

LPSP-801

Comment ID	LPSP-801
Person ID	1323851
Include files	LPSP-801-EM-Dean 2107_Redacted.pdf
Consultee Name	Mr Alec Dean
Position	Senior Planner
Company / Organisation	Knowsley Council
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	
Title	
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

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

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-804
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 7.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES SA 7.9

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	allocation inaccurate at 2 dwellings - should be 3 from planning permission granted

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>change RES SA 7.9 from 2 to 3 dwellings to accord with planning permission.</p>

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

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

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

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

Comment ID	LPSD-805
Person ID	1323881
Include files	LPSD 805 -EM-Fordham 2207_Redacted.pdf
Consultee Name	Mrs Anne Fordham
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 11
Title	Strategy for town and local centres
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 11 para 3.234
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	a third supermarket in West Kirby is not needed , it would put local shops out of business and not increase choice

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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Comment ID	LPSD-806
Person ID	1323862
Include files	LPSD 806-EM-Miller 2307_Redacted.pdf
Consultee Name	Ms Linda Miller
Position	Secretary
Company / Organisation	Monk's Ferry/Alabama Way Car Park and Slipway Asset of Community Value Group
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 3
Title	Birkenhead Waterfront Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	MUA-RA4.1 & MUA-RA4.2

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Overall, very little consideration is being given to the needs of existing residents, the focus being on visitor/public access and new builds. And why isn't Monk's Ferry being respected as a heritage site, with links to the Priory? The Mersey Ferry commentary points the Victorian slipway out as marking the site of the first ferry across the Mersey, operated by the monks in the 12th century. This makes sense, given the proximity to the Priory and the fact that one doesn't have to wait for the tide to launch a vessel. Fig 4.31, pages 74 and 75 in document 'BR4 Draft Birkenhead Waterfront Neighbourhood Framework 2022'. Obviously, we are opposed to a residential development, due to the proximity to our respective properties. New builds on the site would be particularly bad news for people on the ground floor and for people on the top floor, if the buildings are high. Currently, the site is pleasant with mature trees and nesting birds. It is also much needed community space. It has been used for a filming location, the annual charity cross-river swim and, recently, the Queen's Jubilee Celebrations.</p> <p>On a smaller, earlier, document 'BR4.2 Birkenhead Waterfront Neighbourhood Framework 2022, I found a reference to PR09 (GS11) – the Monk's Ferry/Ivy Street Park.</p>

	<p>This seems to involve boardwalks and pontoons. Again, the historic links to the Priory are being ignored. Presumably, this park would be right on the waterfront? The water is fierce here and there are warning signs about bathing. It is also a potential flood area. The current car park is a high, solid structure which does a great job in protecting the area during storms. How is this boardwalk park going to work, particularly in relation to new builds? One other thing that strikes us is that the Council (as seen on the above schedule in particular) seems keen to eliminate cars in favour of pedestrian and cyclist access. There is no mention of disability access. Physically disabled people often need cars to get about.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>Monks ferry should be treated as heritage site.</p>

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

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

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

If you wish to participate in the

<p>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>	

Comment ID	LPSD-808
Person ID	1237771
Include files	LPSD 808- EM-Clarke 1707_Redacted.pdf
Consultee Name	Mr Terence Clarke
Position	
Company / Organisation	Residents(other than of Grange Hall) of Grange Old Road
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES SA 6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	see below
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Council Proposal that Land on Grange Hill Which is Subject to Restrictive Covenants (prescribed in a Conveyance dated 20 October 1982 in the PUBLIC INTEREST) Be Used for Housing Development We refer to your email of 14 July @ 15.16.and respond as follows in particular regarding your reference to a Planning Inspector, who has yet to be appointed: 1. At no time during the lengthy period during which you were drafting the local plan did you consult

	<p>with the Friends of Grange Hill or Local Residents regarding your ill founded proposal. However the Council have colluded during this period with the owner of the land in question regarding its proposal.</p> <p>2. A petition with over 1200 signatories was submitted to the Council on the 11 July strongly objecting to the Council's proposal</p> <p>3. The FofGH submitted on the 13 June representations strongly objecting to the Council's proposal</p> <p>4 Drs Fraser McLean Smith and Caroline O'Callaghan submitted on the 5 July representations strongly objecting to the Council's proposal</p> <p>5. Other residents of Grange Old Road have made a number of representations strongly objecting to the Council's proposal</p> <p>6. Grange Hill is a Heritage Site and Grange Old Road is on the Heritage Trail between two West Kirby Conservation Areas</p> <p>7. The land in question is surrounded if not part of a Site of Scientific, Biological and Ecological Interest and a Local Wildlife Site on which foxes, bats and a variety of birdlife can be found</p> <p>8. The land in question was not available in 2000 when it was included in the Council's UDP AND continues not to be available for housing development</p> <p>9 The Council continue to be in breach of its obligation under the EIR 2004 to disclose communications with the owner of the land in question regarding the Council's ill founded proposal which is intended to unjustly enrich the owner of the land in question</p> <p>The Council have a duty/obligation in the Public Interest to consider all of the above and decide that its "proposal would significantly harm the character and appearance of an area" which the Council have referred to in its correspondence as "Green Space" AND delete its proposal from its local plan</p> <p>We applied on the 26 May 2022 to the Council that the land in question be Designated in accordance with the Government's National Planning Framework a "Local Green Space" and the evidence which has been submitted meets the criteria under the NPPF for the land in question to be so Designated.</p> <p>We await hearing from the Council accordingly</p> <p>Terence Clarke C.Eng. M.I.C.E.(elected 1971) F.C.I.Arb (elected 1991) on behalf of the residents of Grange Old Road West Kirby.</p>
omplies with the Duty to co-operate * Yes * No	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	see above

<p>to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability</p>	<p>delete housing allocation RES SA6.4 and designate as Local Green Space.</p>

<p>Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>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>	

*	Yes	
*	No	

LPSD-809

Comment ID	LPSD-809
Person ID	1237771
Include files	LPSD-809-EM-Clarke Attach 1 of 8 1907_Redacted.pdf LPSD-809-EM-Clarke 1907_Redacted.pdf LPSD-809-EM-Clarke Attach 4 of 8 1907_Redacted.pdf LPSD -809-EM-Clarke Attach 8 of 8 1907_Redacted.pdf LPSD-809-EM-Clarke Attach 3 of 8 1907_Redacted.pdf LPSD-809-EM-Clarke Attach 6 of 8 1907_Redacted.pdf LPSD-809-EM-Clarke Attach 5 of 8 1907_Redacted.pdf LPSD-809-EM-Clarke Attach 2 of 8 1907_Redacted.pdf LPSD-809-EM-Clarke Attach 7 of 8 1907_Redacted.pdf
Consultee Name	Mr Terence Clarke
Position	
Company / Organisation	Residents(other than of Grange Hall) of Grange Old Road
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	

Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES SA 6.4
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	see below
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 Positively Prepared Not Justified Not Effective Not Consistent with National Policy

<p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>refer attachments, RES SA 6.4 should be Local Green Space not housing allocation</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>No</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>see above</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</p>	

<p>Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>RES SA 6.4 should be Local Green Space</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p>	

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

LPSP-810

Comment ID	LPSP-810
Person ID	1324658
Include files	LPSP-536,810,846-849,1397-1399-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Jessica Bond
Position	
Company / Organisation	Barrat David Wilson
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
Number	Part 2
Title	The Places and Our Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	2.38 Vision point H
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. The focus of the emerging Local Plan should be to provide much needed homes to meet current and future housing needs, in the locations where such homes are needed, rather than shoe-horning housing into a narrow area of the Borough. This is clearly out-of-sync with the overall thrust of the NPPF.

