

Comment ID	LPSD-901
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?	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.	MUA-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 of this and MUA- RA7.2 & MUA- RA 7.3]

<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-902
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 9
Title	Liscard 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-RA9.1

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 no planning permission consider that site will deliver 100 dwellings in years 6-10 of plan period as best case scenario]

<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-903
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 9
Title	Liscard 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.	other developable areas

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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Comment ID	LPSD-904
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 10
Title	New Brighton 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-RA10.1

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 therefore suggest push back dwellings to years 6-10 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 delivery phasing of RES-RA10.1]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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-905
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 10
Title	New Brighton 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-RA10.1

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 ownership constraints no Neighbourhood Framework produced]

<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-906
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 11
Title	New Ferry 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-RA11.1

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 for why the capacity was increased from the planning permission figure of 11 to 43 dwellings]

<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-907
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 11
Title	New Ferry 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-RA11.4

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 approval proposed dwellings should be pushed 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 delivery phasing of RES-RA11.4]</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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LPSP-908

Comment ID	LPSP-908
Person ID	1324015
Include files	LPSP-631,908,910,911,922-EM-Trewhella Attach 2507_Redacted.pdf LPSP-631,908,910,911,922-EM-Trewhella Form 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	1324016
Agent Name	Mr Graham Trewhella
Position	
Company / Organisation	Cass Associates
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1

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	please refer to attachment

<p>Local Plan is unsound. Please be as precise as possible.</p>	<p>United Utilities recognises the importance of securing the effective regeneration of places and communities along the eastern margin of Wirral. However, it believes that there needs to be a better balanced approach that has a focus on regeneration but also accommodates the sustainable growth of the settlements on the western side of the peninsula. The opportunity for this is currently constrained by the paucity of sites in the urban area of the western settlements.</p> <p>The lack of opportunity for new development across the Plan Period to 2037 in the western settlements is clearly illustrated in Policy WP 7 Policy for Irby, Thingwall, Pensby, Heswall and Gayton. This area currently accommodates approximately 13,100 dwellings and is home to 28,500 people, of which almost 45% live in areas falling within the highest 20% of the Index of Multiple Deprivation for England. But the opportunity for the sustainable growth is extremely limited. The policy only identifies sites with a combined capacity of 34 houses over the plan period to 2037.</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>To achieve a balance there is a compelling case to reconsider Green Belt boundaries in order to create opportunities for selective urban expansion of communities such as Thingwall.</p> <p>There are sound planning reasons why a more balanced approach to the distribution of housing and other development is needed. A more balanced approach will meet the key objectives of the Local Plan but will also include for the sustainable growth of all communities across Wirral. A well-structured change to the Local Plan strategy will provide the exceptional circumstances that are necessary to justify selective alterations to the Green Belt boundary.</p> <p>The balanced approach is needed, not only to facilitate sustainable growth of all communities, but also because there are limitations to the strategic approach set out in the draft Local Plan.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-909
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 11
Title	New Ferry 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-RA11.5

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 can be delivered but proposed dwellings should be pushed 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 delivery phasing of RES-RA11.5]</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-910

Comment ID	LPSD-910
Person ID	1324015
Include files	LPSD-631,908,910,911,922-EM-Trewhella Attach 2507_Redacted.pdf LPSD-631,908,910,911,922-EM-Trewhella Form 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	1324016
Agent Name	Mr Graham Trewhella
Position	
Company / Organisation	Cass Associates
Number	Policy WS 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	Please refer to attachment

<p>Local Plan is unsound. Please be as precise as possible.</p>	<p>Wirral has a high level of affordable housing need. The Wirral Strategic Housing Market Assessment (SHMA) 2021 calculates that there is a need for 374 affordable homes each year. The majority should be two and three bed housing units. The need is not being alleviated by the current rate of affordable homes delivery – the annual average completion rate for affordable homes in the five year period to 2019/20 was 173.</p> <p>The draft Local Plan puts forward an affordable housing strategy (Policy WS 3.3) which aims to ensure that affordable housing in housing schemes of 10 units or more is provided at a rate of between 10% and 20%.</p> <p>The weakness of this policy is that a high proportion of new housing is anticipated in areas of low viability involving high density development. There is a risk that, for viability reasons, new development will support very little affordable housing, if any. In addition the housing type might not meet the overriding requirement for two and three bed family units.</p> <p>There is a risk that the affordable housing crisis in Wirral will get worse.</p> <p>The viability of the Local Plan policies has been tested (Wirral Local Plan 2021 to 2037 CIL & Viability Assessment – Aspinall Verdi). In brief, it recognises that the viability of new housing anticipated across the urban regeneration areas is “unquestionably challenging”. The majority of housing will be delivered in Zone 1 Low Value – Brownfield where viability is, at best, uncertain. This means that (without grant support) there is a real risk that not all of the anticipated housing will be delivered and, as already noted, that it will not be capable of supporting affordable housing.</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</p>	

<p>duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat 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>A more balanced approach with an element of sustainable growth in the western settlements would be more likely to result in the delivery of affordable housing on sites where development will be viable and where the need for two and three bed family homes can be accommodated.</p> <p>A more balanced approach, with housing distributed more widely across Wirral, will lessen the viability risk and give more certainty around the delivery of both market and affordable housing</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

LPSD-911

Comment ID	LPSD-911
Person ID	1324015
Include files	LPSD-631,908,910,911,922-EM-Trewhella Form 2507_Redacted.pdf LPSD-631,908,910,911,922-EM-Trewhella Attach 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	1324016
Agent Name	Mr Graham Trewhella
Position	
Company / Organisation	Cass Associates
Number	Policy WS 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	Please refer to attachment For market housing the SHMA identifies that there is particular need for two, three and four bedroom family homes. This creates a tension with a strategy that aims to deliver housing at a high density on urban regeneration sites.

unsound. Please be as precise as possible.	The need for new family housing not only arises in the eastern parts of Wirral. A need also exists in the western settlements.
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 combination of these two factors points to a compelling requirement to make provisions in the strategic approach to housing for more homes across the western settlements. This is the more balanced approach, tailored to meeting the need for family homes of the sizes identified in all parts of Wirral.

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

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

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

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

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

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

please outline why you consider this to be necessary:	
<p>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-912
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 WP 1.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA1.1

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 [site can be delivered but proposed dwellings should be pushed 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 delivery phasing of RES-SA1.1]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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-913

Comment ID	LPSP-913
Person ID	1323689
Include files	LPSP-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 WP 3.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA3.9

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 can be delivered but proposed dwellings should be pushed to years 11-16 due to physical constraints/ viability concerns]

<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 delivery phasing of RES-SA3.9]</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-914
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 WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.2/MPA-SA4.2

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 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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Comment ID	LPSD-915
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 WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.3/MPA-SA4.2

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 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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Comment ID	LPSD-916
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 WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.5

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 can be delivered but proposed dwellings should be pushed 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 delivery phasing of RES-SA4.5]</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-917
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 WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.7/MPA-SA4.1

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: physical site constraints can only deliver 50dpa from year 11 of 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. In particular Attachment 6</p> <p>[Change delivery phasing of RES-SA4.7/MPA-SA4.1]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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-918
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 WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.11

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 can be delivered but proposed dwellings should be pushed to 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 delivery phasing of RES-SA4.11]</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-919
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 WP 5.1
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA5.1

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 [site can be delivered but proposed dwellings should be pushed 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 delivery phasing of RES-SA5.1]</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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-920
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 WP 5.1
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA5.3

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 [site can be delivered but proposed dwellings should be pushed to 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 delivery phasing of RES-SA5.3]</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-921
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 WP 5.1
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA5.5

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 [the additional 30 dwellings added to the trajectory since the 2021 SHLAA are not evidenced]

<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-922

Comment ID	LPSD-922
Person ID	1324015
Include files	LPSD-631,908,910,911,922-EM-Trewhella Attach 2507_Redacted.pdf LPSD-631,908,910,911,922-EM-Trewhella Form 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	1324016
Agent Name	Mr Graham Trewhella
Position	
Company / Organisation	Cass Associates
Number	Policy WS 1.1
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	The site is currently in the Green Belt but there is a compelling case to allocate it for new housing development in the emerging Local Plan as part of Parcel 7.19.

