

LPSP-951

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| <b>Comment ID</b>   | LPSP-951   |
| <b>Person ID</b>  | 1249263  |
| <b>Include files</b>  | <a href="#">LPSP-940-941, 943-944, 949-951-EM-Gilbert Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Acceptable LLP   |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1324020  |
| <b>Agent Name</b>   | Mr<br>Ian<br>Gilbert   |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   | Barton Willmore (Stantec)  |
| <b>Number</b>   | Policy WP 6.3  |
| <b>Title</b>  | Residential Sites  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WP6.3  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>*        Yes<br>*        No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>*        Yes<br>*        No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*        Not Positively Prepared<br>*        Not Justified<br>*        Not Effective<br>*        Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | Please refer to attachment,<br>• Policy WP6.3 - Land at Grange Hill Farm, Grange Old Road, West Kirby (RES-SA6.4): allocated for 35 dwellings, in the absence of a planning application or developer, the site should not be included in the Council's five-year housing land supply. |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>RES-SA6.4 should not be included in the Council's five-year housing land supply.</p> |

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

**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**

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| <b>Comment ID</b>  | LPSD-952  |
| <b>Person ID</b>   | 1323679   |
| <b>Include files</b>   | <a href="#">LPSD-405, 945, 952-955 &amp; 1402-1403-EM-Storey Attach 2207_Redacted</a> |
| <b>Consultee Name</b>  | Ms<br>Eleanor<br>Ogilvie  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | MCI Development   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy RA 6   |
| <b>Title</b>   | Wirral Waters Regeneration Area   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Site  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  |   |
| <b>Please state which Site ID/Reference this</b>   | RES-RA6.2,RES-RA6.3,RES-RA6.6   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment.<br>The Council have not provided any evidence to justify the quantity of development that can be delivered in Regeneration Areas along with associated infrastructure within the Plan period. The delivery strategy does not take a realistic view on the economic viability issues that are present on the majority of allocated sites. Insufficient evidence has been supplied to prove the viability of these major regeneration sites be it through grant funding or otherwise. If found to be unsound, further consideration would need to be given to housing growth on viable and deliverable sites on other brownfield land sites which are available. |

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| as precise as possible.   |   |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   | Additional brownfield sites should be allocated |



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

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| 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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| <b>Comment ID</b>  | LPSD-953  |
| <b>Person ID</b>   | 1323679   |
| <b>Include files</b>   | <a href="#">LPSD-405, 945, 952-955 &amp; 1402-1403-EM-Storey Attach 2207_Redacted</a> |
| <b>Consultee Name</b>  | Ms<br>Eleanor<br>Ogilvie  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | MCI Development   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy WS 3.2   |
| <b>Title</b>   | Housing Density   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | , WS 3.2,   |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | The Council have not provided any evidence to justify how the housing density requirements respond to the needs of the Borough and how this will deliver the quantum of larger family housing required. If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver lower density schemes and provide for larger family housing and affordable housing. |

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| as precise as possible.   |  |
| omplies with the Duty to co-operate<br>* Yes<br>* 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)

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

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| <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> |  |

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| <b>Comment ID</b>  | LPSD-954  |
| <b>Person ID</b>   | 1323679   |
| <b>Include files</b>   | <a href="#">LPSD-405, 945, 952-955 &amp; 1402-1403-EM-Storey Attach 2207_Redacted</a> |
| <b>Consultee Name</b>  | Ms<br>Eleanor<br>Ogilvie  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | MCI Development   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy WS 3.3   |
| <b>Title</b>   | Affordable Housing Requirements   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.3,   |
| <b>Please state which Site ID/Reference this</b>   |   |



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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment.<br>The Council have not provided any evidence to justify how they will deliver the quantum of affordable housing required. There is reference to the need for a 'robust' affordable housing policy which has not been forthcoming. This will further lead to a greater undersupply of affordable homes and inequalities across the Borough.<br>If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver affordable housing to respond to the needs of the Borough |

