

Comment ID	LPSD-852
Person ID	1246348
Include files	LPSD-852-PDF-LE-Carbery_Redacted.pdf
Consultee Name	Mrs Elizabeth Carbery
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	WS 1
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
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. As far as the housing figure is concerned many figures have been bandied around - 12,000, 13,360, 16,000 and 21,000 this latter figure includes the regeneration of Birkenhead - pick a figure. In fact In October 2018 WBC did ask the government if they should be using more up to date figures to ascertain housing numbers but this would have considerably reduced the housing figure to 477 instead of around 803 per year for 15 years. The plan has got to be supported by evidence but this is not the case as the council have had to act on government Instructions and the council have not done their own research into this. The council's QC said they must stick to the 2014 base, otherwise the local plan might be brought into question. This same QC who works on behalf of WBC also works for the government - a definite conflict of interests.

	<p>The population figures for Wirral as per the ONS statistics is 2011 - 319,800 and for 2022 - 320,200, an increase of 0.1%. The council's own compendium of statistics which they have apparently ignored is not much higher than this . In addition the 18-64 age group is decreasing and the 65+ are increasing but this latter group already live in or own their own houses. Further, there are many empty houses 111 wirral, over 4,000.</p> <p>The government have now changed their stance on using the 2018 figures which makes sense and why produce later figures if no-one is going to act on them but the council is now intent on using the 2014 figures. These figures are flawed and through that error we may lose some of our green belt with the ensuing losses.</p> <p>In short the local plan is based on false figures as the council are sticking with the 2014 figures and not the 2018 figures as now decreed by the government nor have they shown any exceptional circumstances - not least that Wirral is a narrow peninsula.</p> <p>It Is not known if there is money for the Infrastructure to service all these houses as WBC has had to call in the government for a loan</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations	

<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>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>No, I do not wish to participate in hearing session(s)</p>

hearing session(s)	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>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-853

Comment ID	LPSP-853
Person ID	1270024
Include files	LPSP 853, 854 & 1400- EM - Dodd
Consultee Name	Susie Dodd
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 2
Title	Heritage Assets
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	New Ferry Regeneration Victorian building stock of architectural merit must be listed and registered accordingly and be re-used appropriately, particularly building stock along Bebington Road and the New Chester Road. The Toll Bar has historic meaning to the town and should be respected as historic fabric. The look and feel of New Ferry must reflect its close neighbour, Port Sunlight Village. New life must be breathed into our high streets. There are numerous serviceable shop premises in the town that could and should meet the needs of local shoppers. This will maintain a sense of community and reduce out-of-town shopping, lowering carbon emissions. Wirral is need of decent shops. Consider the shops on Pensby Road and Cross Lane. Emulate those models. What New Ferry doesn't need is another supermarket; buildings are costly. The 'grocers' that run them undercut suppliers and produce contains far too much plastic, a massive polluter. Bebington Road, running through New Ferry, should be un-pedestrianised. Pedestrianising roads detracts from the historic footprint and the architectural merit of historic stock. By-all-means keep it car free but use metal bollards to prevent traffic entering and exiting the shop area. New build and infill must not detract from the architectural merits of any historic buildings, in this case Port Sunlight. It is important that buildings of character are retained, as they add continuity, charm, and reflect on the history of the area. Old building

	stock uses less carbon, new builds use more carbon. New construction must reflect the character of the historic property, use materials that complement the existing building stock, and be constructed to high eco standards to address the climate and ecological emergency we are now having to deal with
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	List Victorian buildings, retain the character of historic buildings. New construction should reflect the character of historic buildings and be built to high ecological standards.

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

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>	

LPSP-854

Comment ID	LPSP-854
Person ID	1270024
Include files	LPSP 853, 854 & 1400- EM - Dodd
Consultee Name	Susie Dodd
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 2
Title	Heritage Assets
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Central Birkenhead Regeneration Victorian building stock of architectural merit must be listed and registered accordingly and be re-used appropriately. In particular, building stock in Arglye Street, Grange Road, Grange Road East and Grange Road West. New build and infill must not detract from the architectural merits of any historic buildings. It is important that buildings of character are retained, as they add continuity, charm, and reflect on the history of the area. Old building stock uses less carbon, new builds use more carbon. New construction must reflect the character of the historic property, use materials that complement the existing building stock, and be constructed to high eco standards to address the climate and ecological emergency we are now having to deal with</p> <p>Birkenhead Waterfront Coastlines are ecologically sensitive areas. Historically, much of the coastline in Wirral and Liverpool has been drastically altered by industry and shipping. However, there is now an opportunity to re-green the waterfront of Birkenhead and consider a greener approach to constructing new building stock. The proposed new high-rise buildings should</p>

	<p>not be considered as rivalling Liverpool's waterfront. Liverpool's waterfront is historically unique, reflecting a time of Empire and wealth. Wirral should and must consider its own identity with low-rise buildings that do not emit large volumes of carbon to construct or maintain. New construction must reflect the character of any historic property and the historic setting of the area. The use of materials must complement any existing building stock and its historic context. All new builds must be constructed to high eco standards to address the climate and ecological emergency we are now having to deal with.1. The planting up of the proposed green areas must complement the coastal ecology to add interest and help bring nature into the region.2. The proposed plans for the waterfront all point towards human interest: bike lanes, walkways and lighting, retail, and leisure. Decent sized areas solely for nature must be set aside to address the ecological collapse caused by climate change, population rise and habitat loss.</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>List Victorian buildings, retain the character of historic buildings. New construction should reflect the character of historic buildings and be built to high ecological standards.</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>	

Comment ID	LPSD-855
Person ID	1249450
Include files	LPSD-511, 855-EM-Josling Form 2307_Redacted.pdf
Consultee Name	Mr. Philip Josling
Position	Trustee
Company / Organisation	Wirral Footpaths and Open Spaces Preservation Society
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5
Title	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Biodiversity networks and Net Gain: Paras 3.125 and 3.142 and Policy WS 5: Whilst paragraph 3.125 states that “this Local Plan also prepares for the requirements of the Environment Act 2021 regarding Biodiversity Net Gain to be introduced”, neither that paragraph nor Policy WS 5 satisfactorily address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required 'net gain'. This practice is exacerbated by the full prohibitions and penalties within the new Act not coming into force until late 2023. Also, although paragraph 3.142 makes mention of “in the rare case of a site being subject to recent damage or detrimental change then the most recent survey undertaken before the change, or an appropriate habitat from a typology will be applied as the base line from which net gain is calculated”, it incorrectly suggests that such occurrences are “rare” when they are not; and does not make it clear if this is to apply independently from the provisions of the new Act coming into force. Neither does it refer to any Council Policy.