Local Plan is unsound. Please be as precise as possible.	<p>The justification for a better balanced strategy for the delivery of housing across all parts of Wirral is set out in these representations and is based on the risks associated with an over reliance on the provision of market and affordable housing in a concentrated area centred on Birkenhead. The compelling case for a wider distribution of housing to include allocations at the western settlements also gives the exceptional circumstances for amending the Green Belt boundary.</p> <p>The site is extremely well contained by surrounding housing and urban infrastructure including the Cross Hill reservoir and road network.</p> <p>The development of housing on the site would be a continuation of the linear pattern of development on the eastern side of Barnston Road.</p> <p>The allocation of the site for housing would have no significant impact on the purposes of including land in the Green Belt. The extent of urban sprawl is limited by the virtue of the way in which the land is contained and there is no prospect that the gap which separates Thingwall from surrounding settlements will be reduced to any harmful degree.</p> <p>There will be encroachment into the countryside but this applies to any location at the urban edge that has not been previously developed.</p> <p>It has been demonstrated that the site is accessible to everyday services and facilities. Walking and cycling distances from the site accesses to these local services and facilities are short and the development will bring the significant potential to improve the quality of key cycling and pedestrian routes. Public transport in the form of bus routes are within easy walking and cycling distances. Overall this is a highly sustainable location for new housing.</p> <p>There are no constraints that will prevent the successful development of the site. Matters such as ecology, access details and the capacity of utilities will require further investigation but are not impediments to new development as such. There are no heritage considerations relevant to the site and the degree of impact on the surrounding landscape will be negligible.</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>There is a compelling planning argument in favour of the removal of SHLAA site 0931 from the Green Belt and allocation for new housing 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>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-923

Comment ID	LPSP-923
Person ID	1323689
Include files	LPSP-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 WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA6.4

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 [site can be delivered but proposed dwellings should be pushed to 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 delivery phasing of RES-SA6.4]</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-925
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 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	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>'For Trees Wirral' has documented over 8,000 public trees destroyed since 2016, a massive carbon gain eg the mass felling of mixed woodland on Gautby Park in Birkenhead and more recently the felling programme of ancient woodland from the Wirral Way, and a loss upwards of 5,500 trees from private land. This is not including the loss of green sward and hedgerows.</p> <p>- Wirral now requires as much remaining land as possible for food production and re-wilding in view of the world situation</p> <p>- Sea levels are rising so we can't keep building outwards.</p>

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Our green spaces need to be extended in order to mitigate against extreme weather and biological extinctions. This involves more than committing to "a 50% increase in tree canopy compared to 2020" as proposed in the Draft Plan.</p> <p>A blanket Tree Protection Order needs to be applied to all Wirral's remaining mature public trees.</p> <p>Wirral now requires as much remaining land as possible for food production and re-wilding in view of the world situation</p> <p>Much of the area of Wirral is protected by International and National laws and Local Environmental Designations and Habitats Directive. These cannot and must not be ignored</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>Wirral Council need to HALT any plans to further oil and gas development and re-direct any subsidies for fossil fuels to renewable energy sources, while maintaining that burning our trees is NOT 'renewable' but has become a scourge on our ecology and climate</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>As my representation is seeking a modification to the plan, YES, I wish to participate in hearing session(s)</p>

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

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

Comment ID	LPSD-926
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
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 UN has stated; "The world needs to set aside a third of all land and sea to protect biodiversity" (BBC News 20.6.2022). Revision of Land use on Wirral is urgently needed in order to address; (i) The Food Crisis (ii) the Nature Crisis and (iii) the Climate Crisis.</p> <p>- 'The government has told Wirral Council that they must build 800 homes per annum or 12,000 in total over the period 2014 to 2032. Despite having granted planning permission already for around 16,000 dwellings, thus surpassing genuine need. Alarminglly the Council have also sought out landowners and developers ready to 'release' Green Belt land for housing development. This has led to a large number of sites being identified. This land amounts to around 8 square miles of Wirral countryside</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>- Sea levels are rising so we can't keep building outward</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary</p>	<p>Any remaining pockets of land on Wirral should now be either returned to native woodland or re-established as productive regenerative farmland.</p> <p>A case for such a return to farmland would be the vast lawned field at Grange Hill mushroom farm, which was previously farmland which currently is in the Plan to build 50 houses.</p>

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Office spaces on Wirral have become dramatically under-used since the pandemic and a new approach to working from homes is well established. This has effectively freed-up huge numbers of buildings. These need to be re-furnished and insulated for housing use before ANY further houses are built. Any builds must be on available genuine brownfield ie by definition; land that has been previously built on; not land that is stripped of its trees and vegetation and wildlife habitat then renamed as 'unused' or 'vacant' land. The concept of; building on "Brownfield first" needs to be "Brownfield ONLY" (ref research by L. Stothard and Prof Dave Gregg's stats and analysis)</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),</p>	<p>As my representation is seeking a modification to the plan, YES, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-927
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 RA2.2

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 issues: only 300 dwellings could come forward in the plan period for the two sites - this and RES RA2.1]

<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. 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-928
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 RA2.2

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 [No evidence to demonstrate the developability of the sites this and MPA RA 2.1: 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-929
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 4.3

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: No evidence for how the capacity of 1000 dwellings has been produced for this and MPA-RA 4.1 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-930
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.	MUA-RA4.1

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 for this and MPA -RA 4.1 & MPA-RA 4.3 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-931
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?	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.	MUA-RA7.2

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 of deliverability of this and MUA-RA 71. and MUA-RA7.3]

<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-932
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?	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.	MUA-RA7.3

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: no evidence of deliverability of this and MUA-RA7.1 and MUA-RA7.2]

<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-933
Person ID	1324038
Include files	LPSD-660-672, 933-935-EM-Teage Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Mr Steve Parry
Position	
Company / Organisation	ION Property Development Ltd
Agent ID	1323576
Agent Name	Andrew Teage
Position	
Company / Organisation	WSP
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
* 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	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer to attachment 4.1.2. To reiterate Ion's support for core policies of the WLPSP set out in chapter 2, Ion can confirm that it is fully supportive of the WLPSP's Development and Regeneration Strategy, particular the focus on regeneration through eleven designated Regeneration Areas, including Hind Street and St Werburgh's, which will rejuvenate existing neighbourhoods and create new neighbourhoods. Ion can also confirm that they are committed to working with Wirral Council and the LPA to assist in the ambitious delivery of regeneration in Birkenhead at scale and at pace, with high quality urban design and sustainability embedded throughout. As such, Ion agree with the WLPSP vision to Re-imagine, Re-discover, and Re-connect Birkenhead, and are therefore supportive in principle of the core draft policies under Policy WS 1 The Development and Regeneration Strategy for Wirral 2021 - 2037 in achieving this vision.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective	

<p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>omplies with the Duty to co-operate * 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</p>	

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

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

Comment ID	LPSD-934
Person ID	1324038
Include files	LPSD-660-672, 933-935-EM-Teage Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Mr Steve Parry
Position	
Company / Organisation	ION Property Development Ltd
Agent ID	1323576
Agent Name	Andrew Teage
Position	
Company / Organisation	WSP
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.	WS3.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	refer to attachment 4.3.6. ION is supportive of the Council's intention to assist with viability challenges of bringing forward new residential development across the identified Regeneration Areas at the outset of the plan period by reducing or waiving the affordable housing requirement on earlier phases of development. They are also confident of the ability to provide affordable housing as part of the overall Hind Street Urban Garden Village scheme within its latter phases.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the	

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

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

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

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

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

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

If you wish to participate in the

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

LPSD-935

Comment ID	LPSD-935
Person ID	1324038
Include files	LPSD-660-672, 933-935-EM-Teage Attach 1 of 2 2507_Redacted.pdf
Consultee Name	Mr Steve Parry
Position	
Company / Organisation	ION Property Development Ltd
Agent ID	1323576
Agent Name	Andrew Teage
Position	
Company / Organisation	WSP
Number	Policy WS 10
Title	Infrastructure Delivery
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.	WS10
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 4.7.1. To reinforce ION's representations in relation to policy WS 1.3 Infrastructure, they would like to reiterate here that they are supportive of the infrastructure items that are identified as being critical and essential for Regeneration Area 5 Hind Street & St Werburghs and Hind Street, Tranmere in the