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| as precise as possible.   |  |
| omplies with the Duty to co-operate<br>* Yes<br>* 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)

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

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| <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> |  |

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| <b>Comment ID</b>  | LPSD-955  |
| <b>Person ID</b>   | 1323679   |
| <b>Include files</b>   | <a href="#">LPSD-405, 945, 952-955 &amp; 1402-1403-EM-Storey Attach 2207_Redacted</a> |
| <b>Consultee Name</b>  | Ms<br>Eleanor<br>Ogilvie  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | MCI Development   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy WS 4.2   |
| <b>Title</b>   | Designated Employment Areas   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | , WS 4.2  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment.<br>The Council have not provided clarity on the length of time acceptable for marketing of vacant employment sites. If the plan is found not be sound, a 6-month marketing strategy should be proposed to satisfy Policy WS 4.2 |

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| as precise as possible.   |   |
| omplies with the Duty to co-operate<br>* Yes<br>* 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 the plan is found not be sound, a 6-month marketing strategy should be proposed to satisfy Policy WS 4.2 |

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



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| <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> |  |

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| <b>Comment ID</b>   | LPSD-956  |
| <b>Person ID</b>  | 1250036   |
| <b>Include files</b>  | <a href="#">LPSD-939,956-958-EM-Thomas 2207_Redacted.pdf</a>                    |
| <b>Consultee Name</b>   | Mr<br>Neil<br>Thomas  |
| <b>Position</b>   | Senior Manager Flood and Coastal Risk Management                                |
| <b>Company / Organisation</b>   | Lead Local Flood Authority, Wirral Borough Council                              |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WD 4   |
| <b>Title</b>  | Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 6.37  |
| <b>Please state which Policy Number this representation relates to.</b>   |   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*      Yes<br>*      No   | Yes  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   | Thank you for consulting with the Lead Local Flood Authority and Coast Protection Authority on the draft Local Plan.<br>There are no representations from either Authority to address any legal aspects of the draft Plan. |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*      Yes<br>*      No   |  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*      Not Positively Prepared<br>*      Not Justified<br>*      Not Effective<br>*      Not Consistent with National Policy |  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   |  |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>6.37 The Environment Agency published new Climate Change allowances in May 2022<br/> <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a></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**

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|---|---|
| <b>Comment ID</b>   | LPSD-957  |
| <b>Person ID</b>  | 1250036   |
| <b>Include files</b>  | <a href="#">LPSD-939,956-958-EM-Thomas 2207_Redacted.pdf</a>                    |
| <b>Consultee Name</b>   | Mr<br>Neil<br>Thomas  |
| <b>Position</b>   | Senior Manager Flood and Coastal Risk Management                                |
| <b>Company / Organisation</b>   | Lead Local Flood Authority, Wirral Borough Council                              |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WD 4   |
| <b>Title</b>  | Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 6.39  |
| <b>Please state which Policy Number this representation relates to.</b>   |   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*      Yes<br>*      No   | Yes  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   | Thank you for consulting with the Lead Local Flood Authority and Coast Protection Authority on the draft Local Plan.<br>There are no representations from either Authority to address any legal aspects of the draft Plan. |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*      Yes<br>*      No   |  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*      Not Positively Prepared<br>*      Not Justified<br>*      Not Effective<br>*      Not Consistent with National Policy |  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   |  |



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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>6.39 The statement is ambiguous and would benefit from clarification regarding the responsibilities of the Lead Local Flood Authority for managing flood risk alone on Ordinary Watercourses and the role of the Environment Agency in managing water quality across all water bodies as well as flood risk on Main River</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:

