of the existing Green Belt parcel and any changes to the Green Belt boundary would be minor in nature.</p> <p>[1] HSE's Land Use Planning Methodology – see: www.hse.gov.uk/landuseplanning/methodology.htm~matrix</p> <p>[2] See: https://flood-map-for-planning.service.gov.uk</p> <p>Should the Inspector or Council determine that it is appropriate to consider Green Belt sites through the current Local Plan review process, then Peel would ask the Council to consider these candidate sites as potential minor Green Belt boundary amendments to help meet local needs. Notwithstanding any change to the allocation status of these sites, any future development on these sites would of course be subject to any further planning consents that would be required.</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	
omplies with the Duty to co-operate	Yes

* Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	<p>Should the Inspector or Council determine that it is appropriate to consider Green Belt sites through the current Local Plan review process, then Peel would ask the Council to consider these candidate sites - as it has been acknowledged by the Council's consultants that they make a weak contribution to the Green Belt when assessed against the five purposes of including land within the Green Belt (as identified within the National Planning Policy Framework).</p> <p>These sites could be considered further and brought forward or safeguarded in planning policy terms to help meet local housing, local community and/or open space needs, as minor amendments to the existing Green Belt boundary.</p> <p>One is located off Ferry Road (0.88 acres) and the other off Seaview Avenue (3.13 acres):</p>

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

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

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

LPSP-615

Comment ID	LPSP-615
Person ID	1323963
Include files	<p>LPSP-615-EM-Storey Form 1 of 5 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 1 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 3 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 2 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 3 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Photos) 2507.pdf</p> <p>LPSP-615-619-EM-Storey Attach 14 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 2 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 10 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 1 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 13 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 4 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 5 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 6 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 7 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 12 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM -Storey Attach 11 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 9 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 8 of 14 2507_Redacted.pdf</p>
Consultee Name	Mr Roy Kenny
Position	
Company / Organisation	Verum Victum Healthcare
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy	Policy

* Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound.	

Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'. The Council have not provided any evidence to justify how they will deliver the quantum of affordable housing required. There is reference to the need for a 'robust' affordable housing policy which has not been forthcoming. This will further lead to a greater undersupply of affordable homes and inequalities across the Borough. If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver affordable housing to respond to the needs of the Borough
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
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	N/A

duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy	<p>Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.</p> <p>If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver affordable housing to respond to the needs of the Borough</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>	For the reasons outlined in the attached Verum Victum Healthcare 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>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-616

Comment ID	LPSP-616
Person ID	1323963
Include files	<p>LPSP-615-619-EM-Storey Attach (Plans 2 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 8 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 9 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM -Storey Attach 11 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 12 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 7 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 6 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 5 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 14 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 13 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 1 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 10 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Photos) 2507.pdf</p> <p>LPSP-615-619-EM-Storey Attach 4 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 3 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 2 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 3 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 1 of 14 2507_Redacted.pdf</p> <p>LPSP-616-EM-Storey Form 2 of 5 2507_Redacted.pdf</p>
Consultee Name	Mr Roy Kenny
Position	
Company / Organisation	Verum Victum Healthcare
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy	Policy

* Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound.	

Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'. The Council have not provided any evidence to justify the quantity of development that can be delivered in Regeneration Areas along with associated infrastructure within the Plan period. The delivery strategy does not take a realistic view on the economic viability issues that are present on the majority of allocated sites. Insufficient evidence has been supplied to prove the viability of these major regeneration sites be it through grant funding or otherwise. The Council have not provided any evidence to justify the quantity of development that can be delivered in Regeneration Areas along with associated infrastructure within the Plan period. The delivery strategy does not take a realistic view on the economic viability issues that are present on the majority of allocated sites. Insufficient evidence has been supplied to prove the viability of these major regeneration sites be it through grant funding or otherwise. If found to be unsound, further consideration would need to be given to housing growth on viable and deliverable sites elsewhere in the Borough. This would act as an exceptional circumstance to justify Green Belt land release. If found to be unsound, further consideration would need to be given to housing growth on viable and deliverable sites elsewhere in the Borough. This would act as an exceptional circumstance to justify Green Belt land release.
Complies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
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 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	<p>Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.</p> <p>green belt release required, allocate land to the south of Greasby</p>

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

* No	
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LPSP-617

Comment ID	LPSP-617
Person ID	1323963
Include files	<p>LPSP-617-EM-Storey Form 3 of 5 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 1 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 3 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 2 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 3 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 4 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Photos) 2507.pdf</p> <p>LPSP-615-619-EM-Storey Attach 10 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 1 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 13 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 14 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 5 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 6 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 7 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 12 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM -Storey Attach 11 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 9 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 8 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 2 of 3) 2507_Redacted.pdf</p>
Consultee Name	Mr Roy Kenny
Position	
Company / Organisation	Verum Victum Healthcare
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WP 5.1
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy	Policy

* Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 5.1
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
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.	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</p> <p>* Not Positively Prepared</p> <p>* Not Justified</p> <p>* Not Effective</p> <p>* Not Consistent with National Policy</p>	<p>Not Positively Prepared</p> <p>Not Justified</p> <p>Not Effective</p> <p>Not Consistent with National Policy</p>
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'. rep states WP 5.2 but think this is error</p> <p>The Council have not provided any evidence that this policy is positively prepared and that the homes planned in Settlement Area 5 will meet the objectively assessed needs of this Settlement Area including affordable housing needs over the plan period.</p> <p>To address this issue, the Council should provide evidence on how the identified supply of homes in SA5 will address these needs over the plan period.</p> <p>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>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	<p>Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.</p>
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate</p>	<p>N/A</p>

representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
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	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'. provide more homes in settlement area 5

forward your suggested revised wording of any policy or text. Please be as precise as possible.	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	For the reasons outlined in the attached Verum Victum Healthcare 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>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-618

Comment ID	LPSD-618
Person ID	1323963
Include files	LPSD-615-619-EM-Storey Attach (Plans 2 of 3) 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 8 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 9 of 14 2507_Redacted.pdf LPSD-615-619-EM -Storey Attach 11 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 12 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 7 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 6 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 5 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 14 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 13 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach (Plans 1 of 3) 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 10 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach (Photos) 2507.pdf LPSD-615-619-EM-Storey Attach 4 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 3 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 2 of 14 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach (Plans 3 of 3) 2507_Redacted.pdf LPSD-615-619-EM-Storey Attach 1 of 14 2507_Redacted.pdf LPSD-618-EM-Storey Form 4 of 5 2507_Redacted.pdf
Consultee Name	Mr Roy Kenny
Position	
Company / Organisation	Verum Victum Healthcare
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy	Policy

* Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound.	

Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'. The Council have not provided any evidence to justify how the housing density requirements respond to the needs of the Borough and how this will deliver the quantum of larger family housing required. If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver lower density schemes and provide for larger family housing and affordable housing
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
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	N/A

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.	N/A
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.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.

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

LPSP-619

Comment ID	LPSP-619
Person ID	1323963
Include files	<p>LPSP-619-EM-Storey Form 5 of 5 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 1 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 3 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 2 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 3 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 14 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Photos) 2507.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 2 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 10 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach (Plans 1 of 3) 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 13 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 4 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 5 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 6 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 7 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 12 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM -Storey Attach 11 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 9 of 14 2507_Redacted.pdf</p> <p>LPSP-615-619-EM-Storey Attach 8 of 14 2507_Redacted.pdf</p>
Consultee Name	Mr Roy Kenny
Position	
Company / Organisation	Verum Victum Healthcare
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Part 2
Title	The Places and Our Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy	Policy

* Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	Vision
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 find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound.	

Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'. The Council have not provided any evidence to justify the small-scale incremental development envisioned within the towns and villages of the west of Wirral and that they will remain stable and thrive over the plan period, and thus that the Vision is sound. If found to be unsound, further consideration would need to be given to how the towns and villages of the west of Wirral can thrive over the plan period. This could include, for example, going beyond the envisaged small-scale incremental development in a way which is aspirational but deliverable to address the issues faced by these towns and villages over the plan period code. The Council have not provided any evidence to justify the limited housing growth planned in Settlement Area 5, and thus that the Development and Regeneration Strategy is not sound – the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified. If found to be unsound, further consideration would need to be given to housing growth needed within Settlement Area 5, to ensure the Development and Regeneration Strategy is sound. If more housing growth is required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.
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	N/A

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.	N/A
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please find attached Regulation 19 response on behalf of Verum Victum Healthcare outlining how we feel the plan is 'unsound'.</p> <p>If found to be unsound, further consideration would need to be given to housing growth needed within Settlement Area 5, to ensure the Development and Regeneration Strategy is sound.</p> <p>If more housing growth is required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt</p>

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

LPSP-620

Comment ID	LPSP-620
Person ID	1323975
Include files	LPSP-620-EM-Dennis Form 1 of 7 2507_Redacted.pdf LPSP-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the representations report for further details (R008). The Council have not provided any evidence to justify the spatial distribution of homes and the negligible number of homes directed to the Hoylake and West Kirby Settlement Area, and thus that the spatial distribution of homes is sound –the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified.If found to be unsound, further consideration would need to be given to the planned number of homes in Hoylake and West Kirby, to ensure that they address the needs of this area over the plan period.

as precise as possible.	<p>This would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt. In this instance, attention should be given to the land to the south and east of Saughall Massie Road which is within a Green Belt parcel which is found to make an overall weak contribution to the purpose of the Green Belt in the within the Wirral Green Belt Review 2019, is suitable, available and achievable for housing development, and well served by public transport, and can provide affordable and larger family homes. Attention should also be given to the land north of Saughall Massie Road which is demonstrated in these representations to make an overall weak contribution to the purpose of the Green Belt, is suitable, available and achievable for housing development, and well served by public transport, and can provide affordable and larger family homes.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to the representations report for further details (R008).</p> <p>If found to be unsound, further consideration would need to be given to the planned number of homes in Hoylake and West Kirby, to ensure that they address the needs of this area over the plan period</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</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-621

Comment ID	LPSP-621
Person ID	1323675
Include files	LPSP-621-Taylor Attach 2207_Redacted.pdf
Consultee Name	Mr Andy Taylor
Position	Spatial Planner
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

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

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

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

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

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

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

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

Comment ID	LPSD-622
Person ID	1323975
Include files	LPSD-622-EM-Dennis Form 2 of 7 2507_Redacted.pdf LPSD-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the representations report for further details (R008). The Council have not provided any evidence to justify the limited housing growth planned in the Hoylake and West Kirby Settlement Area, and thus that the Development and Regeneration Strategy is sound – the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified.

<p>as precise as possible.</p>	<p>If found to be unsound, further consideration would need to be given to housing growth needed within the Hoylake and West Kirby Settlement Area, to ensure the Development and Regeneration Strategy is sound. If more housing growth is required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt.</p> <p>In this instance, attention should be given to the land to the south and east of Saughall Massie Road which is within a Green Belt parcel which is found to make an overall weak contribution to the purpose of the Green Belt in the within the Wirral Green Belt Review 2019, and which is suitable, available and achievable for housing development, and well served by public transport.</p> <p>Attention should also be given to the land north of Saughall Massie Road which is demonstrated in these representations to make an overall weak contribution to the purpose of the Green Belt and is suitable, available, and achievable for housing development, and well served by public transport.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>1 Please refer to the representations report for further details (R008) release green belt sites</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-623
Person ID	1323975
Include files	LPSD-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf LPSD-623-EM-Dennis Form 3 of 7 2507_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the representations report for further details (R008). The policy says (at part A1) that new build dwellings should comply with nationally described space standards or any successor standards. 4.37.To justify this policy evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed. If this evidence is provided and sufficiently justifies the adoption of space standards, then consideration should also be given to a reasonable transitional period following adoption to enable developers to factor the cost

as precise as possible.	of space standards into future land acquisitions. The policy also says (at part A2) that that new build dwellings should comply with the higher water efficiency standard of 110 litres/ per person/ per day under Regulation 36(3) of the Building Regulations or any successor standard. If the Council wishes to adopt this optional standard for water effectively then they will need to demonstrate that there is a clear need for doing so based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement. The policy goes on to say (at part A4i) that that on developments of 17 or more new build dwellings at least 6% will be 'wheelchair adaptable' in line with Part M4(3)(2)(a) of the Building Regulations or any successor standard. The Council have yet to provide sufficient evidence for this policy to be considered justified or consistent with national policy
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to the representations report for further details (R008). policy is not sufficiently evidenced- further evidence required</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</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-624

Comment ID	LPSP-624
Person ID	1323975
Include files	<p>LPSP-624-EM-Dennis Form 4 of 7 2507_Redacted.pdf</p> <p>LPSP-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 1 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 4 of 17_Redacted.PDF</p> <p>LPSP-624-EM-Dennis-Attach 12 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 10 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 13 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 16 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 14 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 2 of 17_Redacted.PDF</p> <p>LPSP-624-EM-Dennis-Attach 11 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 15 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 8 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 5 of 17_Redacted.PDF</p> <p>LPSP-624-EM-Dennis-Attach 7 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 3 of 17_Redacted.PDF</p> <p>LPSP-624-EM-Dennis-Attach 9 of 17_Redacted.pdf</p> <p>LPSP-624-EM-Dennis-Attach 6 of 17_Redacted.PDF</p>
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map 	

* Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.4
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	

<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</p> <p>* Not Positively Prepared</p> <p>* Not Justified</p> <p>* Not Effective</p> <p>* Not Consistent with National Policy</p>	<p>Not Positively Prepared</p> <p>Not Justified</p> <p>Not Effective</p>
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to the representations report for further details (R008).</p> <p>The Council have provided insufficient evidence on how the Ecological Networks will be effective insofar as the intended strategy to divert biodiversity net gain to the land within private ownership with the Nature Improvement Focus Areas. The Council should provide clarification on how biodiversity net gain would be directed to the land within private ownership with the Nature Improvement Focus Areas, particularly if this land is not allocated for residential development which would provide the impetus to deliver biodiversity net gain. If this evidence is not forthcoming, then it could only be concluded that the strategy for biodiversity net gain within the Nature Improvement Focus Areas is not justified.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to the representations report for further details (R008). further evidence sought</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-625
Person ID	1323975
Include files	LPSD-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf LPSD-625-EM-Dennis Form 5 of 7 2507_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WS 12
Title	Monitoring and Review
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 12
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the representations report for further details (R008). The Council have not included a mechanism to ensure that this policy will be effective. The Council should include appropriate trigger mechanisms for the review of the Local Plan.

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.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Please refer to the representations report for further details (R008). add trigger mechanisms

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

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

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

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

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

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

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

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

Comment ID	LPSD-626
Person ID	1323975
Include files	LPSD-626-EM-Dennis Form 6 of 7 2507_Redacted.pdf LPSD-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 6.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the representations report for further details (R008). The Council have not provided any evidence that this policy is positively prepared and that the homes planned in the Hoylake and West Kirby Settlement Areas 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 Hoylake and West Kirby 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,

as precise as possible.	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, such as the land at Saughall Massie Road.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Please refer to the representations report for further details (R008). f 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, such as the land at Saughall Massie Road.

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

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

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

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

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

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

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

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

Comment ID	LPSD-627
Person ID	1323975
Include files	LPSD-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf LPSD-627-EM-Dennis Form 7 of 7 2507_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WS 5.1
Title	Green and Blue Infrastructure Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.1/ NIA fig 3.6
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the representations report for further details (R008). The Council have provided insufficient evidence on how the Green and Blue Infrastructure Strategy will be effective in so far as the intended strategy for habitat creation on to the land within private ownership with the Nature Improvement Areas. The Council should provide clarification on how habitat will be created on the land within private ownership with the Nature Improvement Areas, particularly if this land is not allocated for residential development which would provide the impetus to deliver improvements within the Nature Improvement Areas. If this evidence is not forthcoming then it could only be concluded that the strategy for habitat creation within the Nature Improvement Areas is not justified.

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.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Please refer to the representations report for further details (R008). further evidence for NIA improvement strategy

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

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

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

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

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

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

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

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

LPSP-628

Comment ID	LPSP-628
Person ID	1248833
Include files	LPSP-628-EM-Storey Form 2507_Redacted.pdf LPSP-628-EM-Storey Attach 2 of 8 2507_Redacted.pdf LPSP-628-EM-Storey Attach 8 of 8 2507_Redacted.pdf LPSP-628-EM-Storey Attach 6 of 8 2507_Redacted.pdf LPSP-628-EM-Storey Attach 4 of 8 2507_Redacted.pdf LPSP-628-EM-Storey Attach 1 of 8 2507_Redacted.pdf LPSP-628-EM-Storey Attach 7 of 8 2507_Redacted.pdf LPSP-628-EM-Storey Attach 5 of 8 2507_Redacted.pdf LPSP-628, 1063-1065 and 1408-EM-Storey Attach 3 of 8 2507_Redacted.pdf
Consultee Name	Mr Philip Galvin
Position	
Company / Organisation	
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Site
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s)	

this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	SHLAA 1979
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 Positively Prepared Not Justified Not Effective Not Consistent with National Policy

<p>* Not Effective</p> <p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please find attached Regulation 19 response on behalf of Mr Galvin outlining how we feel the plan is 'unsound'.</p> <p>The Council have not provided any evidence to justify the small-scale incremental development envisioned within the towns and villages of the west of Wirral and that they will remain stable and thrive over the plan period, and thus that the Vision is sound.</p> <p>If found to be unsound, further consideration would need to be given to how the towns and villages of the west of Wirral can thrive over the plan period. This could include, for example, going beyond the envisaged small-scale incremental development in a way which is aspirational but deliverable to address the issues faced by these towns and villages over the plan period.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>N/A</p>
<p>If you wish to make a separate representation,</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>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please find attached Regulation 19 response on behalf of Mr Galvin outlining how we feel the plan is 'unsound'.</p> <p>If found to be unsound, further consideration would need to be given to how the towns and villages of the west of Wirral can thrive over the plan period. This could include, for example, going beyond the envisaged small-scale incremental development in a way which is aspirational but deliverable to address the issues faced by these towns and villages over the plan period. release green belt including land at Irby Road, Irby</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>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>For the reasons outlined in the attached Mr Galvin finds that the current plan is unsound. A large portion of this relates to weakness in the Council's evidence base which have formulated the policies that are considered to be 'unsound'. Our previous representation to consultations have not been implemented. As such, we request that we are involved in any discussions relating to the identified policies and strategy.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-629
Person ID	1323993
Include files	LPSD-629-EM-Cooper Form 2507_Redacted.pdf
Consultee Name	Mr Graeme Cooper
Position	Secretary
Company / Organisation	Branch 5 British Sub-Aqua Club
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 1
Title	Seacombe River Corridor Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Paragraphs 4.14 - 4.17:</p> <p>The Local Plan is not sound because it is not effective in respect of Policy RA 1, Seacombe River Regeneration Corridor, where it has failed to take full and proper account of the importance of the Guinea Gap Leisure Centre swimming pools and facilities for the community, and it does not provide sufficiently for the protection of these in the future. Ignoring the crucial role that the pools and facilities play for local people seriously compromises the Plan's ability to meet its stated aim of: "neighbourhood renewal and the creation of new sustainable waterside residential communities and a new mixed use quarter adjoining Wallasey Town Hall."</p> <p>Our branch of the British Sub-Aqua Club (the UK national body for a scuba diver nd snorkel training) is based in the heart of the Regeneration Corridor area, at 1 Riverview Road. BSAC is a branch-based organisation, with volunteer instructors offering members the opportunity to learn to scuba-dive and snorkel, and also take part in UK and overseas diving trips and</p>

