

<b>Comment ID</b>	LPSD-751
<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 5.69
<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>	Settlement Area 8: Para 5.69 After Sub-para 1, there should be another introduced: "Protect and enhance the existing 'quiet' and 'dark sky' areas, essential to the wellbeing of much wildlife (protected and vulnerable) and the special character and ambiance of such areas of countryside." Sub-para 4 should be expanded to refer to the Council's Motion which was passed into Policy unanimously whereby ALL 'productive farmland' is to be protected from development, which protection is to extend beyond B&MV Category 3a land.

<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</b></p>	<p>Repeated responses to Q4b(3) as they describe the modifications sought:</p> <p>Rural Area - Settlement Area 8: Para 5.69</p> <p>After Sub-para 1, there should be another introduced: "Protect and enhance the existing 'quiet' and 'dark sky' areas, essential to the wellbeing of much wildlife (protected and vulnerable) and the special character and ambiance of such areas of countryside."</p> <p>Rural Area - SA 8 and Policy WP 8.2: Para 5.69 Sub-para 4</p>

<p><b>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>Sub-para 4 should be expanded to refer to the Council's Motion which was passed into Policy unanimously whereby ALL 'productive farmland' is to be protected from development, which protection is to extend beyond B&amp;MV Category 3a land. This should also apply to Policy WP 8.2, Para 'C' Sub-para 2.</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>YES, please, but NOT necessary for these items.</p>

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

<b>Comment ID</b>	LPSD-752
<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 8.2
<b>Title</b>	Agricultural Land
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	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 8.2
<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>	Rural Area - SA 8 and Policy WP 8.2: Para 5.69 Sub-para 4 Sub-para 4 should be expanded to refer to the Council's Motion which was passed into Policy unanimously whereby ALL 'productive farmland' is to be protected from development, which protection is to extend beyond B&MV Category 3a land. This should also apply to Policy WP 8.2, Para 'C' Sub-para 2.

<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>Repeated responses to Q4b(3) as they describe the modifications sought:</p> <p>Rural Area - SA 8 and Policy WP 8.2: Para 5.69 Sub-para 4</p> <p>Sub-para 4 should be expanded to refer to the Council's Motion which was passed into Policy unanimously whereby ALL 'productive farmland' is to be protected from development, which protection is to extend beyond B&amp;MV Category 3a land. This should also apply to Policy WP 8.2, Para 'C' Sub-para 2.</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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LPSP-753

<b>Comment ID</b>	LPSP-753
<b>Person ID</b>	1249070
<b>Include files</b>	<a href="#">LPSP-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
<b>Title</b>	The Development and Regeneration Strategy for Wirral 2021 - 2037
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <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
<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	
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 2.5. As set out in detail later in these representations, the site could come forward as an infill development within the existing village or could come forward as part of a wider strategic Green Belt release/allocation for development on land around Storeton and east of the M53.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Allocate Landican Lane in the Local Plan (SP032/SHLAA 4009)

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>	Yes

<b>Comment ID</b>	LPSD-754
<b>Person ID</b>	1277283
<b>Include files</b>	<a href="#">LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Ross Harding
<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 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	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>	
<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 Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Please refer to attachment.</p> <p>Our concerns around the IA outlined above also apply to the conclusions of the HRA (Section 6) that state adverse effects on Wirral's estuarine and coastal European sites regarding recreational pressure can be excluded including recreational pressure in functionally linked land. Both the IA and its inclusion as mitigation in the HRA must be approved by Natural England to ensure the soundness of the WLP.</p> <p>Natural England must also be satisfied with all existing and forthcoming mitigation strategies for allocated sites in Birkenhead adjoining the East Float of the Birkenhead and Wallasey dock system to ensure there are no impacts from recreational pressure to functionally linked habitat.</p>

	<p>The policy wording amendment suggested in Paragraph 5.122 of the HRA has not been included in the WLP: "Proposals for new coastal protection and sea defence works in line with the adopted Shoreline Management Plan, and development allocations (both housing and employment. as well as windfall developments I will be permitted where it is demonstrated that there will be no adverse effects on coastal processes, designated biodiversity or geodiversity assets, heritage assets and water quality. Public access to and along the coast should be preserved and where possible, enhanced."</p> <p>As stated in the HRA, as this proposed amendment has not been incorporated it cannot be concluded that the Wirral Local Plan will not result in adverse effects on coastal and estuarine European sites regarding the impact pathway coastal squeeze.</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>Our concerns around the IA outlined above also apply to the conclusions of the HRA (Section 6) that state adverse effects on Wirral's estuarine and coastal European sites regarding recreational pressure can be excluded including recreational pressure in functionally linked land. Both the IA and its inclusion as mitigation in the HRA must be approved by Natural England to ensure the soundness of the WLP.</p> <p>Natural England must also be satisfied with all existing and forthcoming mitigation strategies for allocated sites in Birkenhead adjoining the East Float of the Birkenhead and Wallasey dock system to ensure there are no impacts from recreational pressure to functionally linked habitat.</p> <p>The policy wording amendment suggested in Paragraph 5.122 of the HRA has not been included in the WLP: "Proposals for new coastal protection and sea defence works in line with the adopted Shoreline Management Plan, and development allocations (both housing and employment. as well as windfall developments I will be permitted where it is demonstrated that there will be no adverse effects on coastal processes, designated biodiversity or geodiversity assets, heritage assets and water quality. Public access to and along the coast should be preserved and where possible, enhanced."</p> <p>As stated in the HRA, as this proposed amendment has not been incorporated it cannot be concluded that the Wirral Local Plan will not result in adverse effects on coastal and estuarine European sites regarding the impact pathway coastal squeeze.</p>

<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>The policy wording amendment suggested in Paragraph 5.122 of the HRA has not been included in the WLP: "Proposals for new coastal protection and sea defence works in line with the adopted Shoreline Management Plan, and development allocations (both housing and employment, as well as windfall developments) will be permitted where it is demonstrated that there will be no adverse effects on coastal processes, designated biodiversity or geodiversity assets, heritage assets and water quality. Public access to and along the coast should be preserved and where possible, enhanced."</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>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSD-755

<b>Comment ID</b>	LPSD-755
<b>Person ID</b>	1249100
<b>Include files</b>	<a href="#">LPSD-510,755-757,761-764-EM-Dennis Attach 1 of 32 2307_Redacted.pdf</a>
<b>Consultee Name</b>	Gary Lynch
<b>Position</b>	
<b>Company / Organisation</b>	Russell Homes
<b>Agent ID</b>	1244620
<b>Agent Name</b>	Rebecca Dennis
<b>Position</b>	
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	
<b>Title</b>	Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	Vision
<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
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please refer to attachment. The Vision also needs to be considered against a backdrop of the finding of the SHMA Update that the west of Wirral has the worst affordability and highest need for family homes in the whole of the Borough. It has yet to be demonstrated that the small-scale incremental development currently envisioned within west of Wirral, and hence the Vision in the Submission Draft Plan has been prepared positively, in a way that is aspirational but deliverable. As such the Vision has yet to be demonstrated to meet the tests of soundness.