	In the face of this type of deliberate destruction, some other LAs have brought in or are in the process of bringing in immediate interim Local Policies to address this awful practice head-on. ITPAS and WGSAs have requested through Councillors and Senior Officers that this be done for Wirral as soon as possible and publicised widely. However, this has not been put in train as yet. We would request that such provisions are put into this Local Plan but also into Local Policies as soon as possible so that 'Net Gains' would then apply to the Biodiversity Base Level existing before any action is taken on site.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	In the face of this type of deliberate destruction, some other LAs have brought in or are in the process of bringing in immediate interim Local Policies to address this awful practice head-on. ITPAS and WGSAs have requested through Councillors and Senior Officers that this be done for Wirral as soon as possible and publicised widely. However, this has not been put in train as yet. We would request that such provisions are put into this Local Plan but also into Local Policies as soon as possible so that 'Net Gains' would then apply to the Biodiversity Base Level existing before any action is taken on site.
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.	As above, if an inflated housing requirement is adopted in the Local Plan, there are implications for the Habitats Regulation Assessment, in that land never considered for development will be sought for residential consent by developers on a speculative basis. Harm may occur to land protected by the important planning and environmental designations that protect land of significance in terms of climate emergency goals and biodiversity net gain. It is incumbent on the local plan process to support the identification of land that is sustainable to deliver future development requirements, avoiding land protected under the Habitats Regulations Assessment.
Please set out the modification(s) you	We request that the wording of Para 3.142 should also be modified so the provision is not dependent on an actual "recent survey" but include other forms of evidence including 'historical images' in Google Earth, photographic evidence, local resident statements, etc.

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

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

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

If you wish to participate in the

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

As members of the WGSA we wish to give support to our submissions.

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-856
Person ID	1323689
Include files	LPSD-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf LPSD-408, 856, 866, 881-EM-O'Connor Attach 2 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. in particular Attachments 1 & 2 The housing requirement is insufficient to meet housing needs. The proposed spatial distribution will not meet housing needs Green Belt release is required to meet identified housing need

	The Council relies heavily upon a document by University of Liverpool entitled Review of consultation submission regarding H6. This was not initially published for consultation but was provided for review upon request.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. Housing Requirement should be at least 1159 dpa spatial distribution should include Green Belt release

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.

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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

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

We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.

you consider this to be necessary:	
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Comment ID	LPSD-857
Person ID	1324041
Include files	LPSD-652-857-858-862-863-864-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Kerren Phillips
Position	
Company / Organisation	Jones Homes
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?	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.	Objective 7, para 3.6
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 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

<p>as precise as possible.</p>	<p>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>Paragraph 3.6 of the Submission Draft version of the Local Plan describes how 'the Council's strategy to meet its development needs sits entirely within existing urban areas' by focusing on the regeneration of Birkenhead. Paragraph 3.6 goes on to explain that the Local Plan 'designates 11 Regeneration Areas across the Settlement Areas of the Borough'; however, upon review of Table 3.1 ('Wirral Settlement Areas, Regeneration Areas and Policy References'), it is evident that the 11 Regeneration Areas are located in just three of the Borough's eight Settlement Areas.</p> <p>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, and which is required to promote a sustainable pattern of development, as required by paragraph 11 of the NPPF. Strategic policies should focus on the growth and development of the entire Borough and not focus on a small geographical area.</p> <p>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 therefore 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, 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.</p>	<p>To maximise choice, we strongly recommend that the Council allocated sites for residential development in an equitable manner across all of the Borough's Settlement Area's including in and around Settlement Area 6 (Hoylake and West Kirby), which closely relates to Jones Homes' Frankby 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>

<p>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>

Comment ID	LPSD-858
Person ID	1324041
Include files	LPSD-652-857-858-862-863-864-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Kerren Phillips
Position	
Company / Organisation	Jones Homes
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.	
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	Refer to attachment - see paragraph 2.4.1-2.4.25 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.

<p>unsound. Please be as precise as possible.</p>	<p>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 annual housing requirement should be uplifted by a minimum of 54 dpa to align with recent demolition data trends</p> <p>Taking account of the requirement described above, to account for economic growth aspirations and demolitions in full, we are aware that the wider development industry has proposed a figure of 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. Whilst we have no specific commentary on what the exact uplifted housing figure should be, we are generally in support of a housing requirement in the region of this amount in order to ensure that the emerging Local Plan meets the Borough's housing needs in full.</p> <p>spatial strategy should allocate across settlement areas</p> <p>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</p> <p>we are we 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.</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</p>	

Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>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 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 6 (Hoylake and West Kirby), which closely relates to Jones Homes' land between Frankby Road and Grange Cross Lane, Newton.</p> <p>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 Frankby 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.</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. As explained within the Delivery Statement at Appendix A, Jones Homes' owns the site at Frankby Road, Newton and therefore it represents a developable residential opportunity which can come forward for development in the short term.</p> <p>To ensure flexibility, we strongly recommend that the Frankby Road site is allocated for Development within the 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 be consistent with the NPPF requirements for the plan to be positively prepared and flexible.</p>
If your representation is seeking a	Yes, I wish to participate in hearing session(s)

<p>modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>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-859
Person ID	1324041
Include files	LPSD-536,810,846-849,1397-1399-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Kerren Phillips
Position	
Company / Organisation	Jones Homes
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
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 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 Whilst we support the principle of housing design standards as set out in draft Policy WS 3.1, which are proposed to ensure suitable space, efficiency, design and accessibility of new housing developments, if the Council is looking to introduce requirements which are more onerous than national standards, it is essential that they are robustly justified and underpinned by relevant and up-to-date evidence, as required by the NPPF.

as precise as possible.	<p>It is critical that the Council's proposed housing design standards do not jeopardise the delivery of the new homes that the Borough urgently needs and that local requirements in respect of building sustainability are viable and achievable in practice.</p> <p>NPPF paragraphs 16(b), 34 and 57 all relate to the need for Local Plans to be deliverable and have regard to viability. In addition, the PPG section in relation to 'climate change' advises that: 'The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability' [Paragraph Reference ID: 6-009-20150327]</p> <p>If the Council wishes to enforce stricter local standards, it must have robust evidence to ensure that this would not impact upon overall development viability, in accordance with the requirements of the NPPF and the PPG. We are concerned that the Council's viability evidence does not robustly justify the need for introducing the proposed water efficiency levels or the requirement to be 'zero carbon ready by design'. If the Council wishes to adopt stricter standards vis-à-vis national requirements, it must ensure that such an approach is evidenced by robust deliverability analysis, which includes appropriate consideration of the Future Homes Standard as part of its viability work – something that the Council currently fails to do.</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	

<p>accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Ultimately, we are concerned that Policy WS 3.1 as presently drafted is too prescriptive and may not be deliverable in practice and could therefore jeopardise the delivery of much needed new homes across the Borough. To ensure that the policy is sound, we propose that the Council's housing design standards should be made consistent with any national standards or requirements at the time of the determination of any planning applications.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>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-860
Person ID	1323689
Include files	LPSD-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf LPSD-408, 860, 866, 868, 870 and 881-O'Connor Attach 7 of 8 2207_Redacted.pdf LPSD-408, 860, 866, 868, 870 and 881-EM-O'Connor Attach 8 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. in particular Attachments 1,7 & 8 The viability assessment of allocations is flawed. The costs in the viability assessment are understated and overlooked, and certain property types overvalued.