<p>as precise as possible.</p>	<p>Furthermore, we are very concerned that the 'Vision' contained within the emerging Local Plan does not recognise what the actual purposes of the 'Green Belt' are expected to achieve with respect to the NPPF. Part B of the 'Vision' states: 'Land within the Green Belt provides a critical agricultural, recreational and ecological resource and Wirral's countryside supports adaptation to and mitigation of climate change.' NPPF paragraph 137, however, explains that the 'fundamental aim of Green Belt policy is to prevent urban sprawl'. Paragraph 138 goes on to explain that the Green Belt serves the following five purposes.</p> <p>We are concerned that the Council's current approach appears to be confusing the fact that the purpose of the Green Belt is to prevent urban sprawl, as opposed to being used as a mechanism to achieve wider environmental objectives. Whilst we support the principle of the Local Plan being used as a mechanism to support environmental objectives, insofar as that accords with the NPPF, this should not be mixed up with the actual purposes of the Green Belt.</p> <p>Whilst we agree that the general thrust of the Green Belt should be maintained where such land fully meets the purposes of the Green Belt as set out in national planning policy, we do not consider that land which does not meet the purposes of the Green Belt, such as our client's site at Chester Road, should be protected from development ad infinitum.</p> <p>We note that Part H of the 'Vision' states: 'The commuter towns and villages of the west of Wirral remain stable having experienced small scale incremental development that has allowed them to continue to thrive within a landscape protected by Green Belt designation'. Not only does there again appear to be some confusion about the 'protection' that the Green Belt is supposed to offer but, fundamentally, we are of the firm view that in order for towns and villages of the west of Wirral 'to thrive', they will need more than just 'small scale incremental development'.</p> <p>There needs to be investment in new housing, which will bring new residents and ensure the continued vitality and sustainability of such towns and villages.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Vision not consistent with National Policy change to Release Green Belt land for development, including land at Chester Road, in the Local Plan.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSP-811

Comment ID	LPSP-811
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	
Title	Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	2.38 - Vision
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>please refer to attachment</p> <p>The Planning Practice Guidance is clear that a vision is central to the purpose of Local Plans (Paragraph: 001 Reference ID: 61-001-20190315). Peel L&P has always advocated that the vision plays a central role in setting out the overall ambition, priorities, and strategies that the Council will seek to deliver over the Plan period. This is at the sub-regional, regional, and national level. It provides a framework for the entire Local Plan.</p> <p>It is our view the Submission Draft Wirral Local Plan vision is, by necessity, far reaching but with an air of realism and a recognition of what is deliverable and achievable in Wirral within the Plan Period.</p> <p>The vision places the potential for Birkenhead and the waterfront at the heart of its regeneration proposals. It rightly identifies East Float as a catalyst of regional and national importance and a focus for public and private investment.</p> <p>Further the vision is explicit in recognising Wirral Waters as an exemplar model of a high quality, connected, sustainable, 'net-zero' emission neighbourhood. It cannot be overstated that Wirral Waters is intrinsic to the ambitions of the Local Plan.</p> <p>The proposed mass transit system providing 'last mile' and other active travel links to Wirral Waters and Scott's Quay are explicitly referenced within the vision which is welcomed. The inclusion of references to a future No Schedule 1 – Summary Table of Representations reduced reliance on private cars and a shift towards active travel as the mode of choice for short journeys, are reflective of the current approach being taken within planning applications at Wirral Waters, which is also welcomed. Peel L&P would like to highlight that the Council's timely delivery of 'last mile' transport infrastructure and other active travel infrastructure is absolutely critical to delivery of housing development at Wirral Waters.</p> <p>Overall, it is our view the Vision articulates the ambition for Wirral Waters well. It explicitly sets out the exemplar nature of Wirral Waters and its national importance, whilst also recognising the intrinsic role of infrastructure delivery in realising the vision.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why:	

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

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to</p>	<p>No, I do not 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>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-812
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	
Title	The Strategic Objectives of the Local Plan
To which part of the Local Plan does this representation relate?	Paragraph(s)
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	2.39 - Strategic objectives
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>The themes of the Strategic Objectives are supported. They encompass a full range of issues within which the resultant policies will sit.</p> <p>In relation to Wirral Waters specifically, the Strategic Objectives will help to facilitate sustainable growth.</p> <p>Strategic Objective 2 is specifically relevant to Wirral Waters and will drive focus towards the transformational Wirral Waters regeneration programme.</p> <p>Together, these objectives respond to Peel's representations made to the Issues and Options stage, which is welcomed. It is not deemed necessary for an individual strategic policy relating to Wirral Waters to be included; this is on the basis that the vision is now explicit in identifying the central role of Wirral Waters as a regeneration project of national importance in addition to other specific policies within the Draft Local Plan (namely Policy RA6).</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>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>It is not deemed necessary for an individual strategic policy relating to Wirral Waters to be included; this is on the basis that the vision is now explicit in identifying the central role of Wirral Waters as a regeneration project of national importance in addition to other specific policies within the Draft Local Plan (namely Policy RA6).</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSP-813

Comment ID	LPSP-813
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer to attachments including progress on Wirral Waters delivery</p> <p>This policy seeks to ensure the Council moves towards a zero-carbon future. The policy is not overly prescriptive, and we endorse this inherent flexibility allowance for evolving technologies over the plan period.</p> <p>The policy tabulates where new dwellings are planned to be distributed across Wirral, which will be developed through a combination of the creation of new neighbourhoods through brownfield development and suitable sites within settlement areas. It is stressed, as it has been during discussions, and correspondence with the Council that delivery is predicated by the Council's ability to deliver timely transport and other infrastructure, with a specific focus on 'last mile' connectivity and other active travel infrastructure.</p> <p>The policy is supportive of higher densities in Regeneration Areas which includes Wirral Waters, and this is supported.</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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	

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

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

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

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

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

If you wish to participate in the

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

LPSP-814

Comment ID	LPSP-814
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 1.2
Title	Employment
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	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>This policy identifies land to be allocated for employment and includes 22.37 Ha at Wirral Waters (Policy RA6) across the lifetime of the plan. This figure is supported by Peel L&P who have been working to support the Council during the period of Local Plan development.</p> <p>Peel L&P can confirm that a planning application has been submitted for the Maritime Knowledge Hub (reference 22/00937). The 0.8ha site will be transformed, through the conversion and extension of the Grade II Hydraulic Generating Station on Four Brides to provide a £23m industry-led, education, research and development, skills and innovation commercial centre of excellence for the maritime and marine industries.</p> <p>A planning application (reference 22/00737) has also been submitted for the next phase of development at MEA Park on West Float (1.79ha).</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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	