<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>The Site should be considered as reasonable alternative in the Sustainability Appraisal process.</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>The Site should be considered as reasonable alternative in the Habitat Regulations Assessment process.</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>Further consideration should be given to how the towns and villages of the west of Wirral can thrive over the plan period - this could include, for example, going beyond the envisaged small-scale incremental development in a way which is aspirational but deliverable to address the issues faced by these towns and villages over the plan period.</p>

<p>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>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</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-756
<b>Person ID</b>	1249100
<b>Include files</b>	<a href="#">LPSD-510,755-757,761-764-EM-Dennis Attach 1 of 32 2307_Redacted.pdf</a>
<b>Consultee Name</b>	Gary Lynch
<b>Position</b>	
<b>Company / Organisation</b>	Russell Homes
<b>Agent ID</b>	1244620
<b>Agent Name</b>	Rebecca Dennis
<b>Position</b>	
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 1
<b>Title</b>	The Development and Regeneration Strategy for Wirral 2021 - 2037
<b>To which part of the Local Plan does this representation relate?</b> * 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	
<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
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please refer to attachment.  The Council have not provided any evidence to justify the very limited housing growth planned in the Mid-Wirral Settlement Area. As such, the Development and Regeneration Strategy has yet to be demonstrated to meet the tests of soundness.  If found to be unsound, further consideration would need to be given to housing growth needed within the Mid-Wirral Settlement Area, to ensure that it addresses the needs of this area over the plan period. If more housing growth is required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt.  Attention should be given to this Site which makes a weak contribution to the purpose of the Green Belt and is suitable, available, and achievable for housing development.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>The Site should be considered as reasonable alternative in the Sustainability Appraisal process.</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>The Site should be considered as reasonable alternative in the Habitat Regulations Assessment process.</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>Further consideration should need to be given to housing growth needed within the Mid-Wirral Settlement Area, to ensure that the Development and Regeneration Strategy is sound – if more housing growth is required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt. Attention should be given to this Site which makes a weak contribution to the purpose of the Green Belt and is suitable, available, and achievable for housing development.</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>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</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-757
<b>Person ID</b>	1249100
<b>Include files</b>	<a href="#">LPSD-510,755-757,761-764-EM-Dennis Attach 1 of 32 2307_Redacted.pdf</a>
<b>Consultee Name</b>	Gary Lynch
<b>Position</b>	
<b>Company / Organisation</b>	Russell Homes
<b>Agent ID</b>	1244620
<b>Agent Name</b>	Rebecca Dennis
<b>Position</b>	
<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> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<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
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Please refer to attachment.</p> <p>Please refer to LPSD-408 Att 2 of 8 "Wirral Local Plan Summary of the Key issues"</p> <p>The Council have not provided any evidence to justify the spatial distribution of homes and the limited number of homes directed to the Mid-Wirral Settlement Area and thus that the spatial distribution of homes is sound – the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified.</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>The Site should be considered as reasonable alternative in the Sustainability Appraisal process.</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>The Site should be considered as reasonable alternative in the Habitat Regulations Assessment process.</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>Further consideration should need to be given to the planned number of homes in Mid-Wirral, to ensure that they address the needs of this area over the plan period – if more homes are required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt.</p> <p>Attention should be given to this Site which can deliver a substantial number of homes, including family homes and affordable homes for young people. Pump Lane, Greasby</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>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</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-758
<b>Person ID</b>	1249219
<b>Include files</b>	<a href="#">LPSD-308,758-EM-Anderson Form 2 of 5 2107_Redacted.pdf</a>
<b>Consultee Name</b>	The Heswall Society by Dr. Steve Anderson
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 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)
<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>	3.142 and 3.125
<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>	The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	The Society fully supports a Regeneration-led Local Plan with enough housing being identified for development over the local plan period (although as indicated separately, it strongly opposes the use of an unjustified and over-inflated figure for housing need that needlessly puts Wirral's Green Belt under potential threat to unneeded and unwarranted development).
<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>The Society would like to see the Local Plan address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required 'net gain'. The Local Plan is stated as preparing for the requirements regarding Biodiversity Net Gain in the forthcoming Environment Act 2021 but the Society feels that the above issue is not satisfactorily covered. Stripping land prior to any planning application is exacerbated by the full prohibitions and penalties within the new Act not coming into force until late 2023.</p> <p>Also, although paragraph 3.142 makes mention of "in the rare case of a site being subject to recent damage or detrimental change then the most recent survey undertaken before the change, or an appropriate habitat from a typology will be applied as the base line from which net gain is calculated". Firstly, such instances are far from rare and need to be addressed</p>

<p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>now. Secondly, the Local Plan wording needs to make it clear that this provision is to apply independently from the provisions of the new Act coming into force. The Society also requests that the wording of Para 3.142 be modified so the provision is not only dependent on any actual “recent survey” but can include other forms of documentary evidence including ‘historical images’ in Google Earth, photographic evidence, local resident statements, etc.</p> <p>The Society requests that the Council brings in as soon as possible, in line with a number of other Councils, immediate interim Local Policies to address this awful practice head-on. This measure should be not only be built into this Local Plan but also into Local Policies as soon as possible so that ‘Net Gains’ would then apply to the Biodiversity Base Level existing before any action is taken on site.</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-759
<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-256,502 &amp; 759-Heath_Redacted.pdf</a>
<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>	
<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 SO1, SO 3. SO 10
<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 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>	SO10 has not been achieved and will not be achieved as the LP stands.SO10 includes 'maintaining good air quality for good health'. Our analyses show this has not been achieved and will not be achieved as the LP stands. The 2021 WLPAQS modelling of CO2 emissions from roads indicates an increase of 1.464 X between their 2018 baseline and 2037 proxy baseline for the preferred LP option, reflecting traffic volume increase. Even with growth in electric vehicles we show that CO2 (and pollutants) will continue to increase significantly over the LP period. This is not compatible with LP SO1 intent to 'reach net zero carbon locally no later than 2041', nor with LP SO3 which includes 'helping to ensure local travel is largely fossil fuel free by 2030'.

<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>reduce the levels of housing growth - introduce a clear mitigation and measurement strategy for air quality</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>Below I give the reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston &amp; Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral &amp; Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p>

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

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

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

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

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

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

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

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

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

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

Yes

and adoption of the  
Plan).

\* Yes

\* No

LPSP-760

<b>Comment ID</b>	LPSP-760
<b>Person ID</b>	1249219
<b>Include files</b>	<a href="#">LPSP-313,760-EM-Anderson Form 4 of 5 2107_Redacted.pdf</a>
<b>Consultee Name</b>	The Heswall Society by Dr. Steve Anderson
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 12
<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>	WS 10
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	<p>The Society is fully behind the Regeneration-led Local Plan with enough housing being identified to satisfy the real housing need over the local plan period using brownfield land. The Society fully supports the green spaces assigned in this table as being classified as Local Green Spaces. These areas provide in varying combinations important:</p> <ul style="list-style-type: none"> <li>• Attractive amenity and recreational areas providing areas to relax and socialise.</li> <li>• Wildlife havens in an urban environment providing a home for many native trees, shrubs, insects and wildlife.</li> <li>• Visually attractive settings within an urban environment</li> <li>• Area for dog walkers and walkers in general</li> <li>• Areas to host outdoor events organised by local business community &amp; charities, and for community celebrations.</li> <li>• Calm, relaxing, traffic free areas</li> <li>• Safe outdoor areas for children to play</li> </ul> <p>In addition, many of these areas are being looked after now by Friends Groups and they are carrying out programs of general improvement. In particular insect friendly planting is being adopted.</p> <p>These Local green Spaces acts as important links to other green areas in Heswall and helps to further improve Wirral's green corridor. They act as wildlife havens in an urban environment and provide a home for many native trees, shrubs, insects and wildlife</p>
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective	



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

<b>Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b>	<p>One area that the Society believes should however be included is OS OA 7.3 (Telegraph Road Open Space) whilst this site has been recognised as being a strategically important open space it has not been afforded the full protection of a designated Local Green Space that this site warrants.</p>
<b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b> * <b>No, I do not wish to participate in hearing session(s)</b>	<p>No, I do not wish to participate in hearing session(s)</p>

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

<b>Comment ID</b>	LPSD-761
<b>Person ID</b>	1249100
<b>Include files</b>	<a href="#">LPSD-510,755-757,761-764-EM-Dennis Attach 1 of 32 2307_Redacted.pdf</a>
<b>Consultee Name</b>	Gary Lynch
<b>Position</b>	
<b>Company / Organisation</b>	Russell Homes
<b>Agent ID</b>	1244620
<b>Agent Name</b>	Rebecca Dennis
<b>Position</b>	
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 5
<b>Title</b>	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5
<b>Please state which Site ID/Reference this 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
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please refer to attachment. These representations also follow on from the consultation response made to the Wirral Environmental Sensitivity Study 2021 and Wirral Blue and Green Infrastructure Strategy 2021, which were consulted upon in 2021 (Appendix 3). That consultation response made by Russell Homes: •Identified fundamental issues with methodological approach of the Wirral Environmental Sensitivity Study 2021 and commented on the incorrect information relating to this Site—plans were also provided showing the correct designations and sensitivity for the Site •Set out how the proposed development will protect, enhance, and mitigate the assets which are present within the Site, leading to betterment for ecology / wintering birds