<p>as precise as possible.</p>	<p>Unallocated sites in the Regeneration Areas are undeliverable the quantum of sites in the Settlement Areas is unrealistic Windfall sites unlikely to come forward no evidence for change of use allowance empty homes allowance is inflated no evidence for new build commitments figure, housing paper provides insufficient information</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular attachments 1, 7 & 8</p> <p>Housing Requirement should be at least 1159 dpa</p> <p>need to identify significant number of additional deliverable and developable sites... in all probability some Green Belt sites.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

hearing session(s)	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</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-861
Person ID	1323566
Include files	LPSD 861-EM-Campbell 2307_Redacted.pdf
Consultee Name	Ms or Mrs Victoria Campbell
Position	spokesperson
Company / Organisation	Mersey Road Focus Group
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 3
Title	Policy for Suburban Birkenhead
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policies Map
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	Map 2
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.	We consider the Local Plan Policies Map is not sound in relation to the area covered by these representations (which all relate to the same corner of Suburban Birkenhead where Bedford Place turns a sharp right-angled corner into Mersey Road, where we live, and the land immediately south of Bedford Place and west of Mersey Road and north of Bedford Road. This residential area borders both Birkenhead Commercial Core, in the form of of Rock Ferry Industrial Estate and Tranmere Oil Terminal bar the width of the Rock Ferry-New Ferry by-pass that runs beside and parallel to Mersey Road. Our representations mostly relate to the colouring and labelling of the 'Interactive Submission Draft Policies Map' in so far as map colouring and labelling reflect both culture and land use.) Because it does not through appropriate colouring and marking designate well known, well documented, council owned, and quite recently improved community green spaces behind Mersey Road and Bedford Road and (b) and at the corner of Mersey Road and Bedford Place. These omissions are not justified and do not reflect previous community input. These sites were removed from SHLAA 2019 because they are not deliverable, not suitable, and not achievable for development due to the HSE safety

	<p>zone restriction, but this document also clearly states their current uses as 'amenity open space.' Both sites are green spaces with paths. See SHLAA 2019 H2.4 APPENDIX 3 -1072 to 1595.</p> <p>The colouring of the map at Bedford Place, which is in map colour presented beyond Rock Ferry Industrial Estate as an extension of Birkenhead's Commercial Core, is unjustified because it would be likely to preserve its longstanding over decades, undesirable status as both an unofficial dumping ground for fly tippers and an opportunity to speed for traffic using it to avoid the traffic lights at the Bedford Road junction with the New Chester Road. Evidence for the long standing problem of fly tipping on Bedford Place should be found in the records of Streetscene or whichever council dept or contractor removes fly tipped rubbish and debris. This rubbish is sometimes also hazardous in the form of dumped fridges and fridge freezers. Bedford Place is currently unsafe for pedestrians (and for push chair and wheelchair users) who have to walk on the road in places along it and then face the hazards of vehicles speeding round the sharp corner from Mersey Road or coming from behind from the New Chester Road or the other way round if walking in the opposite direction. In addition to the lack of road safety for local residents, hikers and cyclists from further afield also use Bedford Place to access the Wirral Circular Trail and Rock Ferry Waterfront. It is a quieter and greener walk/ride than down Bedford Road, and generally pleasanter, except of course when a speeding car appears from nowhere or when ugly fly tipped waste has been dumped there. Equally the status quo (no speed restrictions or traffic calming measures at the sharp corner where Bedford Place joins Mersey Road) or on Mersey Road or on Mersey Lane South makes it very unsafe for residents and their visitors getting in and out of cars, or just walking, who risk a speeding vehicle coming suddenly down from Mersey Lane South or round the corner from Bedford Place. The speed this traffic can go at often does not allow for reactions from other road/pavement users and does not tend to slow down even if people are on the road. This whole corner is currently unplanned and therefore unsafe. The only way for the public to access the Rock Park Conservation Area, The Refreshment Rooms, Rock Ferry Waterfront, it's far reaching listed stone jetty and the coastal promenade/esplanade is to cross the by-pass on the bridge at Rock Lane East (or travel by foot or bike from New Ferry). This makes the bridge at Rock Lane East and access to it strategically important. This makes Bedford Place, as an important public access to the above, strategically important too. See Priorities for Suburban Birkenhead 5.28 point 1. and Rock Park (CON-SA3.4).</p>
<p>complies 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</p>	

<p>representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<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>In our view and for our area the modifications necessary to make the Local Plan sound include: (a) the council owned community green spaces/amenity open spaces behind Mersey Road and Bedford Road (b) and at the corner of Mersey Road and Bedford Place, be coloured and labelled as such (as they are in many other places on the draft policies map) (c) the colouring of the map adjusted so that the colour for Birkenhead Commercial Core finishes directly behind the backs of the factories of the Rock Ferry Industrial Estate on the north side of Bedford Place and the colouring of Bedford Place be that used for the rest of suburban Birkenhead hopefully leading to the improvements mentioned below.</p> <p>The hope is that Bedford Place might then become a road where fly tipping and speeding is seen as completely unacceptable by the wider community and made far more difficult than it is at present, and become an asset rather than a liability, and the safety of walkers and cyclists would take precedence over cars and lorries travelling beyond the speed limit and/or fly tippers out to dump their loads unseen. We would hope to see this new care and status reflected in wider and improved pavements/walkways, on Bedford Place; maximum 20mph speed limits between Mersey Lane South, Mersey Road and along Bedford Place and traffic signs indicating rights of way at the unmarked three way junction between Mersey Road, Bedford Road and Mersey Lane South, which is also the official route for the Wirral Circular Trail. (d) the trees, particularly on the south side of Bedford Place, which mitigate pollution for residents and are also habitat to a wide variety of nesting and roosting birds, also be labelled on the map to reflect their importance to the local community (e) the council owned compound on south side of Bedford Place (also removed from SHLAA in 2019 for the same reasons as the other sites) not be used for anything noisy, dirty or polluting, in recognition of the fact that this is a residential area already hemmed in on two sides by industry, and the busy, fast moving dual carriageway that runs immediately beside Mersey Road and its attendant air and noise pollution. We think this site needs tidying up for the proposed change in culture and expectations for Bedford Place to be effective. 7. We think it may be necessary to participate in examination hearing sessions, 8. to ensure our comments have been heard.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in</p>	

<p>examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<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-862
Person ID	1324041
Include files	LPSD-652-857-858-862-863-864-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Kerren Phillips
Position	
Company / Organisation	Jones Homes
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
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.	WS3.2
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 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 attachments It is important that the focus on higher density development and the emphasis on previously developed land does not preclude the delivery of much-needed homes in sustainable locations across the Borough.

as precise as possible.	Whilst we recognise that paragraph 125 of the NPPF states that Local Plans should use minimum density standards for city and town centres and other locations that are well served by public transport, it is important that such minimum density standards are based on robust evidence and achievable in practice. We are concerned that the Council has inflated density requirements as part of its strategy of focus housing growth in Birkenhead and surrounding areas, in an effort to reduce the number of sites that it needs to allocate elsewhere across the Borough, presumably for political reasons.
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	We recommend that the Council should amend its proposed minimum density standards to a level which is deliverable and not at the expense of over-development and urban intensification in a narrow area of the Borough.