<p>as precise as possible.</p>	<p>Council's Infrastructure Delivery Schedule (IDS) contained within Appendix A of the Infrastructure Delivery Plan (IDP), and as such are broadly supportive of the provisions of WS 10.1.</p> <p>4.7.2. They do however feel it is also important to reiterate that they have concerns over the cost assumptions regarding the provision of infrastructure contained in the IDP, specifically in some instances that there is no supporting detail as to how each item has been costed, as well as discrepancies between the costs included in the IDS and the WLPCVA site specific viability appraisal for Hind Street Urban Garden Village.</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>Revise accuracy of costings in the IDS.</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>	

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>	

Comment ID	LPSD-936
Person ID	1324125
Include files	LPSD-936-EM-Pitt Attach 1 of 2 2507_Redacted.pdf LPSD-936,1203-1205,1227-1228-EM-Pitt Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Ms Rachel Pitt
Position	Senior Planning and Enabling Manager
Company / Organisation	Homes England
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	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	Whole Plan
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>please refer to attachment 1</p> <p>Homes England would like to express its support for the efforts of Wirral Metropolitan Borough Council (WMBC) in preparing a plan for the future needs of the Borough. Homes England supports the preparation of plans to ensure that long term housing needs and economic growth ambitions are met.</p> <p>With the exception of policies that affect Homes England's active land interests, we do not propose to comment on the content of specific policies contained within the Local Plan. Homes England owns land within Wirral Borough, to the South of Clatterbridge Hospital. We provide representations regarding the Plan's impacts on our land holdings within the enclosure to this letter.</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.	The Duty to Cooperate Homes England is satisfied that WMBC has engaged constructively, actively and on an ongoing basis with the Agency during the preparation of the Local Plan Submission Draft.
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	

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

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

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

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

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

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

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

Comment ID	LPSD-937
Person ID	1324768
Include files	LPSD-937-EM-Friends of Harrison Park Form 2507_Redacted.pdf
Consultee Name	Ms. Lynette Rose
Position	Chair
Company / Organisation	Friends of Harrison Park
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 10
Title	New Brighton 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.	Harrison Park

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 Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Harrison Park should be considered as a heritage park, the Harrison family donated the parks land and surrounding area. Harrison Shipping line is a well re-knownned firm that locally supported the Wallasey area. The maps do not identify the park as such in the way it has been shown.

omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	Harrison Park should be considered as a heritage park, the Harrison family donated the parks land and surrounding area. Harrison Shipping line is a well re-knownned firm that locally supported the Wallasey area. The maps do not identify the park as such in the way it has been shown.

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-938
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 2
Title	The Places and Our Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	vision
Please state which Site ID/Reference this representation relates to.	

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

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

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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Comment ID	LPSD-939
Person ID	1250036
Include files	LPSD-939,956-958-EM-Thomas 2207_Redacted.pdf
Consultee Name	Mr Neil Thomas
Position	Senior Manager Flood and Coastal Risk Management
Company / Organisation	Lead Local Flood Authority, Wirral Borough Council
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? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	6.35
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.	Thank you for consulting with the Lead Local Flood Authority and Coast Protection Authority on the draft Local Plan. There are no representations from either Authority to address any legal aspects of the draft Plan.
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>6.35 The Coast Protection Authority agrees that Coastal Change Management Area requirements should be reviewed during the review of the Local Plan and take into account any further information, evidence or Policy Change in the Shoreline Management Plan.</p>

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

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

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

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

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

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

LPSP-940

Comment ID	LPSP-940
Person ID	1249263
Include files	LPSP-940-941, 943-944, 949-951-EM-Gilbert Attach 2507_Redacted.pdf
Consultee Name	Acceptable LLP
Position	
Company / Organisation	
Agent ID	1324020
Agent Name	Mr Ian Gilbert
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS3.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared 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. It is considered that the affordable housing need figure of 374 units per year is not robust and policies based on this figure are unsound as a consequence. It is our view that Wirral's affordable housing need has been artificially reduced: <ul style="list-style-type: none"> • By using national gross household formation rates rather than 2014-based SNHP rates for Wirral Borough, and by applying a low proportion of households who are likely to be in need at levels well below the equivalent figure for existing households, affordable housing need has been suppressed. • By changing how social re-lets have been factored into the analysis, arc4 has increased the supply of affordable housing compared to how this element was calculated in its 2019 SHMA. The new approach also involves double-counting first lets, by also banking these new completions at an earlier stage.

	<ul style="list-style-type: none"> By increasing the timeframe for disposing of the backlog from 5 to 10 years, arc4 is assuming that hundreds of households will be without suitable accommodation in the medium-term.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally	4.23 To address the backlog of affordable housing in full over the first 5 years of the Local Plan, and by making amendments to arc4's methodology to ensure a sound approach, Wirral's annual affordable housing need would be far higher than 374 units per year.

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

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

LPSP-941

Comment ID	LPSP-941
Person ID	1249263
Include files	LPSP-940-941, 943-944, 949-951-EM-Gilbert Attach 2507_Redacted.pdf
Consultee Name	Acceptable LLP
Position	
Company / Organisation	
Agent ID	1324020
Agent Name	Mr Ian Gilbert
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 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.	WS3.4
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 attachment."4.10 The Council's evidence demonstrates a need for larger family homes. However, the Council's spatial strategy is seeking to direct development to where there are available brownfield sites. For the reasons set out below, we consider that this will not deliver sufficient variety of land to meet the needs of different groups. This has resulted in a mismatch between housing needs and supply. 4.11 Wirral's reliance on urban previously developed land will inevitably deliver predominantly

	apartment led and high-density schemes such as Wirral Waters. As a result, the units likely to be delivered from its developable supply of urban sites will be smaller 1- and 2-bedroom units. This is contrast to an identified need to deliver 60% (across all tenures) of larger 3- and 4-bed units."
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>4.18 Consequently, we consider the Council must look to allocate additional sites which are suitable, available, and deliverable to ensure the right type of homes are provided in the right locations across the Borough.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-942
Person ID	1323898
Include files	LPSD-585, 942 & 946-948-EM-Watson Form 5 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	WS3.2 – Housing Density 2.1. Leverhulme have provided detailed representations on housing density within their joint representations with the consortium of parties (see evidence by Lichfields (July 2022 para.5.15.11). Those representations concern several interrelated matters including the effect of the proposed density on the viability of development allocations within Wirral. Representations prepared by Roger Hannah (July 2022) provides evidence that the assumed housing mix across

as precise as possible.

the typologies does not result in densities above 45dph (pp.27-30) for the generic typologies and 40-98dph for strategic sites. This is a considerable difference from the Aspinall Verdi assessments of 40-70dph for generic typologies and 29-453 for strategic sites and does not support the minimum 60-70dph expected by Policy WS3.2 (noting that WS3.2 proposes a net developable area, not gross (WLP para.3.63)).

2.2. The detailed assessment by Roger Hannah highlights a significant concern that site coverage is

grossly overestimated in the assessment by Aspinall Verdi for the vast majority of sites. Policy WS3.2 will thereby need to be amended to reflect deliverable developments based on the Council's own housing mix requirements. This will lead inevitably to the need to identify additional sites. The assessment also evidences that the strategic sites will contain a high concentration of apartments, such that additional sites will be needed to provide the 3, 4 and 5 bedroom dwellings that the Borough requires. It will also fail to deliver the affordable housing required 2.3. The draft Local Plan's own allocations are in direct conflict with Policy WS3.2. The mix of housing required by the Borough cannot be provided by the allocations.

2.4. Leverhulme considers that many of these issues derive from the false position adopted by the LPA that the Green Belt should not be considered for development under any circumstances, a position that has persisted to the submission local plan despite clear concerns raised by Wirral's largest landowner and the UK's largest housebuilders, amongst others, at each stage of plan preparation.