	<p>•Set out how development at this Site could response positively to the Wirral Blue and Green Infrastructure Strategy 2021 if it was included in the plan as a residential allocation, by delivering a significant new green/blue corridor on the edge of the Site</p> <p>The Council have provided insufficient evidence on how the Green and Blue Infrastructure Strategy will be effective insofar as the intended strategy for habitat creation on to the land within private ownership with the Nature Improvement Areas.</p> <p>Refer also to LPSD-510 Attachments 23, 24, 25, 26, 27, 28, 29, 30, 31 related to Environmental Sensitivity Study 2021 and Wirral Green and Blue Infrastructure Strategy 2021 consultations. Attachments submitted during consultations for Environmental Sensitivity Study 2021 and Wirral Green and Blue Infrastructure Strategy 2021.</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>The Site should be considered as reasonable alternative in the Sustainability Appraisal process.</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>The Site should be considered as reasonable alternative in the Habitat Regulations Assessment process.</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 Council should provide clarification on how habitat will be created on the land within private ownership with the Nature Improvement Areas, particularly if this land is not allocated for residential development which would provide the impetus to deliver improvements within the Nature Improvement Areas. If this evidence is not forthcoming, then it could only be concluded that the strategy for habitat creation within the Nature Improvement Areas is not justified.</p> <p>Inclusion of the site.</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>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</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>



<b>Comment ID</b>	LPSD-762
<b>Person ID</b>	1249100
<b>Include files</b>	<a href="#">LPSD-510,755-757,761-764-EM-Dennis Attach 1 of 32 2307_Redacted.pdf</a>
<b>Consultee Name</b>	Gary Lynch
<b>Position</b>	
<b>Company / Organisation</b>	Russell Homes
<b>Agent ID</b>	1244620
<b>Agent Name</b>	Rebecca Dennis
<b>Position</b>	
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

<p><b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b></p>	
<p><b>Legally compliant</b>  *        Yes  *        No</p>	
<p><b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b></p>	
<p><b>Sound</b>  *        Yes  *        No</p>	No
<p><b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b></p>	
<p><b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b>  *        Not Positively Prepared  *        Not Justified  *        Not Effective  *        Not Consistent with National Policy</p>	Not Justified
<p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>	<p>Please refer to attachment.</p> <p>The Council have provided insufficient evidence on how the Ecological Networks will be effective insofar as the intended strategy to divert biodiversity net gain to the land within private ownership with the Nature Improvement Focus Areas.</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>	The Site should be considered as reasonable alternative in the Sustainability Appraisal process.
<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 Site should be considered as reasonable alternative in the Habitat Regulations Assessment process.
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	The Council should provide clarification on how biodiversity net gain would be directed to the land within private ownership with the Nature Improvement Focus Areas, particularly if this land is not allocated for residential development which would provide the impetus to deliver biodiversity net gain. If this evidence is not forthcoming, then it could only be concluded that the strategy for biodiversity net gain within the Nature Improvement Focus Areas is not justified or cannot be delivered without development.

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</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><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-763

<b>Comment ID</b>	LPSP-763
<b>Person ID</b>	1249100
<b>Include files</b>	<a href="#">LPSP-510,755-757,761-764-EM-Dennis Attach 1 of 32 2307_Redacted.pdf</a>
<b>Consultee Name</b>	Gary Lynch
<b>Position</b>	
<b>Company / Organisation</b>	Russell Homes
<b>Agent ID</b>	1244620
<b>Agent Name</b>	Rebecca Dennis
<b>Position</b>	
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 12
<b>Title</b>	Monitoring and Review
<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 12
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please refer to attachment. Please refer to LPSD-408 Att 1 of 8. "Wirral Local Plan- Developer and Housebuilder Consortium Soundness Representations" However, neither the policy nor Appendix 15 include a trigger mechanism which would prompt the Council to undertake a review of the Local Plan. For instance, whilst Appendix 15 suggests that housing completions would be monitored annually, there is no trigger for a review of the Local Plan, if for example, housing completions fall below a certain percentage of those predicated in the housing trajectory.

	<p>Furthermore, there is very little confidence that as things stands the plan will achieve its housing trajectory owing to the heavy reliance of delivering most of the planned new homes within the Regeneration Areas. In this regard, attention should be drawn to the representations by Lichfield on behalf of the Consortium which confirms that the Regeneration Areas will not provide the number of homes envisaged by a significant margin.</p> <p>The Council have not included a mechanism to ensure that this policy will be effective.</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>The Site should be considered as reasonable alternative in the Sustainability Appraisal process.</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>The Site should be considered as reasonable alternative in the Habitat Regulations Assessment process.</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>Allocating more greenfield sites for residential development, such as this Site, would give reassurance that the housing trajectory in the plan would stay on track and may alleviate the requirement to review the plan prior to the relevant five-year period. If not, it is highly likely that the Council will need to review the plan within the first five years of the plan period and identify more sites to deliver new homes.</p> <p>The Council should include appropriate trigger mechanisms for the review of the Local Plan</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

<b>Comment ID</b>	LPSD-764
<b>Person ID</b>	1249100
<b>Include files</b>	<a href="#">LPSD-510,755-757,761-764-EM-Dennis Attach 1 of 32 2307_Redacted.pdf</a>
<b>Consultee Name</b>	Gary Lynch
<b>Position</b>	
<b>Company / Organisation</b>	Russell Homes
<b>Agent ID</b>	1244620
<b>Agent Name</b>	Rebecca Dennis
<b>Position</b>	
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WP 5.1
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * 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 5.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. The Council have not provided any evidence that this policy is positively prepared and that the homes planned in the Mid-Wirral Settlement Areas will meet the objectively assessed needs of this Settlement Area including affordable housing needs and the need for self-build and custom-build homes, over the plan period.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>The Site should be considered as reasonable alternative in the Sustainability Appraisal process.</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>The Site should be considered as reasonable alternative in the Habitat Regulations Assessment process.</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>To address this issue, the Council should provide evidence on how the identified supply of homes in Mid-Wirral will address these needs over the plan period.</p> <p>If unsound, more sites would be required in the housing supply to address housing needs, including affordable housing needs and the need for self-build and custom-build homes, which would be delivered during the middle and latter end of the plan period. Given that the supply of housing land in the urban area is already exhausted in the Submission Draft Plan, this is an exceptional circumstance to alter Green Belt boundaries in this area and identify sites which currently lie on the edge of the Settlement Area to boost the supply of homes, such as this Site.</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>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</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-767
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSD-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 4.3
<b>Title</b>	The Port and Maritime Zone
<b>To which part of the Local Plan does this representation relate?</b>	Site
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	EMP-SA 2.2



representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Peel Ports Group supports the overall intention of Policy WS 4.3 and welcomes the fact that previous comments have been integrated into the wording of the policy. For reasons outlined in the following sections, it is also considered that the policy is amended such that the following sites are included as safeguarded port-related development and infrastructure in Part F: •EMP-RA3.1–Twelve Quays •EMP-SA2.2–Tower Wharf
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Sites currently identified as EMP-RA3.1 and EMP-SA2.2 should be allocated for safeguarded port-related development and infrastructure within Part F of the policy (WS 4.3)

<p>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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>

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

<b>Comment ID</b>	LPSD-768
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSD-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WP 2.3
<b>Title</b>	Employment Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	EMP-SA2.2

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment Accordingly, the policy is not justified because it proposes the allocation of a site that is not available to meet the suggested use. Policy RA 3 is also not justified because it fails to follow the evidence gathered by the WELPS which identified significant viability and deliverability issues for site EMP-RA3.1.

