

<b>Comment ID</b>	LPSD-701
<b>Person ID</b>	1248557
<b>Include files</b>	<a href="#">LPSD-701-EM-Sayce Form 1 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-701-703, 1371, 1376, 1379-1383, 1391-1395-EM-Sayce Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Stephen Sayce
<b>Position</b>	
<b>Company / Organisation</b>	Enviroment Agency
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1.4
<b>Title</b>	Flooding and Drainage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1/ whole plan
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	Please refer to attachment A robust assessment of flood risk and the impacts of climate change has been undertaken through production of the submitted Level 1 and 2 SFRAs. The SFRAs provide evidence to enable the Council to undertake both the flood risk Sequential Test and Exception Test. This is clarified in the WLP Submission Draft Sequential & Exception Tests Report. We have no comments to make with regards to the Sequential Test. Para. 5.43 of the S&E Tests Report confirms 13 proposed allocations require the Exception Test to be undertaken in compliance with the NPPF. The Exception Test has two parts - EA has only focused on part ii to ensure development is safe over its lifetime without increasing flood risk, part i is for the Council to assess.
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-702
<b>Person ID</b>	1248557
<b>Include files</b>	<a href="#">LPSD-702-EM-Sayce Form 2 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-701-703, 1371, 1376, 1379-1383, 1391-1395-EM-Sayce Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Stephen Sayce
<b>Position</b>	
<b>Company / Organisation</b>	Enviroment Agency
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 1.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA1.3

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment EA acknowledged and concur that this proposed allocation has been subject to an individually approved site-specific FRAs. As such EA is in general agreement that this site has been subject to the Exception Test and passed. No objection to allocation within the plan, although it might be sensible to ensure the most up to date climate change allowance projections have been used.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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



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

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

\*      **Yes**  
\*      **No**

LPSD-703

<b>Comment ID</b>	LPSD-703
<b>Person ID</b>	1248557
<b>Include files</b>	<a href="#">LPSD-703-EM-Sayce Form 3 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-701-703, 1371, 1376, 1379-1383, 1391-1395-EM-Sayce Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Stephen Sayce
<b>Position</b>	
<b>Company / Organisation</b>	Enviroment Agency
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 4
<b>Title</b>	Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	6.39
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

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

<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	<p>Clarification/Minor Modification (which we should have noted before) regarding environmental permit requirements. The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:</p> <ul style="list-style-type: none"> <li>• on or within 8 metres of a main river (16 metres if tidal)</li> <li>• on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)</li> <li>• on or within 16 metres of a sea defence</li> </ul>

<p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<ul style="list-style-type: none"> <li>• involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert</li> <li>• in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission</li> </ul> <p>Paragraph 6.39 may need to be amended to reflect this.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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LPSP-704

<b>Comment ID</b>	LPSP-704
<b>Person ID</b>	1323669
<b>Include files</b>	<a href="#">LPSP-404,704,706,707-Grimster Attach 2107_Redacted.pdf</a> <a href="#">LPSP-404,704,706,707-EM-Grimster Form 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Ray Burgan
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1248451
<b>Agent Name</b>	Mr Steve Grimster
<b>Position</b>	Director
<b>Company / Organisation</b>	Grimster Planning
<b>Number</b>	
<b>Title</b>	The Strategic Objectives of the Local Plan
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	2.39 - Strategic objectives
<b>Please state which Policy Number this representation relates to.</b>	



<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the</b>	Strategic Objective 7 focuses specifically on housing delivery and the need to provide sufficient housing to meet identified local housing needs and providing a choice of housing for people at all stages of life and incomes. However, the spatial strategy that the Council is pursuing will not enable this to be realised, with housing needs failing to be met locally – instead, they

<b>Local Plan is unsound. Please be as precise as possible.</b>	<p>will only be provided for in east and north-east Wirral. There is a need to deliver a mix of market and affordable housing across the Wirral over the emerging Local Plan period, with a balanced approach to housing delivery as outlined previously.</p> <p>The housing needs of people in west Wirral should not need to be met in east Wirral and vice versa. Whilst development in the west of Wirral will inevitably require the release of Green Belt land, the emerging Local Plan is the platform through which to undertake these policy changes. By trying to avoid making difficult decisions, namely the release of Green Belt land, it is our Client's position that the Council's preferred approach will fail to deliver the sufficient housing which is needed to meet identified local needs and will fail to provide a choice of housing for people at all stages of life and incomes.</p>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A

<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Accordingly, whilst our Client supports the principle of what Strategic Objective 7 seeks to achieve, this will only be achieved through a change to the Council's spatial strategy and a much more balanced approach to housing and economic growth across the whole of Wirral.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

LPSP-706

<b>Comment ID</b>	LPSP-706
<b>Person ID</b>	1323669
<b>Include files</b>	<a href="#">LPSP-404,704,706,707-EM-Grimster Form 2207_Redacted.pdf</a> <a href="#">LPSP-404,704,706,707-Grimster Attach 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Ray Burgan
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1248451
<b>Agent Name</b>	Mr Steve Grimster
<b>Position</b>	Director
<b>Company / Organisation</b>	Grimster Planning
<b>Number</b>	Policy WS 1
<b>Title</b>	The Development and Regeneration Strategy for Wirral 2021 - 2037
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is</b>	It will lead to a significant imbalance in housing delivery between east and west Wirral, with the Council adopting what is effectively an already tested and flawed approach to housing delivery;

<p><b>unsound. Please be as precise as possible.</b></p>	<p>Ø The urban conurbation will need to meet the housing needs of west Wirral, given that no Green Belt release is proposed around the urban settlements as part of the Council's preferred approach (i.e. Settlement Areas 5 to 8, as well as the separately defined Large and Small Villages). Accordingly, any persons/families in housing need in west Wirral will need to relocate to east Wirral to access a new home. This is applicable to people seeking an affordable home/first time buyers, families, and older persons seeking specialist housing accommodation. Needs will not be met locally within and around those Settlement Areas;</p> <p>Ø A limited housing choice for existing and new residents, with a focus on high-density development in the form of apartments. This will limit the opportunities for new family housing and specialist accommodation for older people, for which there is an identified need in Table 6.4 of the Council's 2021 SHMA Update, with the highest demand being for 3-bedroom market homes, and 2-bedroom affordable homes, with an overall 20% demand for 4 or more bedrooms across all tenures;</p> <p>Ø No contingency in the event of housing under-delivery in the urban conurbation, with Green Belt constraints remaining in place around the towns and villages in west Wirral. No safeguarded land is even proposed as a contingency measure for the proposed Plan period or beyond. The Council is effectively adopting the same failed position and approach as per that since 2005; and</p> <p>Ø Potential out-migration of people looking to move into a new family home to the neighbouring authority area of Cheshire West and Chester where such housing provision is being built, including on former Green Belt sites which were released and allocated as part of the Council's 2015 Local Plan to meet its housing needs.</p> <p>It should be noted that our Client is not against the re-use of previously developed land. That is, after all, consistent with Section 11 of the NPPF. However, it is crucial that the new Local Plan provides a balance between brownfield and greenfield land release and new development. As drafted, the Council's development strategy is fundamentally reliant on the redevelopment and regeneration of brownfield sites, an approach which simply isn't considered to be sustainable based on historic trends and evidence in the Wirral. Adopting another 'urban conurbation' approach to growth over the next 16 years is evidence that the Council has failed to learn from its past mistakes and is once again adopting an 'all eggs in one basket' strategy. Our Client considers this to be a totally flawed approach and one which they strongly object to.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>N/A</p>

<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	<p>N/A</p>
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>As such, the role and growth function/capacity of Settlement Areas 5 to 8 should be recognised and much more appropriate and higher levels of growth apportioned to these areas during the Plan period.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to</b></p>	<p>No, I do not wish to participate in hearing session(s)</p>



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

## LPSD-707

<b>Comment ID</b>	LPSD-707
<b>Person ID</b>	1323669
<b>Include files</b>	<a href="#">LPSD-404,704,706,707-Grimster Attach 2107_Redacted.pdf</a> <a href="#">LPSD-404,704,706,707-EM-Grimster Form 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Ray Burgan
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1248451
<b>Agent Name</b>	Mr Steve Grimster
<b>Position</b>	Director
<b>Company / Organisation</b>	Grimster Planning
<b>Number</b>	Policy WP 8.1
<b>Title</b>	Green Belt
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 8.1

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *      Yes *      No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is</b>	On review of the SD, it is clear that the Council is not proposing to progress with any Green Belt release. For the reasons set out previously, our Client does not consider that this will provide for a sound Local Plan. The wider consequence is that no adjustments to any existing Green Belt boundaries across the Wirral will be undertaken as part of the new Local Plan, despite these having been in place since 1983 as outlined above.

<b>unsound. Please be as precise as possible.</b>	
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	Our Client objects to this approach, as there are examples where land and buildings are designated as lying in the Green Belt despite clearly performing none of the Green Belt purposes set out in paragraph 138 of the NPPF. One such case involves our Client's land interests at 173 Caldy Road, Caldy, and the neighbouring land and properties. - remove from Green Belt Designation

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

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

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

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

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

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

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

<b>Comment ID</b>	LPSD-708
<b>Person ID</b>	1267569
<b>Include files</b>	<a href="#">LPSD-708-EM-Russell Form 1 of 8 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jo Russell
<b>Position</b>	
<b>Company / Organisation</b>	Stoford Developments Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	2.38 - Vision
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>We object to the Vision on the basis of its failure to acknowledge the strength of the motorway network that is crucial to keeping the Wirral well connected and supports the opportunities for growth in logistics. The Wirral is one of a number of LPAs within the North West, linked by a series of motorways that are connected to the M6, serving as a north-south spine through the country. In turn, many of these authorities, including Wirral, Ellesmere, Liverpool, provide port connections and therefore offer opportunities for international trade and commerce which complements that strategic network and links it directly to international trade.</p> <p>As set out in our response to WS1.1 the global pandemic has seen unprecedented changes in the way that the B1/2/8 sector has and continues to operate and the UK industrial logistics market is thriving. Stoford contend that the Vision should seek to support this change.</p>



<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>The Vision should support the B1/2/8 sector.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Stoford are experienced developers of land within the north west. We have current market knowledge and a reputation for delivery. As a developer controlling a significant parcel of land within the Wirral area, and with the potential to address the shortfall within the WLP employment land supply, we believe it necessary to attend and participate in the Examination.</p>

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-709
<b>Person ID</b>	1267569
<b>Include files</b>	<a href="#">LPSD-709--EM-Russell Form 2 of 8 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jo Russell
<b>Position</b>	
<b>Company / Organisation</b>	Stoford Developments Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	2.39 - SO 11
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	We support the intention of strategic objective 11 to 'provide a range of employment and mixed-use sites to meet needs, attracting inward investment, provide work opportunities...'. However, since the draft Local Plan fails to properly take into account market signals and evidence from past take-up in assessing the future need for employment land, the consequence is that the need for employment land overall and in terms of demand for larger space for manufacturing and logistics is underestimated and the proposed supply of sites is insufficient.  As such, Stoford contend that the proposed Plan will be unable to meet strategic objective 11 in full. The Plan will need to increase its supply of allocated sites, including land for large scale B8 uses, to properly fulfil this objective.