2.5. This position has resulted in the Council presenting a strategy that appears to sit well with national planning policy but will in fact entirely fail to meet the needs and desires of its residents and businesses, and is directly contrary to National Policy.

2.6. These concerns were raised with the authority at earlier stages of the consultation but no changes to the policies and proposals have resulted. Rather than engaging on these matters, the LPA have, via their consultants, responded to the most recent concerns around the proposed densities that no changes are required, as set out in Document H5.5. The Consortiums concerns are addressed as representation E19 (paras. 2.43 to 2.52). The response summarises (in its view) a number of 'broad criticisms levelled at the study which collectively are considered to make any policy based on the work undeliverable and thus unsound.' These include:

- That the work was not subject to effective consultation with landowners and developers directly involved in the delivery of housing;
- That the work is not reflective of other evidence within the Local Plan evidence base, specifically the 2018 baseline viability study and the draft Strategic Housing Land Assessment (SHMA) 2019;
- That the study does not effectively consider biodiversity net gain and the Blue and Green Infrastructure and the implications these will have on density;
- The study does not focus enough on local character;
- That historic delivery densities are flawed as a basis for future projections;
- That PPG cautions against the isolated use of 'dwellings per hectare' as proposed in WS3.2;

2.7. The LPAs consultants have responded to these concerns. They defend the position taken citing that:

'almost 20% of the requirement is for flatted accommodation, with 65% requiring a house with the main need being a three-bedroom house' and that: '...Countless examples of this need can be delivered at a higher density. Even the requirement for larger four bed houses can be delivered at higher density through townhouses / three storey properties – such approaches have been used extensively for almost 20 years'.

2.8. Leverhulme strongly disagrees with this, for the reasons set out in the consultation submission - that is, the interrelationship of all of the relevant aspects of development to determine the most appropriate and deliverable approach.

2.9. Wirral Council's approach can be summarised as "hopeful in the extreme" and it disregards the substantial evidence demonstrating its many flaws on this matter.

2.10. We would highlight to the Inspector that the LPA response acknowledges that 'The density study was not intended to address viability but only to review the Council's existing approach and to recommend where higher densities would be most appropriate' (emphasis added). This emphasises the flaws we consider to exist in the foundations of the Local Plan in that the brief for the density study was not to identify appropriate densities but to review the existing approach and recommend where higher densities would be most appropriate.

2.11. To some considerable degree, this approach is simply a case of seeking to justify the unjustifiable by pushing the evidence in one direction from the outset.

2.12. Furthermore, the Council's response suggests that decision makers would be considering the full range of policies to manage density on any particular site and that to place excessive emphasis on WS3.2 (as they suggest the Consortium do) is misleading as there are policies for design, green infrastructure, parking etc. considered in the planning balance. It states that 'The density policy should be used as a starting point for site-specific consideration...' (emphasis added). We disagree with this assumption of how policy would be applied for the following reasons.

2.13. The densities are titled 'minimum' and a decision maker would fully expect this to be met. There is only one justification cited in WS3.2 for a decision maker to reduce the density below the minimum, which is having regard to 'site characteristics' (WS3.2B). The Consortium and Leverhulme have provided detailed considerations of why they consider the densities to be very likely to be overstated and that fewer dwellings will be delivered, due to the other policies applied by the Local Plan. It is not evident that a similar exercise has been carried out by the LPA – indeed, it appears that this has not been carried out, as the response to E19 in H5.5 indicates this would be for the decision maker to consider on a site-by-site basis. However,

	<p>other LP policies are not 'site characteristics' and would not therefore enable a reduced density under WS3.2B. As drafted, those matters would essentially result in a departure from the plan.</p> <p>2.14. There are significant outstanding concerns regarding the proposed densities and whether they are justified in relation to the housing mix and housing type needed/desired, and whether infrastructure and open space could be realistically delivered on these sites. Further, we have significant concerns whether the sites are viable – and there is substantive evidence to demonstrate that they are not - and whether they would be capable of delivering even the low affordable housing levels sought (please see comments on WS3.3). Historic delivery rates from several heavily-subsidised regeneration schemes have been very poor and indicate that allocations would be extremely slow to deliver, if at all. The minimum densities proposed are overly rigid and will not provide the homes that people want or the infrastructure they need.</p> <p>2.15. For each of the above reasons we consider the housing density policy to be based on a flawed fundamental premise such that the evidence base does not seek to identify appropriate densities due to the way it was commissioned, is unjustified and inconsistent with national policy.</p> <p>2.16. The Leverhulme Vision would provide one appropriate alternative to the Council's approach, delivering family housing at appropriate densities on viable sites with higher levels of affordable housing (25%), suitable open space, alternative green space, and with health, wellbeing and building beautifully forming the core, deliverable basis for sustainable development. The Leverhulme Vision should therefore have been considered as an alternative (or additional), approach to the spatial strategy to deliver an appropriate solution to meeting the identified needs of the community within The Wirral.</p> <p>5.21 In summarising the Housing Policies under WS3 it appears to be a consistent theme within the draft Local Plan that a relatively crude approach has been taken towards the drafting of policies – resulting in policies which have only a cursory, if any, relationship with the supporting text and the evidence prepared. They lack detail and fail completely to withstand scrutiny in respect of delivery and outcomes that would be achieved when decision makers attempt to apply them.</p> <p>5.22 As presented in this draft Local Plan, the required homes, their design, character, tenure and supporting facilities offered by their location will simply fail against the economic, social and environmental aims of the plan and the improvements sought. The draft Local Plan is not sound.</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>	No comment

<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>No comment</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>WS3.2 – Housing Density</p> <ol style="list-style-type: none"> 2B should be amended to reduce the minimum densities in order for the type and character of homes required/desired (as shown through the evidence) to be delivered. At present the densities are considered to be too high to deliver the preferred housing mix; 2B must be amended to include a much wider range of circumstances in which the 'minimum' density may not be applied, in accordance with the Council's responses to consultees on this matter; <p>While the above changes would better reflect the evidence in order to make the policy Sound, the changes will alter the effectiveness of the Plan and the allocations such that the Plan will remain unsound.</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>The matters raised by Leverhulme are a complex array of interrelated planning issues that identify failings in the strategy and the detail of the Plan, its preparation, drafting and effectiveness. These are matters of interpretation and understanding of the evidence produced by the Council, and of evidence prepared to assist the Council at earlier stages of plan making.</p> <p>It will require the consideration and cross-examination of evidence and the range of representations made in order to assist the Inspector in coming to a view on the soundness of the policies with particular regard to their compliance with national planning policies, their effectiveness and justification.</p> <p>To assist the Inspector with the examination we consider it essential that Leverhulme attend any Hearing Session on Housing.</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-943

Comment ID	LPSP-943
Person ID	1249263
Include files	LPSP-940-941, 943-944, 949-951-EM-Gilbert Attach 2507_Redacted.pdf
Consultee Name	Acceptable LLP
Position	
Company / Organisation	
Agent ID	1324020
Agent Name	Mr Ian Gilbert
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WP 1.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP1.2
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 as precise as possible.	Please refer to attachment Policy WP1.2 - Rear of the Lighthouse Public House (RES-SA1.1): allocated for 10 dwellings in the first five years of the plan, the site does not benefit from extant planning permission.

<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>RES SA1.1 This site should not contribute to the Council's five year housing land supply.</p>

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

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

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

LPSP-944

Comment ID	LPSP-944
Person ID	1249263
Include files	LPSP-940-941, 943-944, 949-951-EM-Gilbert Attach 2507_Redacted.pdf
Consultee Name	Acceptable LLP
Position	
Company / Organisation	
Agent ID	1324020
Agent Name	Mr Ian Gilbert
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WP 3.3
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.	WP3.3
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 as precise as possible.	please refer to attachment Policy WP3.3 - Former Christ Church, Park Road South, Birkenhead (RES-SA3.9): allocated for 16 dwellings, there are significant physical constraints which must be overcome which give rise to viability concerns. The existing church building remains derelict.