<p><b>as precise as possible.</b></p>	<p>The policy is ineffective because it proposes a use that is not deliverable at site EMP-RA3.1. The site will be used for extended trailer parking as part of the Stena line expansion. ...It is also considered that there are more readily available, developable, and deliverable sites identified within the WELPS to meet the employment land requirements.</p> <p>As a result, the proposed employment allocation at site EMP-RA3.1 is inconsistent with national policy because it does not pass the test of being deliverable or effective in order to meet the identified need for employment land. The policy is not justified because it has failed to properly consider the evidence gathered by the Council as part of the WELPS exercise, and the representations provided by the site owner during the WELPS consultation. This is contrary to Paragraph 16 of the NPPF which states that "Plans should... be prepared positively, in a way that is aspirational but deliverable..." and "be shaped by early proportionate and effective engagement between plan makers and local organisations, businesses, infrastructure providers and operators..." (emphasis added).</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 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>It is requested that employment allocation sites EMP-SA2.2 and EMP-RA3.1 are deleted, and the sites allocated as part of the Port and Maritime Zone.</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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>
<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-770

<b>Comment ID</b>	LPSD-770
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSD-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<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	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</b>	EMP- RA3.1

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment Proposals map identifies site as being within Residential Density Zone RES DZ1 despite policy not supporting residential uses in this site.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Employment allocation reference EMP-RA3.1 should be deleted, and the site allocated as part of the Port and Maritime Zone and not shown in residential zone

<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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>

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-771
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSD-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<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>	Site
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	RES-RA2.1

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Peel Ports Group does not consider Policy RA 2 can be justified or effective whilst it includes allocation references RES-RA2.1 and RES-RA2.2. The Council (as Planning Authority) are already considering relying on other environmental legislation to address potential impacts on amenity as a result of locating residential properties next to unfettered 24/7 operational terminal at United Molasses, and the lay-by berth at Alfred Dock, operated by Peel Ports Group.



<p><b>as precise as possible.</b></p>	<p>The implementation text for Policy RA 2 states that the Masterplan and detailed development proposals for residential allocations RES-RA2.1 and RES-RA2.2 must demonstrate to the satisfaction of the Council that:</p> <ul style="list-style-type: none"> <li>i. The potential environmental impacts arising from the operation of the United Molasses Tank Storage facility and the Alfred Dock ship berth are fully considered and appropriate mitigation measures adopted to ensure that appropriate residential amenity is achieved; and</li> <li>ii. residential development will not impact on the normal operation of port related operations or businesses.</li> </ul> <p>However, the evidence base lacks any information on how this can be achieved, and how the proposed numbers of 200 and 250 new homes, respectively, has been derived. The proposed allocation lacks sufficient evidence to demonstrate deliverability.</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>Proposed residential allocation sites RES-RA2.1 and RES-RA2.2 should be deleted, or further evidence should be provided to demonstrate that sufficient mitigation measures to avoid conflict with unfettered neighbouring port uses is achievable.</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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>
<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 *      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-772
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSD-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<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>	Site
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	RES-RA2.2

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Peel Ports Group does not consider Policy RA 2 can be justified or effective whilst it includes allocation references RES-RA2.1 and RES-RA2.2. The Council (as Planning Authority) are already considering relying on other environmental legislation to address potential impacts on amenity as a result of locating residential properties next to unfettered 24/7 operational terminal at United Molasses, and the lay-by berth at Alfred Dock, operated by Peel Ports Group.

<p><b>as precise as possible.</b></p>	<p>The implementation text for Policy RA 2 states that the Masterplan and detailed development proposals for residential allocations RES-RA2.1 and RES-RA2.2 must demonstrate to the satisfaction of the Council that:</p> <ul style="list-style-type: none"> <li>i. The potential environmental impacts arising from the operation of the United Molasses Tank Storage facility and the Alfred Dock ship berth are fully considered and appropriate mitigation measures adopted to ensure that appropriate residential amenity is achieved; and</li> <li>ii. residential development will not impact on the normal operation of port related operations or businesses.</li> </ul> <p>However, the evidence base lacks any information on how this can be achieved, and how the proposed numbers of 200 and 250 new homes, respectively, has been derived. The proposed allocation lacks sufficient evidence to demonstrate deliverability.</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>Proposed residential allocation sites RES-RA2.1 and RES-RA2.2 should be deleted, or further evidence should be provided to demonstrate that sufficient mitigation measures to avoid conflict with unfettered neighbouring port uses is achievable.</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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>
<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 *      No</p>	<p>Yes</p>



LPSP-773

<b>Comment ID</b>	LPSP-773
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSP-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<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	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</b>	EMP-RA6.3

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Policy RA 6, in its current form, is considered to be unsound due to a lack of proportionate evidence—evidence has been provided by the owner of the sites to confirm there is a strategy in place for their future development and that they are unavailable to meet the wider unmet employment needs of Wirral. However, this evidence has been discounted or ignored without justification. As a result, the policy fails the test of being justified.

<p><b>as precise as possible.</b></p>	<p>Policy RA 6 is also considered to be unsound because it is not effective. For the reasons set out in this response, and in response to previous evidence base consultations, the sites are not deliverable for the purposes proposed in the draft Local Plan.</p> <p>As a result, the proposed employment allocation at the site is inconsistent with national policy because it does not pass the test of being deliverable or effective in order to meet the identified need for employment land. This is contrary to Paragraph 16 of the National Planning Policy Framework ('NPPF'), which states that "Plans should... be prepared positively, in a way that is aspirational but deliverable..." and "be shaped by early proportionate and effective engagement between plan makers and local organisations, businesses, infrastructure providers and operators..." (emphasis added). Whilst there has been engagement between the Council and Peel Ports Group, it is not considered this engagement has been effective, as the points raised in previous consultation exercises have not been acknowledged in the preparation of the draft Local Plan.</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 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 proposed employment sites, references EMP-RA6.3 and EMP-RA6.4, must be deleted and both sites should be safeguarded for port decant purposes and allocated solely as part of the Port and Maritime Zone.</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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>
<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-774

<b>Comment ID</b>	LPSP-774
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSP-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WM 3
<b>Title</b>	Safeguarding mineral reserves and infrastructure
<b>To which part of the Local Plan does this representation relate?</b>	Site
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	MSA-SA4.1

<b>representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	<p>Please refer to attachment</p> <p>Policy WM 3 safeguards minerals infrastructure in the interest of facilitating the continuing supply of minerals. This includes the Eastham Sands facilities for landing marine-won sand and gravel at Riverbank Road, Bromborough (site reference MSA-SA4.1), owned by MDHC (Peel Ports Group).</p> <p>During previous Local Plan consultations, there was an application (reference EPR/HB3308LW/A001) by Boskalis Westminster with the Environment Agency (EA) for an Environmental Permit to authorise the landing and processing of maintenance and virgin dredging at Riverbank Road. The permit was granted on the 24th September 2020.</p> <p>Peel Ports Group supports the safeguarding of mineral reserves and associated infrastructure and supports the proposed wording of Policy WM 3. It is considered this policy is both sound and legally compliant..</p>
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	<p>Policy WM 3 safeguards minerals infrastructure in the interest of facilitating the continuing supply of minerals. This includes the Eastham Sands facilities for landing marine-won sand and gravel at Riverbank Road, Bromborough (site reference MSA-SA4.1), owned by MDHC (Peel Ports Group).</p> <p>During previous Local Plan consultations, there was an application (reference EPR/HB3308LW/A001) by Boskalis Westminster with the Environment Agency (EA) for an Environmental Permit to authorise the landing and processing of maintenance and virgin dredging at Riverbank Road. The permit was granted on the 24th September 2020.</p> <p>Peel Ports Group supports the safeguarding of mineral reserves and associated infrastructure and supports the proposed wording of Policy WM 3. It is considered this policy is both sound and legally compliant..</p>
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	

<p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>	
<p><b>omplies with the Duty to co-operate</b>  *        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 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>N/A</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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>
<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-775

<b>Comment ID</b>	LPSP-775
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSP-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<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	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</b>	EMP-RA6.4

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Policy RA 6, in its current form, is considered to be unsound due to a lack of proportionate evidence—evidence has been provided by the owner of the sites to confirm there is a strategy in place for their future development and that they are unavailable to meet the wider unmet employment needs of Wirral. However, this evidence has been discounted or ignored without justification. As a result, the policy fails the test of being justified.