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

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Stoford are experienced developers of land within the north west. We have current market knowledge and a reputation for delivery. As a developer controlling a significant parcel of land within the Wirral area, and with the potential to address the shortfall within the WLP employment land supply, we believe it necessary to attend and participate in the Examination.</p>

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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LPSD-710

<b>Comment ID</b>	LPSD-710
<b>Person ID</b>	1267569
<b>Include files</b>	<a href="#">LPSD-710-EM-Russell Form 3 of 8 2507_Redacted.pdf</a> <a href="#">LPSD-710, 712, 713-EM-Russell Attach 1 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-710, 712, 713-EM-Russell Attach 2 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-710,712,713-EM-Russell Attach 3 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jo Russell
<b>Position</b>	
<b>Company / Organisation</b>	Stoford Developments Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1.2
<b>Title</b>	Employment
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.2

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

**Local Plan is unsound. Please be as precise as possible.**

1. Stoford Properties Ltd (Stoford) control 46.17ha (hereafter circa 46ha) of land within the administrative area of Wirral MBC known as Hooton park. A plan outlining this land is included at Appendix 1 to this representation. The land is within the Green Belt, and is the former Hooton Airfield. There are existing operations within the site including a Go Karting Track, Alpine Storage (Use Class B8) and AM Transport Liverpool Limited (Use Class B8). The planning history relating to these uses is included at Appendix 2.
  2. Given the onsite uses, and the former airfield activity that has left areas of hard standing within the site, it is a site that displays previously developed and greenfield characteristics.
  3. Stoford are promoting the land known as Hooton Park (the Former Hooton Airfield) for development within the B2/B8 uses, and as a site with excellent access to the M53 (the junction 6 slip road is only 388m from the site entrance on West Road) and being adjacent on two of its three boundaries to established employment areas, Stoford consider that it should be allocated within the Local Plan Employment Land Supply at Policy WS.1.2. The site has not been allocated and therefore Stoford object to Policy WS1.2 and supporting text/paragraph references.
  4. Stoford have commissioned Nicol Economics as an independent expert, and their accompanying report (Appendix 3) provides clear evidence on the economic need for an additional allocation of employment land within the WLP in order make the plan sound, in the context of the promotion of land at Hooton Park as such an allocation. The Nicol report provides details of the benefits that could be expected, should the site be allocated, and that were the site not to be allocate that the plan would not be justified or positively prepared in that it would not make provision for the known requirements of the District.
  5. The objections address the following key points:
    - The overall requirement of 52.9ha (WLP Table 3.5) is grossly insufficient to meet the market demand that Stoford evidence, and in particular the figures of B2 (23ha) and B8 (26.2ha). The Plan is therefore not positively prepared and is not consistent with national policy. The accompanying report by Nicol (2022) recommends that a requirement for industrial uses is more likely to be within a range of 96.9ha-135.8ha (para 1.3 (16-17))
    - The proposed employment land supply of 65.6ha (net developable area) as set out within Policy WS1.2 is not reflective of the actual net developable area that is listed within the policy, for each site, once properly analysed. The Plan is therefore not positively prepared, effective or consistent with national policy.
    - The delivery periods for the identified supply (Policy WS1.2) highlight a serious absence of larger sites that are suitable, available and deliverable to meet the requirement of modern B2/B8 operators, particularly in the first five years of the Plan period. The Plan is not therefore effective.
    - Much of the employment land supply within Policy WS1.2 is not readily available for a wide variety of B2/B8 uses, and is focused on port and marine uses, given the location of the sites and the specific wording within the subsequent site-specific Policy allocations. This element of the supply is therefore not part of the available floorspace that will be meaningfully available to the general B2/B8 market where port related access or marine related activities are not demonstrable. The Plan is therefore not positively prepared, justified or effective.
    - The consequences of failing to plan for sufficient demand and allocate corresponding supply/have a portfolio of deliverable sites, is to the detriment of supporting the economic competitiveness of the Liverpool City Region, and driving economic transformation within the Borough. The Plan is therefore not positively prepared or consistent with national policy.
- Key point 1: The WLP is based on a) information that is out of date; b) ignores market signals, or at least, summarily dismisses them and therefore conflicts with PPG; c) and at a City Region level, the WLP relies on historic evidence predating the pandemic that completely understates levels of attractiveness and the need for larger B8 premises within the Wirral.
6. The WLP employment land requirement of 52.9ha is informed by the evidence within the Wirral Employment Land and Premises Study 2021 (WELPS). The WLP states at 3.22 that the WELPS utilises employment forecasts prepared by Oxford Economics for the Liverpool City region in 2019. Stoford consider that the continued relevance of employment forecasts that have been prepared in 2019 is misguided, given the subsequent global pandemic has seen unprecedented changes in the way that the B1/2/8 sector has and continues to operate. As Lambert Smith Hampton puts it:
 

'What happened in 2021 was frankly unparalleled, with just about every record you can think of either broken or smashed. The experience of COVID-19 has essentially 'fast-forwarded' structural change, driving a stampede of occupiers to better adapt their supply chains and expand online fulfilment, while the cold reality of Brexit has given impetus for greater onshoring of goods.

As investors in other property sectors continue to grapple with uncertainty, the UK industrial logistics market is thriving. The sector rose to the challenge of COVID-19 in 2020, paving the way for a frenzy of activity in 2021; a year that saw record take-up, record levels of speculative development and, tellingly, record low levels of supply.' (LSH 2022, Fast Forward – Industrial and Logistics Market.)
  7. Stoford strongly contend that forecasts from 2019, underpinning the WLP are not an effective basis for the calculation of employment land requirements. Paragraph 5.27- 5.29 of Nicol (2022) supporting these representations based upon far more up to date information makes further observations on this point also.
  8. The WELPS includes three alternative demand scenarios for jobs growth and consequential employment land requirements. The selected scenario is the 'Economic Capacity Impact Scenario', which the WLP advises at para 3.25 is the best scenario because it builds upon the basis of the Oxford 2019 forecasts. The Market Capacity Impact scenario is discounted by the Council because 'the Wirral economy is already radically different to its historic nature, a trend likely to be exacerbated by other factors such as Covid 19 and Brexit with a clear switch of the economy towards less job dense activities' (WLP para 3.25)
  9. It appears that the WLP is using the Oxford 2019 forecasts, coupled with the assumption on job density, to drive down the requirements for B8 floorspace in particular, and this leads to the low requirements that feature in Table 3.5 of the WLP.

10. In fact, the evidence of very strong demand/requirements for floorspace within the Industrial and Logistics sector could not be starker. Within their report (LSH 2022, Fast Forward – Industrial and Logistics Market.) LSH present a ‘regional’ summary of the North West market, which is presented in the following graphic (please refer to attached form)

11. Wirral MBC is one of a number of LPAs within the North West, linked by a series of motorways that are connected to the M6, serving as a north-south spine through the country. In turn, many of these authorities, including Wirral, Ellesmere, Liverpool, provide port connections and therefore offer opportunities for international trade and commerce which complements that strategic network and links it directly to international trade. The LSH Report referenced above states that ‘Despite considerable development activity, record take-up has put a huge dent into overall supply. Total availability across the North West fell by 49% during 2021, the sharpest percentage terms fall of any UK region, leaving total supply equivalent to 0.9 years of average take-up.’

12. The above figures represent alarming statistics and will only be compounded by approaches such as that of the WLP, where the employment needs/demands of the Industrial and Logistics sector are not acknowledged and carried forward into allocations.

13. Further work also before the Council is contained within the planning application made by Pegasus for the Ark Royal site in 2022. The following table (referenced Table 2.4) is extracted from the Economics Benefits Statement within that (approved) application.

14. Last year, there were approximately 11,200 businesses in Wirral. Between 2011 and 2021 the total number of companies in the area grew by 2,630. This represents growth of 30.7%, which is above the growth rate seen in the North West (27% - 68,000 businesses) and the growth rate seen in Great Britain (27% - 665,835 businesses) over the same timeframe. It is only just below the growth rate seen in Liverpool City Region (31.9% - 13,000 new businesses). The WLP approach to not accepting market signals and dismissing the Market Capacity Impact Scenario (para 3.25 WLP) is that the Council will fail to support the future ability of businesses to perform at and above regional and national trends because there will not be sufficient land available. The last decade has seen the reuse of existing vacant sites and premises; the extension of existing sites; and the concentration of businesses in non-Grade A stock. The fast pace of evolution associated with the Industrial and Logistics sector now, as it attempts to match the pace of demand fuelled by e commerce, is in the face of little existing stock/land, and with few sites of any strategic size being made available within the Plan. Just one location over 5ha is allocated for the first five years (Wirral Waters). It is accepted that the Wirral Waters allocation for the Plan period is 22.37ha overall, however importantly this is a site where a phased approach is in place and the investment funding secured, to support a masterplan targeting small to medium sized units within a specialised campus style environment. The Wirral Waters website advises:

‘Plans for a specialist waterside logistics and manufacturing campus, which will target priority sectors for Wirral and the Liverpool City Region, have been submitted to Wirral Council by Peel L&P.

The planning application submitted is for the first phase of the proposed Marine, Energy and Automotive (MEA) Park. The first phase is a £9m highly sustainable, 70,000 sq. ft multi-unit industrial and warehouse scheme that targets industrial and logistics companies and supply chains.’

15. Stoford commissioned a local agency, B8 Real Estate to prepare a report on the state of the local market, to inform these representations and the Local Plan evidence base. A copy is enclosed at Appendix 4. An earlier iteration of the report was commissioned in 2021 at the request of the Council during discussions with Stoford about the former Hooton Airfield site and our representations to the draft WELPS. During those discussions, officers had advised that an opportunity for influencing the draft Local Plan was available, and that they would welcome evidence of the demand for strategic industrial and logistics sites that Stoford has referred to. The earlier iteration of the B8RE report was submitted to the Council in the summer of 2021, however no formal acknowledgment or comment has ever been received, and it does not appear to have influenced the Council’s approach which is inexplicable.

16. Within the updated B8RE Report, there are clear conclusions relating to

- North West Demand and Take up: In the North West, the 5 year average yearly take-up of ‘Big box’ units is around 4.50M sq. ft but in 2021 this rose by 38% to a record level of 6.20M sq. ft and with 1.80M sq. ft already transacted after less than 3 months of 2022 and another 2.60M sq. ft in where solicitors have been instructed to agree and exchange contracts, all of the evidence points to the expectation that 2022 will be another record year for take-up in the North West. Notable large deals already signed up in 2022 include 878,000 sq. ft to Home Bargain and 505,000 sq. ft to Iceland Foods at Omega in Warrington plus 393,000 sq. ft to SCCL/Unipart at Widnes. (Page 6, B8 RE)
- The scale of floorspace required: The largest proportion of transactions were within the 90K – 200K sq. ft size range (18 transactions – 58%) given these were the most popular sizes of speculative units. Of speculative new build demand, 50% of units were let before practical completion. (Page 7, B8RE)
- Supply: There was only 1.38M sq. ft of new build and Grade B stock available at the end of 2021 with speculative new build accounting for 474K sq. ft (3 units – 34%); Grade A refurbished – no availability and Grade B refurbished 906k sq. ft (5 units – 66%). (Page 7, B8RE)
- Speculative development: Despite the number of schemes proposed and under construction, the case for further speculative development remains exceptionally strong with a large number of unsatisfied highprofile requirements in the big box North West market. Particularly in the 250k sq. ft plus bracket with four units under construction and a further two set on site at the beginning of 2022 to meet demand for larger sites.
- A well established area: Wirral/Ellesmere Port is a well-established industrial area with significant large scale industry predominantly in manufacturing but also distribution. Significant occupiers include Essar (1,000 acre plus oil refinery), Vauxhall (1m sq. ft plus car manufacturing plant), Pro Group (640,000 sq. ft manufacturing plant), Regatta (635,000 sq. ft distribution facility), Grief (400,000 sq. ft manufacturing facility), JLR/DHL (450,000 sq. ft distribution facility), SAICA (400,000 sq. ft manufacturing facility). (Page 8 B8 RE)
- A constrained supply: only 4 sites are currently available over 2 acres; as detailed on Page 9 of the B8 RE report, and these all are currently in the planning system and will not be available within by the time this WLP is adopted.

- Absence of large scale From the North West site schedule at Appendix C of the B8 RE Report, it is evident there are no other sites available in the North West that can accommodate a single unit of over 600,000 sq. ft or a single plot of over 50 acres. As such, the former Hooton Airfield is the only realistic site (if allocated) that could deliver something of this scale.

- Demand for strategic sites: The B8 RE Report (Appendix D) details enquiries that remain unsatisfied, primarily with a North West/Wirral locational requirement

17. As noted in paragraph 7 above, the job-related forecasts appear to be one factor that has driven down the overall calculation for employment floorspace, particularly B8, which is considered by the WELPS to be a low density employer. There are other factors that the WELPS should have considered when determining the quantum of Industrial and logistics land required.

18. The forecasting does not appear to have considered the requirements of the occupiers within the B8 sector – seeking large scale footprints with yards and circulation spaces often oversized to support the level of HGVs movements stemming from the growth in e-commerce that has escalated since 2020. Brexit and subsequent on shoring to maintain supply chains has also driven demand for bespoke units, for companies such as Hermes and DPD – looking to support their online clients with storage space.

19. Nicol (2022) comments on the failure of the employment land supply to provide for these needs:

The quality of employment sites varies and two of the larger allocations at North Side (13.1 hectares between them) are of lower quality and not suitable for larger scale development of inward investment. The four allocations at the Marine, Energy and Automotive (MEA) Park in Wirral Waters total 21.5 hectares according to the Council's assessment of supply. These are well located and will form part of high quality supply. However, there are some development constraints and their focus is on port related uses. (para 1.3 (20)) and

'One of the prime locations for larger scale development, Cammell Laird South, has now effectively been removed from the employment land supply. Taking account of the definitive reduction in net developable area for EMP- RA8.2 (SMM Business Park), then as a minimum the available land supply has been reduced from 65.6 hectares to 54.7 hectares - a fall of 12 hectares.' (para 1.3 (22)) and

There is a clear spatial imbalance in the location of the majority of the employment allocations. This reflects the Council's regeneration priorities but does not provide a range and choice of larger sites for businesses across the whole local authority area. In particular, business that wish to be located in the south of the borough closer to the national motorway network and the industrial complex by the Manchester Ship Canal are poorly served by the proposed supply. (para 1.3 (23))

20. Independent agencies have also recorded the strength of the industrial and logistics market.

- Analysis by Lambert Smith Hampton (LSH) shows that industrial and logistics take up in the UK hit a record high of 59.7 million sq. ft. in 2020 and the market continues to go from strength to strength. LSH note that take-up reached 40 million sq. ft. in the first half of 2021, which is the highest half-year total on record (<https://www.lsh.co.uk/industrial-and-logistics-market/overview/occupier-overview> )

- CBRE's UK Logistics Snapshot (Q2 2021) found that the North West accounted for 12.1% of logistics take up on Q2 2021.