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| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> |  |
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| <b>Comment ID</b>   | LPSD-958   |
| <b>Person ID</b>  | 1250036  |
| <b>Include files</b>  | <a href="#">LPSD-939,956-958-EM-Thomas 2207_Redacted.pdf</a>     |
| <b>Consultee Name</b>   | Mr<br>Neil<br>Thomas   |
| <b>Position</b>   | Senior Manager Flood and Coastal Risk Management                 |
| <b>Company / Organisation</b>   | Lead Local Flood Authority, Wirral Borough Council               |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WD 4.3  |
| <b>Title</b>  | Sustainable Drainage Systems (SuDS) and Natural Flood Management |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WD4.3  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*      Yes<br>*      No   | Yes  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   | Thank you for consulting with the Lead Local Flood Authority and Coast Protection Authority on the draft Local Plan.<br>There are no representations from either Authority to address any legal aspects of the draft Plan. |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*      Yes<br>*      No   |  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*      Not Positively Prepared<br>*      Not Justified<br>*      Not Effective<br>*      Not Consistent with National Policy |  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   |  |

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| <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>Policy WD 4.3</p> <p>L "Local Lead Flood Authority" - should be Lead Local Flood Authority</p> <p>S 1. Words in bold and underline missing: should be as close to greenfield rates <b><u>as reasonably practicable</u></b>:</p> <p>S. SuDS schemes must be designed to manage surface water up to and including the 1 in 100 year six hour event and:</p> <p>1. limit discharge rates and volumes to the greenfield equivalent for green field sites, and as close to greenfield rates <b><u>as reasonably practicable</u></b>, with a minimum 50% betterment, on</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.

brownfield sites;

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),

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| <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> |  |



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| <b>Comment ID</b>   | LPSD-959  |
| <b>Person ID</b>  | 1277264   |
| <b>Include files</b>  | <a href="#">LPSD-959, 960-EM-O'Doherty Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Ms<br>Lucy<br>O'Doherty   |
| <b>Position</b>   | Development Plans Manager   |
| <b>Company / Organisation</b>   | St Helens Borough Council   |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WS 4   |
| <b>Title</b>  | Strategy for Economy and Employment                                 |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 2.22  |
| <b>Please state which Policy Number this representation relates to.</b>   |   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |  |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   |  |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>Our response relates to the issue of meeting sub-regional strategic B8 needs.</p> <p>It is noted that on page 35 of the Plan it states that:</p> <p>“the key cross boundary need for land for strategic warehousing and distribution (known as Use Class B8) is not critical to Wirral.”</p> <p>It is also noted that page 72 of the Plan states that:</p> <p>“based on the conclusions of the City Region Strategic Housing Market and Employment Land Assessment large scale B8 (warehousing) study, no additional provision for large scale B8 is made within Wirral in the Local Plan due to the Borough's position relative to logistics demand.”</p> |

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| <p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p> | <p>As previously stated in our response to the Duty to Cooperate Proforma, Wirral Council December 2020 (as set out in the appendices of Wirral Local Plan 2021-2037 Duty to Cooperate Statement of Compliance, March 2022), St Helens Council do not consider the issue of strategic B8 needs is sufficiently addressed in the LCR SoCG. As raised in St Helens Council's response to the LCR SDS Our Places LCR Listens (Stage 2) Consultation, the Council consider the SDS to be the appropriate place to consider and resolve the provision of strategic B8 employment land. This is a matter of relevance currently, with LCR evidence showing the need to deliver strategic B8 employment land, but agreement on how this overall LCR need should be disaggregated to individual Council areas across the LCR is needed. The SDS provides the mechanism to address this and arrive at an agreed solution, which will then inform subsequent Local Plans.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>   |   |
| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  |   |