<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>Deliverability of RES-SA3.9 uncertain.</p>

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

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

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

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

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

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

Comment ID	LPSD-945
Person ID	1323679
Include files	LPSD-405, 945, 952-955 & 1402-1403-EM-Storey Attach 2207_Redacted
Consultee Name	Ms Eleanor Ogilvie
Position	
Company / Organisation	MCI Development
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 4
Title	Strategy for Economy and 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 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	Please refer to attachment. The Council's evidence base has not provided justification for the retention of existing employment land which is not available for employment use. This matter should have been picked up within the WELPS however not all existing employment sites were assessed. If found to be unsound, further consideration would need to be given to underutilised and vacant employment sites which have no scope for retention and reallocate for alternative uses such as housing. This would further benefit the Council's Housing Delivery Strategy.

as precise as possible.	Specifically Land at Beaufort Road Birkenhead that is not viable or suitable for employment use any longer.
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	If found to be unsound, further consideration would need to be given to underutilised and vacant employment sites which have no scope for retention and reallocate for alternative uses such as housing. Specifically Land at Beaufort Road Birkenhead that is not viable or suitable for employment use any longer.

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

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

LPSD-946

Comment ID	LPSD-946
Person ID	1323898
Include files	LPSD-585, 942 & 946-948-EM-Watson Form 5 of 29 2507_Redacted.pdf LPSD-584, 585, 942 & 946-948-EM-Watson Form 4 of 29 2507_Redacted.pdf LPSD-581 & 946-EM-Watson Form 1 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WS 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 Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is	WS3.3 – Affordable Housing Requirements 3.1 Para 3.36 states one of the aims of the Local Plan is to meet the needs of ‘...the many

unsound. Please be as precise as possible.

households for which market housing is beyond financial reach or unsuitable to their needs.' Affordable Housing is covered within the LP at paragraphs 3.53 - 3.56, stating variously that:

- 25% of households on lower quartile earnings cannot afford any tenure option at current prices (3.53)
- There is a need for 374 affordable homes per annum (3.53)
- That NPPF requires at least 10% of homes to be provided as affordable home ownership products and 25% of those must be First Homes (3.54);
- The Council's evidence is that 20% of homes should be provided as Affordable Homes (3.55)
- The mix of affordable housing should be:
 - o 35% social rented; o 22% affordable rented;
 - o 43% affordable home ownership (3.55)
- The impact of the requirement on different value areas has resulted in the AH provision in WS3.3 (note the text states Policy 'WS 3' but presumably meant 'WS3.3') (3.55).
- Where viability is poor, early phases can reduce or waiver AH to maintain quality (3.56)
- Later phases expected to increase AH where market conditions improve (3.56);

3.2 Policy WS3.3 itself states, in summary, that:

D. Different affordable housing rates will be applied to different Zones, from 10%-20% (WS3.3D);

E. Within Zones 1 and 2 the full 10% AH can be provided on later phases, relying on future increases in land and property values (WS3.3E)

F. 25% to be First Homes; remainder to accord with SHMA unless this significantly prejudices the needs of specific groups (WS3.3F).

G. Off-site provision or payment in lieu will only be considered if on-site provision is not practical, it can be justified, and the proposal will better achieve a mixed and balanced community (WS 3.3G);

3.3 The four Viability Zones are mapped through the Draft Policies Proposals Map. In overlaying the density Zones this highlights the dominance of areas with the lower viability to provide most of the housing within the WLP. Indeed, as Lichfields have noted in representations on behalf of the Wirral Development Consortium (July 2022) around 50% of the total delivery of homes is being provided within the Birkenhead Regeneration Zones. At 10% affordable housing, these areas would, even on an optimistic fully-policy-compliant basis, deliver fewer than 900 affordable homes over the 16 year plan period, which is less than 2.5 years' need as identified in the SHMA (2021). The remainder of sites allocated in the Plan are expected to deliver between 10% - 20% affordable housing, depending on the Zone.

3.4 At best, and regardless of viability, this approach appears to achieve a delivery of around 2,000 – 2,500 affordable dwellings (125-156dpa), well below the 3,266 dwellings (20%, para.3.55) and well below the 25% (374dpa) identified at para.3.53 (taken from SHMA para.3.18). This is surprising as the WLP clearly recognises at para.3.55 that 'evidence indicates that overall a minimum of 20% of newly built housing over the plan period should be affordable' (emphasis added). . The WLP therefore ignores the evidence and fails to deliver even in the most optimistic of circumstances, in conflict with national policy (NPPF 62). We also note that other analyses indicate that the Plan is based on a very low assessment of need that should be interrogated further (Lichfields; para. 6-6.5).

3.5 We cannot reconcile that a need for 374 affordable dwellings per annum (para 3.53) is recognised, which would total circa.6,000 homes over 16 years, has been reduced to fewer than 3,000 dwellings with no apparent consideration of an alternative strategy that may achieve the full need, contrary to national planning policy.

3.6 Even against these inappropriately low ambitions, the policy allows for further reductions in delivery under WS3.3-E and WS3.3-G:

a. WS3.3-E allows up to 100% of affordable housing to be delayed to later phases on regeneration sites, controlled through obligations.

i. This is potentially acceptable if the Council could rely on greater delivery in later phases and an alternative supply for early phases is provided to ensure a consistent delivery across each year of the Plan. There is no such alternative supply to cover these early phases or an indication of where they may be located. Given Green Belt constraints, such sites may be difficult to secure if they are not identified at the plan making stage.

ii. We are very concerned that there is little evidence to reassure the Inspector that later phases of regeneration schemes can be expected to be more viable to deliver the total 10% requirement. Such sites have a history of slow delivery in Wirral due in part to viability. There is no guarantee that improvements will occur and this appears to be an entirely un-evidenced approach that is completely inappropriate for a statutory development plan. iii. Fundamentally, if the Council's strategy fails there is no alternative to pick up the affordable housing need from these sites.

b. WS3.3-G allows offsite provision or payments in lieu on any development proposal.

i. This is essentially a repeat of NPPF 63, contrary to NPPF 16. However, it adds a test of 'practicable'. Clarity should be sought from the Council on what practical concerns have been identified that have required this addition to the tests in NPPF63.

ii. If none have been identified, the word is suspiciously added and WS3.3-G is entirely unnecessary as it is covered by national policy.

iii. If concerns are known, we recommend the Inspector interrogates these as 'practical' issues should not arise with tenure blind housing (WS3.3D).

	<p>iv. If concerns are justified to the Inspector we would recommend that it remains inappropriate for the WLP to not know how and where affordable homes may be delivered, especially when the need is greater than supply and when alternatives are known to be available, such as the Leverhulme Vision.</p> <p>3.7 To assist decision makers when applying WS3.3-E, para.3.56 of the WLP directs that applications on regeneration sites with poor viability will be supported by reducing or waiving affordable housing on early phases (as per the policy), with additional wording that this should be increased on later phases 'where market conditions improve' (3.56 p64). The expectation of improved market conditions is not clearly based on evidence and we would ask the Inspector to investigate this assumption with the Council to ensure it is robust and justified.</p> <p>3.8 The reduction to 10% in Zones 1 and 2 is an acknowledgement that schemes are already unviable. The delay of affordable housing to later phases accepts that early phases will not deliver at all. Our primary concern is that affordable housing will not be delivered and that policy WS3.3 has been designed to disguise this obvious flaw in the WLP strategy by allowing regeneration sites to delay, and potentially avoid entirely, affordable housing, under the hopeful position that market conditions will improve;' and any development may claim 'practical' issues to avoid on-site delivery. As drafted, the WLP will never meet the evidenced need of 25% and could be much lower. This is inconsistent with national planning policy and will not meet the housing needs of the community. The policy is therefore ineffective and contrary to national policy.</p> <p>3.9 Secondly, while the Council will be fully alert to these issues (as they form an important part of the WLP, the evidence, and consultee comments), no alternative approach to secure 25% affordable housing appears to have been considered. For example, Leverhulme have advanced their Vision that can deliver viable sites immediately with 25% affordable housing. No assessment has been advanced of whether the failure to deliver sufficient affordable housing amounts to exceptional circumstances to release the Green Belt. We consider that it does, and that the Plan is clearly unsound for not considering Green Belt releases in the face of the extreme viability issues on regeneration sites and overall viability across the borough which has resulted in a maximum 10% - 20% requirement against a need of 25%. The Policy is therefore unjustified.</p> <p>3.10 The result is a Plan that will deliberately fail to deliver sufficient affordable housing, particularly in the immediate plan period and will at the very least frustrate the needs of this section of the community until later in the plan, but may never meet their needs at all.</p> <p>3.11 As an alternative, the Plan should have considered more viable approaches to the delivery of homes and considered sites that could actually achieve the affordable housing levels required.</p> <p>3.12 As an example, the Leverhulme proposals are capable of delivering 25% affordable housing. In the absence of any evidence to demonstrate that the draft Local Plan allocations will meet affordable housing needs, this factor alone provides exceptional circumstances to justify development within the Green Belt. Such considerations have not formed any part of the preparation of the draft Local Plan, even though evidence demonstrates that the plan will not deliver the homes needed. Wirral Council has failed to consider suitable alternatives to its flawed spatial strategy.</p> <p>5.21 In summarising the Housing Policies under WS3 it appears to be a consistent theme within the draft Local Plan that a relatively crude approach has been taken towards the drafting of policies – resulting in policies which have only a cursory, if any, relationship with the supporting text and the evidence prepared. They lack detail and fail completely to withstand scrutiny in respect of delivery and outcomes that would be achieved when decision makers attempt to apply them.</p> <p>5.22 As presented in this draft Local Plan, the required homes, their design, character, tenure and supporting facilities offered by their location will simply fail against the economic, social and environmental aims of the plan and the improvements sought. The draft Local Plan is not sound.</p>
complies 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.	