	<p>related training. Our branch has over 100 members, who meet weekly at our Riverview Road clubhouse, where we also keep our two RHIB diving boats and other diving equipment. We are very much part of the local community, training weekly at the Guinea Gap swimming pool, and taking part in community events, such as charity fundraising for the local New Brighton RNLI lifeboat service. The branch was founded by the noted local WW 2 veteran and pioneer scuba diver, Lieutenant Commander Ian Fraser, VC in the 1950s.</p> <p>With regard to the Council's plans for the Town Hall/Guinea Gap area, we note that Policy RA1 deals with the overall Seacombe River Corridor Regeneration Area, and that Riverview Road comes within the Wallasey Town Hall and Toronto/Demesne Street and Borough Road East Waterside Neighbourhood Masterplan Area (MPA-RA1.1).</p> <p>Looking at the Council's proposals here, we would welcome the Council's overall plans to improve the Brighton Street Corridor by which the area is approached. In particular, the redevelopment of underused retail unit and sites for residential, commercial and retail use. However, we would point out that any such developments should not reduce or otherwise compromise the car parking facilities between the Guinea Gap sports hall and Brighton Street. Continued access to the car park here is essential for our members, particularly when moving heavy diving equipment into our premises. We would mention in addition that this car park is well used by people visiting the wider Guinea Gap sports facilities, and that it should be protected from development for other purposes.</p> <p>Looking at the Guinea Gap complex itself, to which our premises are adjacent, we note that while Wallasey Town Hall, the Brighton Public House and Seacombe Ferry are identified as "heritage assets", Guinea Gap baths does not appear to have been give this special status. This is surprising, given that the baths are a prime example of a late Victoria swimming baths, and the facility is Wirral's oldest swimming pool. We would hope that the baths' not being identified as heritage building does not mean that they are being considered for repurposing or even demolition. It goes without saying that having a swimming pool located adjacent to us is of great benefit for a scuba-diving club, and we would be extremely concerned about any plans that would limit or removing the club's access to the pool. Moreover, Guinea Gap baths and its associated leisure and fitness facilities are an extremely important facility for the local community, in what is very much an under-resourced part of the borough. They are well used by both by the community and local schools, and any plans for the area must ensure that the pools and Guinea Gap's other facilities are protected, and remain accessible and affordable for people from Seacombe and the wider area. Their loss would have a major negative impact.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	<p>N/A</p>
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Plan should confirm that the existing swimming, sports and leisure facilities at Guinea Gap Baths and Leisure Centre will be protected as highly valued resources for the local communities in Seacombe and more widely. The Plan should also give details of how these facilities could be enhanced, while maintaining them as resources that are affordable and accessible for local communities.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>We do not believe that the Local Plan, as it is currently drafted, takes sufficient account of the importance of the Guinea Gap baths and Leisure Centre as a vital resource for the community. We believe that our participation in the hearing session(s) would enable us to fully demonstrate the crucial role played by Guinea Gap's facilities, both directly for us, as a community sports club, and for the wider community, in what is very much an under-resourced part of the borough.</p> <p>For us directly, are a community-based sports club (scuba diving), and our premises are located at the centre of the Town Hall Quarter. We rely on the continued availability of community-accessible swimming facilities at the Guinea Gap Leisure in order to carry on being able to operate, thus allowing our members to participate in a unique leisure activity that promotes health, well-being and environmental awareness.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-630

Comment ID	LPSD-630
Person ID	1324011
Include files	LPSD-630-EM-Conroy Form 2507_Redacted.pdf LPSD-630,1144-1147-EM-Conroy Attach 1 of 2 25072507_Redacted.pdf LPSD-630, 1144-1147-EM-Conroy Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Mr Ian Simpson
Position	
Company / Organisation	Countryside Properties
Agent ID	1324008
Agent Name	Mr Michael Conroy
Position	
Company / Organisation	Barton Willmore (Santec)
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	A clear misalignment between overall anticipated job growth in Wirral and its housing requirements in the emerging Local Plan. It is difficult to see how Wirral's employment land can be delivered without a significant increase in the proposed housing requirements to accommodate the required labour force.
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment and Consortium response. We are concerned the strategy has been dictated by political pressures to deliver a certain quantum of new homes on brownfield sites rather than promoting sustainable patterns of development

<p>unsound. Please be as precise as possible.</p>	<p>across the Borough and ensuring the needs of different groups, particularly families, are met in accordance with national policy. For the reasons detailed below and in Section 4, the current evidence provided by the Council does not robustly justify their approach.</p> <p>Properties do not dispute the development of brownfield land should be encouraged; however, the Council need to ensure their strategy meets local needs to not undermine the vitality and viability of local communities outside of Birkenhead and their centres.</p> <p>50% of the housing supply (8,678 units) is located within 11 Regeneration Areas, 9 of which are within Birkenhead; 1,730 units are to be delivered through existing commitments, 2,425 dwellings within Settlement Areas, and an allowance is made for 3,490 dwellings which can be expected to be delivered through net gains from conversions and changes of use, windfall development, and the return to use of empty home</p> <p>the Council's claimed supply to also be fundamentally flawed and not justified by robust evidence. Our review and assessment of each component of the land supply has been informed by Lichfields Technical Paper 4 – Assessing the Housing Land Supply (Appendix 3) and Roger Hannah's Technical Paper 5 - Viability (Appendix 4).</p> <p>The regeneration of Birkenhead, Wirral Waters, and other areas within east Wirral has been a longstanding aspiration of the Council. However, despite Council support, these regeneration aspirations have not materialised, and it is concerning that the Local Plan is wholly reliant on the wholesale change of fortune in delivering what has thus far been a longstanding and persistently underachieving strategy.</p> <p>the Council's own evidence is clear that for the regeneration aims of the Council to be realised, significant outside funding and a comprehensive change in the housing market of the area will need to occur.</p> <p>It is concerning, considering the challenges in bringing forward brownfield land in the Regeneration Areas in a difficult market area, that a large proportion of the Council's housing allocations are also physically challenging. It is our view that development will simply not come forward where it is anticipated, and at the scale envisaged, and it will limit delivery as well as sufficient options for prospective residents and exacerbate the imbalance caused by the focus of development on Regeneration Areas.</p> <p>For these reasons, the Council should re-examine sites earmarked for housing in Other Settlement Areas to ensure that its housing supply is reflective of sites which have genuine prospects of being delivered.</p> <p>the evidence base supporting the Local Plan is silent on absorption rates. There has been no evidence presented by the Council to demonstrate that the housing market can accommodate the types of housing likely to come forward in Regeneration Areas, particularly bearing in mind the delivery of competing schemes in Liverpool. The rate at which residential units will be delivered correlates to absorption rate; if absorption rates are low the delivery of housing will be slow. If housing is slow to come forward in the Regeneration Areas it will fundamentally undermine the Council's ability to meet its housing requirement. It is imperative that the Council has fully considered how absorption rates will impact upon housing delivery.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the</p>	