<b>as precise as possible.</b>	<p>Policy RA 6 is also considered to be unsound because it is not effective. For the reasons set out in this response, and in response to previous evidence base consultations, the sites are not deliverable for the purposes proposed in the draft Local Plan.</p> <p>As a result, the proposed employment allocation at the site is inconsistent with national policy because it does not pass the test of being deliverable or effective in order to meet the identified need for employment land. This is contrary to Paragraph 16 of the National Planning Policy Framework ('NPPF'), which states that "Plans should... be prepared positively, in a way that is aspirational but deliverable..." and "be shaped by early proportionate and effective engagement between plan makers and local organisations, businesses, infrastructure providers and operators..." (emphasis added). Whilst there has been engagement between the Council and Peel Ports Group, it is not considered this engagement has been effective, as the points raised in previous consultation exercises have not been acknowledged in the preparation of the draft Local Plan.</p>
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	

<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>The proposed employment sites, references EMP-RA6.3 and EMP-RA6.4, must be deleted and both sites should be safeguarded for port decant purposes and allocated solely as part of the Port and Maritime Zone.</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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>
<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-777
<b>Person ID</b>	1323872
<b>Include files</b>	<a href="#">LPSD-538,767,768,770-775 &amp; 777-EM-Muir Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Warren Marshall
<b>Position</b>	
<b>Company / Organisation</b>	Peel Ports Group Ltd
<b>Agent ID</b>	1323871
<b>Agent Name</b>	Mr Darren Muir
<b>Position</b>	Associate Planner
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 4.3
<b>Title</b>	The Port and Maritime Zone
<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 4.3 AND POLICIES MAP
<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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment Peel Ports Group welcomes and supports the commitment within the emerging Local Plan to maximise the economic contribution of the Eastham Dock Estate as a low carbon transport corridor, for port-related storage, processing and distribution uses, waterborne freight and rail transport through land allocations and Policy WS 4.3.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	The Eastham Dock Estate is referred to in the Local Plan Proposals Map and Policy 4.3 "Port Wirral, Eastham". Peel Ports Group requests that reference to the "Port Wirral, Eastham" is deleted and replaced with the "Eastham Dock Estate".

<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>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>

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>

LPSP-778

<b>Comment ID</b>	LPSP-778
<b>Person ID</b>	1249015
<b>Include files</b>	<a href="#">LPSP-580,778,780-784-EM-Robinson Attach 1 of 3 2507_Redacted.pdf</a> <a href="#">LPSP-580,778,780-784-EM-Robinson Attach 2 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	North West Construction
<b>Position</b>	
<b>Company / Organisation</b>	North West Construction
<b>Agent ID</b>	1249017
<b>Agent Name</b>	Mr Phil Robinson
<b>Position</b>	Director
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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 attachment 1 and 2 Site Selection Background Paper 2022 - Site selection process fundamentally flawed. Site SHLAA0738 not considered for GB release. Wirral Green Belt Review 2019 - Relevant parcel (parcel 2.6) makes a weak contribution to GB and should be considered to be released.

<p><b>as precise as possible.</b></p>	<p>Wirral Strategic Housing Land Availability Assessment 2021 - The Council should have considered whether sites in the Green Belt were suitable, available, or achievable, including this site, since it is entirely conceivable that they will need to call upon sites within the Green Belt to ensure that the plan is sound.</p> <p>Transport &amp; Accessibility Review for sites for Further Investigation 2020 - The land at Fender Lane, Bidston has not been considered in the Transport &amp; Accessibility Review 2020 without any justification being provided as to why it has not been included.</p> <p>The housing requirement does not account for economic growth in any meaningful manner and there is strong justification to plan for a higher level of economic growth.</p> <p>There is insufficient evidence to adequately demonstrate that the Regeneration Areas:</p> <ul style="list-style-type: none"> <li>•Will be able to deliver the infrastructure required to deliver the planned number of homes over the plan period</li> <li>•Are suitable, available, and achievable for the planned number of homes over the plan period</li> <li>•Are viable and that affordable housing requirements will be met</li> <li>•Will provide sufficient larger homes for families.</li> </ul> <p>The claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified.</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>Please refer to the representations report for further details</p>
<p><b>If you wish to make a separate representation, relating to legal compliance,</b></p>	<p>Please refer to the representations report for further details</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>The housing requirement should align with economic growth and the number of demolitions factored into the housing requirement should be justified with sufficient evidence.</p> <p>Evidence should be provided to adequately demonstrate that the Regeneration Areas:</p> <ul style="list-style-type: none"> <li>• Will be able to deliver the infrastructure required to deliver the planned number of homes over the plan period</li> <li>• Are suitable, available, and achievable for the planned number of homes over the plan period</li> <li>• Are viable and that affordable housing requirements will be met</li> <li>• Will provide sufficient larger homes for families</li> </ul> <p>Evidence should be provided to substantiate the claim that exceptional circumstances do not exist to alter the Green Belt boundaries</p> <p><b>Site Selection Background Paper 2022</b> - The Council should have assessed whether all sites in the Green Belt were suitable, available and achievable in the SHLAA 2019. Ultimately, the Council are now claiming that no Green Belt release is required within the Borough. However, should the Council be required to consider residential allocations through Green Belt release, they should go back to the drawing board and reconsider all Green Belt sites put forward since the site-selection process is clearly flawed.</p> <p><b>Wirral Green Belt Review 2019</b> - Should the Council be required to consider residential allocations through Green Belt release, first priority should be given to this site which is identified by Arup as being within a weakly performing Green Belt parcel.</p> <p><b>Wirral Strategic Housing Land Availability Assessment 2021</b> - The Council should have considered whether sites in the Green Belt were suitable, available, or achievable, including this site, since it is entirely conceivable that they will need to call upon sites within the Green Belt to ensure that the plan is sound. Given that the site has not been assessed by the Council the only details in this regard are provided in these representations which confirms that it is wholly suitable, available, and achievable for residential development.</p> <p><b>Transport &amp; Accessibility Review for sites for Further Investigation 2020</b> - The site is within a weakly performing Green Belt parcel in the Wirral Green Belt Review 2019, so at the very least this parcel should have been considered.</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>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-780
<b>Person ID</b>	1249015
<b>Include files</b>	<a href="#">LPSD-580,778,780-784-EM-Robinson Attach 1 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	North West Construction
<b>Position</b>	
<b>Company / Organisation</b>	North West Construction
<b>Agent ID</b>	1249017
<b>Agent Name</b>	Mr Phil Robinson
<b>Position</b>	Director
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 3.1
<b>Title</b>	Housing Design Standards
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

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

<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 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. Evidence should be provided to justify the housing design standards.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</p>
<p><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-781
<b>Person ID</b>	1249015
<b>Include files</b>	<a href="#">LPSD-580,778,780-784-EM-Robinson Attach 1 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	North West Construction
<b>Position</b>	
<b>Company / Organisation</b>	North West Construction
<b>Agent ID</b>	1249017
<b>Agent Name</b>	Mr Phil Robinson
<b>Position</b>	Director
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 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 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>	Please refer to attachment. The Wirral Density Study (February 2021) states that in developing the density policy, it will need to be accepted that some changes to local character will occur when implementing minimum densities, especially in the areas where a significant uplift may occur. A balance needs to be taken between these changes and establishing higher densities. There will be a need to ensure that the local character is not lost due to the emphasis on establishing higher densities. The Council will also need to give significant consideration to whether the need for greater density is sufficient to overlook the need to protect resident's amenity or provision of normal residential facilities. There is also limited evidence to suggest that the Council have given sufficient consideration to other policy requirements which may also impact on density and site layout including the use of the M4(2) and M4(3) standards, the nationally described space standards (NDSS), provision of cycle and bin storage, the mix of homes provided, the availability of EV Charging



	alongside parking, any implications of design coding and the provision of tree-lined streets, highways requirements, and the requirements in relation to biodiversity net gain, changes to the Building Regulations requirements in relation to heating and energy and the Future Homes Standard.
<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>	Please refer to the representations report for further details
<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>	Please refer to the representations report for further details
<b>Please set out the modification(s) you consider necessary to make the Local</b>	There is a very real risk that to achieve the densities proposed the Council it may not be able to deliver on a number of these other policy requirements. It would therefore be beneficial to reconsider the reality of the density requirements alongside the impacts of all of the Council's policy requirements.