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

\*      **Yes**  
\*      **No**

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| <b>Comment ID</b>   | LPSD-960   |
| <b>Person ID</b>  | 1277264  |
| <b>Include files</b>  | <a href="#">LPSD-959,960-EM-O'Doherty Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Ms<br>Lucy<br>O'Doherty  |
| <b>Position</b>   | Development Plans Manager  |
| <b>Company / Organisation</b>   | St Helens Borough Council  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WS 4  |
| <b>Title</b>  | Strategy for Economy and Employment                                |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 3.93   |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |  |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   |  |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>Our response relates to the issue of meeting sub-regional strategic B8 needs.</p> <p>It is noted that on page 35 of the Plan it states that:</p> <p>“the key cross boundary need for land for strategic warehousing and distribution (known as Use Class B8) is not critical to Wirral.”</p> <p>It is also noted that page 72 of the Plan states that:</p> <p>“based on the conclusions of the City Region Strategic Housing Market and Employment Land Assessment large scale B8 (warehousing) study, no additional provision for large scale B8 is made within Wirral in the Local Plan due to the Borough's position relative to logistics demand.”</p> |



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| <p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p> | <p>As previously stated in our response to the Duty to Cooperate Proforma, Wirral Council December 2020 (as set out in the appendices of Wirral Local Plan 2021-2037 Duty to Cooperate Statement of Compliance, March 2022), St Helens Council do not consider the issue of strategic B8 needs is sufficiently addressed in the LCR SoCG. As raised in St Helens Council's response to the LCR SDS Our Places LCR Listens (Stage 2) Consultation, the Council consider the SDS to be the appropriate place to consider and resolve the provision of strategic B8 employment land. This is a matter of relevance currently, with LCR evidence showing the need to deliver strategic B8 employment land, but agreement on how this overall LCR need should be disaggregated to individual Council areas across the LCR is needed. The SDS provides the mechanism to address this and arrive at an agreed solution, which will then inform subsequent Local Plans.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>   |   |
| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  |   |

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

\*      **Yes**  
\*      **No**

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| <b>Comment ID</b>   | LPSD-961  |
| <b>Person ID</b>  | 1324127   |
| <b>Include files</b>  | <a href="#">LPSD-961-964-EM-McComb Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Ms<br>Anna<br>McComb  |
| <b>Position</b>   | Associate Town Planner  |
| <b>Company / Organisation</b>   | NHS Property Services Ltd                                       |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WS 10.4  |
| <b>Title</b>  | Facilities for Education, Health and Emergency Services         |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 10.39   |
| <b>Please state which Policy Number this representation relates to.</b>   |   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |                            |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* 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.   | please refer to attachment |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>NHSPS supports the seeking of contributions to mitigate the impacts of development on local infrastructure as it accords with the principles of sustainable development as set out in national and local plan policies. In relation to section 10.39, the NHS should also have flexibility, alongside the option of seeking financial contributions, to seek the provision of new on-site healthcare infrastructure and to secure free land and infrastructure/ property to meet the relevant healthcare needs arising from developments.</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**

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| <b>Comment ID</b>   | LPSD-962   |
| <b>Person ID</b>  | 1324127  |
| <b>Include files</b>  | <a href="#">LPSD-961 -964-EM-McComb Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Ms<br>Anna<br>McComb   |
| <b>Position</b>   | Associate Town Planner   |
| <b>Company / Organisation</b>   | NHS Property Services Ltd  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WS 10.4   |
| <b>Title</b>  | Facilities for Education, Health and Emergency Services          |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 10.44  |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |



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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |                            |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* 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.   | please refer to attachment |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>In relation to calculating developer contributions, NHSPS support the use of Census data to quantify the estimated population of developments, although it should be noted that the wording should allow for the review of population per household figures. Some flexibility has been accorded regarding project costs in section 10.44. From our experience in this area, simple average construction cost data in quantifying developer contributions towards healthcare must be considered very carefully. In some instances, essential cost assumptions have excluded, which meant potential costs required at delivery were underestimated. NHSPS respectfully requests that relevant expertise and NHS data sources are also considered when establishing GP practice floorspace cost benchmarks in section 10.43</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-963