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

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

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

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

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

If you wish to participate in the

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

LPSP-815

Comment ID	LPSP-815
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 1.3
Title	Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	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>This policy relates to key infrastructure, noting that the Local Plan will seek to deliver active travel networks, a mass transit system within Birkenhead, a new multi-purpose Greenway (the Dock Branch Park) and a green and blue infrastructure network.</p> <p>The delivery of sound infrastructure is critical for the successful delivery of development of Wirral Waters. This cannot be overstated or undervalued.</p> <p>With reference to the Council's Submission Draft Infrastructure Delivery Plan (IDP) May 2022, the timely Infrastructure Delivery and the need to secure funding within a phased timeframe that responds clearly and directly to wider regeneration, including Wirral Waters, is imperative. This was emphasised by Peel L&P (Ports) Ltd within their representation to the Issues and Options consultation stage, and it continues to be imperative that the Council recognises its overarching responsibility in delivery. The IDP reflects this, and bids submitted for initial phases of active travel is a positive sign that needs to continue momentum and commitment.</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>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

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

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

LPSP-816

Comment ID	LPSP-816
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 2
Title	Social Value
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to Attachment The outline planning permission for East Float (ref. OUT/09/06509) is underpinned by a number of 'Guiding Principles'. This includes principles around skills and employability as well as enterprise. As such at the heart of the outline planning permission is a commitment to local job creation, knowledge sharing and training, all contributing to overall social value of development.

as precise as possible.	<p>In respect of major development, the draft policy wording includes an indication that this would only be required 'where appropriate', the Council will seek to enter into a planning agreement and/or impose conditions relating to the use of local labour and provision of training and skills for local communities.</p> <p>For clarity the policy should define the threshold for a 'major development' and indicate how any condition or legal agreement would be framed. Whilst there is a philosophy around social value running through the approach to Wirral Waters, there is potential for this draft policy to be onerous and inflexible meaning applicants would have to provide a disproportionate level of detail at an early stage.</p> <p>Policy WS2 broadly aligns with national policy where social value is a long-established thread of sustainable development. The policy builds flexibility in around use of local labour, which is supported. Peel L&P supports this as using local labour will not always be appropriate, or achievable but should always be explored and encouraged.</p>
omplies with the Duty to co-operate * Yes * No	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	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Clarification of what comprises a 'major development' should be provided or linked to established definition. Any requirement must be proportionate. The policy or justification should indicate how any condition or legal agreement would be framed. Without this detail available, the policy is too vague and there is potential for this requirement to be onerous and inflexible as such place disproportionate requirements on applicants.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSP-817

Comment ID	LPSP-817
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. This policy brings the Local Plan in line with national space standards. It requires new development to comply with Building Regulations 36(3) in terms of water efficiency standards and Part M4(2) relating to accessibility and adaptability.

as precise as possible.	<p>The policy requires all new homes on developments of 17 or more units to provide at least 6% wheelchair adaptable units. This level of provision is identified within the SHMA, which forms part of the evidence base of the Local Plan.</p> <p>It is considered this requirement should be explicitly linked to viability. There is an expectation that wheelchair accessible units will occupy a greater floor area but also that development that achieves greater sustainability credentials is likely to have come at additional cost to the developer. The policy should reflect that viability will be a consideration.</p>
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Explicit reference within the policy should be included to allow for viability. The policy should recognise that development that meets and exceeds wheelchair accessible units and demonstrates sustainable/net zero credentials is given suitable weight when considering the acceptability of a proposal on balance.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSP-818

Comment ID	LPSP-818
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment The higher minimum density of 70 dwellings per hectare within the Waterfront Density Zone (RES-DZ1) is supported as sound and justified. It will result in efficient use of land at Wirral Waters as required by national policy and is also reflective of the committed development approved at East Float and the live applications for Reserved Matters approval. It should be noted the proposals currently being considered at Vittoria Studios (for reserved matters approval) include a density of c.291 dwellings per hectare which is way in excess of this minimum standard.
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	

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

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

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

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

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

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

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

LPSP-819

Comment ID	LPSP-819
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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. The Wirral Waters approach is to create balanced communities that integrate with existing communities. The emerging Northbank neighbourhood area illustrates Peel L&P's and Homes England's approach to create 'homes for all' via a range of tenures and typologies. See comments to WS3.4.

as precise as possible.	<p>Peel L&P (Ports) Ltd endorse the Draft Policy subsection 'D' which identifies lower provision of affordable housing requirements in Zones 1 and 2 which are identified as having poor viability.</p> <p>Subsection 'E' also notes that the policy allows for additional flexibility in Zones 1 and 2 to allow for a greater proportion of affordable homes to be delivered in the later phases of a proposal. This approach recognises the inherent challenges associated with delivering transformation in these poor market areas, which is welcomed.</p> <p>The draft policy could usefully include text to clarify that the affordable housing requirements will be subject to viability, to be fully aligned to national policy.</p>
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

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

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

LPSP-820

Comment ID	LPSP-820
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to Attachment Subsection 'H' suggests new housing must be of an appropriate 'type, size and tenure' to meet the needs of the local community. There is no clear indication within this policy wording of how this will be assessed by the Local Planning Authority. Subsection 'I' states that within Regeneration Areas a reduced minimum threshold for larger units (three or more-bedroom units) of 30% will be applied.

as precise as possible.	Wirral Waters has, and will continue to, cater for a range of living types, including family housing and provision for older persons. It is a 'place for all' as the first new neighbourhood area at Northbank gives testament. Given the scale of the development, there will continue to be opportunities to include a diverse housing mix by way of the typology and tenure. However, it is important to recognise that it has always been a predominantly apartment-led development, as articulated through the East Float Outline Planning Permission and supporting information. The flexibility within Subsection 'J' is welcomed. It balances the identified needs of the evidence base with site specific constraints and regeneration priorities set out in the Local Plan.
omplies with the Duty to co-operate * Yes * No	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	Flexibility should be included within the policy subsection 'H' to allow for dwellings to be designed to be adaptable for specialist needs.

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

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

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

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

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

If you wish to participate in the

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

Comment ID	LPSD-821
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 4.2
Title	Designated Employment Areas
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 4.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment This policy links to the Primary Employment Areas shown on the Policies Map. Across Wirral Waters the area allocated for safeguarded employment land aligns with committed development. The policy needs to reflect changes to the Use Class Order, and the flexible range of uses that now sit within this, being specific that offices are now contained within Class E. It is noted the Draft Local Plan contains a definition of main employment uses at footnote 95 but explicit reference to office space in Policy WS 4.2 is deemed necessary whilst also acknowledging other employment generating uses may be deemed appropriate.
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Explicit reference within the policy to office space (Use Class E) and other main employment uses.

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

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

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

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

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

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

Comment ID	LPSD-822
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 4.4
Title	Tourism
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 4.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is	Please refer to Attachment. The Vision states: 'The leisure attractions, impressive historic buildings and world class parks make the 'LeftBank' a magnet for visitors.'

unsound. Please be as precise as possible.	As set out in the Planning Practice Guidance as part of Plan Making, the vision provides the Framework. There is support for subsection 'K' that actively supports tourism development in specific areas. Tourism development will be 'encouraged' in these locations. However, given the strength of ambition within the vision for tourism development across the Left Bank we suggest reference to the Left Bank is explicitly referenced within this subsection.
omplies with the Duty to co-operate * Yes * No	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	Explicit reference to the LeftBank as an area for tourism to be encouraged in line with the Local Plan vision.