<p>duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy</p>	<p>Countryside Properties are of the opinion that significant changes are required for the housing land supply to meet the tests of soundness and the Council need to identify a significant number of additional deliverable and developable sites to address the identified shortfall. Due to all brownfield options being exhausted and there being no evidence that neighbouring authorities could meet the unmet housing need, we consider there to be exceptional circumstances at play to require Green Belt land to be released for housing. Given the significance of this to the delivery of the strategy, and the quantum of changes needed to make this policy sound, this needs to be addressed now rather than wait for the next Local Plan review.</p> <p>Lichfields analysis clearly demonstrates that the Council has a significant shortfall of housing land available to meet its housing needs and should not pursue a strategy which focuses development entirely within urban areas. To rectify this problem the Council must look to allocate additional sites (including further consideration of whether exceptional circumstances exist to justify the release of Green Belt land) which are suitable, available, and deliverable to ensure the housing needs of the Borough are met. This includes Countryside Properties site at Marsh Lane, Bebington</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>	Countryside Properties (UK) PLC representations raise serious concerns with the proposed housing requirement, spatial strategy, housing land supply and policies related to housing mix and density and affordable housing. It is important that we can explore these elements in person with the Inspector given they are fundamental to the Local Plan being found sound in accordance with national policy.
<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-631

Comment ID	LPSD-631
Person ID	1324015
Include files	LPSD-631,908,910,911,922-EM-Trewhella Form 2507_Redacted.pdf LPSD-631,908,910,911,922-EM-Trewhella Attach 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	1324016
Agent Name	Mr Graham Trewhella
Position	
Company / Organisation	Cass Associates
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	Please see full representations report - LAND TO THE EAST OF BARNSTON ROAD SUBMISSION DRAFT LOCAL PLAN CONSULTATION RESPONSE on behalf of United Utilities Property Services (July 2022)
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.	
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	Please see full representations report - allocate LAND TO THE EAST OF BARNSTON ROAD SUBMISSION DRAFT LOCAL PLAN CONSULTATION RESPONSE on behalf of United Utilities Property Services (July 2022)

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)

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

Comment ID	LPSD-632
Person ID	1249263
Include files	LPSD-632-EM-Gilbert Form 2507_Redacted.pdf
Consultee Name	Acceptable LLP
Position	
Company / Organisation	
Agent ID	1324020
Agent Name	Mr Ian Gilbert
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	See enclosed representations
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>please refer to attachment</p> <p>The Council's proposed housing requirement is insufficient to deliver the level of economic growth proposed in the Local Plan. The Council's housing requirement of 835 dph cannot support the economic growth aspirations of the Local Plan which seeks to deliver 65ha of employment land, and specifically the chosen Economic Capacity Scenario which has the potential to generate 4,000-5,000 jobs overall.</p> <p>2.41 It is difficult to see how Wirral's employment land can be delivered without a significant increase in Wirral's housing requirements to accommodate the required labour force. This situation is exacerbated by how Wirral has an ageing population and is almost</p>

	<p>operating at full employment.</p> <p>2.42 Wirral's position within LCR, in the context of growth strategies and strategic infrastructure improvements, is considered to clearly justify a housing requirement greater than that derived from the standard method, and therefore an uplift on the standard method of 6dpa to support 82 jobs a year over the plan period is very low.</p> <p>2.43 Accordingly, the Local Plan will fail to meet its first aim of the its Vision and, in its current drafting, will not make a significant contribution to the economic competitiveness and international standing of the Liverpool City Region. Nor would the Plan address point 'v' of the 'Issues for the Plan to address' set out at paragraph 2.17 of the Plan "meet the needs of the current and future population for housing and improve the balance between housing and jobs".</p> <p>2.44 It is our client's view that the Council's approach to calculating its housing requirement is flawed and should be revisited to ensure that it does not act as a barrier to economic growth. Acceptable has significant concerns with Wirral's claimed housing supply. As has been demonstrated, each component of the Council's housing supply is overstated and unsubstantiated.</p> <p>3.52 It is unrealistic to focus development within areas which historically have been a poor housing markets with fundamental viability issues. The regeneration of Birkenhead, Wirral Waters, and other areas within east Wirral has long had Council support and yet Housing Supply evidently there are fundamental reasons why sites in these areas remain underdeveloped or slow to come forward for housing. The Local Plan is in essence seeking a continuation of a longstanding and persistently flawed, underachieving strategy.</p> <p>3.53 There is also no evidence to suggest that the housing market in Wirral can absorb the high-density housing envisaged in the Regeneration Areas, a dynamic compounded by Wirral being within the same housing market area as Liverpool. The types of housing schemes coming forward at the Regeneration Areas will be directly competing with those in Liverpool City Centre which will have a negative impact on absorption rates.</p> <p>3.54 There is considerable ambiguity in the Council's evidence with respect to existing housing commitments which is unhelpful and does not instil confidence that the housing supply figures are robust or that the existing permissions can be implemented and delivered. The level of housing anticipated to come forward at Other Settlement Areas is not reflective of sites which have genuine prospects of being delivered due to a lack of developer interest in identified sites, the absence of extant planning permissions, and viability constraints, and overstates the number of dwellings which could be expected to come forward.</p> <p>3.55 The Council's position that 21% of its housing supply is to be met through allowance and windfall development is unjustified and inappropriate. The calculating of windfall development and conversions / change of use based on annual monitoring and past delivery rates does not amount to 'compelling evidence', and the returning of empty properties back into use should not be considered outside the general windfall allowance.</p> <p>3.56 It is considered that the Council's housing supply is wholly inadequate and flawed due to its strategy which focuses development entirely within urban areas. The Council must look to allocate additional sites (including further consideration of whether exceptional circumstances existing to justify the release of Green Belt land) which is suitable, available, and deliverable to ensure the housing needs of the Borough are met.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty	

<p>to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability</p>	<p>See enclosed representations</p> <p>increase housing requirement to meet economic growth, increase supply, release green belt including Land off New Chester Road Eastham.</p>

<p>Appraisal or Habitat Regulations Assesment 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)? * No, I do not wish to participate in hearing session(s) * 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>Acceptable LLP has serious concerns with the robustness of the Council's proposed housing requirement and identified supply, particularly the complete reliance placed on the delivery of urban sites to meet the current and future needs of the Wirral. The Local Plan as drafted will not provide a sufficient choice of housing to meet identified needs and will not deliver the right homes in the right places and subsequently will not support the Borough's economic growth aspirations. It is Acceptable LLP's view that exceptional circumstances exist to release land from the Green Belt to ensure the needs of all sections of the population can be met including the demonstrable need for aspirational and family housing. In this context, Acceptable LLP's land at New Chester Road, Eastham provides a suitable site for removal from the Green Belt and allocation for residential 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>

*	Yes
*	No

LPSP-633

Comment ID	LPSP-633
Person ID	1324021
Include files	LPSP-633-EM-Evans Form 1 of 10 2507_Redacted.pdf LPSP-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment The spatial distribution of the proposed housing requirement needs to be rebalanced in order to achieve a sound, sustainable and deliverable Local Plan. The Sustainability Appraisal recognises the benefits of a distributed pattern of housing at paragraph 4.15.7.