<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.</p>	<p>Such amendment is likely to necessitate the need for the Council to identify additional sites which can be viability delivered across the Borough. For the reasons explained in Section 1 of our representation, it is clear that Jones Homes' site at Frankby Road is capable of helping the Council to address its housing need whilst ensuring a sustainable pattern of development.</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</p>	

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-863

Comment ID	LPSP-863
Person ID	1324041
Include files	LPSP-652-857-858-862-863-864-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Kerren Phillips
Position	
Company / Organisation	Jones Homes
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 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.

as precise as possible.	<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>Whatever the actual figure should be, as we have noted above, the PPG states that the total housing requirement set out in a Local Plan may need to be considered where it could help deliver the required number of affordable homes. The Council's own evidence points towards the requirement for a substantial uplift in the housing requirement currently being progressed within the emerging Local Plan.</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. 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].</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	

<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>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 Frankby 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 6, and therefore the release of the site will enable a meaningful quantum of the Borough's pent-up affordable needs to be accommodated, whilst supporting the delivery of a sustainable pattern of development, as required by the NPPF.</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-864
Person ID	1324041
Include files	LPSD-652-857-858-862-863-864-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Kerren Phillips
Position	
Company / Organisation	Jones Homes
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 6.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 not align with the overall thrust of the NPPF which promotes sustainable patterns of development.

<p>as precise as possible.</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. To address a 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 Frankby Road – which represents a deliverable opportunity in a sustainable location – and the proposed development will deliver a range of important benefits without harming the purposes of the Green Belt. As such, we recommend that Policy WP 6.3 should be amended to include specific reference to the allocation of the Frankby Road site, which will contribute towards ensuring that the Borough's housing needs can be met in full</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>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. To address a 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 Frankby Road – which represents a deliverable opportunity in a sustainable location – and the proposed development will deliver a range of important benefits without harming the purposes of the Green Belt. As such, we recommend that Policy WP 6.3 should be amended to include specific reference to the allocation of the Frankby 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 Frankby 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</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>	<p>Yes</p>

Comment ID	LPSD-865
Person ID	1323689
Include files	LPSD-408, 865, 873-EM-O'Connor Attach 3 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
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	
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.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. in particular attachment 3 Forecasted Jobs growth using the economic capacity scenario would not be sustained by the housing figure. Insufficient residential land is allocated in the Plan.

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base.</p> <p>In particular attachment 3</p> <p>more residential land should be allocated to support the forecasted jobs growth</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-866

Comment ID	LPSP-866
Person ID	1323689
Include files	LPSP-408, 860, 866, 868, 870 and 881-EM-O'Connor Attach 8 of 8 2207_Redacted.pdf LPSP-408, 860, 866, 868,870 and 881-O'Connor Attach 7 of 8 2207_Redacted.pdf LPSP-408, 856, 866, 881-EM-O'Connor Attach 2 of 8 2207_Redacted.pdf LPSP-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy WS 1.3
Title	Infrastructure
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 1,2 7 & 8 [there are inconsistencies between the Viability Assessment and IDP. The VA does not itemise transport as a cost to be borne by developments. The funding gap in the IDP for essential infrastructure is for transport only. IDP states this will only be funded through developer contributions.]

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular attachment 1,2 7 & 8

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)

We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.

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-867
Person ID	1323506
Include files	LPSD-867,925,926-EM-Johnson 0107_Redacted.pdf
Consultee Name	Ms Diane Johnson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	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	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.	<p>please refer to attachment</p> <p>- Local expertise such as the reports by Professor Ludi Simpson (Manchester University) and the research by Professor David Gregg were not included in the Council's arrival at the housing figures. To this end the Local Plan does not appear legally compliant. Indeed, there was no transparent process (ie the process wasn't published) revealing how the Council came by the housing figures used in the draft Local Plan. Neither have the Council considered alternative approaches as is their duty in developing the plan. The Council must not weaken in it's resolve to protect greenspace.</p>
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>The 2022 Census population figures for Wirral have been published for 2022. These show that, the Draft Local Plan for populations and housing have not been positively prepared. The figures for Wirral are as follows:</p> <p>POPULATION;</p> <p>2011: 319,800</p> <p>2022: 320,200</p>

	<p>This represents an increase of 0.1%.</p> <p>That is; an increase of 400 people over 11 years, or 36.4 people/year.</p> <p>Over these 11 years there has been a huge push on new-builds across Wirral's green spaces with many thousands of new houses being built.</p> <p>However, in the Plan, Wirral Borough Council have based population projections at 2022 of 324,500 and implied many thousands more houses need to be built (averaging as 18 homes per new resident)</p> <p>I believe that the figures put forward by the Authority in this Local Plan are unsound and should, therefore, be withdrawn.</p> <p>- To proceed with the housing numbers indicated in the Local Plan draft would place Wirral's ecology under unprecedented threat. Restoration of habitats is mentioned as an important role of the Local Plan. Realistically this requires restoring land to woodland and forest or to productive food land.</p> <p>- Wirral is an over-urbanised peninsula and cannot absorb further expansion of its housing stock, particularly as thousands of luxury housing has already been constructed over the last five years, and the Birkenhead Regeneration scheme is well underway adding further builds</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</p>	

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

<p>hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>As my representation is seeking a modification to the plan, YES, I wish to participate in hearing session(s)</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-868
Person ID	1323689
Include files	LPSD-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf LPSD-408, 860, 866, 868, 870 and 881-O'Connor Attach 7 of 8 2207_Redacted.pdf LPSD-408, 860, 866, 868, 870 and 881-EM-O'Connor Attach 8 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1, 7 & 8 [Evidence base including the Viability Assessment, does not robustly justify the need for introducing the water efficiency standards at the levels proposed, or the requirement to be carbon ready by design as set out in the Future Homes Standard. This will impact on site viability.]

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1, 7 & 8 The Viability Assessment should be updated to take into account the Future Homes Standard.