|   |  |
|---|--|
| <b>Comment ID</b>   | LPSP-963   |
| <b>Person ID</b>  | 1324127  |
| <b>Include files</b>  | <a href="#">LPSP-961- 964-EM-McComb Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Ms<br>Anna<br>McComb   |
| <b>Position</b>   | Associate Town Planner   |
| <b>Company / Organisation</b>   | NHS Property Services Ltd  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WS 10.4   |
| <b>Title</b>  | Facilities for Education, Health and Emergency Services          |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 10.43  |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |  |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   |  |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>In relation to calculating developer contributions, NHSPS support the use of Census data to quantify the estimated population of developments, although it should be noted that the wording should allow for the review of population per household figures. Some flexibility has been accorded regarding project costs in section 10.44. From our experience in this area, simple average construction cost data in quantifying developer contributions towards healthcare must be considered very carefully. In some instances, essential cost assumptions have excluded, which meant potential costs required at delivery were underestimated. NHSPS respectfully requests that relevant expertise and NHS data sources are also considered when establishing GP practice floorspace cost benchmarks in section 10.43</p> |

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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**

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|---|---|
| <b>Comment ID</b>   | LPSD-964  |
| <b>Person ID</b>  | 1324127   |
| <b>Include files</b>  | <a href="#">LPSD-961 - 964-EM-McComb Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Ms<br>Anna<br>McComb  |
| <b>Position</b>   | Associate Town Planner  |
| <b>Company / Organisation</b>   | NHS Property Services Ltd   |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WS 10.4  |
| <b>Title</b>  | Facilities for Education, Health and Emergency Services           |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WS10.4  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |                            |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* 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.   | please refer to attachment |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, it is essential that all planning policies enable flexibility within the NHS estate. On this basis, NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed, which in turn delays vital re-investment in the NHS estate. The NPPF is clear in stating that Local Plans should adopt policies that "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community" (Paragraph 93b). It is important that policies consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from</p> |

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| <p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p> | <p>disposals, as well as revenue spending that is saved, can be used to improve facilities and services. Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>   |   |
| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  |   |

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| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> |  |
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LPSP-965

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| <b>Comment ID</b>  | LPSP-965   |
| <b>Person ID</b>   | 1324027  |
| <b>Include files</b>   | <a href="#">LPSP-643 and 965-EM-Gilbert Attach 2 of 2 2507_Redacted.pdf</a><br><a href="#">LPSP-643 and 965-EM-Gilbert Attach 1 of 2 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Nicholas<br>Mills  |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  | Wain Estates   |
| <b>Agent ID</b>  | 1324020  |
| <b>Agent Name</b>  | Mr<br>Ian<br>Gilbert   |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  | Barton Willmore (Stantec)  |
| <b>Number</b>  | Policy WS 3.4  |
| <b>Title</b>   | Housing Mix  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |  |
| <b>Please state which Policy Number this representation relates to.</b>  | WS3.4  |

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| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |
| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*      Yes<br>*      No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*      Yes<br>*      No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*      Not Positively Prepared<br>*      Not Justified<br>*      Not Effective<br>*      Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| <b>Please give details of why you consider the Local Plan is</b>  | Please refer to attachment<br>51. Putting to one side our client's concerns in relation to the appropriateness of the Council's spatial strategy, we consider that the Council's entire dependence on such sites coming forward will simply not meet the housing needs of the borough in type or tenure. We set out above that the housing requirement will not deliver the aspirational homes or family homes |



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| <b>unsound. Please be as precise as possible.</b>  | that will be required to boost the sectors of growth that the Council is relying on for economic success. However, the Council's own evidence on the mix of housing needs demonstrates that its housing land supply will not meet needs. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  |  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>   |  |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>        |  |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b> |  |
| <b>Please set out the modification(s) you consider necessary</b>   | Increase the housing supply to deliver the mix needed.   |

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

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

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

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

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

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

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| <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> |  |

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| <b>Comment ID</b>  | LPSD-966  |
| <b>Person ID</b>   | 1323898   |
| <b>Include files</b>   | <a href="#">LPSD-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Leverhulme Estate   |
| <b>Agent ID</b>  | 1323897   |
| <b>Agent Name</b>  | Mr<br>Edward<br>Watson  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Strutt and Parker   |
| <b>Number</b>  | Policy WS 5.1   |
| <b>Title</b>   | Green and Blue Infrastructure Networks  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 5.1  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.5 WS5.1 – Green and Blue Infrastructure Networks<br>1.6 The Wirral Green and Blue Infrastructure Strategy was prepared in November 2020. A definition of what comprises Green and Blue Infrastructure (GBI) is set out at 1.18-1.20 of the strategy, but it is essentially a network of multi-functional green and blue spaces and other natural features, urban and rural, which can deliver a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. |

as precise as possible.