The move towards online retail has continued and is likely to continue in the long-term, with demand for warehousing space showing no signs of abating. However Stoford consider that the WLP requirement has been significantly underplayed, and fails to respond to this and similar evidence. As a result it fails to allocate land for schemes that have the potential to deliver this warehousing space. Paragraph 5.35 of the Nicol (2022) report accompanying these representations arrives at the same conclusions.

Employees within the Industrial and Logistics Sector

21. Para. 3.23 of the WLP suggests that the B2 and B8 sector will see a reduction in the number of jobs over the Plan Period. The WLP uses the perceived reduction in B2/8 to support the case for a depressed land requirement. We disagree with this and consider that if employment land supply were increased and not constrained, this sector would see an increase in jobs available and in addition, a variety of job roles. The WLP fails to acknowledge the high value jobs that are delivered by the Industrial and Logistics sector.

22. The BPF co-authored report, 'Levelling up Logistics' advises

'I&L jobs have become increasingly diverse over the last decade. At the beginning of the decade the sector had a much more polarised distribution, with a higher share of managers at one end of the spectrum and more plant and machinery operatives and elementary occupations at the other end. Today we see a higher share of Professional and Associate Professional and Technical roles, typically associated with higher-skilled engineering and technological professions.' (page 17)

Key point 2: The proposed employment land supply of 65.6ha (net developable area) as set out within Policy WS1.2 is not reflective of the actual net developable area that is listed within the policy for each site, once analysed. The Plan is therefore not positively prepared, effective or consistent with national policy.

23. Stoford have analysed the supply of sites that are listed within policy WS1.2. The sites are presented as being capable of delivering a net developable area of 65.60ha. However following a desk based analysis of each site, Stoford believe that this figure is much lower, and is likely to be some 10-15 hectares less in terms of net developable area. This is equivalent to a freestanding strategic employment site akin the Former Mobil Oil site (RA6.1); Mea Park (RA6.3 and 6.4); Eastham Dock Estate (SA4.5); or Cammell Laird South (SA2.1). On this basis alone the Hooton site is needed. Of further note is that all of these large allocations have pipeline plans for their development, and so are not sites that could meet the needs of one single end occupier.

24. This is strongly supported by the attempts of Stoford to test the market for this site. Following more than 18 months of discussions with the Council during which time Stoford sought to bring a manufacturing company called De Jong, to the Wirral and meet their operational needs for a 90,000sqm building by

2024. The Council advised during Teams meetings that there were no available sites for De Jong to locate to within the Wirral, including their draft allocations. None were large enough and/or available for such a building. The Council advised that if Stoford were to deliver such a building at the former Hooton Airfield, this would need to be a planning application led

scenario, and demonstrate Very Special Circumstances. As recently as January 2022 the Council advised that they were not able to make an allocation within the emerging Plan to meet De Jong's immediate needs (i.e. for a site to accommodate 90,000sqm within the first five years of the Plan period), seemingly because of the local political sensitivities over any green belt release. Unfortunately, after over 18 months of discussions, De Jong, upon the submission of the Local Plan, advised Stoford that they could no longer carry the risk of not satisfying their business plan (and the risks associated with a VSC application) and they have chosen to lease two smaller units that are being delivered close to the Hooton Park site, within Chester and Cheshire West. These two units will meet the company's needs and offer them the certainty that they require to remain in the local area. The decision to take smaller less efficient units, but have the certainty of floorspace in an ever decreasing local supply was more important to them.

25. The table accompanying these representations (Appendix 5) examines each of the sites that comprise the allocation within Policy WS1.2. Appendix 6 provides a short commentary on each of the sites that form the supply, and our justification for reducing the net developable areas where appropriate.

A simplified table listing the sites, their allocated areas and suggested net developable areas that Stoford believe are more justifiable, is presented below and in total come to circa 17 hectares less than the supply assumed by the Council:

Location WLP Net Developable Area (ha) Stoford Recommended Net Developable Area (ha)

RA1 Seacombe Corridor 0 0

RA2 Scotts Quay 0 0

RA3 Birkenhead Waterfront 1.58 1.0

RA4 Central Birkenhead 0 0

RA5 Hind Street and St Werburgs 0 0

RA6 Wirral Waters 22.37 16.28

RA7 Hamilton Park 0.98 0.98

RA8 North Side 13.11 6.28

RA9 Liscard 0 0

RA10 New Brighton 0 0

Settlement Area 1 Wallasey 0 0

Settlement Area 2 Birkenhead Commercial Core 6.58 5.52

Settlement Area 3 Suburban Birkenhead 0.58 0

Settlement Area 4 Bebington, Bromborough and Eastham 15.66 14.18

Settlement Area 5 Leasowe

Morteton Greasby and Woodchurch 4.74 4.24

Settlement Area 6 Hoylake and West Kirby 0 0

Settlement Area 7 Weswall 0 0

Settlement Area 8 Rural Area 0 0

Total 65.6 48.48

26. On the basis of the above analysis, Stoford consider that there is potentially some 17ha of the WLP identified supply of NDA, that is not deliverable and therefore the allocations listed should be reduced accordingly.

Key point 3: The delivery periods for the identified supply (Policy WS1.2) highlight an absence of sites that are suitable, available and deliverable to meet the requirement of modern B2/B8 operators, particularly in the first five years of the Plan period. The Plan is not therefore effective.

27. Even without the reductions that Stoford recommends are necessary to the NDA within the WLP employment land supply, the trajectory for site delivery outlined within policy WS1.2 provides for very limited supply in the early part of the Plan period. The reliance on sites particularly within the Wirral Waters allocation, means that a phased approach is inevitable. The principle of regeneration in this area is not disputed. The allocation also has an experienced developer (Peel) behind it.

28. However, there are factual matters that point to sites within the overall supply, fuelling shortfalls in the available supply of land.

1. The inference of port related uses applies to a number of sites (RA6 for example) and whilst it is an acceptable employment use, it removes land from the generic B2/B8 supply for supporting more industry standard floorspace, and those not requiring port access



2. The references to maritime uses, training centres etc (e.g. MEA Park) is another similar steer from the WLP, that fails to acknowledge that in addition to these more niche occupiers, that is a requirement for less specialised, B2/B8 premises

3. The viability of the majority of previously developed sites that most the WLP employment land supply is considered to be below average-poor, by the Council within the WELPS. Whilst there may have been some improvements with values since the evidence base was collated – further illustrating the evidence base being out of date, there are future uncertainties regarding the EU's relationship with Northern Ireland for example,. This has placed a reliance on external funding interventions, and this will continue to be the case and be increasingly difficult in the months to come. The effect of this will be the reduced rate of delivery and the uncertainty over later phases. This will be coupled with the fact that the WLP simply hasn't allocated enough choice in employment land sites.

4. The size of the individual sites that comprise the supply of employment land is also a limitation in the delivery of employment sites – with no single site capable of accommodating a typical unit of 500,000sqft for example.

5. Many of the allocated sites have been previously allocated in the UDP and/or have had planning permissions that have failed to be implemented e.g. RA6 and SA2. The accompanying table at Appendix 5 illustrates this. Where sites have failed to be delivered despite having an allocation and/or a planning permission within the last ten years, we question what level of reliance can be put on the certainty of them delivering within particular phases of the plan period, as Policy WS1.2 suggests will be the case?

Key Point 4 : A quantum of the employment land supply within Policy WS1.2 is not readily available for B2/B8 uses, and performs a function related to port and marine facilities, given the location of the sites and the specific wording within the subsequent site-specific Policy allocations. This element of the supply detracts from the available floorspace that will be generally available to the B2/B8 market where port related access or marine related activities are not demonstrable. The Plan is therefore not positively prepared, justified, or effective.

29. A further criticism of the WLP employment land supply is the limited supply of sites and premises that are available for general B2/B8 uses. Of the larger allocations, there is a focus on port related uses, with 36% of the employment land supply, referring to port related uses (across three sites).

'The importance of having the right mix of sites and premises to support businesses and the economy is a feature of both Wirral's and the Liverpool City Region's current (2022) economic strategies.' (para 1.3 Nicol, 2022)

30. However, this spatial diversity is not provided for within the WLP:

'In particular, business that wish to be located in the south of the borough closer to the national motorway network and the industrial complex by the Manchester Ship Canal are poorly served by the proposed supply. Successful business locations such as Wirral International Business Park in Bromborough only have one or two small sites available for development.' (para 1.3 (23) Nicol, 2022)

The WLP evidence base does not provide for the market's demand for larger sites/premises, and the port related emphasis of the few larger sites within the WLP is compounding this.

'There is specific evidence of very strong recent strong demand for larger sheds in the Wirral/Ellesmere Port/Deeside area. This is evidenced by the fact that one of the draft Local Plan's few proposed larger employment allocations (the 5.5 hectares site at Cammell Laird South) is being promoted for Tungsten Properties for a large single speculative 490,000 sqft (45,523 sqm) industrial development.' (para 1.3 (15) Nicol, 2022) and also

The draft Local Plan states it has allocated 65.6 hectares of net developable land a surplus over the assessed need according to the Plan. However, the proposed supply of employment land is concentrated in just eight allocations that between them have 49 hectares or 75% of total assessed supply.

The quality of employment sites varies and two of the larger allocations at North Side (13.1 hectares between them) are of lower quality and not suitable for larger scale development of inward investment. The four allocations at the Marine, Energy and Automotive (MEA) Park in Wirral Waters total 21.5 hectares according to the Council's assessment of supply. These are well located and will form part of high quality supply. However, there are some development constraints and their focus is on port related uses. (para 1.3 (19 & 20), Nicol, 2022)

Key point 5: The consequences of failing to plan for sufficient demand and allocate corresponding supply/have a portfolio of deliverable sites, is to the detriment of supporting the economic competitiveness of the Liverpool City Region, and driving economic transformation within the Borough. The Plan is therefore not positively prepared or consistent with national policy.

31. The importance of having the right mix of sites and premises to support businesses and the economy is a feature of both Wirral's and the Liverpool City Region's current (2022) economic strategies. (Nicol 2022, para 1.3 (5))

32. The Nicol (2022) para 1.3(25) report comments on the potential benefits of allocating additional land, at the Former Hooton Airfield and how this could support the economic competitiveness of the Liverpool City Region.

'providing a range and choice for local businesses and inward investors. In the absence of having range of employment land sites to meet a range of requirements, the needs of some inward investors and some existing occupiers/businesses will not be met and the Wirral (and so likely the wider Liverpool City Region) will miss out on the jobs and associated economic benefits. This choice needs to be in terms of:

The size of sites – especially sites enabling the development of larger units (especially 200,000 sqft and over requiring a plot of around 5 hectares or more)

The location of sites across the Wirral

The availability of sites for immediate development and use.'

	<p>33. The LCR benefits from a Plan for Prosperity (March 2022). This Plan also recognises the importance of having a mix of sites. Nicol (2022) refers to this at para 3.16 The Plan, building on the earlier draft LIS, has a key action being “Ensure that LCR’s businesses have the right physical infrastructure to grow”. Here the Plan states that: “a central enabler to the delivery of LCR’s growth ambitions is to provide the right mix of sites, buildings and facilities across the city region, which are attractive to the market, facilitate investment and are essential to both employment and productivity. Key to this, is the right quality and variety of space to achieve businesses’ growth ambitions”...” LCR will ensure that employment sites - supporting all areas of the economy - are able to develop and grow to help maximise the volume of good jobs created and sustained.” (page 79, our emphasis added). ‘The LCRCA and Liverpool City Region LEP started the process of developing a Local Industrial Strategy (LIS) for the city region in 2019. These were the local manifestation of the, then, national Industrial Strategy. The draft Local Industrial Strategy was published in March 2020, just before the onset of the Covid-19 pandemic (see Figure 3.1). Under the business environment theme (“a dynamic business base creating opportunity”) the draft LIS emphasised that one of the five actions is “ensure that LCR’s businesses have the right physical infrastructure to grow”. This LIS stated that: “A central enabler to the delivery of LCR’s growth ambitions is to provide the right mix of sites, buildings and facilities across the City Region, which are attractive to the market, facilitate investment and are essential to both employment and productivity. Key to this, is the right quality and variety of space to achieve businesses’ growth ambitions. LCR will ensure that employment sites - supporting all areas of the economy - are able to develop and grow to help maximise the volume of good jobs created and sustained” (page 54, our emphasis added). The accompanying report by Nicol (2022) draws similar references, citing the Economic Growth Plan, within paragraphs 3.15-3.17.</p> <p>Conclusions</p> <p>34. The above representations and the supporting appended evidence identify that the draft Local Plan has failed to properly take into account market signals and evidence from past take-up in assessing the future need for employment land. The evidence base has also become quickly out of date due to the structural changes in the UK economy, the Liverpool City Region (and now that of the Wirral) in terms of demand for and uses of large scale logistics space.</p> <p>35. The Submission Draft Local Plan (Policy WS1.2) therefore understates the need for employment land overall and in terms of demand for larger space for manufacturing and logistics. It also overstates the actual supply in the allocated sites proposed.</p> <p>36. Therefore, to support the economy and business needs of the Wirral, there need to be an increased supply of allocated sites that meet the needs of businesses as evidence by market signals.</p> <p>37. The proposed employment site allocation at Hooton Park would help meet this gap between needs and supply.</p> <p>Appendix 1: Plans – Context Plan with Photographs, Masterplan, Masterplan with Constraints, Masterplan with Benefits</p> <p>Appendix 2: Summary of site planning history appended with relevant decision notices and plan showing areas of previously development land.</p> <p>Appendix 3: Nicol Economics Report</p> <p>Appendix 4: BR8 Real Estate Report</p> <p>Appendix 5: Stoford Analysis of WLP Employment Land Supply</p> <p>Appendix 6: Stoford justification for the reduction in site net developable areas</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please</b></p>	