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)

We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.

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-869
Person ID	1242281
Include files	LPSD-869-EM-Roberts 2507_Redacted.pdf
Consultee Name	Dr Elaine Roberts
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Part 3 Strategic Policies
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>I welcome and support WBC's stated commitment to protect greenbelt and develop a strategy putting climate change, wildlife and the environment at the heart of their future plans. I would ask that: Greenbelt 100% protected from development. Green spaces likewise. Brownfield land should be regenerated for common benefit. Farm land should be preserved for farming, to increase our self-sufficiency and reduce carbon footprint of crops.</p> <p>Regeneration of urban areas with good design, enhanced public transport links and adequate access to shops, health, schools and amenities, with thought to best way to increase job opportunities and maybe eco tourism if we protect our biological and historical sites of national importance adequately. All designs to put carbon saving, energy efficiency, BNG and the environment foremost in plans and green spaces built in for the wellbeing of the inhabitants</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	

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
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LPSP-870

Comment ID	LPSP-870
Person ID	1323689
Include files	LPSP-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf LPSP-408, 870, 876-EM-O'Connor Attach 4 of 8 2207_Redacted.pdf LPSP-408, 860, 866, 868, 870 and 881-EM-O'Connor Attach 8 of 8 2207_Redacted.pdf LPSP-408, 860, 866, 868,870 and 881-O'Connor Attach 7 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy WS 3.2
Title	Housing Density
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 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	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1, 4, 7 & 8 [Nationally Described Space Standards will not be achievable at the minimum densities prescribed by Policy WS 3.2

as precise as possible.	<p>The Approach to density will not help meet identified housing need. The densities proposed are not viable for the sites identified in the WLP. The Birkenhead High Density Family Housing Study demonstrates that the densities recommended in Policy WS 3.2 are undeliverable</p> <p>Viability testing of WS 3.2 is flawed because the assessment adopts the same unit mix across different densities</p> <p>The densities will not deliver the housing Mix set in Policy WS 3.4]</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	<p>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1, 4,7 & 8</p>

<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.</p>	<p>Viability Assessment should be updated to take into account Future Homes standard, reduce required densities and find additional viable sites to deliver housing mix.</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</p>	<p>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

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-871

Comment ID	LPSP-871
Person ID	1308276
Include files	LPSP-871,872-EM-Khoo 2507_Redacted.pdf
Consultee Name	Helen Khoo
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	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	
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.	Please refer to attachment Adding to the theme of valuing the natural environment in which we have sought to live (moving back to Hoylake from living in a city, specifically for this reason), we are strongly against the recent aggressive proposals to over-develop Hoylake, into what could become a housing estate for apartment blocks. The historic Royal Liverpool Golf course and Stanley Road areas are particularly being targeted at present. We are not against appropriate economic development of existing residential property, but destroying historic and perfectly functional existing buildings to build large blocks of new apartments in this iconic conservation area is completely inappropriate, short-sighted and is unacceptable for a conservation area. Please listen to what the conservation groups and residents associations are saying. The Conservation value of the area will be destroyed if it is overdeveloped and this outcome will be irreversible.

	<p>Our area is beautiful and historic, and close to nature, and that is why people come from afar to visit the famous links golf course and from all around the region to enjoy the local nature at Red Rocks and along West Kirby and Hoylake Beaches. It is very tedious to have to keep defending this precious landscape from aggressive building proposals. Firstly, we would like to ask the Council to take a more robust approach to protect the character of this area of Hoylake. It is really sad that the rare and beautiful coastal landscape that we have here (and should be looking after properly), is under such threat from developers for their own temporary gain, - particularly as most developers will move on from Hoylake once they have spoilt it and won't hang around to see the lasting environmental impact.</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>we would like to ask the Council to take a more robust approach to protect the character of this area of Hoylake.</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>	

Comment ID	LPSD-872
Person ID	1308276
Include files	LPSD-871,872-EM-Khoo 2507_Redacted.pdf
Consultee Name	Helen Khoo
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 4
Title	Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management
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.	WD 4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	please refer to attachment We cannot see the point in: a. Removing sand from the beach (as the wind and sea just bring it back) b. Raking the sand (this is a waste of money as it has a short temporary effect and just grows back) c. Poisoning the beach with unhealthy chemicals, (which also only have a temporary effect).

	<p>We object strongly to the community golden beach campaign which seems to loudly represent only a small number of people in Hoylake and does not represent the wider community. To us, having tried to collect a range of evidence, this campaign seems to be ill-informed as it mainly focusses on cosmetic appearance of the beach, rather than the longer term impact (and value) of dune formation and re-wilding.</p> <p>It seems to us that a sandbank and natural lagoon is forming out from Red Rocks. Why not just let this happen? Historically there was a sea lake in Hoylake anyway. We wonder if we will end up with a landscape like Formby / Crosby with small dunes and a lake, before reaching natural golden sand on the other side of the dunes. We just do not understand the need for only a flat gold beach instead of dunes, when the gold sand will be there anyway on the other side of the dunes</p> <p>Also regarding development, instead of a ridiculous amount of money being spent on West Kirby sea-wall, let nature form the flood defences for you similar to above. Instead, with the money saved, why not buy the building for sale and under threat of overdevelopment, 'Wirral Point', at the end of Stanley Road and at the tip of the Peninsula? The existing building could be developed into a nature centre for bird watching, sustainable ecology, star gazing (the dark skies are fabulous at night), and nature education. This, in our view would be a far better use of council money. This action would</p> <p>a. prevent this particular building from overdevelopment,</p> <p>b. and would be a statement of the council's commitment to value, preserve and protect our incredible coastal landscape.</p> <p>c. would also benefit locals and visitors alike by offering ecology education, so that the natural landscape can be enjoyed and cared for by future generations for many years to come.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal	

<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>Also regarding development, instead of a ridiculous amount of money being spent on West Kirby sea-wall, let nature form the flood defences for you similar to above. Instead, with the money saved, why not buy the building for sale and under threat of overdevelopment, 'Wirral Point', at the end of Stanley Road and at the tip of the Peninsula? The existing building could be developed into a nature centre for bird watching, sustainable ecology, star gazing (the dark skies are fabulous at night), and nature education. This, in our view would be a far better use of council money. This action would</p> <ol style="list-style-type: none"> prevent this particular building from overdevelopment, and would be a statement of the council's commitment to value, preserve and protect our incredible coastal landscape. would also benefit locals and visitors alike by offering ecology education, so that the natural landscape can be enjoyed and cared for by future generations for many years to come.
<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>	