<p>unsound. Please be as precise as possible.</p>	<p>The current DWLP Spatial Strategy is unsound as drafted on the basis that:</p> <ul style="list-style-type: none"> • It is over-reliant on delivery from the RAs, with over 50% of the supply claimed to come from a concentration of sites in Birkenhead which is a very challenging housing market area. These sites are almost entirely high-density sites, leading to a lack of diversity in housing types and tenures. • It fails to capitalise on the opportunities presented by good quality market areas in West Wirral which can support delivery and achievement of the DWLP's vision and objectives. • Fails to utilise the availability of large sites to achieve housing delivery and diversification of the housing offer. • The DWLP Spatial Strategy is underpinned by a Sustainability Appraisal which underplays disadvantages of the chosen option and overstates the advantages of alternatives. <p>The overall result is that the DWLP is based on an unsound spatial strategy which is not justified, not positively prepared, contrary to national planning policy and not effective. Further details are provided in paragraphs 5.7 – 5.34 of Bloor's Representations.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>please refer to attachment</p> <p>The DWLP Spatial Strategy is underpinned by a Sustainability Appraisal which underplays disadvantages of the chosen option and overstates the advantages of alternatives.</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</p>	

Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Increase the housing requirement and alter the spatial distribution to utilise areas of Green Belt in West Wirral in order to provide a more robust and balanced housing land supply which will better support the Plan's objectives. release land at Irby Road</p>
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.</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-634

Comment ID	LPSP-634
Person ID	1324021
Include files	LPSP-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf LPSP-634-EM-Evans Form 2 of 10 2507_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 5.1
Title	Green and Blue Infrastructure Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.1

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

<p>Local Plan is unsound. Please be as precise as possible.</p>	<p>The approach of Part A1 of the policy does not accord within national planning policy, specifically NPPF paragraph 99 which allows the loss of open space (including sport and recreation land, and specified types of blue infrastructure: lakes, reservoirs, canals and rivers) where demonstrated to be surplus to requirements, the loss would be replaced, or development is for alternative provision of greater benefit. It does not apply to other types of green infrastructure. As such the policy is unsound as drafted and should be modified to align with the NPPF.</p> <p>The Policy provides no clarity on the type of development or location where contributions will be required – presumably they would be targeted towards the priorities in the 'Priority GBI Opportunities'2 – but provides no information on the amount of contribution that will be sought. Neither does it make clear the circumstances in which contributions will be sought, for example will it be where development has a direct effect on a GBI typology, is within a set distance of a typology or a criteria-based test. It is not justified in its current form and is unsound for this reason.</p> <p>In the absence of clarity about contributions, the policy (both part A1 and B) do not enable the tests for planning obligations, as set out in the CIL Regulations, to be met. The policy is not legally complaint and does not accord with national policy on the requirements for obligations3. This is a further reason as to why it is unsound as drafted.</p> <p>Further details are provided in paragraphs 5.36 – 5.41 of Bloor's Representations.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the</p>	

<p>accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Part A of the policy to be revised to align with paragraph 99 of the NPPF. Greater clarity provided on Part B in relation to the type of development, location and circumstances where contributions towards Green and Blue Infrastructure are to be required.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * 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>In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.</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-635

Comment ID	LPSP-635
Person ID	1324021
Include files	LPSP-635-EM-Evans Form 3 of 10 2507_Redacted.pdf LPSP-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.4

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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	Please refer to attachment Bloor supports proposals to ensure that biodiversity is protected and enhanced reflecting legislation that protects specified habitats and species and the requirements of the Environment Act 2021 to secure 10% biodiversity net gain

unsound. Please be as precise as possible.	Part L of the policy includes an unclear requirement that 'where relevant' biodiversity assets are protected, enhanced and functionally connected with wider networks. The priorities for enhancement are identified by reference to specific locations identified through the evidence base but the supporting text does not provide any explanation of what constitutes the relevant circumstances for protection. This absence of clarity means that the policy is not justified or effective as drafted and is therefore unsound.
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	Further clarity, having regard to evidence and national planning policy, regarding the protection of biodiversity and the enhancement expected.

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)

In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.

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

Comment ID	LPSD-636
Person ID	1324021
Include files	LPSD-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf LPSD-636-EM-Evans Form 4 of 10 2507_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 5.7
Title	Maintenance of Green Infrastructure and Open Space Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.7

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	The policy does not provide any clarity on the approach for securing the management plan. It is normal practice that management plans are secured through S106 agreements.

unsound. Please be as precise as possible.	
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	clarity on the approach for securing the management plan. It is normal practice that management plans are secured through S106 agreements.

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)

In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.

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

Comment ID	LPSD-637
Person ID	1324021
Include files	LPSD-637-EM-Evans Form 5 of 10 2507_Redacted.pdf LPSD-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 5.9
Title	Evidence of approach
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.9

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified
Please give details of why you consider the Local Plan is	Please refer to attachment The policy requires planning applications to demonstrate how the benefits requirement by policy WS5 have been achieved. It is unnecessary for this to be a policy requirement as it is an implicit function of the validation checklist which should require major applications to be accompanied by suitable evidence in the form of assessments / surveys and a Planning Statement

unsound. Please be as precise as possible.	which demonstrates how a proposed development complies with the policy requirements. The lack of necessity for such a policy renders it unjustified and not positively prepared and therefore unsound.
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	Remove the policy as it is not 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 hearing session(s),

In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.

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

Comment ID	LPSD-638
Person ID	1324021
Include files	LPSD-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf LPSD-638-EM-Evans Form 6 of 10 2507_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 6.1
Title	Placemaking Principles
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 6.1

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

Local Plan is unsound. Please be as precise as possible.	Part A1 of the policy requires development to 'contribute positively to the efficient revitalisation and regeneration of existing neighbourhoods'. This should only be applicable to developments within (or within a specified distance of / where there is a functional link with) Regeneration Areas. It should not be a requirement for all developments as there is no justification to do so; as such the policy is unsound as presently drafted.
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	Further clarification as to the requirements around the contribution to the revitalisation and regeneration of existing neighbourhoods.

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)

In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.