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

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

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

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

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

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

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

you consider this to be necessary:	
<p><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-782
<b>Person ID</b>	1249015
<b>Include files</b>	<a href="#">LPSD-580,778,780-784-EM-Robinson Attach 1 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	North West Construction
<b>Position</b>	
<b>Company / Organisation</b>	North West Construction
<b>Agent ID</b>	1249017
<b>Agent Name</b>	Mr Phil Robinson
<b>Position</b>	Director
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 3.4
<b>Title</b>	Housing Mix
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<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>Please refer to attachment.</p> <p>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 set out above. There will also be site-specific circumstances where this may not be achievable and housing mix matters are best considered on a case-by-case basis.</p> <p>This policy also highlights an issue with the Council's Development and Regeneration Strategy. Outside of identified Regeneration Areas, there is a desire to deliver larger properties to rectify the fact that within the Regeneration Areas, predominately smaller properties are to be delivered (dominated by apartment schemes).</p> <p>Given that the Development and Regeneration Strategy allows for limited housing growth outside of the Regeneration Areas, it is not clear how three bedroom and larger properties will be added to the housing stock of the Borough in any meaningful manner.</p>

	This will result in further Imbalance in the housing stock, which will be dominated by smaller properties. Whilst there is undoubtedly a need for such properties, it will not meet the housing needs of other housing groups (most notably family housing) at the scale required. This a particular concern given the 2021 SHMA Update concludes there to be strongest demand and need for three-bedroom properties.
<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>	Please refer to the representations report for further details
<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>	Please refer to the representations report for further details
<b>Please set out the modification(s) you consider necessary</b>	A more balanced approach to housing delivery would result in the delivery of housing stock to meet a variety of housing mix needs and suitable development sites such the land at Fender Lane, Bidston provides the opportunity to provide family housing and larger properties.  Evidence should be provided to justify the 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),

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

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

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



<b>Comment ID</b>	LPSD-783
<b>Person ID</b>	1249015
<b>Include files</b>	<a href="#">LPSD-580,778,780-784-EM-Robinson Attach 1 of 3 2507_Redacted.pdf</a> <a href="#">LPSD-580,778,780-784-EM-Robinson Attach 3 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	North West Construction
<b>Position</b>	
<b>Company / Organisation</b>	North West Construction
<b>Agent ID</b>	1249017
<b>Agent Name</b>	Mr Phil Robinson
<b>Position</b>	Director
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 5
<b>Title</b>	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 attachment 1 and 3. Merseyside Environmental Advisory Service RAG Screening 2019 –Submitted Green Belt Sites - On this basis, the ecology, archaeology and contamination constraints of the site aren't a reason to prevent its allocation in the plan should the need arise for the Council to consider residential allocations through Green Belt release.

as precise as possible.	<p>Wirral Environmental Sensitivity Study 2021 - LUC gave the site a high environmental sensitivity rating based purely on the fact that it is within Flood Zone 3. In response to the consultation, it was firmly set out that the site should not be given a high sensitivity rating on this basis alone, particularly when other environmental assets within the site have low or moderate sensitivity, and the site could be developed without increasing the risk of flooding elsewhere and without effecting flood storage capacity.</p> <p>Level 1 Strategic Flood Risk Assessment July 2021 - The SFRA 2021 says that consideration should be given to withdrawal of the site on the basis that the site is at existing risk (of flooding) and because there is "therefore a high likelihood of future risk". North West Construction are fully aware that the site is within Flood Zone 3a which are areas at high risk of flooding and may also play a role in flood storage capacity. However, this does not mean that the site is unsuitable for a residential allocation. It is entirely possible to demonstrate that suitable development can take place in Flood Zone 3a without effecting flooding elsewhere and without effecting flood storage capacity.</p> <p>Wirral Landscape Sensitivity Assessment 2021 - The land Fender Lane, Bidston has not been considered in the LSA 2021 or LSA Addendum 2021, without any justification being provided as to why it has not been included.</p> <p>The Nature Improvement Area Focus Areas include the River Birket Corridor (NIA-4), which includes the land at Fender Lane, Bidston.</p> <p>The Council have provided insufficient evidence on how the Ecological Networks will be effective insofar as the intended strategy to divert biodiversity net gain to the land within private ownership with the Nature Improvement Focus Areas.</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>	Please refer to the representations report for further details
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the</b>	Please refer to the representations report for further details

<p>duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>The Council should provide clarification on how biodiversity net gain would be directed to the land within private ownership with the Nature Improvement Focus Areas, particularly if this land is not allocated for residential development which could provide the impetus to deliver biodiversity net gain.</p> <p>If this evidence is not forthcoming, then it could only be concluded that the strategy for biodiversity net gain within the Nature Improvement Focus Areas is not currently justified.</p> <p><b>Merseyside Environmental Advisory Service RAG Screening 2019 –Submitted Green Belt Sites</b> - On this basis, the ecology, archaeology and contamination constraints of the site are not a reason to prevent its allocation in the plan should the need arise for the Council to consider residential allocations through Green Belt release.</p> <p><b>Wirral Environmental Sensitivity Study 2021</b> - On these basis, the environmental and landscape sensitivity of the site is not a reason to prevent its allocation in the plan should the need arise for the Council to consider residential allocations through Green Belt release.</p> <p><b>Level 1 Strategic Flood Risk Assessment July 2021</b> - The SFRA 2021 notes that further information is required to inform whether the site can pass the Exception Test. The proposed development will address the Exception Test at the appropriate time, which in this instance would be at the time of making a planning application.</p> <p><b>Wirral Landscape Sensitivity Assessment 2021</b> - The site is within a weakly performing Green Belt parcel in the Wirral Green Belt Review 2019, so at the very least this parcel should have been considered in the LSA 2021 or LSA Addendum 2021.</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>To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-784
<b>Person ID</b>	1249015
<b>Include files</b>	<a href="#">LPSD-580,778,780-784-EM-Robinson Attach 1 of 3 2507_Redacted.pdf</a>
<b>Consultee Name</b>	North West Construction
<b>Position</b>	
<b>Company / Organisation</b>	North West Construction
<b>Agent ID</b>	1249017
<b>Agent Name</b>	Mr Phil Robinson
<b>Position</b>	Director
<b>Company / Organisation</b>	Pegasus Group
<b>Number</b>	Policy WS 12
<b>Title</b>	Monitoring and Review
<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 12
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please refer to attachment. However, neither the policy nor Appendix 15 include a trigger mechanism which would prompt the Council to undertake a review of the Local Plan. For instance, whilst Appendix 15 suggests that housing completions would be monitored annually, there is no trigger for a review of the Local Plan, if for example, housing completions fall below a certain percentage of those predicated in the housing trajectory. Furthermore, there is very little confidence that as things stands the plan will achieve its housing trajectory owing to the heavy reliance of delivering most of the planned new homes within the Regeneration Areas.