LPSD-873

Comment ID	LPSD-873
Person ID	1323689
Include files	LPSD-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf LPSD-408 and 873-EM-O'Connor Attach 5 of 8 2207_Redacted.pdf LPSD-408, 865, 873-EM-O'Connor Attach 3 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
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	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1, 3 & 5 [Based on the requirements of Policy WS 3.3, the supply of sites identified in the WLP will not address the identified affordable housing needs for the Borough. Methodology used in the SHMA(2021) to determine affordable housing is flawed.

as precise as possible.	Green Belt release is required.]
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	<p>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1, 3 & 5</p> <p>[Identify and release sustainable and suitable sites in Wirral which can viably deliver at least 20% affordable housing</p> <p>True figure derived from Consortium's study for affordable housing need equates to 1,430 dpa</p>

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Green Belt release is required to meet affordable housing need].</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</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-874

Comment ID	LPSP-874
Person ID	1323689
Include files	LPSP-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy WS 3.6
Title	Specialist Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.6
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 1 [Insufficient Older Persons and Specialist housing provision]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 1</p> <p>[Identify sufficient older persons and specialist housing provision]</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-875

Comment ID	LPSP-875
Person ID	1323692
Include files	LPSP-875,878,879,880,887,889,890-EM-Power Attach 2 of 2 2207_Redacted.pdf LPSP-875,878,879,880,887,889,890,894-EM-Power 2207_Redacted.pdf LPSP-894-EM-Power Attach 1 of 2 2207_Redacted.pdf
Consultee Name	Mill Lane Estates&StewartMilne Home
Position	
Company / Organisation	
Agent ID	1323691
Agent Name	Mr Jon Power
Position	Associate Partner
Company / Organisation	Asteer Planning
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment An overall housing need of 835 dpa is insufficient to meet the needs of the Borough over the next Plan Period The 'Exceptional Circumstances' test is unnecessarily restrictive Housing delivery has been suppressed

<p>as precise as possible.</p>	<p>Key data is unavailable</p> <p>Failure to align with employment land needs</p> <p>Errors in the calculation of the 2014-based sub-national population projections</p> <p>Failure to address the housing affordability crisis</p> <p>As set out in Section 3 of these representations and based on the in-depth technical work prepared by Lichfields to examine the Submission Plan and its evidence base, it is considered that the overall housing need figure (equating to 835 dpa) is unsound as it is based on flawed evidence that does not account for the growth potential of the Borough and the wider region, nor does it account for the suppression of supply that the Council's failure to deliver an up to date Development Plan has created. On this basis, it is considered that Policy WS1.1 is unsound.</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</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>In summary, an uplifted housing target in the order of around 1,150 dpa allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. As such, it is considered that the overall housing need identified in the Submission Plan, and the evidence that underpins it, is unsound.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

hearing session(s)	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Mill Lane Estates would like to place on record its intention to appear at Examination in Public to discuss the soundness of the Wirral Local Plan and, if the opportunity arises, discuss the merits of the Eastham site.</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-876

Comment ID	LPSP-876
Person ID	1323689
Include files	LPSP-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf LPSP-408, 870, 876-EM-O'Connor Attach 4 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
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	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1 & 4 [Policy WS 3.4 would only facilitate the delivery of 38% three or more bedroom properties, base don the WLP supply.]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1 & 4</p> <p>[Find additional viable sites to deliver housing mix.]</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-877
Person ID	1323689
Include files	LPSD-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
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.	WS1
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.	The Consortium is concerned that the absence of SoCG indicates that the requirements of the DtC have not been complied with . We have identified several fundamental deficiencies in the Council's evidence base, including a failure to robustly assess the needs of different groups of the community, such as the needs of students and those in the private rented sector. If the Council is unable to define the extent of its own need for these groups, we are concerned that it will not be in a position to co operate with other Liverpool City Region authorities on these matters.
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular attachment 1

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-878

Comment ID	LPSP-878
Person ID	1323692
Include files	LPSP-894-EM-Power Attach 1 of 2 2207_Redacted.pdf LPSP-875,878,879,880,887,889,890,894-EM-Power 2207_Redacted.pdf LPSP-875,878,879,880,887,889,890-EM-Power Attach 2 of 2 2207_Redacted.pdf
Consultee Name	Mill Lane Estates&StewartMilne Home
Position	
Company / Organisation	
Agent ID	1323691
Agent Name	Mr Jon Power
Position	Associate Partner
Company / Organisation	Asteer Planning
Number	Policy WS 1.3
Title	Infrastructure
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment Policy WS1.2 sets out the Borough's infrastructure requirements, linked to its Infrastructure Delivery Plan ("IDP"). The Consortium Representations and Technical Paper prepared by Roger Hannah identifies significant flaws in the Council's consideration of both s.106 contributions and the funding gap required to deliver essential and desired infrastructure. This is in addition to the clear viability issues and significant public intervention required to deliver sites in the Borough's regeneration areas.

as precise as possible.	The Council's s.106 assumptions, for example, exclude any contributions to health or education, as well as underestimating contributions required on the Borough's regeneration sites. The IDP identifies and £42.14m funding gap for essential infrastructure and a £335.8m gap for additional desirable infrastructure over the Plan Period. There is little consideration of how this will be delivered or secured, beyond developer contributions which, as discussed, have been underestimated in key regeneration areas and will be difficult to viably secure without major public funding.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	In short, it is considered that Policy WS1.2 is unsound and undeliverable, and will not meet the infrastructure needs of the Borough over the Plan Period. This will result in a significant infrastructure deficit and requires viable and deliverable sites that can contribute to required infrastructure and, where possible, deliver new infrastructure on-site.

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

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

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

If you wish to participate in the

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

Mill Lane Estates would like to place on record its intention to appear at Examination in Public to discuss the soundness of the Wirral Local Plan and, if the opportunity arises, discuss the merits of the Eastham site.

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

LPSD-879

Comment ID	LPSD-879
Person ID	1323692
Include files	LPSD-875,878,879,880,887,889,890-EM-Power Attach 2 of 2 2207_Redacted.pdf LPSD-875,878,879,880,887,889,890,894-EM-Power 2207_Redacted.pdf LPSD-894-EM-Power Attach 1 of 2 2207_Redacted.pdf
Consultee Name	Mill Lane Estates&StewartMilne Home
Position	
Company / Organisation	
Agent ID	1323691
Agent Name	Mr Jon Power
Position	Associate Partner
Company / Organisation	Asteer Planning
Number	Policy WS 3.3
Title	Affordable Housing Requirements
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 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	
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 Section 3 details the reasons why the Council's identified affordable housing requirements are based on flawed evidence that significantly underplays the scale of the Borough's need, and therefore the scale of an escalating problem.

as precise as possible.	The Submission Plan's heavy reliance on urban intensification and its Birkenhead Regeneration Zones may result in upwards of 70% of the Council's claimed housing supply failing to deliver any viable affordable units without significant public intervention. The Council's approach to affordable housing need and supply is fundamentally unsound, cannot deliver the aspirations of Policy WS3.3 and will result in a significant worsening and the of the Borough's affordability crisis.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	The annual need for affordable housing in the Borough is estimated to be as high as 1,430 dpa based on analysis by Lichfields, and whilst it is clear that this cannot be met in its entirety, it justifies a significant uplift in overall housing need to even attempt to alleviate the affordability crisis faced by the Borough.