## Assessment

### 1.7

Whilst the priority opportunities for GBI are set out in the strategy prepared in 2020, nowhere does the draft Local Plan, or its supporting evidence, demonstrate how these priority opportunities will or can be achieved. Rather, in the absence of any evidence to the contrary, it is apparent that the draft Local Plan's attempt to meet housing needs through the regeneration of brownfield land, regardless of viability and deliverability, cannot meet the priority opportunities that Wirral Council sets out in its own GBI strategy.

1.8 The delivery of the GBI strategy is wholly reliant on the housing set out in the New Local Plan being delivered in a timely manner, and also being sufficiently economically viable to make the appropriate financial contributions required.

1.9 Detailed evidence has been submitted elsewhere in respect of demonstrating that the draft Local Plan's approach to urban regeneration will involve complex schemes with serious questions over delivery and viability even without any contribution, whatsoever, to meeting GBI requirements. This will compromise the delivery of the GBI networks, which require a strategic approach across the Borough.

1.10 Put very simply, the draft Local Plan's approach to housing does not provide any money to spend on the appropriate enhancement of Green and Blue Infrastructure.

1.11 In this regard, it is imperative to note that it is a surprise that, despite undertaking Green Belt Reviews in 2018 and 2019, both of which identified Green Belt land that had the potential to be suitable for release, WBC's Submission Draft Local Plan does not propose to release any land from the Green Belt. This is a proven methodology which would successfully meet the requirements of Policy WS5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity/Landscape protection, without risking the damage or loss of the main objectives of this policy and what it is trying to safeguard.

1.12 As set out in The Leverhulme Vision (April 2020) (appended to this representation alongside a phasing plan showing the three phases of the Vision), the Estate is developing an Estate-wide green infrastructure plan, with the initial focus being on priorities identified in the NPPF, including access enhancements, visual enhancements, and improvements to environmental quality. This would significantly benefit all residents of Wirral Borough and a much more effective approach in comparison to the current proposed housing allocation sites through urban regeneration solely on brownfield sites, which are incapable of meeting the requirements of Policy WS5. (see map in attachment)

1.13 In effect, the draft Local Plan's strategy is fundamentally flawed. Policy WS5 is simply an unachievable "wish-list" because the current draft Local Plan allocations cannot deliver its intent.

1.14 It ought to go without saying that the enhancement of habitats should play an important role in responding to the challenges of climate change and biodiversity, and that the conservation benefits of this has the potential, if done properly, to include:

- Enhanced landscape connectivity across the Wirral;
- Creation and management of new biodiverse habitats;
- Multifunctional habitat design

1.15 However, after a careful analysis of the interactive Wirral Local Plan 2021-2037 Submission Draft Policies Map, several of the sites being proposed for development simply cannot provide adequate improvements to the Green and Blue Infrastructure. This is due to the location of housing allocations RES-RA6.1, RES-RA6.2, RES-RA6.3, RES-RA6.4, RES-RA6.5, RES-RA6.6, RES-RA2.2 and RES-RA2.1 all being located in the Port of Liverpool area, where general improvements or provision of Green and Blue Infrastructure will be severely limited due to the nature and location of the land proposed for, in total around 3,900 dwellings (35% of the new homes being proposed across the Plan area). These sites are economically unviable and undeliverable, even without provisions for Green and Blue Infrastructure (and many other provisions that would normally be expected for any form of development, let alone ambitious and complex urban regeneration schemes, the fact that these things are not costed is a further fundamental flaw rendering the draft Local Plan unsound and is covered elsewhere in other representations).