	In this regard, attention should be drawn to the representations by Lichfield on behalf of the Consortium which confirms that the Regeneration Areas will not provide the number of homes envisaged by a significant margin.
<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>	Please refer to the representations report for further details
<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>	Please refer to the representations report for further details
<b>Please set out the modification(s) you consider necessary to make the Local</b>	Allocating more greenfield sites for residential development, such as the land at Fender Lane, Bidston would give reassurance that the housing trajectory in the plan would stay on track and may alleviate the requirement to review the plan prior to the relevant five-year period. If not, it is highly likely that the Council will need to review the plan within the first five years of the plan period and identify more sites to deliver new homes.



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

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

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

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

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

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

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

you consider this to be necessary:	
<p><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

## LPSD-785

<b>Comment ID</b>	LPSD-785
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a> <a href="#">LPSD-785-EM-Dawber Form 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1

<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Positively Prepared Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is</b>	Please refer to attachment The assumptions made in terms of the amount of housing to be accommodated in the regeneration areas are overly optimistic.

<b>unsound. Please be as precise as possible.</b>	The amount of housing proposed within the regeneration areas is not deliverable over the plan period. The regeneration areas will does not take a realistic view in terms of the suitability and likely economic viability of sites therein to deliver housing.
<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>	Reduce the amount of housing proposed within the regeneration areas, particularly Scott's Quay, to reflect the need to retain established port and employment uses and ensure that adequate mitigation can be accommodated within residential schemes to ensure that existing employment and port activities can continue and intensify.

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)

UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations

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-786
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<b>Number</b>	Policy WS 1.2
<b>Title</b>	Employment
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.2
<b>Please state which Site ID/Reference this</b>	



representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>The identification of Primarily Employment Areas as being appropriate areas to accommodate new employment development is wholly appropriate. Further, comment on the Primarily Employment Areas policy (WS 4.1) is below.</p> <p>While supported, there are concerns relating to the potential conflict between encouraging new employment development on land very close to significant residential allocations. These are discussed later in this Section and in Section 4 of these representations.</p> <p>The promotion of port and marine related facilities at West Float is also appropriate.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is	

unsound. Please be as precise as possible.	
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	N/A

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)

UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations

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-787
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<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> * 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 4.1
<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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment In a similar vein to WS 1.2 the identification of Primarily Employment Areas for retention and enhancement for their existing or wider employment uses to achieve the economic strategic of the WLP is appropriate. However, the practicality of this is questionable owing to the allocation of significant residential development in proximity of Primarily Employment Areas, such as UM's North Alfred Dock site, given the inevitable amenity issues associated.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

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

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)

UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations



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

<b>Comment ID</b>	LPSD-788
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<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> * 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 4.2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	<p>Please refer to attachment</p> <p>The designation of UM's North Alfred Dock site and northern parcel of the Dock Road site as a Designated Employment Areas are welcomed.</p> <p>The wording of the policy is also appropriate in that proposals for the redevelopment, renewal, intensification, or extension of existing employment sites and premises within Use Classes B2 and B8, or wider employment generating uses will be encouraged.</p> <p>This policy is reflective of the importance of employment related to the port in this location. Further discussion regarding the implications of residential allocations close to Primarily Employment Areas and the potential of these to impact on the implementation of Policy WS 4.2 are discussed below.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is	

unsound. Please be as precise as possible.	
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	N/A

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)

UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations

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-789
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<b>Number</b>	Policy WS 4.3
<b>Title</b>	The Port and Maritime Zone
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 4.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment List of exceptions is not clear as to whether it is an inclusive or exclusive list and as such does not meet the requirements of paragraph 16 of the NPPF.



as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	The list of exceptions at G, should be amended to made it an inclusive list in order to offer maximum safeguarding to the port and maritime zone. The wording should be amended as follows: 1 consideration has been given to the future needs of the Port; and 2 the continued operations of the Port would not be unacceptably prejudiced; or and

<p><b>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>3 the development requires a coastal location.</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>UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations</p>

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

<b>Comment ID</b>	LPSD-790
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<b>Number</b>	Policy WS 7.2
<b>Title</b>	Privacy and Amenity
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment It is considered that the policy is not deliverable over the plan period as it is not realistic when considered against other policies. The policy is aspirational but not deliverable in the content of the uses proposed close to the North Alfred Dock.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Amendments required to policies WS 1.1 and RA 2 to remove the residential allocation at Scott's Quay or reduce the quantum of development to allow for greater setbacks and the potential to accommodate significant mitigation.

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)

UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations

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-791
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<b>Number</b>	Policy WS 7.3
<b>Title</b>	Agent of Change
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment It is considered that the policy is not deliverable over the plan period as it is not realistic when considered against other policies. The policy is aspirational but not deliverable in the content of the uses proposed close to the North Alfred Dock.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Amendments required to policies WS 1.1 and RA 2 to remove the residential allocation at Scott's Quay or reduce the quantum of development to allow for greater setbacks and the potential to accommodate significant mitigation.

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)

UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations

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-792
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<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	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 2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment It is considered that the allocation is not deliverable and so would not contribute towards meeting the housing needs of Wirral. There is not sufficient evidence to demonstrate that impacts from existing employment uses can be mitigated to an acceptable level.

<b>as precise as possible.</b>	It is considered that the policy is not deliverable over the plan period as it is not realistic when considered against other policies. The policy is aspirational but not deliverable in the content of the uses proposed close to the North Alfred Dock.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local</b>	Amendments required to policies WS 1.1 and RA 2 to remove the residential allocation at Scott's Quay or reduce the quantum of development to allow for greater setbacks and the potential to accommodate significant mitigation. Should the Policy remain in the Plan, Point C.4. should be amended to the following in order to reflect the Policy WS 4.2.



<p><b>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p><i>mitigation measures to ensure that the operation of <del>port-related businesses</del> <b>current, intensified, or new employment uses</b> are not impacted on by adjoining residential uses and that appropriate residential amenity is achieved.</i></p> <p>Wording should also be added to Point D in order that protections to employment uses are also afforded to the East Street Masterplan Area (MPA-RA2.2). As such, a new Point 4 should be added which reads:</p> <p><i>mitigation measures to ensure that the operation of current, intensified, or new employment uses are not impacted on by adjoining residential uses and that appropriate residential amenity is achieved.</i></p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>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>UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations</p>

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

<b>Comment ID</b>	LPSD-793
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<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	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 6
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Not effective as it will limit the deliverability of WS 4.2 and WS 4.3 in stymying the operation of existing and future dock and employment uses. The policy is not consistent with strategic policies WS 4.2 and WS 4.3 and therefore is unclear how a decision maker should interpret the WLP as a whole given the contradiction.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Add in additional requirement for development proposals within the East Float Masterplan Area (MPA-RA6.1) to provide mitigation to allow remaining dock and employment uses to continue. <i>mitigation measures to ensure that the operation of current, intensified, or new docks or employment uses are not impacted on by adjoining residential uses and that appropriate residential amenity is achieved.</i>

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)

UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations

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

<b>Comment ID</b>	LPSD-794
<b>Person ID</b>	1323581
<b>Include files</b>	<a href="#">LPSD-785 to 794-EM-Dawber Attach 2007_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Vic Brodrick
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323582
<b>Agent Name</b>	Mr Matthew Dawber
<b>Position</b>	
<b>Company / Organisation</b>	Barton Wilmore
<b>Number</b>	Policy WD 14
<b>Title</b>	Pollution and Risk
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 14
<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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>Policy WD 14 states that new development that would impose significant restrictions on the continued operation of existing licenced or controlled processes, or that would lead to an existing use being classified as a statutory nuisance, will not be permitted.</p> <p>As stated in Sections 3 and 4 of these representations, the allocation and subsequent development of high density residential development so close to UM's North Alfred Dock site has significant potential to result in increased numbers of complaints from new residents and as such pressure to impose new restrictions in operations.</p> <p>The Proposals Map clearly shows the close relationship between the employment site and the proposed residential allocations. The relatively small size of the residential allocations and high density proposed limits the potential for adequate setbacks to be accommodated. This is shown on Figure 1 below. [SEE ATTACHMENT, FIGURE 1, PAGE 22]</p> <p>Appendix 1 of these representations demonstrates the potential for amenity issues such as noise or odour to be present close to the North Alfred Dock site. Appendix 2 shows the size of tanks present. These demonstrate that the ability to fully mitigate impacts on high density residential amenity immediately adjacent is not realistic.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	