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),

Mill Lane Estates would like to place on record its intention to appear at Examination in Public to discuss the soundness of the Wirral Local Plan and, if the opportunity arises, discuss the merits of the Eastham site.

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-880

Comment ID	LPSP-880
Person ID	1323692
Include files	LPSP-894-EM-Power Attach 1 of 2 2207_Redacted.pdf LPSP-875,878,879,880,887,889,890,894-EM-Power 2207_Redacted.pdf LPSP-875,878,879,880,887,889,890-EM-Power Attach 2 of 2 2207_Redacted.pdf
Consultee Name	Mill Lane Estates&StewartMilne Home
Position	
Company / Organisation	
Agent ID	1323691
Agent Name	Mr Jon Power
Position	Associate Partner
Company / Organisation	Asteer Planning
Number	Policy WS 3.4
Title	Housing Mix
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 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	
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 There is a fundamental disconnect between the Council's evidence base (the SHMA) and the Council's proposed strategy. It is clear that there is a disregard for this evidence and that the Plan will not deliver the homes that the Borough's population needs during the next Plan Period. Moreover, there is no mechanism or strategy to ensure that family homes are delivered in the proposed regeneration areas, and no sound strategy to demonstrate how a minimum of 30% of dwellings (as required by Policy WS3.4) in these regeneration areas will be delivered as 3 bedroom + family homes.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	This approach is irreparably unsound and cannot be addressed by Main Modifications. Addressing the correct mix will require a fundamental rethink of the Council's spatial and land allocations strategy, and in particular an approach which identifies sites of a size and location where this mix can be delivered.

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>Mill Lane Estates would like to place on record its intention to appear at Examination in Public to discuss the soundness of the Wirral Local Plan and, if the opportunity arises, discuss the merits of the Eastham site.</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>	Yes

Comment ID	LPSD-881
Person ID	1323689
Include files	LPSD-408, 860, 866, 868, 870 and 881-EM-O'Connor Attach 8 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy WS 10.1
Title	Provision of Infrastructure
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 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	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1, 2, 7 & 8 [there are inconsistencies between the Viability Assessment and IDP. The VA does not itemise transport as a cost to be borne by developments. The funding gap in the IDP for essential infrastructure is for transport only. The IDP states this will only be funded through developer contributions.]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachments 1, 2, 7 & 8</p> <p>The Viability Assessment should be updated to take account of the costs of key infrastructure that must be funded by developer contributions so that viability is not overstated.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-882
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 1
Title	Seacombe River Corridor Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	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.	MPA RA 1.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [deliverability issues: no site allocations in the RA broad locations have not been assessed in relation to their availability, suitability, developability and deliverability Birkenhead 2040 Framework does not outline viability of delivering a residential development to the south of Wallasey Town Hall

	North Seacombe Recreation Ground and Play Area should be retained and improved]. .]
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]

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)

We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.

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-883
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
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 RA2.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [deliverability issues: only 300 dwellings could come forward in the plan period for the two sites - this and RES RA2.2]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-884
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
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.	MPA RA2.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [No evidence to demonstrate the developability of the sites this and MPA RA 2.2: the WLP allocates a further 125 dwellings to the 450 dwellings in Birkenhead Road MPA and therefore double counts the housing supply no timeframe for the publication of the neighbourhood framework]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-885
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 3
Title	Birkenhead Waterfront Regeneration Area
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 RA 3.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability and viability concerns: No evidence to demonstrate the developability of the site and the capacity to deliver 180 dwellings unviable due to poor site conditions]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-886
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
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.	MPA-RA 3.1/ MUA-RA 3.1/ MUA-RA3.2

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 Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability concerns: No evidence for how the capacity of 450 dwellings has been produced No evidence of agreement from key stakeholders whether development is favourable No evidence of a formal strategy for delivery]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-887
Person ID	1323692
Include files	LPSD-875,878,879,880,887,889,890-EM-Power Attach 2 of 2 2207_Redacted.pdf LPSD-875,878,879,880,887,889,890,894-EM-Power 2207_Redacted.pdf LPSD-894-EM-Power Attach 1 of 2 2207_Redacted.pdf
Consultee Name	Mill Lane Estates&StewartMilne Home
Position	
Company / Organisation	
Agent ID	1323691
Agent Name	Mr Jon Power
Position	Associate Partner
Company / Organisation	Asteer Planning
Number	Policy WS 3.5
Title	Self-Build and Custom Build Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.5
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	
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 It is considered that the approach to delivering custom and self-build housing in the Submission Plan is unsound. It does not address how Policy WS 3.5 will be met and does not consider how the spatial strategy will address need, nor the preferences of custom or self-build residents

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

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>Mill Lane Estates would like to place on record its intention to appear at Examination in Public to discuss the soundness of the Wirral Local Plan and, if the opportunity arises, discuss the merits of the Eastham site.</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>	Yes

Comment ID	LPSD-888
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 4
Title	Central Birkenhead Regeneration Area
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-RA4.1 Plot E

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability concerns: due to clearing of site and lack of outline planning permission or reserved matters submission, the Consortium pushes the delivery trajectory for the site back to include 129 dwellings within years 11-16 with the remainder of the site coming forward beyond the plan period]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-889
Person ID	1323692
Include files	LPSD-894-EM-Power Attach 1 of 2 2207_Redacted.pdf LPSD-875,878,879,880,887,889,890,894-EM-Power 2207_Redacted.pdf LPSD-875,878,879,880,887,889,890-EM-Power Attach 2 of 2 2207_Redacted.pdf
Consultee Name	Mill Lane Estates&StewartMilne Home
Position	
Company / Organisation	
Agent ID	1323691
Agent Name	Mr Jon Power
Position	Associate Partner
Company / Organisation	Asteer Planning
Number	Policy WS 5
Title	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
To which part of the Local Plan does this representation relate?	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
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	
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment These policies include justifiable aspirations and we support the need to contribute to and improve provision, particularly on-site, of the Borough's natural and recreational assets. However, these aspirations are again at odds with the Borough's urban intensification approach which, as demonstrated, includes a significant number of sites that are not viable in traditional terms and that require significant public intervention.

as precise as possible.	This will result in a significant deficit in the provision of this infrastructure and habitat gain, with a particular inability to deliver on-site provision in constrained urban areas.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	A Plan which delivers larger and fundamentally more deliverable and viable sites will support the delivery of new green and blue infrastructure, new usable open space for existing and future communities, better sports/leisure provision that can be incorporated into new developments and a significant uplift in biodiversity across the Borough.