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><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat</b></p>	<p>The table within the WLP Policy WS1.2 should be amended to reflect the NDA as per the table within these representations.</p> <p>The supply of sites should include reference to an allocation of land at Hooton Park. The available area is circa 46ha. There is potential to allocate the site in totality or a partial allocation/partial safeguarding of land could be made. This approach is discussed within our representations concerning Green Belt policy within the WLP.</p>

<p><b>Regulations</b>  <b>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.</b></p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  *      <b>No, I do not wish to participate in hearing session(s)</b>  *      <b>Yes, I wish to participate in hearing session(s)</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Stoford are experienced developers of land within the north west. We have current market knowledge and a reputation for delivery. As a developer controlling a significant parcel of land within the Wirral area, and with the potential to address the shortfall within the WLP employment land supply, we believe it necessary to attend and participate in the Examination.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b>  *      <b>Yes</b></p>	<p>Yes</p>

* No	
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<b>Comment ID</b>	LPSD-711
<b>Person ID</b>	1267569
<b>Include files</b>	<a href="#">LPSD-711-EM-Russell Form 4 of 8 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jo Russell
<b>Position</b>	
<b>Company / Organisation</b>	Stoford Developments Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 2
<b>Title</b>	Social Value
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>We support Policy WS 2 which requires major development to deliver net social gain in support of the economic, health and cultural wellbeing of the local community.</p> <p>As is shown on our Hooton Park Masterplan with benefits we would make sustainable travel easy with plenty of electric car chargers, secure cycle shelters, and proper shower rooms. We are proposing a cycle hub with employee bike hire and a cycle way that links to new cycleway being constructed along West Road. We are proposing a walking / running route along the perimeter of the site alongside good outdoor space, employee wellbeing areas with seating and trim trail, all providing a positive working environment.</p> <p>We would embrace the use of a local labour policy for construction and occupation of the development covering skills and apprenticeships.</p> <p>We are sustainable developers who build units that are well designed, well insulated, and minimise energy using locally sourced products and materials.</p>

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

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Stoford are experienced developers of land within the north west. We have current market knowledge and a reputation for delivery. As a developer controlling a significant parcel of land within the Wirral area, and with the potential to address the shortfall within the WLP employment land supply, we believe it necessary to attend and participate in the Examination</p>

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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LPSD-712

<b>Comment ID</b>	LPSD-712
<b>Person ID</b>	1267569
<b>Include files</b>	<a href="#">LPSD-712-EM-Russell Form 5 of 8 2507_Redacted.pdf</a> <a href="#">LPSD-710, 712, 713-EM-Russell Attach 2 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-710, 712, 713-EM-Russell Attach 1 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-710,712,713-EM-Russell Attach 3 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jo Russell
<b>Position</b>	
<b>Company / Organisation</b>	Stoford Developments Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 4.1
<b>Title</b>	Meeting the Strategy
<b>To which part of the Local Plan does this representation relate?</b>	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 4.1

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is</b>	See representations to WS1.2 - LPSD 710.

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	Allocate Parcel 4.16. Amend the table in Policy WS1.2 to reflect the NDA as per the table within these representations.

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)

Stoford are experienced developers of land within the north west. We have current market knowledge and a reputation for delivery. As a developer controlling a significant parcel of land within the Wirral area, and with the potential to address the shortfall within the WLP employment land supply, we believe it necessary to attend and participate in the Examination.

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

LPSD-713

<b>Comment ID</b>	LPSD-713
<b>Person ID</b>	1267569
<b>Include files</b>	<a href="#">LPSD-710, 712, 713-EM-Russell Attach 1 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-710, 712, 713-EM-Russell Attach 2 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-710-EM-Russell Form 3 of 8 2507_Redacted.pdf</a> <a href="#">LPSD-713-EM-Russell Form 6 of 8 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jo Russell
<b>Position</b>	
<b>Company / Organisation</b>	Stoford Developments Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 4.2
<b>Title</b>	Designated Employment Areas
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 4.2

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	See representations to WS1.2 LPSD 710
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is</b>	See representations to WS1.2 LPSD 710

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	<p>Allocate Parcel 4.16.</p> <p>Amend the table in Policy WS1.2 to reflect the NDA as per the table within these representations.</p>



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

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

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

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

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

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

Stoford are experienced developers of land within the north west. We have current market knowledge and a reputation for delivery. As a developer controlling a significant parcel of land within the Wirral area, and with the potential to address the shortfall within the WLP employment land supply, we believe it necessary to attend and participate in the Examination.

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

LPSP-714

<b>Comment ID</b>	LPSP-714
<b>Person ID</b>	1267569
<b>Include files</b>	<a href="#">LPSP-714-EM-Russell Form 7 of 8 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jo Russell
<b>Position</b>	
<b>Company / Organisation</b>	Stoford Developments Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.1
<b>Title</b>	Green and Blue Infrastructure Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	We support Policy WS 5.1 which requires development proposals to contribute to high quality, coherent and resilient networks of blue and green infrastructure. Our Masterplan for Hooton Park maintains the vast majority of trees and hedges on-site and proposes replacement planting to compensate for those that would be lost. We are proposing a cycle hub with employee bike hire, a walking / running route along the perimeter of the site alongside good outdoor spaces and employee wellbeing area with trim trail. We are also proposing to create a new cycleway which links to the cycleway planned for along West Road in Cheshire West and Chester. Our masterplan incorporates sustainable drainage systems and would make measurable biodiversity gains.

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

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Stoford are experienced developers of land within the north west. We have current market knowledge and a reputation for delivery. As a developer controlling a significant parcel of land within the Wirral area, and with the potential to address the shortfall within the WLP employment land supply, we believe it necessary to attend and participate in the Examination.</p>

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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LPSPD-715

<b>Comment ID</b>	LPSPD-715
<b>Person ID</b>	1267569
<b>Include files</b>	<a href="#">LPSPD-715-EM-Russell Form 8 of 8 2507_Redacted.pdf</a> <a href="#">LPSPD-710,712,713-EM-Russell Attach 3 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Jo Russell
<b>Position</b>	
<b>Company / Organisation</b>	Stoford Developments Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 8.1
<b>Title</b>	Green Belt
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 8.1
<b>Please state which Site ID/Reference this</b>	



representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 Form attached for details of table and plans, and further attachments 1. Stoford Properties Ltd (Stoford) control 46.17ha (hereafter circa 46ha) of land within the administrative area of Wirral MBC known as Hooton park. A plan outlining this land is included at Appendix 1 to this representation. The land is presently located within the Green Belt, and formerly was in use as Hooton

as precise as possible.

Airfield. There are existing operations within the site including a Go Karting Track, Alpine Storage (Use Class B8) and AM Transport Liverpool Limited (Use Class B8). The planning history relating to these uses is included at Appendix 2.

2. Given the existing on site uses, and the former airfield activity that has left areas of hard standing within the site, it is a site that displays both previously developed and greenfield characteristics.

3. Stoford are promoting this land which will be known as Hooton Park for development within the B2/B8 uses, and as a site with excellent access to the M53 (the junction 6 slip road is only 388m from the site entrance on West Road) and being adjacent on two of its three boundaries to established employment areas, Stoford consider that it should be allocated within the Local Plan Employment Land Supply at Policy WS.1.2. Such an allocation would require the land to be released from the Green Belt. WLP Policy WP8.1 (Green Belt) and WP8.2 (Agricultural Land) are therefore objected to, since their application to this site would prevent its development for employment uses. Our objections also extend to the supporting text, paragraphs 5.62 to 5.74.

4. These representations are supported by a critique of the Wirral Green Belt Review 2019 (GBR), prepared by Turley (Appendix 3). The GBR was prepared by Arup, on behalf of the Council and is Evidence Document GB1.

5. The Site is located in the south of Wirral Borough. It is adjacent to the urban area of Eastham, which forms part of the main urban conurbation to the east of the M53 motorway. It also adjoins the settlement boundary of the Ellesmere Port urban area within Cheshire West and Chester. Appendix 1 illustrates site photographs taken around the site boundary that emphasise the urban surroundings to the north, north-west and east/south east.

6. Our objections address the following key points:

- The failure of the WLP to acknowledge that there are exceptional circumstances to warrant the release of land from the green belt to meet employment needs. There is strong case for considering allocating at the very least part of the proposed site as employment land allocation in order to bolster employment land supply in the Wirral. The “exceptional circumstances” being the grossly inadequate supply of employment land to meet future need. The element of employment land need is detailed within our report authored by Nicol Economics (2022) that is submitted in response to Policy WS1.2. Cross references are made where appropriate. Throughout the preparation of the Local Plan and site selection process that is documented within document BP2, ‘Site Selection Background Paper 2022’, the matter of exceptional circumstances have either been inexplicably dismissed, or not considered (having been ruled out previously).

(Step 1) Site Identification (2019)

Hooton Park was submitted as a potential housing site and was part of the Council’s Step 1a sites, identified through the SHLAA 2019. The Council dismissed the site as being unsuitable because of the Green Belt status (page 147, Appendix 4, SHLAA 2019).

Interim Green Belt Site Assessment (Dec 2019)

The Council undertook an Interim Green Belt Site Assessment following the WLP GBR in 2019. Two high level options were considered for release, based on the areas performing ‘weak’ contributions to the Green Belt.

- The approach of the Green Belt Assessment (GBR) undertaken by Arup’s and its shortcomings set out in the critique by Turleys. There are a number of aspects of the GBR which are considered to be flawed, being unjustified and/or inconsistent application of the methodology. They relate to the definition and assessment of General Areas, the approach to the definition of parcels and the assessment of parcels.

- The conclusions reached in the assessment of Parcel 4.16 (within which the Hooton Park site is located) are specifically considered and critiqued. We object to the GBR’s conclusion in respect of the site/parcel 4.16.

- The failure of the WLP to identify any safeguarded land as part of their review of the Green Belt, which means that the inner boundary of the green belt is very unlikely to endure in the long term.

Key Point 1: The failure of WLP to consider exceptional circumstances

Evidence Document BP2, ‘Wirral Site Selection Paper 2022 v2’ details the site selection process that informed the WLP. Stoford consider this process and the early dismissal of exceptional circumstances is a fundamental flaw of the WLP evidence base and undermines the soundness of the Plan itself. Diagram 2 (page 8) within BP2 illustrates the process, and the key stages/steps are highlighted in the following summary table, with our commentary on the specific shortcomings of each step or stage.

It should be noted that the site at Hooton Park was initially presented to the Call for Sites as a housing opportunity, however it has been over 18 months since Stoford first held a (virtual) meeting (5th November 2020) with Officers at the Council to explain the opportunity for employment development at Hooton Park, with Stoford as developer and promoter. Therefore whilst in the early stages of the site selection process, the Hooton Park site will have been part of the housing sites assessed by the Council, from November 2020 officers were aware of the alternative.

Irrespective of this, the point we make below relates to the failure (often on a non site specific basis) of the Council to acknowledge the exceptional circumstance relating to employment land needs. If this had been acknowledged, the approach to Green Belt within the WLP would in our view have been different and with different consequences for sites such as Hooton Park.

Page 17 of BP2 refers to Appendix 4.7 of the Issues and Options Documents for details of the Interim Green Belt Site Assessment.

Map A within Appendix 4.7 (extract below) illustrates how the Hooton Park site relates to the weakly performing parcels and an extract is below. This is relevant because if the Hooton Park site had been assessed as being weak in its contribution, this would have meant the site being considered as part of the IGBSA and being part of the high level options for release. Turley's critique of the GBR considers that the Hooton Park site does perform a weak contribution. (map in attachment)

Appendix 4.7 concludes: that Site 4.15 is wrongly deemed as having no developable area and Site 4.18 is not taken forward because further screening was done in respect of the adjacent oil refineries (COMAH Zones) and the limitations such Zones could place on residential uses. Sites 4.13 and 4.19 are not covered, but equally are not carried forward.

It is notable that the Hooton Park Site is within the same broad location as the above sites that were considered within the Interim Site Assessment as possible sites for release albeit no justification is given with regards to why sites 4.13 to 4.15 for example were considered initially, yet Hooton Park was not. Given Hooton Park is adjacent to sites that have been considered for release, the Council clearly not advocating that the location of the site is inappropriate. The reason for Hooton Park not having been identified for potential release therefore must be a case of the Council perceiving that it fulfills Green Belt purposes.