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

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

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

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

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

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

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

Comment ID	LPSD-823
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 5.1
Title	Green and Blue Infrastructure Networks
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please see attachment The policy wording states that the loss of green or blue infrastructure is unacceptable and would only be considered in 'exceptional circumstances' and where provision is made for appropriate compensatory measures. Neither the blue and green infrastructure nor what constitutes 'exceptional circumstances' are defined.

as precise as possible.	The policy should recognise that in some cases impact can be mitigated and development acceptable due to wider benefits. The need to demonstrate exceptional circumstances is neither justified or consistent with national policy, the wording should be amended accordingly for this policy to be sound
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Subsection 'A1' should be clear what is defined as green infrastructure – it is assumed that this relates to assets identified in Figure 3.6 but this is not specified and the figure is pixelated. A high-quality image would be needed or and/or an interactive layer so such infrastructure is easily identifiable.</p> <p>It is suggested the wording of the policy at A1 is amended as follows to be sound:</p> <p><i>'Protecting existing green and blue infrastructure and ecological assets and networks. The loss of green and blue infrastructure should be avoided and only be considered where the loss can be justified, and provision is made for appropriate compensatory measures, mitigation or replacement in line with the relevant legislation.'</i></p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-824
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 5.2
Title	Open Space Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer attachment Subsection 'E' works in flexibility to the policy by recognising on site open space may not be possible, particularly within densely populated or high-rise development sites. This is addressed within Subsection J, which notes that strategic open space provision may be more appropriate but also recognises the different forms of open space that could be provided to adequately meet the objective of the policy and identified need created by the development. The policy should explicitly include reference to viability
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Explicit reference to viability should be added to the policy, recognising that meeting the standards on site or by off-site contributions may not be feasible in all cases.

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

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

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

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

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

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

Comment ID	LPSD-825
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 5.3
Title	Outdoor Sports Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment. The policy works in flexibility by recognising on site open space may not be possible, particularly within densely populated or high-rise development sites. The policy should explicitly include reference to viability.
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Explicit reference to viability should be added to the policy, recognising that meeting the standards on site or by off-site contributions may not be feasible in all cases.

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

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

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

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

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

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

Comment ID	LPSD-826
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 5.5
Title	Mitigating Recreational Disturbance on International Sites for Nature Conservation
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.5
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. Any application requirement must be proportionate to the scale or type of development. There is insufficient clarity provided within this draft policy as to when it is 'appropriate' to request contributions towards the mitigation measures within the LCR Recreational Disturbance Avoidance and Mitigation Strategy – which has not yet been completed (the policy notes that this will be completed during the early part of the plan period, which is too vague to provide any certainty).

as precise as possible.	<p>The accompanying SPD should be appropriately consulted upon, and it is not clear whether it will be kept updated.</p> <p>Ecological mitigation will not be considered in relation to viability, so there could potentially be implications on other commuted sums if the SPD is not adequately considered, evidenced and justified. Any contributions towards measures such as Recreational Diffuse should be linked to the specific development in question.</p>
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	<p>The policy should provide clarity on as to when it is 'appropriate' to request contributions towards the mitigation measures within the LCR Recreational Disturbance Avoidance and Mitigation Strategy, once it has been published.</p>

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

It should also allow flexibility for mitigation to be offered by the applicant outside of the LCR Strategy particularly given that there is likely to be a period where the LCR Strategy is not completed, and the Policy is in place.

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

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

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

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

Comment ID	LPSD-827
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 5.7
Title	Maintenance of Green Infrastructure and Open Space Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.7
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please see attachment. It is considered that this draft policy is not essential. Any open space to be provided would normally be subject to a condition requiring the provision of a management plan or an associated S.106 would include provision for management of such space. This could be dealt with via an appropriate planning condition, rather than forming a draft policy.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	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	Removal of Policy

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

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

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

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

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

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

Comment ID	LPSD-828
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 5.9
Title	Evidence of approach
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.9
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	please see attached. It is questioned whether this draft policy is essential and proportionate. This could be a validation requirement, rather than a policy. If considered essential, the requirement should also make allowance for applicants to set out justification where benefits are not provided. This recognises each site is to be considered on a site-by-site basis and on balance.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	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	Removal of policy – this could be a validation requirement should the Council deem it necessary.

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

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

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

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

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

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

Comment ID	LPSP-829
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 6.3
Title	Masterplan Areas
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 6.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please see attachment This draft policy is supported. It is positively prepared, it clearly relates to discreet areas, and has sufficient flexibility to enable Masterplans to be updated where appropriate.
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	

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

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

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

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

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

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

Comment ID	LPSD-830
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 7.3
Title	Agent of Change
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please see attachment. Peel L&P has no objection to this policy in principle; however we consider it is important for the policy to make clear that proposals should also consider committed development, including outline planning permissions. The East Float Outline Permission is fundamental to the vision of the Local Plan. Outline Planning Permission for the East Float needs to be adequately considered when development comes forward in the surrounding areas and it is appropriate for this policy to reflect this position.
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	For the policy or at least the supporting text to make clear that proposals should consider committed development including outline planning permissions. The East Float Planning Permission is fundamental to the vision of the Local Plan. The East Float Outline Planning Permission needs to be adequately considered when development comes forward in the surrounding areas and it is appropriate for this policy to reflect this position.

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

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

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

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

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

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

Comment ID	LPSP-831
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 7.5
Title	Tall Buildings
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.5
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please refer attachment Subsection F/1 requires design of tall buildings to be exceptional and of the highest quality. It is not clear how the Council would assess what constitutes exceptional design. It is questioned whether this is appropriate. Paragraph 130 of the National Planning Policy Frameworks provides several criteria (1 – f) to ensure development meets high standards of design. The requirements for 'exceptional' design go beyond national policy requirements. Moreover, the Council's evidence base does not enlighten on why tall buildings would be subject to such a design test. We consider the policy is not justified or positively prepared and it is suggested the reference to exceptional and highest quality design is removed.

as precise as possible.	The draft policy or supporting text need to provide a definition of a 'tall building'. At 3.164 it specifies in areas of largely 2-3 storeys an 8-10 storey building would be a tall building. It goes on to say buildings over 15 storeys would be super-tall. Greater clarity is needed, and a blanket definition of mid-rise, tall and super-tall buildings would be helpful, potentially in a tabulated form. Subsection 'H' should be reworded to require 'shadow/light assessment' rather than 'issues'.
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Removal of 'design must be exceptional and of the highest quality' and replace with: 'Design must be high quality, grounded in context.' Definition of 'tall building' needs to be clarified. Reword to replace 'Issues' with the word 'assessment' within subsection 'H' in relation to shadow/light.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-832
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 8.2
Title	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. Peel L&P are leading in sustainable transformation at Wirral Waters. Delivery of Sustainability initiatives are via the Wirral Waters Sustainability Action Plan'. Low and zero carbon construction is accepted as necessary within the emerging policy context. There does, however, need to be recognition that this is an ambitious policy in terms of viability and feasibility.

as precise as possible.	Whilst reference to flexibility and viability is included within the policy wording, which is welcomed, it is important to emphasise this to ensure new development is not stifled or unreasonably stalled as technologies develop.
omplies with the Duty to co-operate * Yes * No	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	Greater recognition is required within the policy wording that this is an ambitious policy, and viability is an important consideration in exercising the policy.