<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>No comment</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>No comment</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>WS3.3 – Affordable Housing</p> <ol style="list-style-type: none"> 1 The Policy should achieve <u>25% affordable housing</u> from development sites; 2 Viability has been demonstrated to be a constraint on affordable housing but the Plan fails to deliver the overall 20% affordable housing it recommends. This should be addressed; 3 Where a delay in affordable housing delivery is permitted, the Policy should positively support the delivery of affordable housing elsewhere, for example on currently unidentified sites; 4 The term 'practicable' should be removed from WS3.3-G; 5 If 'practicable' is removed from WS3.3-G, then <u>3-G can be removed entirely</u> as it repeats national policy; <p>Addressing the above soundness issues with this policy will have clear implications on the strategy of the plan in meeting the housing needs of specific groups. We consider the Plan to be unsound if the above modifications are made, unless an additional or alternative provision of affordable housing is identified.</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>The matters raised by Leverhulme are a complex array of interrelated planning issues that identify failings in the strategy and the detail of the Plan, its preparation, drafting and effectiveness. These are matters of interpretation and understanding of the evidence produced by the Council, and of evidence prepared to assist the Council at earlier stages of plan making.</p> <p>It will require the consideration and cross-examination of evidence and the range of representations made in order to assist the Inspector in coming to a view on the soundness of the policies with particular regard to their compliance with national planning policies, their effectiveness and justification.</p> <p>To assist the Inspector with the examination we consider it essential that Leverhulme attend any Hearing Session on Housing.</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-947
Person ID	1323898
Include files	LPSD-584, 585, 942 & 946-948-EM-Watson Form 4 of 29 2507_Redacted.pdf LPSD-585, 942 & 946-948-EM-Watson Form 5 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WS 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 Justified Not Consistent with National Policy
Please give details of why you consider the	WS3.4 – Housing Mix

<p>Local Plan is unsound. Please be as precise as possible.</p>	<p>4.1 WS3.4-H concerns the delivery of an appropriate mix of homes to meet the needs of the community. While this is a standard policy, we consider Policy WS3.4H to be poorly constructed as set out below. Leverhulme also fully endorse the conclusions of the Lichfields evidence that the policy is unjustified as it is inconsistent with the evidence base and will not deliver the larger homes identified as being required (see: Lichfields paras. 7.0-7.14). The policy is therefore unsound.</p> <p>4.2 Policy WS3.4-H does not state where an appropriate mix may be identified, such as the latest SHMA, or within the LP itself, to allow an applicant or a decision maker to consider any updated, or alternative, mix for a specific site. Further, the housing mix is a district wide requirement and any specific site should be capable of flexibility to balance out delivery across the authority. At present the policy does not direct a decision maker to apply anything other than an appropriate mix, which is ambiguous for both applicants and decision makers.</p> <p>4.3 WS3.4-I allows up to 100% of homes to be three or more bedroom properties. While larger dwellings are needed and we have serious reservations that the WLP will deliver these dwellings, we are also uncertain whether this is a deliberate intension of the Policy to encourage 100% larger dwellings and would ask the Inspector to explore this with the Council.</p> <p>4.4 WS3.4-I supports a minimum provision of larger dwellings of either 70% or 30%. WS3.4-J then sets out criteria to assess whether sites are capable and suitable of accommodating larger dwellings. This seems counterintuitive as Part I already favourably seeks the delivery of larger dwellings, up to 100%, so any further assessment should concern a departure from this position rather than criteria for meeting Part I. Presumably this criteria would actually be applied if a scheme is submitted that is below the minimums sought. Therefore WS3.4-J should (presumably) more accurately be an assessment of whether sites are capable and suitable of accommodating 'smaller' dwellings (or 'fewer larger dwellings'). This should be clarified for the policy to be clear and effective.</p> <p>4.5 In either case, the criteria J1-4 allows considerable scope to not meet the aim of WS3.4-I (character of the area; meeting other social, economic or environmental aims; evidence of alternative demand; meeting other aims of the Council). It is not clear whether the Policy has any force at all given these exceptions. These matters should ideally form material considerations if there is a departure from the policy to deliver larger dwellings, at present an application would accord with the Plan if a justification under any of the rather sweeping exceptions can be made.</p> <p>4.6 Given this, the policy is poorly conceived and poorly prepared. It is not in accordance with national policy and unjustified by the evidence.</p> <p>5.21 In summarising the Housing Policies under WS3 it appears to be a consistent theme within the draft Local Plan that a relatively crude approach has been taken towards the drafting of policies – resulting in policies which have only a cursory, if any, relationship with the supporting text and the evidence prepared. They lack detail and fail completely to withstand scrutiny in respect of delivery and outcomes that would be achieved when decision makers attempt to apply them.</p> <p>5.22 As presented in this draft Local Plan, the required homes, their design, character, tenure and supporting facilities offered by their location will simply fail against the economic, social and environmental aims of the plan and the improvements sought. The draft Local Plan is not sound.</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</p>	<p>No comment</p>

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.	No comment
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy	<p>WS3.4 – Housing Mix</p> <p>1. This policy <u>cannot</u> be readily amended to provide the type, size and tenure of homes needed by the community, due to the allocations in the plan being largely incapable of delivering against the evidenced housing needs. We therefore consider the policy to be unsound and modifications to the policy would not make it effective;</p> <ol style="list-style-type: none"> 1 If the Inspector is generally satisfied that the mix can be delivered, policy WS3.4-H should be amended to state where the '<i>appropriate</i>' housing mix' will be identified. This will reduce uncertainty; 2 If the criteria under WS3.4-J concerns the delivery of larger dwellings, the criteria <u>should be deleted</u> as WS3.4-I already supports a minimum number of larger dwellings; 3 If the criteria under WS3.4-J are to assess schemes where the number of larger dwellings applied for is <i>below</i> the minimum stated, then the text should be altered to: '<i>...when assessing whether sites are capable and suitable of accommodating larger <u>smaller</u> dwellings:</i>' 4 The criteria under WS3.4-J should be refined as the scope of allowed departures from the Policy are considered to be too broad to make the policy effective.

or text. Please be as precise as possible.	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<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>The matters raised by Leverhulme are a complex array of interrelated planning issues that identify failings in the strategy and the detail of the Plan, its preparation, drafting and effectiveness. These are matters of interpretation and understanding of the evidence produced by the Council, and of evidence prepared to assist the Council at earlier stages of plan making.</p> <p>It will require the consideration and cross-examination of evidence and the range of representations made in order to assist the Inspector in coming to a view on the soundness of the policies with particular regard to their compliance with national planning policies, their effectiveness and justification.</p> <p>To assist the Inspector with the examination we consider it essential that Leverhulme attend any Hearing Session on Housing.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-948

Comment ID	LPSD-948
Person ID	1323898
Include files	LPSD-585, 942 & 946-948-EM-Watson Form 5 of 29 2507_Redacted.pdf LPSD-584, 585, 942 & 946-948-EM-Watson Form 4 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WS 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, 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 Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is	WS 3.5 – Self Build and Custom Housebuilding 5.1 Policy WS3.4-K expects sites of more than 50 dwellings, where a need is identified in the area, to secure serviced plots of land. Policy WS3.4-L requires these to be marketed for 12 months and if not sold within that time, they may be offered to a Registered Provider before being built out by the developer.

unsound. Please be as precise as possible.