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>Mill Lane Estates would like to place on record its intention to appear at Examination in Public to discuss the soundness of the Wirral Local Plan and, if the opportunity arises, discuss the merits of the Eastham site.</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>	Yes

LPSD-890

Comment ID	LPSD-890
Person ID	1323692
Include files	LPSD-875,878,879,880,887,889,890-EM-Power Attach 2 of 2 2207_Redacted.pdf LPSD-875,878,879,880,887,889,890,894-EM-Power 2207_Redacted.pdf LPSD-894-EM-Power Attach 1 of 2 2207_Redacted.pdf
Consultee Name	Mill Lane Estates&StewartMilne Home
Position	
Company / Organisation	
Agent ID	1323691
Agent Name	Mr Jon Power
Position	Associate Partner
Company / Organisation	Asteer Planning
Number	Policy WS 8
Title	Strategy for Sustainable Construction, Renewable and Low Carbon Energy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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 Embedding climate change and net zero technologies into new developments is critical to addressing the climate emergency. In parallel with the comments above, there is no evidence that the Borough's regeneration areas can viably support the costs associated with being zero carbon ready by design. For example, as set out by Roger Hannah, the Council's Viability Assessment makes no allowance for no allowance for Future Homes Standards which will become effective by 2025. This is a significant regulatory change and the estimated cost of £8,000 per dwelling is not considered.

as precise as possible.	Similarly, there is limited consideration of how low carbon technology, renewable energy and other changes required to move the Borough towards carbon neutral status will be achieved.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Deliverable sites must complement the Borough's urban regeneration to deliver viable and deliverable net zero schemes.

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>Mill Lane Estates would like to place on record its intention to appear at Examination in Public to discuss the soundness of the Wirral Local Plan and, if the opportunity arises, discuss the merits of the Eastham site.</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>

Comment ID	LPSD-891
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 4
Title	Central Birkenhead 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.	RES-RA4.2 Plot G

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability concerns: due to clearing of site and lack of detailed planning application, the Consortium pushes the delivery of 92 dwellings back to years 11-16 of the the plan period]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-892
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 4
Title	Central Birkenhead 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.	RES-RA4.1 Plot I & J

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Site is deliverable but due to viability concerns means allowance for delivery of all 185 dwellings in years 6-10 is considered more realistic]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [change delivery phasing]</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-893
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 4
Title	Central Birkenhead 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.	MPA-RA 4.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability concerns: No evidence for how the capacity of 1000 dwellings has been produced between this and MPA - RA 4.3 and MUA-RA4.1 No areas for housing delivery have been identified due to absence of masterplans]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-894
Person ID	1323692
Include files	LPSD-894-EM-Power Attach 1 of 2 2207_Redacted.pdf LPSD-875,878,879,880,887,889,890,894-EM-Power 2207_Redacted.pdf
Consultee Name	Mill Lane Estates&StewartMilne Home
Position	
Company / Organisation	
Agent ID	1323691
Agent Name	Mr Jon Power
Position	Associate Partner
Company / Organisation	Asteer Planning
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s)	
* Policy	
* Site	
* Policies Map	
* Sustainability	
* Appraisal	
* Habitat	
* Regulations	
* Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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 attachments The land at Eastham was identified as a site with the potential for Green Belt release and subject to further investigation (ref: SP050 – Land West of Rivacre Road), demonstrating the Council's willingness to consider the site as part of its overall spatial strategy. Since this point, the Council has moved away from a spatial strategy that it recognised as necessary, and which sought to provide a blend of urban regeneration and Green Belt release to meets its identified needs, towards an undeliverable and unviable brownfield only approach.

as precise as possible.	In the Submission Version of the Wirral Local Plan, the site is identified as Green Belt land and, moreover, the Local Plan proposes no Green Belt release. This is contrary to its previous approach and presents a strategy that delivers a mix, type and tenure of new homes that is neither viable nor delivers housing that meets the needs of residents and businesses. Representations made by Mill Lane Estates (prepared by Asteer Planning LLP) and the Housebuilder Consortium (prepared by Lichfields) to the Submission Draft of the emerging Wirral Local Plan set out in detail why the Local Plan in its current form is fundamentally unsound
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	There are strategic and site specific exceptional circumstances which support an alteration to the Green Belt in Eastham. The site is uniquely positioned to meet identified need and to supporting a spatial strategy that delivers a sustainable pattern of growth in the Borough by support the housing and employment needs of the Peninsula's southern arc.

<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.</p>	<p>Amending the Green Belt around the site through the plan making process would create a logical, defensible and long term Green Belt boundary to the south of the Wirral urban area, which does not have an adverse impact on the openness of the surrounding countryside and which releases a strategic site that is not required to meet the purposes of the Green Belt, as defined by the NPPF.</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</p>	<p>Mill Lane Estates would like to place on record its intention to appear at Examination in Public to discuss the soundness of the Wirral Local Plan and, if the opportunity arises, discuss the merits of the Eastham site.</p>

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-895
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 5
Title	Hind Street and St Werburgh's Regeneration Area
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-RA5.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Viability and deliverability concerns: grant funding will be insufficient to cover remediation costs and other viability matters there are land ownership constraints the consortium proposes a rate of 50 dwellings across the final six years of the plan period]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Change the delivery phasing of RES-RA5.1, the consortium proposes a rate of 50 dwellings across the final six years of the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-896
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 5
Title	Hind Street and St Werburgh's Regeneration Area
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.	MPA-RA5.2

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 Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability concerns: No evidence for how the capacity of 240 dwellings has been produced no areas for housing delivery have been identified]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-897
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
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	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-RA6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability concerns: no planning permission housing delivery should be pushed back with 84 dwellings being completed in years 6-10 and the further 146 dwellings in years 11-16]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Change phasing of delivery for RES-RA6.4]</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-898
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 6
Title	Wirral Waters Regeneration Area
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-RA6.3

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability concerns: reprofile from 120 years 1-5, remaining 90 dwellings do not have planning permission, therefore should be moved back to years 6-10]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Change phasing of delivery for RES-RA6.3]</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-899
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy RA 6
Title	Wirral Waters Regeneration Area
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-RA6.2

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 Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Viability concerns: site and market constraints make the site unviable the site will not deliver identified housing need for family homes and affordable housing]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-900

Comment ID	LPSD-900
Person ID	1323689
Include files	LPSD-408, 882-886, 888, 891-893, 895-907, 909,912-921,923,927-932-EM-O'Connor Attach 6 of 8 2207_Redacted.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
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	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.	MPA-RA7.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6 [Deliverability concerns: no evidence of deliverability]

<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>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. In particular Attachment 6</p> <p>[Identify a significant number of additional deliverable and developable sites... including from the Green Belt and safeguarded land for beyond the plan period]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>

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