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

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

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

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

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

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

Comment ID	LPSD-833
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 8.5
Title	Carbon Compensation through Renewable and Low Carbon Energy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.5
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment. This policy is supported as it recognises that net zero carbon may not be possible on all sites. Its inclusion in the Local Plan will ensure quality development can progress in the Borough whilst the ultimate carbon target in the plan period is not undermined.
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	

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

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

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

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

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

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

Comment ID	LPSD-834
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 9.1
Title	Transport Schemes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 9.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment At subsection B, the safeguarding of land for public transport, walking and cycling will assist the Council's wider net zero carbon ambition. Subsection C of the policy states that 'a Mass Transit system will be developed' (route to be determined).

<p>as precise as possible.</p>	<p>Peel L&P consider the policy to be vague, with no information on options assessed or delivery timescale/ targets for the mass transit system provided. To help clarify expectations, further commitment to the Mass Transit system is needed. As part of this, a timeframe could usefully be included. We note an approximate route is indicated on the proposals map. Any phasing of the delivery of the potential mass transit system should be shared. This could be usefully included in the Infrastructure Delivery Plan. At present costs are still 'unknown' without bids submitted.</p> <p>A funding bid for Phase A of the mass transit system has been submitted, the timeline should be set out and more prescriptive to provide developers with additional certainty around transport infrastructure delivery and timing.</p> <p>The delivery of the mass transit system is crucial in supporting ambitions of the highly sustainable neighbourhoods planned for Wirral Waters. The Local Plan will play a vital role in securing this, demonstrating a commitment to the delivery of the system, which will 'unlock' the regeneration sites.</p> <p>The draft wording will last the lifetime of the plan, which runs until 2037. Further clarity or indication of delivery and expectations over this timeframe would assist in meeting the objectives of this strategy which is so crucial to the success and delivery of Wirral Waters.</p> <p>The importance of the Mass Transit System was addressed within the previous representations submitted on behalf of Peel L&P (Ports) Ltd to the Issues and Options consultation. The following remains relevant and we re-emphasise: "Without positive steps being taken in delivery support – especially transport - the ability of Wirral Waters to maximise its potential over the plan period – will be undermined and, ultimately poses a risk to the ability of Wirral Council to develop a sound Local Plan. The importance of the above measures in realising the development potential of Wirral Waters cannot be overstated. They represent the key foundations on which the project will be built"</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>No</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal</p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Inclusion of specific timescales, together with any anticipated phasing, should be included within the Local Plan. Efforts to secure funding should be prioritised given the pace at which development is progressing at Wirral Waters with a number of major applications ending determination.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-835
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 9.3
Title	Servicing Development
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 9.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. The current draft policy is not specific with regard to the level of provision required in 'major non-domestic proposals'. It mentions showers, bike cages and lockers, but does not specify a quantity. This would most usefully be addressed with amended wording to allow for appropriate provision to the scale of the development, and only when deemed appropriate.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	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	Suggested amendment: "4. in major nondomestic proposals, a suitable level of provision should be provided for cyclists to include showers, bike cages and lockers enclosed within a building where appropriate and unless it can be demonstrated that this would be inappropriate."

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

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

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

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

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

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

Comment ID	LPSD-836
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 10.1
Title	Provision of Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. This policy needs to include recognition that the infrastructure required is in part for the developer to contribute, but also in part the responsibility of the Council to deliver/secure appropriate funding streams.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	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	Suggested amendment: Subsection 'C' "Developers will be expected to provide on-site provision where essential to the acceptable delivery of the development, or where appropriate a financial contribution towards either offsite provision or the enhancement of existing off-site facilities to mitigate the impact of development. This will be determined on a site- by- site basis. The Council will seek to secure appropriate funding streams to support strategic infrastructure requirements within Regeneration Areas".

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

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

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

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

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

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

Comment ID	LPSD-837
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 10.2
Title	District Heat Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.2 District Heat Networks
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please see attachment. The draft policy could usefully acknowledge that there may be other appropriate locations for district heat networks which would be supported by the Council. The safeguarding of land is welcomed to secure the future delivery of the necessary infrastructure.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	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	Modification to include other potential appropriate locations for district heat networks.

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

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

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

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

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

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

Comment ID	LPSP-838
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 10.4
Title	Facilities for Education, Health and Emergency Services
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment The purpose of including references to financial contributions within a policy is to create certainty and transparency for developers as to the type and amount of contribution likely to be required.

<p>as precise as possible.</p>	<p>Appendix 10 includes a formula to calculate anticipated financial contributions. Within 'Education', it is noted that the 'the average construction cost per pupil' is included as part of the formula, but this is not clarified or detailed. It is questioned whether this is sufficiently detailed to provide the certainty sought. It is suggested the Council provide an up-to-date figure which is caveated to allow update within an SPD or guidance document so there is transparency for applicants and developers.</p> <p>The policy as drafted does not account for viability. Any reference to financial contributions needs to include wording to ensure viability is fairly considered. This is particularly important in regeneration areas where costs of remediation, infrastructure delivery and other contributions can be disproportionately high.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>No</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Any reference to financial contributions needs to include wording to ensure viability is fairly considered. This is particularly important in regeneration areas where costs of remediation, infrastructure delivery and other contributions can be very high.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-839
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. The purpose of including references to financial contributions within a policy is to create certainty and transparency for developers as to the type and amount of contribution likely to be required.

<p>as precise as possible.</p>	<p>Appendix 10 includes a formula to calculate the financial contributions. Within 'Open Space', it is noted that the 'cost of provision' is included as part of the formula, but this is not clarified or detailed. It is questioned whether this is sufficiently detailed to provide the certainty sought. It is suggested the Council provide an up-to-date figure which is caveated to allow update within an SPD or guidance document so there is transparency for applicants and developers.</p> <p>The policy as drafted does not account for viability. Any reference to financial contributions needs to include wording to ensure viability is fairly considered. This is particularly important in regeneration areas where costs of remediation, infrastructure delivery and other contributions can be disproportionately high.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>No</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Any reference to financial contributions need to include wording to ensure viability is fairly considered. This is particularly important in regeneration areas where costs of remediation, infrastructure delivery and other contributions can be very high.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSP-840

Comment ID	LPSP-840
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 11.3
Title	Town and Local Centre Impact Assessments
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 11.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Appears to conflict with the Local Plan vision and ambitions that includes new leisure and tourism uses within identified Regeneration Areas, which are outside of established centres. A potential amendment could include reference to defined Regeneration Areas within the policy, which could overcome this potential conflict.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	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	Proposed amendment: <i>"G. Development proposals for main town centre uses that are edge of centre or outside a Town, District or Local Centre shown on the Policies Map, and not within a defined Regeneration Area will only be permitted where it can be demonstrated that:</i> <i>1. no alternative, suitable sites are available, first within, and then at the edge of a Town, District or Local Centre shown on the Policies Map in line with the sequential test; and</i>

<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><i>2. the site is easily accessible by a choice of means of transport and is, or will be, well connected to a Town, District or Local Centre shown on the Policies Map. 3. they do not undermine the vitality and viability of existing centres "</i></p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	

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

LPSP-841

Comment ID	LPSP-841
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 11.4
Title	Meanwhile Use
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 11.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment. The flexibility provided by policy WS11.4, to allow 'meanwhile uses' and 'pop up' shops within buildings, where they are complementary to the surrounding uses and do not compromise the longer-term development of a site, is welcomed and demonstrates consistency with National Policy to ensure the most efficient use of land and buildings. Peel L&P would ask for consideration to be given to extend support for meanwhile uses on vacant land within regeneration areas where a permission has been granted, to assist in changing perceptions and creation of vibrancy within emerging communities pending delivery of later phases of permitted development, where this is demonstrated to be appropriate.
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Peel L&P would ask for consideration to be given to extend support for meanwhile uses on vacant land within regeneration areas where a permission has been granted, to assist in changing perceptions and creation of vibrancy within emerging communities pending delivery of later phases of permitted development, where this is demonstrated to be appropriate.