5.2 Para. 3.51 of the LP confirms the growing popularity of SBCH and states that it will 'encourage' the provision of plots through WS3 but that the preference for rural sites is not likely to be met due to the Green Belt.

5.3 At first glance the policy on self-build and custom housebuilding (SBCH) does not encourage or support the favourable determination of applications for SBCH and certainly not in relation to individual projects, which would presumably be determined under the ordinary development policies of the Plan. It provides no additional weight to this type of housing at all and only seeks to potentially provide serviced plots within larger developments.

5.4 The Policy is written in the language of the Duty to Provide Serviced Plots (Self-build and Custom Housebuilding Act 2015 (legislation.gov.uk)), which is a Duty on the LPA to maintain a register of those interested in self build homes. The Duty requires the Council to have regard to the Register and that 'At the end of each base period, relevant authorities have 3 years in which to permission an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period' (Paragraph: 023 Reference ID: 57-023201760728). There is no leeway in the Duty but there is no sanction either, except that 'regard to the register' may include consideration of past unmet need in the planning balance.

5.5 SBCH can be delivered through serviced plots but also through several other approaches. In Wirral, they appear to be largely delivered through individuals finding appropriate plots of land themselves or converting existing structures and buildings, as evidenced in the Council's AMR 2019. In other areas they may be delivered through specific allocations for solely SBCH homes.

The Policy says nothing about these circumstances, even though individuals finding a plot (noted as windfall development in the Local Plan) make up the vast majority of SBCH in Wirral.

5.6 To identify the demand, the Council maintains a register of SBCH (as they are required to do) to determine how the authority is delivering against the Duty. The Duty provides an allowance of three years to deliver serviced plots against the date of joining the register. The Council have reported on the progress of delivery of SBCH within its Annual Monitoring Report up to 2018-19 (Published January 2021). There are no later AMRs. At the time, this indicated that 207 individuals were registered with a preference for the following:

- 150m2 – 499m2 plots
- 57% seeking a detached dwelling
- Preference for the West of the Borough;
- Preference for locations outside existing built up areas

5.7 The AMR then states that there were 113 plots for single dwellings with potential for self build with planning permission.

5.8 Despite the Council ceasing to record its progress on SBCH, the Government publish the returns once a year, providing a quantitative demand against the supply of serviced plots in relation to the Duty (Self-build and custom housebuilding data: 2016 to 2020-21 - GOV.UK (www.gov.uk) published 8th February 2022). Although this is based on returns by the LPA, we recommend it provides the most up to date data for Wirral. It shows the following demand and delivery:

(refer to table in attachment)

5.9 The above data is readily available to the LPA when preparing the Plan. The failure to analyse the demand and supply in any detail is a failure of the Plan and should be corrected we would highlight that there is a wealth of information that the Plan could also have in relation to SBCH if it truly sought to address the needs of this section of the community. these representations we cite the 2021 Government review of SBCH, The Bacon Review Richard Bacon MP, titled House - How putting customers in charge can change everything (2021) . This was subject to an Independent review published 24th June 2022 available for the draft WLP and therefore we concentrate on the 2021 report.

5.10 The Bacon Review provides a thorough assessment of demand and supply issues, principally to identify how the UK could deliver a much greater number of self-build homes. The Review made six recommendations, which include raising awareness of the Right to Build recommendation) and to support SBCH through the planning reforms (5th Chapter 6 concerns the planning processes and confirms that:

'Permissioned land is without doubt the single greatest constraint to the growth of the self-commissioned housing market' (p.64);

'Since 2012 the planning system has needed to consider the demand for custom and self-build homes. In practice such activity is rarely undertaken in a robust way. The result is that local plans rarely reflect either the underlying demand or preferences of the market' (p.64);

5.11 and within the Economic Analysis section:

'In a NaCSBA survey (2020) of would-be self-builders, 42 per cent said a plot of land was a barrier (and 49% the process of gaining planning permission)

5.12 The reliability of SBCH Registers and how they compare to demand identified through other sources is a fundamental issue in identifying true demand for this type of housing. The Bacon Review again provides clear caution on relying on the registers, with the following commentary:

'Medium term demand is available from the Right to Build Registers that each local authority has been legally obliged to maintain since 1 April 2016. These Registers show a level of demand that is consistently below the level of international delivery or that from consumer surveys. This gap can be explained in part because only 13% of the population are aware of the Self-Build Registers including over half of self-builders. Only one in six self-builders identified as having joined a register.

The Registers themselves are therefore incomplete records of demand. Furthermore, both MHCLG and NaCSBA analysis shows a significant volume of records are removed from Registers each year, or moved within Registers such that the duties on the authority are reduced. In addition, it has become increasingly difficult to join the Register in the area where you would

like to live. The most recent NaCSBA survey identified 32% of planning authorities imposing constraints to those seeking to join the key Part 1 of the Registers including substantial and unjustifiable fees and the requirement for a mortgage offer to be in place. (p.31, emphasis added)

5.13 We would therefore caution the authority in solely using the Registers, which we consider to significantly underestimate true demand, a matter that the Council should have been aware of if a considered review of the supply and delivery of SBCH were undertaken.

5.14 It is noted that LP para.3.51 states 304 people on the register, not 306 as per the return but this does not make a notable difference. It is also questioned whether replacement dwellings (one for one replacements) have been included in the data, which would not represent the Council providing a 'serviced plot' as the owner will have sought a property, applied for permission and then built the home without the need for the Register or any positive facilitation by the LPA. Such 'subversive action' is identified in the Bacon Review (p.64). Further analysis of how the Council have facilitated the delivery of these plots and calculated SBCH delivery would be welcome in this regard and assist the Inspector in identifying whether the data is accurate

5.15 Considering the data, the total number of individuals on the Register (column 2) has increased every year irrespective of the delivery of plots (column 4). This indicates that the plots identified are not meeting the demand from those on the Register, or that more new entrants are joining the register each year than plots delivered. The latter point is not borne out in the data (column

1) as the total number of entrants each year is stated, and this has increased each year (column 2) with no evidence that the plots delivered have reduced the demand. Therefore the LPA must be failing to either manage the Register properly or it is failing to deliver serviced plots for those on the Register, relying on individuals to find their own plots but recording them as the provision of serviced plots.

5.16 The situation has deteriorated every year since Period 1, indicating that the delivery of this type of housing has little to do with the Council taking a favourable and pro-active approach. The Policy appears to take the same approach to this important demand as the LPA has taken prior to the submission of the LP.

5.17 Combining the Government data and the preferences identified in Wirral AMR2019, the Council's approach to SBCH is woefully short of what is needed or demanded.

5.18 Policy WS3.5 is designed only to assist the Council in meeting its Duty to provide serviced plots but does nothing to actually deliver SBCH homes as it grants no additional weight at all to any SBCH proposals, it only seeks to secure plots (for a limited time) on larger allocations. The policy is far short of what is needed and indicates a cursory approach to this type of housing and a poor understanding of the demands and delivery of such homes. The need exists now and there will be a predictable failure to meet the demand for Serviced Plots in Base Periods 7 (205), and 9 (306) given past undersupply. We are uncertain how the Council will manage Base Period 8.