Step 1B Review of existing employment sites and identification of new employment sites (2017 and 2019)

As Nicol (2022) highlights within his report that supports our representation to policy WS1.2, both 2017 and 2019 predate the structural shifts within the employment land market and the demand for larger sites. This is first failing of Step 1B of the site selection process (see Para 4.47 of evidence document BP2).

There is no mention of Exceptional Circumstances at this Step of the process, potentially because the process highlights that there were 41 sites with a Net Developable Area of 59.5ha and these were recommended to form the employment land supply (para 4.53 of BP2).

At that time, the WELPS 2017 referred to a need of 80ha for the Plan Period (para 4.55 of BP2) and therefore a shortfall of sites existed.

Employment Land Options 2019

Para 4.57 of the BP2 highlights that in light of the potential shortfall of employment sites within the WELPS 2017, an Options Study in 2019 was commissioned, and one aspect of that would be to consider Green Belt locations, if land at Wirral Waters were not assessed and reclassified as part of the deliverable employment land supply.

Para 4.63 of BP2 goes on to state that the ELOS 2019 concludes that five of the Wirral Waters sites that had previously not been part of the employment land supply in the WELPS 2017, could now form part of the supply as at 2019.

Step 2 - Stage 1 Planning Site Assessment (2019)

Para 4.74 of BP2 refers to the WELPS 2017 and the ELOS 2019 being the source of evidence for this stage. 36 sites form part of this stage and were taken to Stage 2. At this point, the employment land need was still circa 80ha based on the WELPS 2017.

This stage however was prior to the structural changes within the market that are described within Nicol 2022

Issues and Options - Consultation (Jan 2020)

This stage also pre dated the Covid 19 pandemic and Brexit – these being the two structural markets shifts that Nicol 2022 refers to as being fundamental to the flawed assessment of employment land need within the WLP.

The Issues and Options Consultation states at 6.12:

There is a focus on delivering Use Class B1 and B2 employment developments to meet the current demand within the Borough. There is a significant proportion of small poor-quality sites within Birkenhead and Wallasey, where there is demand from Small and Medium Enterprise(SMEs) for smaller sites. The future employment space should focus on accommodating SMEs wanting modern small Use Class B1 and B2 employment space within Birkenhead.

Evidence by Nicol and B8RE counter this.

And at 6.14 of the Issues and Options Consultation 2020:

Furthermore, the Liverpool City Region Large Scale B8 Areas of Search Site Assessment 2019 found that Wirral is not optimally located for distribution uses due to its relatively poor connectivity to the rest of the City Region or to the M6. It is considered that land with good road network access is the most desirable across the existing industrial stock

Our evidence and enquiries schedule demonstrate otherwise.

And at para 6.26 of the Issues and Options Consultation 2020 This document contains an interim list of 36 urban sites for proposed allocation for employment B-class uses (listed in Appendix 4

.6 as part of the Council's preferred option). Collectively these sites will exceed the required 80 ha Local Plan requirement.

Therefore whilst the Issues and Options document did consider two Options for Green Belt release (options 2a and 2b) within the consultations material - see para 4.86 of Document 2B, these Options were purely for residential development, and not for employment use because the Council had arrived at the conclusion that their supply exceeded their requirement.

However the evidence since Jan 2020 has substantially changed and the WLP evidence has not been properly updated to reflect major changes in the employment market.

The 36 sites that passed the Stage 1 Planning Site Assessment were identified as proposed allocations within the Issues and Options Consultation, collectively supplying 105ha (para 4.90 of the Document BP2)

#### Site Identification Update

Page 27 of BP2 advises that after the Issues and Options Consultation, the Council commissioned updates to the SHLAA and the WELPS. Para 4.99 notes that 'Sites in the Green Belt have continued to be discounted in the absence of exceptional circumstances.'

At para 4.99 under the sub heading of WELP 2021, BP2 confirms that the WELPS 2021 updated the anticipated demand for employment land.

We strongly disagree with the above extracts, given that following an online meeting with Officers in Spring 2021 led to Stoford commissioning an independent report on employment land demand at the Council's request, and submitting this on 2 July 2021. No reference is made to that evidence within the WELPS 2021 which is purportedly considering anticipated demand for the period to 2037.

None of the enquiries that are listed within the B8 RE Report (subsequently updated for Stoford's representations) are featured within the WELPS 2021 in respect of commentary on demand.

In addition, discussions in respect of Stoford's then likely occupier of Hooton Park De Jong (who sought 90,000sqm of floorspace by 2024 within Wirral) also commenced during the preparation of the WELPS 2021 and yet despite officers acknowledging during discussions that there were no suitable available or deliverable sites within the WELPS 2021 to satisfy their needs, the update to the WELPS finalised in 2022 fails to reference that exceptional circumstances were now in play. Neither was an update made or considered necessary by the Council, to the Arup GBR.

As noted above, the Issues and Options Consultation had only explored Green Belt releases for housing, and not for meeting employment needs. As such the WLP fails to consider the most up to date evidence before the Council when the Draft Plan was then prepared over the course of 2021/22 and submitted for Examination.

Para 4.136 of BP2 advises that it was recommended that a particular focus should be given to the sites with an overall rating of Very Good or Good in the analysis undertaken in the WELPS 2021. With this in mind the text advises that there were 63.5ha NDA of sites that were Very Good or Good. The paragraph continues:

'This indicated that no 'Average', 'Poor' or 'Very Poor' sites would be required to deliver the required levels of employment development over the Local Plan Period.'

However this is not the case. The allocations under policy WS1.2 include

Site Size (NDA) Score

RA8.2 6.83 Average

RA8.1 6.28 Poor

RA6.1 1.8 Average

RA6.5 0.95 Average

SA4.5 9.28 Poor

SA5.1 1.1 Average

SA5.2 1.46 Average

SA5.3 1.93 Average

SA5.4 0.25 Average

Total 29.88

Almost half of the employment land supply is on sites that are Average, Poor or Very Poor in terms of overall scoring, which is contrary to text at 4.136 of BP2 concerning site selection. At the time of preparing the WELPS 2021, this was a further opportunity for the Council to acknowledge that there were exceptional circumstances 'in play' in terms of the need to consider the demand/supply balance of employment land. This was not followed up.

Stage 2 Planning Assessment of Sites (delivery) April 2020-February 2022

Para 4.141 of BP2 (Site Selection Paper) describes this as an iterative process, and whilst Stoford were actively engaging with the Council (See our site chronology at Appendix 4) over this period, the same cannot be said for the Council. Paragraph 4.146 of BP2 advises that in deciding which sites to be allocated for employment development, in addition to the findings of WELPS 2021 and other studies, the Council also 'took into account ... discussions with landowners and site promoters'.

Stoford disagree with this statement. Representations were made to the WELPS Consultation in March 2021, and to the Environmental Sensitivity Study and the Blue and Green Infrastructure Study. Further meetings were held with officers, and upon their request a report from B8 RE was commissioned and submitted that evidenced the levels of demand through enquiries for large scale premises. Stoford also introduced its likely occupier of the site (De Jong) and held meetings with officers and the occupier, outlining their requirement for a 90,000sqm footprint by 2024. None of this evidenced is featured within the Council's evidence base. De Jong's needs and their inability to identify a site were obviously part of the exceptional circumstances known to the Council, along with the additional enquiries listed within the B8 RE Report.

Despite having this evidence before them, the Council did not explore the matter of exceptional circumstances again, and proceeded to finalise the WELPS, the Green Belt Review and the Submission Local Plan. This is not conducive to effective plan making or a justified approach, nor does it sit comfortably with the Council's obligation to support the economic base of its area.

Key Point 2 and 3: The approach of the Green Belt Assessment (GBR) undertaken by Arup's (Evidence Document GB1) and the observed shortcomings. There are a number of aspects of the GBR which are considered to be flawed, being unjustified and/or inconsistent application of the methodology. They relate to the definition and assessment of General Areas, the approach to the definition of parcels and the assessment of parcels.

#### Definition and assessment of general areas

Paragraph 5.3 and 5.4 of the Turley report (Appendix 3) explain that the Arup GBR defines and assesses general areas, albeit this is not an approach required by the NPPF or Planning Practice Guidance.

Turley comments: 'The definition and assessment of General Areas does not add anything of relevance to the assessment of specific parcels. It is unclear what the reason for the definition and assessment of the General Areas is (other than providing an assessment of the whole of the Green Belt), particularly in light of the recognition by the GBR1 that there will be 'will be significant differences in the overall conclusions' between parcels within the General Areas and the General Areas themselves.'

#### Definition of Parcels

The approach to the definition of parcels is flawed and the methodology applied inconsistently.

Turley states at para 5.6 'The approach of the GBR therefore has no regard to the actual effect of the boundary landscape and leads to a situation where, through simple application of the methodology, a substantial unprotected treeline will be held to be less durable than an insubstantial but protected treeline. '

The parcel definition also ignores the variety of land uses present, and the variety of characteristics of land, within these parcels. A number of the example of reviews elsewhere referenced in the GBR use these aspects in defining assessment parcels, but the GBR inexplicably does not.

These issues are apparent when looking at the definition of parcel 4.16 (Hooton Park) (and 4.14, 4.15 and 4.18). The parcel boundary does not reflect the presence of a significant, double width tree / hedgeline (albeit unprotected) which follows the line of a disused railway (part of which remains in situ to the east) as illustrated in Figure 5.1 (of the Turley Report). It is considered that this feature represents a far more suitable parcel boundary and that the Parcel should be redrawn using this feature as its northern boundary, continuing the current northern boundary following the route of the disused railway line and tree / hedgeline to the east. Riveracre Road would continue to be the western boundary. This is illustrated in Figure 5.3 of the Turley Report.

The existing Parcel boundary also ignores the very large group TPO (indicated by the area with green dots below) – a feature which the GBR recognises as 'durable' - and also the substantial and permanent built development adjacent to Eastham as shown in the aerial photographs below. However, the redrawing of the boundary as suggested above would mean that these features were omitted from Parcel 4.16.

#### The Assessment of Parcels

The assessment of Parcel 4.16 in the GBR concludes that it makes a 'moderate' overall contribution to the Green Belt. This is a direct function of the scoring against individual purposes, with the GBR directing how different combinations of scoring against individual purposes are translated into an overall score; four

'moderate' contributions - as per the GBR assessment - results in a 'moderate' overall contribution.

Stoford do not agree with the overall assessment of either Parcel 4.16. They consider that a number of the conclusions reached in respect of individual purposes are unjustified and that a reduced contribution is made in relation to several purposes. An explanation of issues identified by Stoford and an assessment against the contribution made by the Parcel in relation to each purpose is provided within the Turley Report at para 5.14 to 5.56. Turley conclude the site should be assessed as follows and ultimately overall makes a weak contribution to the Green Belt purposes:

#### Purpose GBR Assessment Revised Assessment

1. Restricting Urban Sprawl Moderate Contribution Weak Contribution
2. Prevent Merging Moderate contribution weak contribution
3. Prevent Encroachment Moderate contribution Moderate contribution
4. Protecting Historic Towns No contribution No contribution
5. Contribute to urban regeneration Moderate contribution Weak Contribution

Overall contribution Moderate contribution Weak contribution

Key Point 4: The failure of the WLP to identify safeguarded land as part of their review of the Green Belt.

Safeguarded land is discussed at paragraph 144 of the NPPF 2021. The paragraph explains how safeguarding land comes into consideration when a LPA is defining their Green Belt Boundaries.

The preceding paragraph of the NPPF, 143 is important here. We have explored each component part of para 143 below

'When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.'

The Wirral GBR and WLP has not had regard to promoting sustainable patterns of development in the consideration of Green Belt and land captured by it. By not addressing the employment land demands and shortcomings in supply, as evidenced within our representations to policy WS1.2, the Plan is not promoting sustainable patterns of development. Occupiers with the potential to offer jobs, and deliver investment in the Wirral, requiring large scale site/premises of circa 250,00sqft or more cannot be accommodated by the Plan. This will lead to the leakage of investment, and the continuation of out commuting trends.

Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

As noted within the Turley report accompanying these representations, the Hooton Park site is directly adjacent to the urban area, with urban features on the north west and north eastern boundaries. Site photographs on the accompanying site plan (Appendix 1) illustrate this further. Parcel 4.16 is inconsistently assessed compared to adjacent parcels that are considered by the GBR to perform a weaker contribution. Parcel 4.16 (Hooton Park) should have been similarly assessed.

Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

No consideration is made within the GBR to the previously developed elements of the Hooton Park site (parcel 4.16). When the Council did explore releasing Green Belt as part of Local Plan Options 2a and 2b, these options did not include the Hooton Park site, and the Council did not give 'first consideration' as required by the NPPF to this parcel as one that is 22% previously developed with buildings and hardstanding (see plan within Appendix 2). Neither is any consideration given to the accessibility of the site by public transport, as can be seen on the accompanying context plan (Appendix 1)

Turning to the matter of safeguarded land and para 143 of the NPPF.