<p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>	
<p><b>omplies with the Duty to co-operate</b>  *        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 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>Policy RA 2, if delivered would conflict with Policy WD 14.</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>UM Terminals have significant concerns regarding the implications of the Local Plan on their continued operations</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>

<b>Comment ID</b>	LPSD-795
<b>Person ID</b>	1324646
<b>Include files</b>	<a href="#">LPSD-795,796,797-EM-Roe Attach 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Starship Group Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Starship Group Ltd.
<b>Agent ID</b>	1323854
<b>Agent Name</b>	Mrs Nicole Roe
<b>Position</b>	Director
<b>Company / Organisation</b>	Eden Planning
<b>Number</b>	Policy WS 8.1
<b>Title</b>	Energy Hierarchy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.1
<b>Please state which Site ID/Reference this 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	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please refer to attachment The National Planning Policy Framework states that Plans should: “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” Policy WS 8.1 sets clear requirements for development proposals to apply the energy hierarchy to minimise energy demand. It sets out 7 criteria for how this will be achieved. However, it does not incentivise developers who achieve or strive to meet objectives higher up the hierarchy nor does it account for viability in meeting these requirements. With regard to the Framework it is not evident how the decision maker should react in the event that the energy hierarchy is not paid due regard. Nor is it clear how the decision maker should react if all residual carbon emissions are offset on site as opposed to a scheme that needs to offset these elsewhere.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>We suggest a modification that includes recognition of viability in achieving net zero but also inclusion of text that supports and gives due weight to development achieving net zero on site. We suggest the addition of the following sentence:</p> <p><i>“Development that implements the energy hierarchy and meets net zero targets on site shall be supported and recognised as a benefit when assessing the application.”</i></p> <p>The addition of this sentences ensures that appropriate weight can be added by the decision maker when weighing proposals in the planning balance. Subject to this change the policy is considered sound.</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>Ensure that the consideration of this key stakeholder (Starship Group) on matters raised in this letter are fully considered.</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-796
<b>Person ID</b>	1324646
<b>Include files</b>	<a href="#">LPSD-795,796,797-EM-Roe Attach 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Starship Group Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Starship Group Ltd.
<b>Agent ID</b>	1323854
<b>Agent Name</b>	Mrs Nicole Roe
<b>Position</b>	Director
<b>Company / Organisation</b>	Eden Planning
<b>Number</b>	Policy WS 8.2
<b>Title</b>	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Please refer to attachment</p> <p>Whilst it is positive that these sustainable construction methods and measures are encouraged in the new local plan, the policy should and could do more to support developments that demonstrate compliance over those that have explored these measures and been unable to deliver them.</p> <p>It is also not clear how the decision maker should apply this policy when determining applications. For example will every application need to provide documentation to demonstrate why Passivhaus standards are not possible and viable? As per text at 3.192 at vi, will every proposal require a passive design capacity assessment? It is also not clear what is meant by equivalent standards. This policy is vague and therefore is not effective. Does the Council see new building regulations and the emerging 'Future Homes Standards' as appropriate equivalent standards? If so this should be explicit in policy or supporting text.</p>

	As currently written this policy is not considered sound as it is not effective. Subject to these changes we would consider this policy to be sound.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local</b>	We suggest the following text is added: "Applications should demonstrate sustainable construction methods and measures as listed at A, B and C of this policy. Where methods are not feasible or viable, evidence to demonstrate this should be put forward by the applicant as part of the planning application. Where methods are implemented and demonstrated these developments will be supported and recognised as benefits when assessing the application."

<p><b>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>At part 2 the policy lists energy use intensities for residential development, commercial development and schools. These should clearly be set out as targets and not requirements. These exceed current expectations set by RIBA for example. The Local Plan needs to balance ambitions for net zero with setting realistic and achievable targets so that Policy does not hinder development and unduly constrain housing delivery.</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>Ensure that the consideration of this key stakeholder (Starship Group) on matters raised in this letter are fully considered.</p>

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

<b>Comment ID</b>	LPSD-797
<b>Person ID</b>	1324646
<b>Include files</b>	<a href="#">LPSD-795,796,797-EM-Roe Attach 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Starship Group Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Starship Group Ltd.
<b>Agent ID</b>	1323854
<b>Agent Name</b>	Mrs Nicole Roe
<b>Position</b>	Director
<b>Company / Organisation</b>	Eden Planning
<b>Number</b>	Policy WS 8.5
<b>Title</b>	Carbon Compensation through Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.5
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Please refer to attachment</p> <p>It is considered that Policy WS 8.5 is not sound in its current form because it is not effective. Policy WS 8.4 allows an applicant to demonstrate when a renewable or low carbon energy supplies are not feasible. Policy WS 8.5 should also require a developer to demonstrate when such technologies are not feasible off site by modification to the policy text.</p> <p>The policy should also set out how it is envisaged that a decision maker will act on the policy when off site is not feasible. We would expect viability to be a consideration but given the Government national target of zero carbon by 2050, we would expect development should only be supported when renewable and zero carbon is not viable and other benefits such as housing delivery clearly outweigh harm. Subject to a modification to WS 8.5 these policies are deemed sound.</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>Policy WS 8.4 allows an applicant to demonstrate when a renewable or low carbon energy supplies are not feasible. Policy WS 8.5 should also require a developer to demonstrate when such technologies are not feasible off site by modification to the policy text.</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>Ensure that the consideration of this key stakeholder (Starship Group) on matters raised in this letter are fully considered.</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-798
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSD-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<b>Number</b>	Policy WP 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	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 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	
<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>Rear of Lighthouse Public House - No clear evidence has been provided to demonstrate that the site will deliver in the five year period.</p> <p>Land at Gibson House, Seabank Road - Not assessed in the SHLAA.</p> <p>Rear of Gibson House, Maddock Road - Not assessed in the SHLAA.</p> <p>Old Manor Club, Withens Lane - Not assessed in the SHLAA.</p> <p>3.12 As shown in the table above, for the majority of the sites included in years 1 – 5 of the Council's trajectory, there is no clear evidence to demonstrate their deliverability as required by the Framework. In the absence of such evidence, these sites such be excluded from the five year supply.</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>Exclude the sites from the five year supply.</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>	

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\*      **Yes**  
\*      **No**



<b>Comment ID</b>	LPSD-799
<b>Person ID</b>	1248448
<b>Include files</b>	<a href="#">LPSD-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf</a>
<b>Consultee Name</b>	Wain Homes North West Ltd
<b>Position</b>	
<b>Company / Organisation</b>	Wain Homes North West
<b>Agent ID</b>	1248449
<b>Agent Name</b>	Mr Stephen Harris
<b>Position</b>	
<b>Company / Organisation</b>	Emery Planning
<b>Number</b>	Policy WP 3.3
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	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 3.3
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Former Gladstone Liberals, Dial Road - Site only has outline planning permission. No reserved matters application made to date. No clear evidence to demonstrate deliverability in the five year period. Redcourt School, 7 Devonshire Place - Site has full planning permission for 30 dwellings. Sevenoaks, Phase 2b - Site has full planning permission for 43 dwellings. Atherthon Hall, Westbourne Road - Not assessed in the SHLAA.

	3.12 As shown in the table above, for the majority of the sites included in years 1 – 5 of the Council's trajectory, there is no clear evidence to demonstrate their deliverability as required by the Framework. In the absence of such evidence, these sites such be excluded from the five year supply.
<b>omplies with the Duty to co-operate</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local</b>	Exclude the majority of the sites from the five year supply.

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)

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