5.19 The policy is unsound as it is not justified based on a proportional approach to the evidence available. Even a straight forward desk top assessment of the available data on this matter, at the time of submission of the Plan, highlights that:

- The requirement to identify the type, size and tenure of SBH is held within para. 62 NPPF;
- There is a separate Duty to deliver serviced plots of land to meet the number of persons on the Council's SBCH Register within three years of entry on the register;
- Demand for serviced plots is not being met in Wirral, failing against the Duty;
- The situation will predictably worsen under the approach of the LPA as it has worsened in every Base Period to date. This is particularly concerning in the short term when the LP should be at its most effective;
- Demand is mostly for homes outside of urban areas, contrary to the Councils SBCH Policy. The policy seeks plots in areas where there is identified demand, which we know from the AMR is more rural areas and the west of the district. These areas have the fewest large sites allocated questioning the effectiveness of delivery;
- There is no analysis of how many plots may be delivered from the allocations, which is necessary to know whether it may be effective or whether alternative approaches may be more appropriate;
- The allowance for marketing over 12 months and sale to an RP covers a short period of time, particularly for sites of over 50 units, such that the delivery of serviced plots is not guaranteed;
- The vast majority of SBCH applications to date have been individual plots brought forward by individuals. However, the policy pays no regard to this at all and concerns the delivery of serviced plots within larger schemes. It would not, despite its title, assist a decision maker in determining an application that was not within a site of 50 or more dwellings, i.e. the vast majority of cases;
- Paragraphs 3.68 - 3.74 do not assist a decision maker in giving additional weight to the provision serviced plots for under 50 units, as such proposals would be expected to be supported in any case.
- The LP admits that the desired rural locations are unlikely to be provided due to the Green Belt. However, its duty under para.35 and 62 needs to be balanced with GB policies especially if there is concern that the policy may fail to deliver, which we consider it will. The Council has not provided this balance or apparently considered any alternative approaches.

5.20 The draft Local Plan completely fails to take relevant factors into account and establish an appropriate approach to self-build housing. For all of the above reasons the SBCH policy is unjustified and does not accord with national policy.

	<p>5.21 In summarising the Housing Policies under WS3 it appears to be a consistent theme within the draft Local Plan that a relatively crude approach has been taken towards the drafting of policies – resulting in policies which have only a cursory, if any, relationship with the supporting text and the evidence prepared. They lack detail and fail completely to withstand scrutiny in respect of delivery and outcomes that would be achieved when decision makers attempt to apply them.</p> <p>5.22 As presented in this draft Local Plan, the required homes, their design, character, tenure and supporting facilities offered by their location will simply fail against the economic, social and environmental aims of the plan and the improvements sought. The draft Local Plan is not sound.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	No comment
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	No comment

<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>WS3.5 – Self Build and Custom Housebuilding (SBCH)</p> <p>The policy should be entirely redrafted to recognise the issues with SBCH and effectively support delivery. It must:</p> <ol style="list-style-type: none"> 1 Identify that decisions will favour SBCH in circumstances where permission may otherwise not be granted, ideally that significant weight will be applied to SBCH proposals (or where they form part of a proposal); 2 Support SBCH on sites of fewer than 50 dwellings, including individual sites, to reflect the evidence of demand; 3 Grant significant weight to applications for SBCH and to meeting the demand for this type of housing; 4 Recognise the Duty to provide Serviced Plots as part of the SBCH Policy; 5 Recognise that the Register is a starting point for identifying demand for Serviced Plots and that greater demand is likely to exist; At the very least the policy should seek to meet the demand on the Register and require effective annual monitoring and management of the Register to ensure those on the Register are regularly informed of available plots; 6 Identify specific allocations for SBCH, ideally where the allowance in WS3.5-L would not apply, so that SBCH providers can secure appropriate land to deliver SBCH separately (and additionally) to normal allocations where housebuilders will regularly be able to out-bid self-builders.
<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>The matters raised by Leverhulme are a complex array of interrelated planning issues that identify failings in the strategy and the detail of the Plan, its preparation, drafting and effectiveness. These are matters of interpretation and understanding of the evidence produced by the Council, and of evidence prepared to assist the Council at earlier stages of plan making.</p> <p>It will require the consideration and cross-examination of evidence and the range of representations made in order to assist the Inspector in coming to a view on the soundness of the policies with particular regard to their compliance with national planning policies, their effectiveness and justification.</p> <p>To assist the Inspector with the examination we consider it essential that Leverhulme attend any Hearing Session on Housing.</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-949
Person ID	1249263
Include files	LPSD-940-941, 943-944, 949-951-EM-Gilbert Attach 2507_Redacted.pdf
Consultee Name	Acceptable LLP
Position	
Company / Organisation	
Agent ID	1324020
Agent Name	Mr Ian Gilbert
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP4.2
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	
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>Please refer to attachment, these sites are referenced in error should be WP4.2</p> <ul style="list-style-type: none"> • Policy WP4.1 – Land at Civic Way, Bebington (RES-SA4.1): allocated for 60 dwellings, no planning application has been submitted and therefore it is unlikely to be delivered in the first five years of the plan. • Policy WP4.1 – Former MOD, Old Hall Road, Bromborough (RES-SA4.1/MPASA4.1): allocated for 250 dwellings, the site has been vacant since 2005 and was assessed by the Council in the 2019 SHLAA as not deliverable or developable. • Policy WP4.1 – Riverside Office Park, Riverwood Road, Bromborough (RESSA4.3/MPA-SA4.2): allocated for 200 dwellings, the Council's 2019 SHLAA has previously concluded that the site was not suitable for residential development and the 2021 ELPS categorises the site as a 'good quality' employment site, owing to its location on the edge of an employment area. • Policy WP4.1 – Eastham Youth Centre, Lyndale Road (RES-SA4.5): allocated for 15 dwellings, the site does not benefit from extant planning permission. The site should not contribute to the Council's five-year housing land supply. • Policy WP4.1 – Former D1 Oils, Dock Road South, Bromborough (RES-SA4.7/MPASA4.1): this 23.5ha site is earmarked for 1,225 dwellings. The site is located within the north-eastern extent of the Wirral International Business Park, surrounded by existing industrial and business uses. The site was formerly in use as a chemical plant and is therefore likely to require remediation. Physical constraints remain on site and considering surrounding uses there are serious doubts over the developability of the site. • Policy WP4.1 – Unilever Research, Quarry Road East, Bebington (RES-SA4.11): earmarked for 120 dwellings, the site is still in active operation for employment use. The site should not contribute to the Council's five-year housing land supply.
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>RES-SA4.1, RES-SA4.1/MPASA4.1, RESSA4.3/MPA-SA4.2, RES-SA4.7/MPASA4.1 have deliverability issues.</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>RES-SA4.5 and RES-SA4.11 site should not contribute to the Council's five-year housing land supply.</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</p> <p>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-950

Comment ID	LPSP-950
Person ID	1249263
Include files	LPSP-940-941, 943-944, 949-951-EM-Gilbert Attach 2507_Redacted.pdf
Consultee Name	Acceptable LLP
Position	
Company / Organisation	
Agent ID	1324020
Agent Name	Mr Ian Gilbert
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WP 5.1
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.	WP5.1
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 attachment <ul style="list-style-type: none"> • Policy WP5.1 – Moreton Family Centre, Pasture Road (RES-SA5.1): allocated for 75 extra care dwellings, the site does not benefit from extant planning permission. The site should not contribute to the Council's five-year housing land supply. • Policy WP5.1 – East of Typhoo, Reeds Lane, Leasowe (RES-SA5.3): earmarked for 100 units, the site does not benefit from planning permission. In the context of the general land use challenges in bringing the site forward, the site should not be included in the Council's five-year housing land supply. • Policy WP5.1 - Former Stirrup Public House, Arrowe Park Road, Woodchurch (RES-SA5.5): allocated for 45 dwellings, it is unclear when the site can be delivered in its entirety with only 15 dwellings granted permission.

<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>RES SA5.1 and RES-SA5.3 should not contribute to the Council's five-year housing land supply.</p> <p>RES-SA5.5 has deliverability issues.</p>

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

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

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