The NPPF states that when defining Green Belt boundaries, Plans should:

'where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period'

The WLP continues to define the Green Belt boundaries without any safeguarding of land at all. As an Authority that is 'hemmed in' by Green Belt and with land either within the urban area or within the Rural Area (of which all of this is Green Belt), it is evident that the Green Belt boundaries will require amendment in order to meet future growth requirements 'well beyond' 2037. The GBR does nothing to assist the LPA with this task. It is silent.

As a result, the Council are unable to

'demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period' (NPPF para 143(e))

It is our view, that should the Inspector examining the WLP accept our case presented within Policy WS1.2 that defines that there is a shortfall within the employment land supply needed to fulfil the requirements as set out within the Nicol (2022) report, then the Hooton Park site at some 47ha has the ability to satisfy that need through an allocation, and any surplus land can be safeguarded.

The accompanying Turley report to these representations considers the defensible boundaries that the Hooton Park parcel can demonstrate, and therefore criterion f of para 143 of the NPPF concerning clear definitive boundaries is also met.

#### Conclusions

To conclude on our representations on this matters:

1. Stoford consider that exceptional circumstances to release the Green Belt in order to satisfy an unmet need for employment land, in the absence of a sufficient deliverable supply, exist within Wirral.
2. There are local and site specific factors that exist to further support the argument that exceptional circumstances exists for the release of land at Hooton Park. Namely, this site makes a weak contribution to the purposes of the Green Belt (Turley, 2022) and is within the broad location where other adjacent parcels has been considered in the preparation of the Plan for release (options 2a and 2b, Issues and Options Consultation). Turley also explore the site context in terms of adjacent urban form – the Eastham refinery to the north, and the Vauxhall redevelopment site recently consented to the south east.
3. The spatial strategy focuses development on the most sustainable parts of the Borough. The WLP already allocate land immediately on the north eastern boundary of the site (SA4.5 Eastham Dock Estate) for development and there can be no question therefore from the Council regarding the location as a sustainable one for employment uses. Indeed, the ability to enhance connections for cyclists and pedestrians to the urban areas west of the site from Hooton Park are stronger than those from the Eastham Dock Estate. Our plan at Appendix X also illustrates the connectivity to local bus routes, and the ability to reduce private car usage to the site in future. Development of this scale at Hooton Park can also enhance existing public transport services.
4. Through Turley's report, we have presented a case that confirms the Hooton Park site makes an overall weak contribution to the five purposes of the Green Belt.

	<p>5. The release of the site can be achieved and clear defensible boundaries are identifiable for land to the south of Riveracre Road, thus ensuring permanency of the boundary and the openness beyond. Land to the south of Riveracre Road can (and does) provide the characteristics of Green Belt, including openness. Turley (2022) demonstrate that there are clear boundaries in the form of roads (Riveracre Road, West Road); railway lines (the disused railway line), hedgerows, woodland etc that create sensible and well defined boundaries for this parcel of land at Hooton Park. Development of this site 'infills' a logical break within the current urban form, and in doing so can create a strong, permanent boundary to the revised urban area along Riveracre Road.</p> <p>6. Whilst there is no express requirement to take visual impact into account when considering the impact of development on green belt openness, it has relevance for those exercising planning judgement. The backdrop of the Eastham oil refinery, and the former Vauxhall works (redevelopment of which is underway for new buildings) are features against which new development at Hooton Park would be set within the context of. The established and well defined hedgerow along Riveracre road is effective at screening development when viewed from the south and through landscape proposals can be bolstered and enhanced thereby avoiding such an allocation appearing to contribute to urban sprawl.</p> <p>7. The site is already being used for a number of business operations and has been for a number of years (see Appendix 2 – planning history). There are areas of hardstanding, buildings, a former aircraft hangar, a go karting track and associated facilities, all of which contribute to the urban character of this site, and more so when viewed against the background of adjacent use to the north and south east of the site.</p> <p>Overall the site is optimally located to meet an immediate need for additional employment land and should be allocated as such now. The approach of the draft plan disregards clear evidence supporting the release of such sites and is seriously out of step with its evidence base.</p> <p>Appendix 1: Site Plans - Location Plan, Context Plan with Photographs, Masterplan, Masterplan with Constraints, Masterplan with Benefits</p> <p>Appendix 2: Summary of site planning history and Plan of PDL</p> <p>Appendix 3: Critique of Wirral Green Belt Assessment 28th June 2022</p> <p>Appendix 4: Chronology of engagement with Wirral MBC</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability</b></p>	



Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Release Green Belt land for development in the Local Plan. Allocate Parcel 4.16.
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>	<p>Stoford are experienced developers of land within the north west. We have current market knowledge and a reputation for delivery. As a developer controlling a significant parcel of land within the Wirral area, and with the potential to address the shortfall within the WLP employment land supply, we believe it necessary to attend and participate in the Examination.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-716

<b>Comment ID</b>	LPSP-716
<b>Person ID</b>	1324088
<b>Include files</b>	<a href="#">LPSP-716-EM-Dickson Form 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mike Horner
<b>Position</b>	
<b>Company / Organisation</b>	Wirral Growth Company
<b>Agent ID</b>	1324087
<b>Agent Name</b>	Mr Greg Dickson
<b>Position</b>	
<b>Company / Organisation</b>	Barton Willmore (Stantec)
<b>Number</b>	Part 3
<b>Title</b>	Strategic Policies
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	ALL
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	The comments, observations and recommendations set out in the enclosed letter of representation are focused on WGC's Priority Sites and are intended to assist the Council in their ongoing preparation of the Wirral Local Plan.
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The comments, observations and recommendations set out in the enclosed letter of representation are focused on WGC's Priority Sites and are intended to assist the Council in their ongoing preparation of the Wirral Local Plan.
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	

<b>as precise as possible.</b>	
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	The comments, observations and recommendations set out in the enclosed letter of representation are focused on WGC's Priority Sites and are intended to assist the Council in their ongoing preparation of the Wirral Local Plan.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	The comments, observations and recommendations set out in the enclosed letter of representation are focused on WGC's Priority Sites and are intended to assist the Council in their ongoing preparation of the Wirral Local Plan.
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	The comments, observations and recommendations set out in the enclosed letter of representation are focused on WGC's Priority Sites and are intended to assist the Council in their ongoing preparation of the Wirral Local Plan.
<b>Please set out the modification(s) you consider necessary to make the Local</b>	The comments, observations and recommendations set out in the enclosed letter of representation are focused on WGC's Priority Sites and are intended to assist the Council in their ongoing preparation of the Wirral Local Plan.

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why</b></p>	<p>WGC strongly supports the development of a robust evidence base for the Borough and that this underpins the development of the Local Plan. Recognising the importance of the Local Plan as a document that will direct development in the period to 2037, the enclosed representations (specially relating to WGC's Priority Sites) are intended to provide a constructive input to the final preparation and drafting of the Local Plan. Moving forward, WGC welcomes the opportunity to continue to actively feed into the development of the Local Plan.</p>

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

LPSP-717

<b>Comment ID</b>	LPSP-717
<b>Person ID</b>	1324090
<b>Include files</b>	<a href="#">LPSP-717-EM-Baker Form 2507_Redacted.pdf</a> <a href="#">LPSP-717,1331,1332,1333-EM-Baker Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Paul Kenny
<b>Position</b>	
<b>Company / Organisation</b>	The KL Pension Fund
<b>Agent ID</b>	1324089
<b>Agent Name</b>	Ms Tillie Baker
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Ruth Jackson Planning Limited
<b>Number</b>	Policy WP 3.4
<b>Title</b>	Employment Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 3.4, WS 4.2,

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is</b>	Please refer to enclosed letter Policy WP 3.4, is more restrictive with respect to allowable uses than Policy WS 4.2, which applies to the North Cheshire Trading Estate. Policy WS 4.2 allows for change of use to non employment uses where robust marketing and economic evidence is provided in support of an application, whereas Policy WP 3.4 offers no such flexibility. There is, therefore, an incentive



<b>unsound. Please be as precise as possible.</b>	<p>for redevelopment of existing sites for non-employment use (potentially leading to loss of existing employment sites), rather than development of a vacant site within the Estate. Policies applicable to the entire Trading Estate should be consistent to avoid perverse outcomes.</p> <p>The Council has allocated more employment land than required, with an acknowledged additional supply likely to come forward at mixed use sites over the plan period. There is, therefore, sufficient buffer contained in the Plan's employment land allocations to incorporate additional flexibility for site allocation EMP-SA 3.1. This is also appropriate in the context of the site's acknowledged viability constraints.</p>
<b>omplies with the Duty to co-operate</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A

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

<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As these representations refer to a single site allocation, I would like to ensure that the comments are not overlooked in the wider discussion of employment policy.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

LPSP-718

<b>Comment ID</b>	LPSP-718
<b>Person ID</b>	1324133
<b>Include files</b>	<a href="#">LPSP-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 2 of 2 2507_Redacted.pdf</a> <a href="#">LPSP-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 1 of 2_2507_Redacted.pdf</a> <a href="#">LPSP-718 and 1401-EM-Robinson Form 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Jones
<b>Position</b>	
<b>Company / Organisation</b>	Port Dredging Ltd
<b>Agent ID</b>	1249017
<b>Agent Name</b>	Mr Phil Robinson
<b>Position</b>	Director
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b>	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is</b>	Please see para 4.3-4.11 (page 10-14) of attached document. Please note paragraph numbers are not consistent {housing requirement should align with economic strategy demolitions allowance should be justified affordable housing requirement won't be delivered

<b>unsound. Please be as precise as possible.</b>	Evidence should be provided to substantiate the claim that exceptional circumstances do not exist to alter the Green Belt boundaries.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary</b>	higher housing requirement substantiate claim that no exceptional circumstances exist to release green belt

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),

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

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



LPSP-719

<b>Comment ID</b>	LPSP-719
<b>Person ID</b>	1324091
<b>Include files</b>	<a href="#">LPSP-719-EM-183 Rose Form 2507_Redacted.pdf</a> <a href="#">LPSP-719-EM-Rose-Form 2501 page1_Redacted.pdf</a> <a href="#">LPSP-719-EM-Rose-Form 2501 page2_Redacted.pdf</a> <a href="#">LPSP-719-EM-Rose-Form 2501 page3_Redacted.pdf</a> <a href="#">LPSP-719-EM-Rose-Form 2501 page4_Redacted.pdf</a> <a href="#">LPSP-719-EM-Rose-Form 2501 page5_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Lynette Rose
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 10
<b>Title</b>	New Brighton Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b>	Habitat Regulations Assessment
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this</b>	

representation relates to.	
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	In relation to the area of Wallasey, Harrison Park has been found to have lizards, there is no mention of doing a study to ensure no lizards would be harmed as it is illegal to deliberately kill, injure or sell/trade common lizards under Wildlife and Countryside Act 1981
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

<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	In relation to the area of Wallasey, Harrison Park has been found to have lizards, there is no mention of doing a study to ensure no lizards would be harmed as it is illegal to deliberately kill, injure or sell/trade common lizards under Wildlife and Countryside Act 1981
<b>omplies with the Duty to co-operate</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	In relation to the area of Wallasey, Harrison Park has been found to have lizards, there is no mention of doing a study to ensure no lizards would be harmed as it is illegal to deliberately kill, injure or sell/trade common lizards under Wildlife and Countryside Act 1981
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	As per previous note please refer re lizard comments

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

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

<b>Comment ID</b>	LPSD-720
<b>Person ID</b>	1324095
<b>Include files</b>	
<b>Consultee Name</b>	Mr Gavin Davies
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 4
<b>Title</b>	Regeneration Policies
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	Regen Policies
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	<p>1/ The plan does not include a bridge. As an international city, a bridge must be built across the Mersey. Currently, there is no way of crossing the river without paying for public transport, which is not always available. This is also an environmental concern. The Mersey Gateway Bridge in Runcorn/Widnes was recently built and this city needs the same.</p> <p>2/ There is no mention of Birkenhead's historic involvement in the transatlantic slave trade and later slave economy. Two major historic pro-slavery events, namely the 1894 construction of the Manchester Ship Canal in Eastham, built to transport cotton produced by trafficked and enslave western Afrikans and the launch of the Enrica by John Laird Sons &amp; Company, later renamed CSS Alabama in 1864. No attempts to further inclusivity of people with protected characteristics is mentioned. This is not consistent with the Equality Act 2010.</p> <p>3/ There is zero focus on the deprive estates on the outskirts of Birkenhead. There is intense historic psychological trauma in the area. This Plan must not become a gentrification project which benefits only the rich, leaving behind the generationally poor. This is 2022, not 1822.</p>
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	<p>Not Positively Prepared</p> <p>Not Justified</p> <p>Not Effective</p> <p>Not Consistent with National Policy</p>
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>1/ The plan does not include a bridge. As an international city, a bridge must be built across the Mersey. Currently, there is no way of crossing the river without paying for public transport, which is not always available. This is also an environmental concern. The Mersey Gateway Bridge in Runcorn/Widnes was recently built and this city needs the same.</p> <p>2/ There is no mention of Birkenhead's historic involvement in the transatlantic slave trade and later slave economy. Two major historic pro-slavery events, namely the 1894 construction of the Manchester Ship Canal in Eastham, built to transport cotton produced by trafficked and enslave western Afrikans and the launch of the Enrica by John Laird Sons &amp; Company, later renamed CSS Alabama in 1864. No attempts to further inclusivity of people with protected characteristics is mentioned. This is not consistent with the Equality Act 2010.</p>