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

Comment ID	LPSD-639
Person ID	1324021
Include files	LPSD-639-EM-Evans Form 7 of 10 2507_Redacted.pdf LPSD-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 7.1
Title	Design Principles
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.1

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

Local Plan is unsound. Please be as precise as possible.	There is a notable degree of overlap between this policy and policy WS6.1 meaning that the policies are unnecessarily long. As an example, policy WS6.1 requires development to enhance the visual amenity, character and distinctiveness of existing settlements which WS7.1 requires developments to 'positively enhance the character, appearance and setting of the surrounding area'. The clarity of these policies would be aided if they were rationalised, more succinct and precise.
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	The policies would be aided if they were rationalised, more succinct and precise.

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)

In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.

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

LPSP-640

Comment ID	LPSP-640
Person ID	1324021
Include files	LPSP-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf LPSP-640-EM-Evans Form 8 of 10 2507_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WD 2.3
Title	Archaeological Assets
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 2.3

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment. The policy requires developments that affect a non-designated site of archaeological interest to be supported by different information 'depending on the nature of the proposal and asset'. The requirements comprise a desk study, ground study, recording of the asset, ongoing monitoring during the construction period.

unsound. Please be as precise as possible.	The policy wording and supporting text is unclear under what circumstances the different requirements apply. It is therefore inconsistent with national planning policy and is unsound.
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	Include reference to the guidance provided through PPG (Paragraph: 041 Reference ID: 18a-041-20190723) which makes clear that decision-making requires a proportionate response. PPG recognises that that in the majority of cases a desk-based assessment will be sufficient reflecting the principle of a proportionate level of assessment.

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)

In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.

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

LPSP-641

Comment ID	LPSP-641
Person ID	1324021
Include files	LPSP-641-EM-Evans Form 9 of 10 2507_Redacted.pdf LPSP-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WD 3
Title	Biodiversity and Geodiversity
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 3

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
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	Please refer to attachment Include reference to the guidance provided through PPG (Paragraph: 041 Reference ID: 18a-041-20190723) which makes clear that decision-making requires a proportionate response. PPG recognises that that in the majority of cases a desk-based assessment will be sufficient reflecting the principle of a proportionate level of assessment. The policy seeks to protect

<p>unsound. Please be as precise as possible.</p>	<p>biodiversity and geodiversity, including trees (part B3). It refers to the protection of irreplaceable habitats which it suggests included ancient, veteran and aged trees. In fact the definition in the NPPF2 only refers to ancient or veteran trees and not 'aged' trees. The policy is therefore inconsistent with national planning policy, is not justified and is unsound as a result.</p> <p>Part F requires adequate provision to be made for appropriate ongoing access management, habitat management, monitoring, maintenance and enhancement of biodiversity or geodiversity interests. It requires these measures to be in place over the lifetime of the development. However, there is no justification for such a timescale (and no reference in PPG or NPPF); the Environment Act 2021 which refers to a 30-year period for the management of on-site habitat management, monitoring and reporting. The policy is therefore unsound due to being unjustified and not consistent with national planning policy.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Part B3 to be revised to omit reference to aged trees. Part F to be revised to align timescales with the Environment Act 2021</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-642
Person ID	1324021
Include files	LPSD-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf LPSD-642-EM-Evans Form 10 of 10 2507_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WD 4.2
Title	Flood Risk
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 4.2

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment Part F of the policy seeks to reduce the causes and impacts of flooding. It is unclear whether this relates to on-site sources, off-site or both. Whilst PPG encourages local authorities and developers to reduce flood risk, the guidance focuses on on-site measures, with reference to off-site measure limited to the design of off-site works. This distinction should be incorporated

<p>unsound. Please be as precise as possible.</p>	<p>into the policy, making clear that developers are not expected to address existing off-site issues. This aspect of the policy is inconsistent with national planning policy and is not justified as presently worded and is therefore unsound.</p> <p>The policy also encourages the floor levels of ground floor and basement access to be 'at least a minimum of 600mm' above the highest flood level. There is no reference to such a requirement in the Strategic Flood Risk Assessment 2019 (SFRA); the only reference to finished floor levels³ is that they 'should always be set a minimum of 300mm above the design water level'. There is no evidential basis for the 600mm figure; this aspect of the policy is therefore unjustified and unsound.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Clarity to be provided that developers are not expected to address existing off-site issues of flood risk and requirement for floor levels to be brought in line with the Strategic Flood Risk Assessment (i.e. 300mm above the design water level).</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-643

Comment ID	LPSD-643
Person ID	1324027
Include files	LPSD-643-EM-Gilbert Form 2507_Redacted.pdf LPSD-643 and 965-EM-Gilbert Attach 2 of 2 2507_Redacted.pdf LPSD-643 and 965-EM-Gilbert Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Mr Nicholas Mills
Position	
Company / Organisation	Wain Estates
Agent ID	1324020
Agent Name	Mr Ian Gilbert
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1.1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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	See enclosed representations We summarise our client's key concerns for the Local Plan against the three broad topics below:

<p>unsound. Please be as precise as possible.</p>	<p>a) the housing requirement which is not aspirational enough to meet the housing needs or economic growth aspirations of either the Wirral or the wider LCR;</p> <p>b) the housing supply which we consider to be unrealistic based on an overly optimistic assessment of the housing market, inflated densities and the delivery of Sites which are unviable; and</p> <p>c) the spatial strategy which will not achieve a sustainable pattern of development and will fail to deliver growth capable of maintaining or enhancing the vitality or viability of the borough's lower order settlements or meeting local housing needs.</p> <p>With regard to the above, we consider that the Local Plan requires a comprehensive re-draft to address those points. We consider that such a re-draft will necessarily require the release of land for development outside of the Council's identified Regeneration Areas and within the Green Belt to provide housing of sufficient quantity and quality and within a range of locations and house types and tenures To ensure that the regeneration aspirations of the Council are not curtailed, we consider that the housing requirement for the Borough should be increased to allow for additional development to be brought forward in its more sustainable settlements to maintain and enhance their vitality and viability; as well as providing much needed family housing, affordable housing, housing for other groups and to help narrow a worsening affordability gap.</p> <p>75. The Council's over reliance on focussing development towards the built-up areas around Birkenhead will result in an unsustainable development pattern.</p> <p>76. The Local Plan and its evidence base clearly identifies a need for family housing which is fundamental to supporting an upward shift in the amount and type of economic activity within the City Region including advanced manufacturing and services. It will be crucial that Liverpool is able to attract and retain the aspirational proportion of the workforce and housing market. It is our client's firm view that the strategy of urban regeneration simply cannot achieve this.</p> <p>77. Further growth within the borough is needed to support the wider economic aspirations of Wirral and the LCR and to deliver the range of housing type and tenure that individual communities require to secure their future sustainability. Economic prosperity, job creation and healthy communities will only come to the borough if a sufficient number and type of homes are available.</p> <p>78. In its current form, the Local Plan essentially proposes to mothball other settlements such as Meols from development, which will result in a decline in services and facilities. We consider that the current proposed strategy will unduly limit growth within the Borough, stifle the Council's own regeneration aims and result in the deterioration of the borough's sustainable settlements outside of Birkenhead. It is capable of meeting identified needs and delivering economic growth.</p> <p>. Our client's site in Meols represents an opportunity to deliver family and affordable housing to provide a balanced housing mix and ensure the vitality and viability of Meols. Our client's Site is considered to make only a weak contribution to the purposes of including land within the Green Belt and should be prioritised for release to assist the borough in meeting its development needs.</p> <p>80. We trust that these comments will be taken into consideration, and we emphasize that this letter should be read in conjunction with the previous representations made by our client throughout the Local Plan process which are appended to this letter.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation,</p>	