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

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

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

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

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

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

Comment ID	LPSD-842
Person ID	1324620
Include files	LPSD-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSD-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Appendix 6
Title	Employment Trajectory
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 2 Scotts Quay Regeneration Area MPA -RA2.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>The inclusion of Scott's Quay as a Regeneration Area which will become a sustainable residential led mixed use area is welcomed. Peel L&P is cognisant of port related uses in the Scott's Quay area and will manage the juxtaposition between residential and port related uses as it develops the masterplan for this area.</p> <p>Scott's Quay is included within Table A6.1 at Appendix 6 Employment Trajectory - the table is empty to show no employment contribution within Scott's Quay. There appears to be no purpose for its inclusion within the table.</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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Removal of Scott's Quay from Table A6.1 at Appendix 6.

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

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

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

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

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

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

LPSP-843

Comment ID	LPSP-843
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy RA 6
Title	Wirral Waters Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 6
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>please refer to attachment for more detail.</p> <p>The recognition of Wirral Waters, as a strategic regeneration area where the Council will support the development of the area for a major, residential-led mixed use, urban regeneration project is welcomed by Peel L&P and is considered to be sound with public/private partnership working, already well established.</p> <p>The quantum of development proposed, aligns with the level Peel L&P considers is achievable and deliverable on sites under its control (RA 6.2 – RA 6.6), subject to the Council's timely delivery of infrastructure to ensure 'last mile' connectivity and other active infrastructure, over the plan period. As well as infrastructure delivery, delivery of Vittoria Studios is predicated on Port decant which itself is dictated by public sector grant support.</p> <p>Significant progress in delivery has already been made at Wirral Waters, subsequent to the Regulation 18 consultation. Delivery has begun at pace and further key milestones have been reached including:</p> <ul style="list-style-type: none"> • The delivery of family housing to the immediate east and west of the East Float Warehouses. The East Float Phase 1 development (reference APP/19/01061) is under construction on site and now nearing completion with Phase 2, submitted for planning approval in April 2022. • The Wirral Waters One Project (formerly known as Legacy Project) has been granted reserved matters approval for 500 residential units (reference DLS/18/00715) pursuant to the East Float Outline Planning Permission and has begun on site following a £130 million investment from Pension Insurance Corporation. • Public realm works, remediation of contaminated land parcels and the creation of Northbank green public space (APP/19/00202) have now been completed. • The new and extended footway and cycleway and associated soft landscaping along Dock Road (APP/18/01487) has now been completed. • The Belong Care Village providing supported later living for people with dementia and their families, located to the east of the East Float Phase 1 site (reference APP/18/00470) is due to start on site this year. • hythe (reference APP/18/00409), the first Grade A office building to be developed speculatively on the Wirral for over a decade, was completed on site in 2021 surrounded by a brand-new streetscape on Tower Road, that has been designed for active travel, with health and wellbeing as a top priority. • Egerton Village (reference 18/00647) has been approved and will provide a new creative, and local amenities hub, creating a focal point for small business activity on Four Bridges. Applications are currently being prepared to formally discharge pre-commencement conditions and the development is due to commence on site later this year

	<ul style="list-style-type: none"> • Maritime Knowledge Hub (reference 22/00937) has been submitted for planning approval. The application will convert and extend the Grade II Hydraulic Generating Station on Four Brides to provide a £23m industry-led, education, research and development, skills and innovation commercial centre of excellence for the maritime and marine industries. • Applications for Approval of Reserved Matters for Vittoria Studios East (reference DLS/18/00717) and Vittoria Studios West (reference DLS/22/00939) pursuant to the East Float Outline Planning Permission were submitted in May 2022. Together, the two applications seek reserved matters approval for 1,851 new dwellings, commercial floorspace and nature led landscaped parkland. • A planning application (reference 22/00737) for the next phase of development at MEA Park on West Float was submitted in April 2022. • Plans for the 'Greenway', a dedicated walkway and cycleway public realm improvement has been approved (reference APP/20/01298). <p>The time-frame for Wirral Waters to be fully developed out, extends beyond the proposed Wirral Local Plan planperiod and given the long-term nature of this nationally important regeneration project, the exact detail and sequencing of future phases must remain flexible to enable this to be responsive to market conditions.</p> <p>Substantial progress has been made in securing funding, establishing commercial agreements with partners and bringing forward the first major new developments (as summarised above). The next 15 years are expected to see this momentum accelerate, to ensure a critical mass of residential and commercial (with complementary) uses are established.</p> <p>Delivery will continue to be underpinned by the Wirral Waters Guiding Principles. The Masterplan for Wirral Waters remains a live document, which continues to guide place-making, ensuring the project integrates with other developments and regeneration initiatives. It has provided the plan for the next 15 years, which has in turn enabled the required conversations with the Council and other public sector bodies with a responsibility for infrastructure planning and delivery to be informed.</p> <p>It has also shaped discussions around funding (including public sector funding) and ensures that appropriate investment and funding, including any required to overcome barriers to delivery, can be secured. Homes England are integral to this, and are closely involved in discussions on the future of Wirral Waters, and the potential support required to accelerate delivery.</p> <p>Peel L&P notes that the proposed approach of residential and employment designations does not reflect the approach of the East Float Outline Planning Permission (EFOP) to deliver mixed-use neighbourhoods and risks limiting the flexibility that the EFOP allows in terms of specific uses within each Quarter. Peel L&P would welcome clarity on the additional uses supported by the East Float Outline Permission within subsection C.</p> <p>It is important to note that the remediation of post-industrial sites requires significant investment frontloaded within the process, and this policy should recognise that viability is an important consideration in ensuring an expedient delivery of the targets expressed.</p> <p>At paragraph 4.120 the Submission Draft Wirral Local Plan is clear that although the Bidston Dock site is not allocated for a specific use in the Local Plan, any development proposals which come forward should complement the regeneration of Birkenhead, Wirral Waters, and promote the economic wellbeing of the Borough. It follows that Policy MPA-RA6.3 should reflect this position and specify a greater range of uses at E1.</p>
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</p> <ul style="list-style-type: none"> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy 	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>omplies with the Duty to co-operate</p> <ul style="list-style-type: none"> * Yes * No 	Yes

<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please</p>	<p>The policy could incorporate greater certainty in relation to the infrastructure needed to support Wirral Waters, linked to comments made to draft Policy WS 9.1 (relating to the mass transport system). Greater certainty is crucial to underpinning this element of the plan as 'sound'. T</p> <p>The policy could also include a specific acknowledgement that viability could be a major potential issue at Wirral Waters, particularly where post-industrial land needs to be remediated to deliver the high quality residential led mixed use development that is proposed.</p> <p>Policy MPA-RA6.3 should specify a greater range of uses at E1 to include employment and residential uses.</p>

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

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

* Yes
* No

Comment ID	LPSP-844
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy RA 7
Title	Hamilton Park Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 7
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment. Peel L&P welcome this draft policy for Hamilton Park as a “new family-oriented neighbourhood” and consider it to be compatible and complementary with Wirral Waters.
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	