	3/ There is zero focus on the deprived estates on the outskirts of Birkenhead. There is intense historic psychological trauma in the area. This Plan must not become a gentrification project which benefits only the rich, leaving behind the generationally poor. This is 2022, not 1822.
<b>Complies with the Duty to co-operate</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>1/ The plan does not include a bridge. As an international city, a bridge must be built across the Mersey. Currently, there is no way of crossing the river without paying for public transport, which is not always available. This is also an environmental concern. The Mersey Gateway Bridge in Runcorn/Widnes was recently built and this city needs the same.</p> <p>2/ There is no mention of Birkenhead's historic involvement in the transatlantic slave trade and later slave economy. Two major historic pro-slavery events, namely the 1894 construction of the Manchester Ship Canal in Eastham, built to transport cotton produced by trafficked and enslaved western Africans and the launch of the Enrica by John Laird Sons &amp; Company, later renamed CSS Alabama in 1864. No attempts to further inclusivity of people with protected characteristics is mentioned. This is not consistent with the Equality Act 2010.</p> <p>3/ There is zero focus on the deprived estates on the outskirts of Birkenhead. There is intense historic psychological trauma in the area. This Plan must not become a gentrification project which benefits only the rich, leaving behind the generationally poor. This is 2022, not 1822.</p>
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local</b>	<p>Museums, public education on historic cruelty of leading members of Birkenhead society.</p> <p>[more focus on deprived estates on outskirts of Birkenhead]</p>



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

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

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

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

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

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

I have many ideas that will benefit the plan.

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

## LPSD-721

<b>Comment ID</b>	LPSD-721
<b>Person ID</b>	1323713
<b>Include files</b>	<a href="#">LPSD-721-EM-Moore Form 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Christopher Moore
<b>Position</b>	Chairman
<b>Company / Organisation</b>	Hoylake Conservation Areas Association
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 3.2
<b>Title</b>	Housing Density
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>The loss of Density Guidelines as in the previous UDP stands to compromise the policies for Conservation Areas. In particular, the draft Local Plan seeks to establish a minimum of 50 dwellings per hectare on land adjacent to and bordering a conservation area. Without adequate controls there is the significant risk of building development approval which would materially compromise the setting of the CA.</p> <p>The CA appraisals for Kings Gap (2000) and Meols Drive (2004) are out of date and the Council has failed to issue management plans for these areas. Both areas have unsound and confusing boundaries which are long overdue for re-assessment. New appraisals have been requested of the Council which, amongst other aspects, should review the designated boundaries as there are traditional Victorian/Edwardian properties adjacent to the Kings Gap CA of heritage value which would benefit from greater protection through local listing. At present, there is no local listing of heritage assets in Wirral although it is understood that this is underway.</p>

<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	1. The Council will ensure that all Conservation Areas have up to date appraisals and supporting management plans. 2. The Council will undertake to produce Local Listings of Non Designated Heritage Assets 3. The Council will not support development proposals which impact unfavourably on the setting of conservation areas

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-722
<b>Person ID</b>	1323714
<b>Include files</b>	<a href="#">LPSD-722-EM-Pierce Form 2507_Redacted.pdf</a> <a href="#">LPSD-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Sam Pierce
<b>Position</b>	
<b>Company / Organisation</b>	Persimmon Homes
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 4.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA4.6



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.	support allocation
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

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

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-723
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 9.3
<b>Title</b>	Servicing Development
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 9.3 Servicing Development
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p> <p>Policy WS 7.4 Parking: Para F: Page 100:</p> <p>Complementing the push for low-carbon mobility by permitting car parking levels below the parking standards is understood and might have its place, but this must not be applied without due care as it could be a recipe for problems with drivers circulating looking for parking spaces – using fuel and creating pollution at a higher-than-average rate – and incidents of ‘road rage’ and confrontation.</p>
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	

<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>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies WS 7.1 and WS 9.3</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</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>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-724
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 3.2
<b>Title</b>	Housing Density
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *     Yes *     No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *     Yes *     No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *     Not Positively Prepared *     Not Justified *     Not Effective *     Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2),</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>*     Yes</p> <p>*     No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the</b></p>	

<p>duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies WS 3.2 and conditions in Paras 3.61 &amp; 3.62</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  * No, I do not wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSa. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-725
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 7.4
<b>Title</b>	Parking
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Policy WS 7.4 Parking: Para F: Page 100: Complementing the push for low-carbon mobility by permitting car parking levels below the parking standards is understood and might have its place, but this must not be applied without due care as it could be a recipe for problems with drivers circulating looking for parking spaces – using fuel and creating pollution at a higher-than-average rate – and incidents of 'road rage' and confrontation.



<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p><b>Policy WS 7.4 Parking: Para F: Page 100:</b></p> <p>Complementing the push for low-carbon mobility by permitting car parking levels below the parking standards is understood and might have its place, but this must not be applied without due care as it could be a recipe for problems with drivers circulating looking for parking spaces – using fuel and creating pollution at a higher-than-average rate – and incidents of ‘road rage’ and confrontation.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-726
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 6
<b>Title</b>	Self-Contained Flats
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 6
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<b>omplies with the Duty to co-operate</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance,</b>	

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies WD 6 A Para 1</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  *      <b>No, I do not wish to</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>



<b>Comment ID</b>	LPSD-727
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 7
<b>Title</b>	Houses in Multiple Occupation
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 7
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance,</b></p>	

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policy WD 7 A para 1</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p><b>Policy WS 7.4 Parking: Para F: Page 100:</b></p> <p>Complementing the push for low-carbon mobility by permitting car parking levels below the parking standards is understood and might have its place, but this must not be applied without due care as it could be a recipe for problems with drivers circulating looking for parking spaces – using fuel and creating pollution at a higher-than-average rate – and incidents of ‘road rage’ and confrontation.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  * No, I do not wish to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-728
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 7.4
<b>Title</b>	Parking
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	Policy WS 7.4 Parking: Para F
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Complementing the push for low-carbon mobility by permitting car parking levels below the parking standards is understood and might have its place, but this must not be applied without due care as it could be a recipe for problems with drivers circulating looking for parking spaces – using fuel and creating pollution at a higher-than-average rate – and incidents of ‘road rage’ and confrontation.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Complementing the push for low-carbon mobility by permitting car parking levels below the parking standards is understood and might have its place, but this must not be applied without due care as it could be a recipe for problems with drivers circulating looking for parking spaces – using fuel and creating pollution at a higher-than-average rate – and incidents of ‘road rage’ and confrontation.</p>



<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-729
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5
<b>Title</b>	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	3.119
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 3.119</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-730
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 1
<b>Title</b>	Seacombe River Corridor Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.13
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-para 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Para 4.13</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-731
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 2
<b>Title</b>	Scott's Quay Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.28
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.28</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>



<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-732
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 3
<b>Title</b>	Birkenhead Waterfront Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.45
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.45</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-733
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 4
<b>Title</b>	Central Birkenhead Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.64
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.



	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.64</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

## LPSD-734

<b>Comment ID</b>	LPSD-734
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 5
<b>Title</b>	Hind Street and St Werburgh's Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.84
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.84</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>



<b>Comment ID</b>	LPSD-735
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 6
<b>Title</b>	Wirral Waters Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.95
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.95</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-736
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 7
<b>Title</b>	Hamilton Park Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.138/9
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	



<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.138/9</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-737
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 9
<b>Title</b>	Liscard Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.160
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<b>omplies with the Duty to co-operate</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal</b>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.160</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSa. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-738
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 10
<b>Title</b>	New Brighton Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.174
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.174</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-739
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 11
<b>Title</b>	New Ferry Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	4.179
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 4.179</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>



<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-740
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 1
<b>Title</b>	Policy for Wallasey
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	5.12 sub para 1 & 2
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.

	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in Paras 5.12 SUB 1 AND 2</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-741
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 11
<b>Title</b>	New Ferry Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	RA 11
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.



	<p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by! ITPAS and WGSA would like Policies WS 7.1 and WS 9.3 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p> <p>The following Paragraphs and Policies give multiple references to high(er) density and the points made above apply (in connection with increased density without loss or even enhanced open space provision between buildings provided by the inclusion of Basements) and should be included in the Conditions of relevant Policies: Paras 3.61/2 (re: minimum densities in Policy WS 3.2), 3.119 (areas of lower land value), 4.13, 4.28, 4.45, 4.64, 4.84, 4.95 (too late as under construction), 4.101, 4.109, 4.138/9, 4.160, 4.174, 4.179, 5.12 (sub-paras 1 and 2) and Policies WS 3.2 (Housing Density), RA 11.B.1, WD 6.A.Para 1, WD 7.A.Para1, et al.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal</b></p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>2. To secure the many benefits outlined in Question 4b(3) above, ITPAS and WGSA would like <b>Policies conditions in RA 11 B.1</b> to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-742
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 10.6
<b>Title</b>	Open Space
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	Policy WS 10.6; Paras 3.225, 5.60 Sub-para 5 et al:
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>There are multiple references within the DLP citing the need to protect and enhance particularly outdoor sports pitches and leisure space, and the fact that most areas across Wirral have an under-provision which should be addressed. It is disappointing therefore to note omissions/exclusions from records which must be corrected.</p> <p>The situation locally within the ITPAS Area is further worsened by the omission from Appendix 11 of Pensby High Schools (including Pensby Sports Centre). There are 'School Playing Fields' not recorded which are very much active. In addition, the large Playing Field to the north side of the School Buildings has been allowed to become overgrown and denied the public access/use which was common prior to the Pandemic. Worryingly, we are informed that there is an expressed desire for the Boys' School and this Green Belt Playing Field to be sold off for a housing development. And, there is suspicion and concern that the mandated reprovision of playing pitches would be proposed to be at Irby Park which has space and (according</p>

	<p>to the incorrect LP description) currently has NIL pitches. There is local concern that this situation has been 'engineered', which should be dispelled through an appropriate statement and correction of the listings.</p> <p>Any proposal to sell off this Pensby High School Playing Field and losing its playing pitch provision would be fiercely opposed as: (i) additional pitches are called for on Wirral, not a reduction; (ii) this Site is Green Belt and would not be accepted as being 'previously developed land' (PDL); (iii) this Green Belt site has a major role to play in keeping the distinct communities of Pensby and Irby apart, in line with NPPF Purpose (b) of Green Belt; (iv) this Green Belt site also plays a major role in the 'openness' of Green Belt in this vicinity and keeping open an important 'green' (cross-Wirral) wildlife corridor; (v) this Green Belt site also serves Green Belt Purposes (a), (c) and (e); and (vi) this Green Belt site would be a necessary part of the mothballed former Boys' School should the school role increase again in the future and the School be reopened.</p> <p>Another unexplained omission from Appendix 11 (SA 7) or Appendix 12 is Dawpool Primary School, Irby, which has a well-used Playing Field.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</b></p>	

<p><b>Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>The responses to Question 4b(3) state what needs modifying: the Pensby High School active sports playing facilities need listing; the Pensby High School Sports Playing Field to the north of the School Building (which has been left uncut) needs listing as a Sports Playing Field with Playing Pitches accessible as prior to Covid to public groups;</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

hearing session(s)	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Irby Park and Pensby High School are both within the ITPAS Area for which I am Planning &amp; Footpath Rep as well as Founder/Convenor of WGSA. I have personal involvement with each of these and am a long-standing Member of Heswall Golf Club.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>



<b>Comment ID</b>	LPSD-743
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5
<b>Title</b>	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	Policy WS 5
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Appendix 17 Environmental Designations: Table 17.1: Omission: On the edge of SA7, just inside SA8 (from Gayton Conservation Area to the Council Boundary with EP&N) is 'Heswall Golf Club'. This is missing from the list in Appendix 17 Table 17.1 and should be included.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>The responses to Question 4b(3) state what needs modifying: and Heswall Golf Club, which has not been mentioned, needs mention and listing in Appendix 17 Table 17.1.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Irby Park and Pensby High School are both within the ITPAS Area for which I am Planning &amp; Footpath Rep as well as Founder/Convenor of WGSA. I have personal involvement with each of these and am a long-standing Member of Heswall Golf Club.</p>

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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LPSD-744

<b>Comment ID</b>	LPSD-744
<b>Person ID</b>	1249070
<b>Include files</b>	<a href="#">LPSD-274, 744-749, 753, 1418-1421-Burns Attach 1807_Redacted.pdf</a>
<b>Consultee Name</b>	PJ Livesey Group and Mr. Peter Bowling
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1249074
<b>Agent Name</b>	Mr. Jonathan Burns
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS1.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment.  Whilst it is welcomed that the housing requirement figure does exceed the minimum 779 Local Housing Need (LHN) figure, this is mainly a result of the 50 dpa demolition allowance. It does not account for economic growth in any meaningful manner, with a 6 dwelling per annum uplift representing a pitiful 0.8% increase to the bare minimum 779 dpa figure. 6 dwellings per annum will have an immaterial effect on supporting economic growth and represents a drop in the ocean in terms of the economic growth the Borough and its residents actually needs and deserves.