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your</p>	<p>See enclosed representations increase housing requirement, increase supply, allocate green belt sites including Land west of Birkenhead Road, Meols,</p>

suggested revised wording of any policy or text. Please be as precise as possible.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	Wain Estates have significant concerns regarding the implications of the Local Plan on future housing delivery, and they are promoting their land interests at Birkenhead Road in Meols which represents a sustainable opportunity for future residential development.
Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan). * Yes * No	Yes

LPSD-644

Comment ID	LPSD-644
Person ID	1240843
Include files	LPSD-191, 644-7, 650-1-Simpson Attach_Redacted LPSD-191, 644-647, 650-651-LE-Simpson Form 0407_Redacted.pdf
Consultee Name	Phil Simpson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>If Wirral Borough Council are allowed to build houses on our greenbelt, we would lose the most precious assets of Wirral, including habitats, environmental assets, trees, hedgerows, wildlife, the land and nature of our Borough.</p> <p>Natural Wirral believe that there is more than enough brownfield sites within the Borough to meet our housing needs.</p> <p>Natural Wirral agrees with the regeneration of the east of the peninsula; however, we do not agree with some of the present strategy.</p> <p>Natural Wirral believes that there is no need to build on any of Wirral's greenbelt, farms, fields or open green spaces. Building on greenbelt is not conducive to the health and wellbeing of Wirral residents young and old.</p>

	Deprived areas of Wirral definitely need regeneration as does the dockland areas but just as importantly our waterfront MUST be given a priority status equal to what can be seen over on Liverpool waterfront.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Do not develop any Green Belt land, including land owned by Leverhulme Estates, regenerate the waterfront instead in the Local Plan.

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

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

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

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

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

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>	

Comment ID	LPSD-645
Person ID	1240843
Include files	LPSD-191, 644-647, 650-651-LE-Simpson Form 0407_Redacted.pdf LPSD-191, 644-7, 650-1-Simpson Attach_Redacted
Consultee Name	Phil Simpson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 4.4
Title	Tourism
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS4.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Demolishing and rebuilding the Town Centre will only help in the short term. It has been tried before; it always fails after a period of time. Therefore, we believe it is not the overall answer. Regenerating the waterfront is the answer, as it has been in Liverpool. The use of our greatest assets as tourist attractions, which are our beaches and promenades, developing here could bring in a massive economic boost. We have well over 12 miles of waterfront. It is crying out for tourism. Another of our greatest assets is the river itself (Mersey) with merchant and cruise ships using almost daily. The westside of the peninsula has a very different attraction, the marshes, abundant with wildlife and excellent views to Wales over the River Dee.

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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Comment ID	LPSD-646
Person ID	1240843
Include files	LPSD-191, 644-7, 650-1-Simpson Attach_Redacted LPSD-191, 644-647, 650-651-LE-Simpson Form 0407_Redacted.pdf
Consultee Name	Phil Simpson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS3.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Natural Wirral believes that we do need some housing. We need what residents keep telling us; that is council housing and low-cost affordable housing. We do not need luxury housing, or housing that is above £300,000.

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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Comment ID	LPSD-647
Person ID	1240843
Include files	LPSD-191, 644-647, 650-651-LE-Simpson Form 0407_Redacted.pdf LPSD-191, 644-7, 650-1-Simpson Attach_Redacted
Consultee Name	Phil Simpson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.6
Title	Specialist Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS3.6
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	There is also no consideration given to our aging population across Wirral. We have the highest number of elderly people across the Northwest, yet there are NO proposals for building bungalows. Over 30% of our population is 65+ and increasing. This does not include people downsizing. Many of our elderly down size to a ground floor level as they are no longer able to negotiate stairs.

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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Comment ID	LPSD-648
Person ID	1324021
Include files	LPSD-648-Evans Form 2507_Redacted.pdf LPSD-633,642 & 648-EM Evans Attach 2 of 2_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 8
Title	Strategy for Sustainable Construction, Renewable and Low Carbon Energy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment The approach of the DWLP is clearly a step-change from the current policy position in Wirral. Many of the measures will require innovative design approaches and there may be additional land-take if on-site renewable energy measures are required. This ultimately has a potentially significant bearing on the viability of developments.

unsound. Please be as precise as possible.	Larger sites in more viable locations, such as the land at Irby Road, offer the greatest potential to achieve these policy objectives offering the flexibility to design accordingly and potentially use areas for renewable energy generation. They are also better placed to bear the additional cost without the need for grant funding. This is a further reason why the DWLP should take a more balanced approach to the type and location of sites for residential development
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	

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

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

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

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

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

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

In order to elaborate on and substantiate the points made in the representations and to participate in further discussion / interrogation at a Hearing Session.

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

[LPSP-649](#)

Comment ID LPSP-649

Person ID 1324038

This representation has been withdrawn

Comment ID	LPSD-650
Person ID	1240843
Include files	LPSD-191, 644-7, 650-1-Simpson Attach_Redacted LPSD-191, 644-647, 650-651-LE-Simpson Form 0407_Redacted.pdf
Consultee Name	Phil Simpson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 9.1
Title	Transport Schemes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS9.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Wirral Borough Council has based their Local Plan on regeneration of dockland areas which in part we agree does need regeneration. However, we have laid bare our regeneration should have started on Wirral's waterfront but should cover a much larger section of Wirral's coastline towards Bromborough, Eastham, etc. Our docklands should incorporate a ferry and liner terminal similar to that of Liverpool but maybe not as far reaching as the huge liners that visit Liverpool. We should also incorporate new travel facilities in tramways, trains, buses, something that Wirral used to have in the prosperous years but now has noting. This Local Plan cannot be justified on strategy unless it covers more alternatives in land use on the east of the peninsula.

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

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

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**