1.16 This is a significant risk for the draft Local Plan. If the aims of the policy are not achieved on these and/or other housing allocations, the draft Local Plan will not enhance Green and Blue Infrastructure Networks on site. This will lead to their deterioration.

1.17 Further, the policy states that 'where on site provision is not possible, financial contributions will be sought to make appropriate provision elsewhere with regard to the relevant priority opportunities'. The inevitable consequence of this is inadequate financial contributions for Green and Blue Infrastructure Networks in close proximity to the Port of Liverpool if and when the sites are found to be unviable in the process of development.

1.18 These are matters that should already have been explored as part of the consideration of allocations. Wirral Council's blind approach to regeneration regardless of viability and deliverability means that not only will the Borough's Green and Blue Infrastructure not be enhanced, as it should be through sustainable development, but that there is a very real risk of significant harm to Green and Blue Infrastructure and/or the allocation of land for development that cannot be developed.

1.19 The draft Local Plan is unsound in this respect.

omplies with the Duty

to co-operate

\* Yes

\* No

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| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>                        | <p>No comment</p>   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>                 | <p>For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.</p>                     |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please</b></p> | <p>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</p> |

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| <p>note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> |  |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>  | <p>Yes, I wish to participate in hearing session(s)</p>  |
| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>   | <p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p> |
| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept</b></p>  | <p>Yes</p>   |



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

\* Yes  
\* No

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|--|---|
| <b>Comment ID</b>  | LPSD-967  |
| <b>Person ID</b>   | 1323898   |
| <b>Include files</b>   | <a href="#">LPSD-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Leverhulme Estate   |
| <b>Agent ID</b>  | 1323897   |
| <b>Agent Name</b>  | Mr<br>Edward<br>Watson  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Strutt and Parker   |
| <b>Number</b>  | Policy WS 5.2   |
| <b>Title</b>   | Open Space Provision  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 5.2  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.20 WS5.2 Open Space Provision<br>1.21 This policy seeks to ensure that new developments contribute to the improvement and enhancement of open space, which may be secured through a mix of on-site provision and/or financial contributions, and is directly linked to Policy WS5.5, which seeks to mitigate recreational pressure on European sites. As identified in Statements of Common Ground (SoCGs) with authorities adjoining Wirral, Natural England regards the maximisation of on-site greenspace provision as a priority mitigation measure for residential development in north-west England. |

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| <p><b>as precise as possible.</b></p>  | <p>Assessment</p> <p>1.22 Taking this into account, it is essential to note after assessing the housing allocation proposed by Wirral Council in the interactive Wirral Local Plan 2021-2037 Submission Draft Policies, several of the sites, previously discussed in paragraph 1.15 which are being proposed for development will not appropriately provide adequate open space provision for residents of Wirral, either on-site or off-site.</p> <p>1.23 For example, housing allocations RES-RA6.1, RES-RA6.2, RES-RA6.3, RES-RA6.4, RESRA6.5, RES-RA6.6, RES-RA2.2 and RES-RA2.1 are all located in the Port of Liverpool area where open space provision will be significantly limited on site due to the nature, location and sizes of the sites where, together, approximately 3,900 dwellings are being proposed in very close proximity to one another. These draft housing allocations are located in an already highly densely populated area and existing open space provision, at Birkenhead Park and Central Park which are likely to be impacted negatively by increased use of residents from the additional dwellings proposed north and south of the related open spaces, without the significant off-site provision and contributions required to offset and mitigate these impacts. It is important to note that the proposed allocations cannot even provide for off-setting and mitigation of harm, let alone provide for the enhancement required by the policy, in line with Wirral Council's own strategy.</p> <p>1.24 A large number of new dwellings, representing a huge proportion of the total provision in the draft Local Plan, are being proposed in an extremely clustered area without making appropriate or adequate Open Space Provision. This will have a severe negative impact on existing nearby open spaces. In addition, if and when the allocated sites are found to be unviable, it is inevitable that there simply will not be any, or sufficient, financial contributions for off-site provision.</p> <p>1.25 In the absence of any substantive evidence to the contrary, Policy WS5 is undeliverable and the draft Local Plan will harm, rather than enhance, the provision of open space In Wirral. The draft Local Plan is unsound in this respect.</p> |
| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>   |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>   |  |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p> | <p>No comment</p>  |
| <p><b>If you wish to make a separate representation,</b></p>   | <p>For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.</p>  |