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

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

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

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

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

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

LPSP-845

Comment ID	LPSP-845
Person ID	1324620
Include files	LPSP-811 to 845-EM-Hinchliffe Attach 2 of 2 2507_Redacted.pdf LPSP-811 to 845-EM-Hinchliffe Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Peel L&P (Ports) Ltd
Position	
Company / Organisation	Peel L&P (Ports) Ltd
Agent ID	1323938
Agent Name	Ms Becki Hinchliffe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WD 4.2
Title	Flood Risk
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 4.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. The policy meets national requirements set out in the Framework in terms of locating vulnerable development in areas of least risk of flooding. Due to the nature of the Borough, the aspirations to regenerate brownfield sites to protect Green Belt locations, this policy will need to provide flexibility, with exceptions recognised where appropriate.

as precise as possible.	The importance and value of dockland development across the Borough including Wirral Waters, must be recognised.
omplies with the Duty to co-operate * Yes * No	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	It would be beneficial if the policy WD 4.2 included flexibility where appropriate. Suggested wording as follows: <i>"If vulnerable uses are permitted in high-risk zones, adequate mitigation will be set out during the application process. Mitigation will be assessed on a case-by-case basis from a planning flood risk and vulnerability classification."</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)

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

Comment ID	LPSD-846
Person ID	1324658
Include files	LPSD-536,810,846-849,1397-1399-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Jessica Bond
Position	
Company / Organisation	Barrat David Wilson
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
Number	
Title	The Strategic Objectives of the Local Plan
To which part of the Local Plan does this representation relate?	Paragraph(s)
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	3.6
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 We are extremely concerned that the focus of regeneration and growth in a narrowly defined geographical area will not provide the housing choice, which is aspired by Strategic Objective 7,

<p>as precise as possible.</p>	<p>and which is required to promote a sustainable pattern of development, as required by paragraph 11 of the NPPF. To ensure consistency with national planning policy, the emerging Local Plan should focus on the growth and development of the entire Borough and not focus on a small geographical area.</p> <p>Under the heading 'A special and healthy place to live', Strategic Objective 7 explains that the Local Plan will: 'enable the provision of sufficient housing to meet identified local housing needs and a choice of housing, including social and affordable housing, for people at all stages of life and incomes.'</p> <p>Whilst we fully support this Strategic Objective, especially as it is in accordance with the thrust of national planning policy, we are concerned that the emerging Wirral Local Plan fails to provide adequate mechanisms to enable such an objective to be achieved in practice.</p> <p>The Council has previously acknowledged that it may not be possible to meet its development needs in full by pursuing a brownfield-led, urban-only approach. Indeed, the Local Plan Issues and Options document which was published for consultation by the Council in Spring 2020 acknowledged that it is unlikely to be able to meet its development requirements in full by pursuing an urban intensification approach. We are unconvinced that the Council now has justifiable evidence for this apparent 'U-turn'. We are extremely concerned that reliance on a brownfield regeneration strategy has not been robustly assessed from a deliverability and viability perspective and so there is a strong risk that the emerging Local Plan will not meet the area's challenging development needs in full. As such, there is a clear risk that the Local Plan it does not represent a justified or effective approach to spatial plan making, in accordance with the NPPF.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>No</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation,</p>	

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your</p>	<p>To maximise choice, we strongly recommend that the Council allocates sites for residential development in an equitable manner across all of the Borough's Settlement Area's including in and around Settlement Area 7, which adjoins the Chester Road site. We consider that growth in and adjacent to key settlements in sustainable locations should be prioritised, even if such an approach would result in the development of land which is currently designated as Green Belt, if such sites do not fulfil the Green Belt purposes, as defined within the NPPF.</p>

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

Comment ID	LPSD-847
Person ID	1324658
Include files	LPSD-536,810,846-849,1397-1399-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Jessica Bond
Position	
Company / Organisation	Barrat David Wilson
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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.	no information provided.
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 Part B of Policy WS 1.1 states that the Local Plan will provide for a minimum of 13,360 net additional dwellings between 2021 and 2037, which is equivalent to 835 dwellings per annum

as precise as possible.

('dpa'). This housing requirement is based on the 779 dpa requirement derived from the standard method for calculating Local Housing Need ('LHN'), alongside an uplift of 6 dpa to support economic growth, and an allowance of 50 dpa to account for demolitions. Paragraph 61 of the NPPF, published in July 2021, states that to determine the minimum number of homes needed in an area, strategic policies should be informed by a LHN assessment, conducted using the standard method as set out in the Planning Practice Guidance ('PPG'), unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

It is important to ensure that the emerging Local Plan allows for sufficient homes of the right types and in the right places to be developed, to ensure that economic growth aspirations can be fully realised. We are of the firm view that the Council should be using the emerging Local Plan as a mechanism to stimulate the Borough's economic renaissance by boosting home ownership, rather than constrain it, as it currently does.

In order for the emerging Local Plan to be found sound, the Council should increase the proposed housing requirement to ensure that market and affordable housing needs can be met in full, in a way that is cognisant of local circumstances. To this effect, we are concerned that the proposed demolition allowance uplift of 50 dpa is significantly less than the average of 104 demolitions per annum between 2011 and 2021, as set out within the SHLAA 2021. It is clear that the Council's current approach is unjustified, and the currently proposed annual housing requirement should be uplifted by a minimum of 54 dpa to align with recent demolition data trends.

Taking account of the requirement described above, to account for economic growth aspirations and demolitions in full, detailed analysis undertaken by 'The Consortium', of which BDW is part of, demonstrates that the Borough's housing requirement should be around 380 dpa higher than the current 835 dpa which is proposed by the Council, thereby equating to an annual housing requirement in excess of 1,200 dpa.

We are concerned that the Council has understated its full housing needs with the emerging Local Plan for political reasons; this does not represent a sound approach to spatial planning. As set under our response to 'Strategic Objectives', we are extremely concerned that the focus of regeneration and growth in a narrowly defined geographical area will fail to provide sufficient housing choice, and will fail to promote a sustainable pattern of development, as required by the NPPF.

The shoe-horning of new residential development onto brownfield sites in the east of Borough risks failing to meeting the full housing needs of those across the Borough as a whole and is not an effective approach to spatial plan making.

To ensure that the plan can be found sound, we strongly recommend that the Council should allocate housing sites in an equitable matter across all of the Borough's Settlement Areas, including in and around Settlement Area 7 which adjoins BDW's site in Heswall. Sustainable sites, which are well located to existing urban areas and which would not result in

the encroachment of settlements – such as our client's land site at Chester Road – should be released from the Green Belt in order to ensure that the Borough's challenging future development needs can be met in full.

It is clear from detailed analysis undertaken by 'The Consortium' that the Council is heavily reliant on the delivery of brownfield and high-density residential schemes in Regeneration Areas to come forward to address a significant proportion of its housing requirement over the plan period. Many of these sites, in and around Birkenhead, have lain abandoned for many years, often due to viability and site contamination issues. We therefore have serious reservations about their deliverability. We are concerned that the Council is relying on this source of supply to meet its dwelling requirements, whereas a balanced portfolio of previously developed and greenfield sites is clearly required to ensure flexibility and choice in the supply of housing across the Borough. This will ensure that housing delivery is maintained throughout the whole plan period, given that many previously developed sites are constrained and can take longer to come forward due to the need for remediation and other related viability issues.