<p><b>as precise as possible.</b></p>	<p>4.16. The suggested uplift of 6 dpa to account for economic growth does not touch the surface or go anywhere near a successful alignment of the Borough's economic and housing needs.</p> <p>4.18. PJ Livesey were previously part of a wider consortium who have appointed Lichfields to calculate an alternative housing target. Whilst no longer part of the consortium, PJ Livesey is aware that this ongoing work advocates a much higher housing requirement figure above and beyond the 835 dpa currently suggested.</p> <p>4.19. To conclude, PJ Livesey is strongly of the view that the currently suggested 835 dpa housing requirement is too low and have set out the compelling case to exceed this figure. An uplift of 6 dpa to account for economic growth will achieve nothing. On the contrary, merely pursuing 835 dpa endangers economic growth in the Borough and will prohibit the Borough reaching its full economic potential.</p> <p>4.20. Instead, a higher housing figure is required which would successfully align with realistic economic growth targets and would enable the high affordable housing need to be meaningfully addressed. However, even this may be insufficient given that the Council's projobs growth approach which is likely to generate far more jobs than could be sustainably accommodated in the Borough without a substantial reversal in the current net outcommuting pattern from Wirral to adjoining Boroughs.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</b></p>	



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

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

## LPSD-745

<b>Comment ID</b>	LPSD-745
<b>Person ID</b>	1249070
<b>Include files</b>	<a href="#">LPSD-274, 744-749, 753, 1418-1421-Burns Attach 1807_Redacted.pdf</a>
<b>Consultee Name</b>	PJ Livesey Group and Mr. Peter Bowling
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1249074
<b>Agent Name</b>	Mr. Jonathan Burns
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 3.3
<b>Title</b>	Affordable Housing Requirements
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS3.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment 4.17. Furthermore, 835 dpa will fail to address affordable housing need. The 2021 SHMA Update states6 an affordable housing need for 374 dwellings per annum. Whilst we dispute the validity of this figure given this is a significant reduction to the figure stated in the 2020 SHMA (which stated 705 affordable dpa), if the 374 figure is utilised then an annual requirement of 835 dpa would require 45% of all new housing development to be affordable if affordable housing need was to be addressed in full. This is simply unrealistic, especially given our viability concerns relating to the focus for nearly all of the Borough's development needs to be met on brownfield land in lower value areas.

as precise as possible.	refer also para 7.8
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	The affordable housing requirement figure should be higher.

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

<b>Comment ID</b>	LPSD-746
<b>Person ID</b>	1249070
<b>Include files</b>	<a href="#">LPSD-274, 744-749, 753, 1418-1421-Burns Attach 1807_Redacted.pdf</a>
<b>Consultee Name</b>	PJ Livesey Group and Mr. Peter Bowling
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1249074
<b>Agent Name</b>	Mr. Jonathan Burns
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 3.4
<b>Title</b>	Housing Mix
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS3.4
<b>Please state which Site ID/Reference this</b>	



representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 7.10. Part I of this policy states that outside identified Regeneration Areas, a minimum of 70% of market dwellings will be developed for larger dwellings of three or more bedrooms, within Use Class C3. Within identified Regeneration Areas this should be a minimum of 30%.

<b>as precise as possible.</b>	7.11. As a starting point, we would suggest that flexibility should be included within the policy as it may not be viable to achieve this requirement in all instances alongside other policy requirements and optional housing standards. There will also be site-specific circumstances where this may not be achievable, and we are strongly of the view that housing mix matters are best considered on a case by case basis.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary</b>	Policy WS3.4 should have flexible requirements for housing mix.

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>	

<b>Comment ID</b>	LPSD-747
<b>Person ID</b>	1249070
<b>Include files</b>	<a href="#">LPSD-274, 744-749, 753, 1418-1421-Burns Attach 1807_Redacted.pdf</a>
<b>Consultee Name</b>	PJ Livesey Group and Mr. Peter Bowling
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1249074
<b>Agent Name</b>	Mr. Jonathan Burns
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 3.1
<b>Title</b>	Housing Design Standards
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS3.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 7.1. The policy states (at part A1) that new build dwellings should comply with nationally described space standards (NDSS) or any successor standards. 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 of space standards into future land acquisitions. Without this evidence, the introduction of NDSS is not justified and therefore this policy as currently drafted is unsound.

<p><b>as precise as possible.</b></p>	<p>7.2. The policy also notes (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.</p> <p>7.3. The policy also states (at part A4i) 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.</p> <p>7.4. The introduction of the above housing design standards has clear viability implications, therefore need be fully justified and viability tested in order for the plan to be deemed sound.</p>
<p><b>omplies with the Duty to co-operate</b>  *     Yes  *     No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</b></p>	

<p><b>Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Design requirements in Policy WS3.1 should be viability tested.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>



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

<b>Comment ID</b>	LPSD-748
<b>Person ID</b>	1249070
<b>Include files</b>	<a href="#">LPSD-274, 744-749, 753, 1418-1421-Burns Attach 1807_Redacted.pdf</a>
<b>Consultee Name</b>	PJ Livesey Group and Mr. Peter Bowling
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1249074
<b>Agent Name</b>	Mr. Jonathan Burns
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b>	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS1.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is	Please refer to attachment 4.21. Policy WS1.1 (Homes) outlines how net additional dwellings will be provided and distributed across the Borough as shown on the Policies Map.

<p><b>unsound. Please be as precise as possible.</b></p>	<p>4.22. There is a notable omission in the policy in that it fails to identify the number of homes that are apportioned to each of the Settlement Areas within the Borough. This is the only policy in the plan which is intended to deal with spatial distribution and given that the Borough is spatially divided into the eight Settlement Areas, this is a fundamental omission in the Submission Draft Plan.</p> <p>4.24. Whilst not confirmed in the Local Plan Submission Draft, the Policy Map clarifies that Storeton falls within the Rural Area – SA8. Storeton is therefore not formally identified as a settlement within the policy, which we have significant concerns about given the village is washed over by Green Belt on the Proposals Map (which we comment on in greater detail in the following section).</p> <p>4.25. More fundamentally, the decision to allocate no growth to rural areas across the Borough is a fundamental issue which renders the plan unsound. Paragraph 79 of the NPPF notes the following: “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” {Our emphasis added}</p> <p>4.26. By failing to allocate any growth to the Rural Area, the Local Plan fails to take account of the requirements of NPPF paragraph 79, therefore is not consistent with national policy and is unsound on this basis. In doing so, the vitality of rural communities such as Storeton will decline as opposed to grow and thrive. Whilst it is accepted that of course areas such as Storeton will accommodate less growth than higher order settlements, effectively constraining any meaningful development cannot be deemed a sustainable, effective, and positively prepared growth strategy.</p> <p>4.30. In terms of the proposed focus of development towards the Urban Conurbation; we agree that it should continue to be a priority for regeneration and redevelopment with continued efforts and investment targeted towards that area. However, there should be no mistake in recognising that this has been the Council’s planning policy and spatial distribution strategy for many decades through the adopted UDP and former and abandoned versions of the emerging Local Plan. The problem is that that strategy alone is not meeting the housing needs of the Borough as a whole and has failed to deliver sufficient homes over many, many years.</p> <p>4.31. The Council’s proposed spatial strategy will not deliver this necessary step change and effectively plans for the status quo. Indeed, many of the sites promoted under the Council’s spatial option are not new sites and have been available for residential development for a considerable period of time. A Local Plan that proposes the same approach and same objectives is also destined to fail to meet the overall housing requirement of the Borough and will continue to fail to meet locally identified needs within other urban settlements and villages including Storeton.</p> <p>5.24. Given the clear need to consider washed over settlements having regard to their open character (or not), and the contribution this makes to the openness of the Green Belt, the following provides commentary on the village of Storeton. 5.25. In considering whether or not the village should be ‘washed-over’ by Green Belt, we have assessed the open character of the village. At this point we would reiterate our significant concerns and objection to the fact that Storeton is not identified as a settlement under Policy WS 1. Indeed, the Council fail to formally identify any settlements within Settlement Area 8 ‘Rural Area’, which is a serious omission. It is even more disappointing given the fact that Storeton was previously included as a village in the settlement hierarchy of the Issues and Options Paper, therefore it is clearly agreed that Storeton must be treated as a village for the purposes of this assessment.</p>
<p><b>omplies with the Duty to co-operate</b>  *        Yes  *        No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation,</b></p>	

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	Release Green Belt land for development

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

<b>Comment ID</b>	LPSD-749
<b>Person ID</b>	1249070
<b>Include files</b>	<a href="#">LPSD-274, 744-749, 753, 1418-1421-Burns Attach 1807_Redacted.pdf</a>
<b>Consultee Name</b>	PJ Livesey Group and Mr. Peter Bowling
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1249074
<b>Agent Name</b>	Mr. Jonathan Burns
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b>	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS1.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment The correct and sound approach for the site selection process would be to consider all Green Belt parcels and sites that have been promoted in the Green Belt, and the findings of the whole evidence base in relation to each site/parcel. This would therefore consider the Green Belt performance of each site/parcel as well as the other evidence base documents to ensure that those sites to be released from Green Belt deliver the most sustainable form of development. Such an approach would also ensure that sites are not solely considered based upon the parcel identification within the Green Belt Review which, as set out later in these representations, are fundamentally flawed and fail to consider all promoted sites.



<p><b>as precise as possible.</b></p>	<p>We therefore reiterate that until such an exercise is undertaken, the site selection process is unsound. Specifically, the Plan is not justified, as it fails to take into account reasonable alternatives and is not based on proportionate evidence.</p> <p>Our client's land interests have been considered in the evidence base as part of four very different land parcels ranging in size from 1.23ha to over 176ha. Given that our client's land interest extends to around 1.78ha, and the significant range in how the evidence base has assessed the site, it is clear that the evidence base fundamentally fails to provide an appropriate evidence from which to consider the site at Landican Lane.</p> <p>The confused and inconsistent methodology of assessing differing site parcels across the various evidence base documents results in a failure to consider reasonable alternatives to the development strategy proposed in the Local Plan. The evidence base is not proportionate, as it fails to grapple with any meaningful assessment of Green Belt parcels, which clearly represent a reasonable alternative to the brownfield sites/urban boundary sites proposed in the Local Plan.</p> <p>Documents in question:</p> <ul style="list-style-type: none"> <li>• GB1 – Wirral Green Belt Review 2019;</li> <li>• H2 – Wirral Strategic Housing Land Availability Assessment 2019 ("2019 SHLAA");</li> <li>• H7 – Wirral Strategic Housing Land Availability Assessment 2021 ("2021 SHLAA");</li> <li>• ECC1 – Study of Agricultural Economy and Land in Wirral, undertaken by ADAS (dated September 2019) ("2019 Agricultural Land Study");</li> <li>• ECC21 – Level 1 Strategic Flood Risk Assessment, undertaken by JBA Consulting (dated July 2021) ("2021 SFRA");</li> <li>• ECC2 – Merseyside Environmental Advisory Service Site Screening, (dated 2019) ("2019 MEAS Site Screening");</li> <li>• ECC5 – Wirral Site Specific Landscape Sensitive Assessment 2021, undertaken by LUC (dated September 2021) ("2021 Landscape Sensitive Assessment"); and,</li> <li>• T9 – Transport &amp; Accessibility Review, undertaken by Mott Macdonald (dated January 2020) ("2020 Transport &amp; Accessibility Review").</li> </ul>
<p><b>omplies with the Duty to co-operate</b> * Yes * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability</b></p>	

Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>The site selection process should consider all Green Belt parcels, including those promoted for development, alongside findings from the entire evidence base in relation to each Green Belt parcel.</p>
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>	
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-750
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 8
<b>Title</b>	Policy for the Rural Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	Para 5.65
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Part 5: Settlement Area Policies: Rural Area - Settlement Area 8: Paras 5.63, 5.65 and 5.69: Rural Area - Settlement Area 8: Para 5.65 Reference to Irby Hall is incomplete: it should read, "the moated site of Irby Hall" as it is one of the best, most-intact moated Hall sites in the north of England.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
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<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Repeated responses to Q4b(3) as they describe the modifications sought:</p> <p>Part 5: Settlement Area Policies: Rural Area - Settlement Area 8: Paras 5.63, 5.65 and 5.69:Para 5.63: Rural Area - Settlement Area 8: Para 5.65</p> <p>Reference to Irby Hall is incomplete: it should read, "the moated site of Irby Hall" as it is one of the best, most-intact moated Hall sites in the north of England.</p>

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

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