It is clear that the standard method is the 'starting point' for the calculation of the housing requirement, and whilst the Council has included a small tokenistic uplift within its proposed housing requirements to support economic growth – of just 6 dpa across the entire borough – we consider that the uplift should be significantly above that which is currently proposed. Importantly, the housing requirement within the emerging Local Plan should ensure alignment with the economic aspirations of the wider Liverpool City Region ('LCR') and other sub-regional growth strategies.

We note that the Baseline Scenario contained within the LCR Strategic Housing and Employment Land Market Assessment identifies that up to 6,600 additional FTE jobs could be created in Wirral by 2037, with up to 11,500 FTE jobs created under a Growth Scenario, based on the improved performance of local growth sectors and identified development projects. It is clear that a disconnect exists between the minimum housing needs figure that the Council is currently pursuing and meeting the sub-region's economic growth ambitions.

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

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

no information provided.

to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability</p>	<p>increase the housing requirement to in excess of 1200 dpa. address allowances in supply.</p> <p>To avoid over-reliance of dubious sources of supply, we recommend that the Council should identify additional housing sites for allocation within the emerging Local Plan.</p> <p>It is clear that some development will be required outside of urban areas and in the presently defined Green Belt – which we note was defined some four decades ago – in order for Wirral's development needs to be met in full. The proposed development at BDW's site will make a meaningful contribution to the supply of housing in Wirral by providing high-quality family homes in a range of styles and sizes, including much-needed affordable properties for local people, thereby helping to meet identified housing needs in the short term.</p> <p>To ensure flexibility, we strongly recommend that the Chester Road site should be allocated for development within the emerging Local Plan. Alternatively, albeit not our preferred preference, the Council could safeguard the land, to be released for development should it become apparent that the Council's supply is not materialising as envisaged. Such an approach would</p>

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

*	Yes
*	No

Comment ID	LPSD-848
Person ID	1324658
Include files	LPSD-536,810,846-849,1397-1399-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Jessica Bond
Position	
Company / Organisation	Barrat David Wilson
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 WS 3.3 sets the requirements for affordable housing provision in different 'viability zones', ranging from 10 per cent in Viability Zones 1 and 2 to 20 per cent in Viability Zones 3 and 4, for new build market housing schemes of 10 or more dwellings.

as precise as possible.	<p>Paragraph 5.37 of the Council's CIL and Viability Assessment, dated June 2022, acknowledges that the development viability of brownfield sites in lower value market areas is, which is proposed to deliver affordable housing, is 'unquestionably challenging at the present time'. As such, we are deeply concerned that the Council is focussing its regeneration efforts in areas which are not viable and therefore the Borough will not be able to deliver the much-needed affordable housing that it needs.</p> <p>Furthermore, we are concerned that Policy WS 3.3 fails to make provision for the full scale of the Borough's affordable housing needs. Whilst the Council's Strategic Housing Market Assessment ('SHMA'), dated October 2021, identifies an affordable housing need for 374 dpa, the Council's previous SHMA 2019 – which was prepared by the same consultant – identified an affordable housing requirement of 705 dpa; this represents a significant reduction of some 331 dpa. Such a significant reduction of the housing requirement (amounting to almost a halving), due to methodological changes used to determine affordable housing need, is highly questionable.</p> <p>Analysis undertaken by 'The Consortium' demonstrates that, based on addressing the backlog in full over the first five years of the plan period and making some other adjustments to ensure that the methodology is realistic, the affordable housing need for the Borough equates to 1,430 dpa.</p> <p>Ultimately, we are concerned that the quantum of affordable housing need required in Wirral cannot be addressed by the Council's urban intensification and brownfield-led regeneration approach.</p> <p>Indeed, the Council's own evidence base acknowledges that: 'it will be challenging to seek the desired levels of affordable housing provision by the private sector within a number of Regeneration Areas, particularly early in the Plan period, above the national requirement for major development to provide at least 10% of the total number of homes to be available for affordable home ownership.' [Housing Delivery Strategy, Version 2, May 2022, Paragraph 6.2]. Taking account of the above, the level of affordable housing need alone in Wirral represents exceptional circumstances to justify changes to the Green Belt boundaries to allocate sites capable of viably delivering sufficient affordable housing. Our client's site at Chester Road can provide a proportion of affordable housing and offer a suitable mix of housing size, type and tenure to meet needs arising in and around Settlement Area 7, and therefore the release of the site will enable a meaning quantum of the Borough's pent-up affordable needs to be accommodated.</p> <p>the level of affordable housing need alone in Wirral represents exceptional circumstances to justify changes to the Green Belt boundaries to allocate sites capable of viably delivering sufficient affordable housing</p>
omplies with the Duty to co-operate * Yes * No	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,	

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your</p>	<p>Allocate land at Chester Road for development, release Green Belt land in the Local Plan and increase the housing requirement to provide affordable housing.</p>

<p>suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>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>	

Comment ID	LPSD-849
Person ID	1324658
Include files	LPSD-536,810,846-849,1397-1399-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Jessica Bond
Position	
Company / Organisation	Barrat David Wilson
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
Number	Policy WP 7
Title	Policy for Irby, Thingwall, Pensby, Heswall and Gayton
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 7.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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	For the reasons that we have set out above, we have serious concerns in respect of the credibility of the Council's proposed brownfield regeneration strategy as set out within the Submission Draft version of its emerging Local Plan. We are very concerned that the Council's proposed strategy of urban intensification, which involves shoe-horning housing in a narrow area of the Borough, does

<p>as precise as possible.</p>	<p>not align with the overall thrust of the NPPF which promotes sustainable patterns of development.</p> <p>we have serious concerns in respect of the credibility of the Council's proposed brownfield regeneration strategy as set out within the Submission Draft version of its emerging Local Plan. We are very concerned that the Council's proposed strategy of urban intensification, which involves shoe-horning housing in a narrow area of the Borough, does not align with the overall thrust of the NPPF which promotes sustainable patterns of development.</p> <p>Having considered the Council's latest evidence, we are of the view that the Council is unlikely to be able to meet its development requirement in full by pursuing an urban intensification approach. Indeed, this was the same conclusion reached by the Council at the time of the publication of its Issues and Options document in Spring 2020; we have serious doubts regarding the robustness of any updated evidence prepared by the Council which now makes arguments to the contrary. As such, we remain of the view that there is a compelling need for the Council to release Green Belt land for development via the emerging Local Plan.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>No</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To address the clear shortfall in meeting housing needs, we strongly recommend that the Council should identify additional land for residential allocation. As we have explained, our client's site at Chester Road – which represents a deliverable opportunity in a sustainable location, as previously acknowledged by the Council – will deliver a range of important benefits without harming the purposes of the Green Belt. The development of our client's site would constitute a logical rounding off of the settlement form, without causing harm to the landscape character of the adjoining land or encroaching on the wider countryside.</p> <p>As such, we recommend that Policy WP 7.3 be amended to include specific reference to the allocation of the Chester Road site, which will contribute towards ensuring that the Borough's housing needs can be met in full.</p> <p>Should the Council be unwilling to allocate the site for immediate development, to ensure flexibility should the Council's strategy not come forward in the way that it expects, the Chester Road site could be released from the Green Belt and safeguarded for future housing development. We emphasise that this is very much a secondary option to allocating the site now.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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