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| relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.   |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p> | <p>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p>   | <p>Yes, I wish to participate in hearing session(s)</p>   |

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| <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>  |  |
| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  | <p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p> |
| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p> | <p>Yes</p>   |

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| <b>Comment ID</b>   | LPSD-968  |
| <b>Person ID</b>  | 1323898   |
| <b>Include files</b>  | <a href="#">LPSD-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | Leverhulme Estate   |
| <b>Agent ID</b>   | 1323897   |
| <b>Agent Name</b>   | Mr<br>Edward<br>Watson  |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | Strutt and Parker   |
| <b>Number</b>   | Policy WS 5.3   |
| <b>Title</b>  | Outdoor Sports Provision  |
| <b>To which part of the Local Plan does this representation relate?</b>   | Policy  |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul> |   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 5.3  |
| <b>Please state which Site ID/Reference this</b>  |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.26 WS5.3 Outdoor Sports Provision<br>1.27 Policy WS5.3 seeks to effectively incorporate Outdoor Sports Provision with the identified needs for the borough, with housing allocations which are not able to provide Outdoor Sports provision required to make an appropriate financial contribution to improve existing facilities.<br>Assessment |



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| <b>as precise as possible.</b>  | <p>1.28 The analysis discussed in paragraph 1.23 above also applies to the Outdoor Sports Provision, as a large proportion of the residential housing allocation will not be able to accommodate outdoor sports provision on site therefore the question remains where will the financial contributions come from in order to provide for the improvement of existing outdoor sports provisions? If and when the housing allocations are found to be unviable and to depend upon public subsidies even without consideration of outdoor sports provision (amongst many other things), it is evident that there is no evidence of suitable, adequate or appropriate financial contributions linked to offsite provision of outdoor sports provision.</p> <p>1.29 This is a fundamental issue, not least because there is an absence of adequate outdoor sports provisions near to the major residential developments RES-RA6.1-6.5, RES-RA2.1/2.2 Wirral Waters Area (approximately 3,900 dwellings), RES-RA5.1 Hind Street, Tranmere (1,400 dwellings) and only a cricket ground near to RES-SA4.7 Former D1 Oils, Dock Road South, Bromborough (1,225 dwellings). Each of these allocations will require significant outdoor sports provision and contributions. However, the wide range of viability and deliverability issues, including but not limited to lack of space on the various sites (similar to paragraph 1.22) and substantive evidence demonstrating an absence of commercial viability for development alone (excluding contributions to meet policy requirements), it is clear and obvious that the provision and success of outdoor sports provision for the majority of the allocated sites is non-existent.</p> <p>1.30 Policy WS5 is undeliverable in this regard. Wirral Council is seeking to build flats and high density housing without making adequate provision for the delivery of its own Green and Blue Infrastructure policy (amongst many other things) and the Plan is unsound in this respect.</p> |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No   |  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b> | No comment   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</b>   | For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.   |

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| <p>relation to the accompanying Habitats Regulations Assessment, please make them here.</p>  |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p> | <p>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b><br/> * No, I do not wish to participate in</p>  | <p>Yes, I wish to participate in hearing session(s)</p>   |

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| <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>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</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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| <b>Comment ID</b>  | LPSD-969  |
| <b>Person ID</b>   | 1323898   |
| <b>Include files</b>   | <a href="#">LPSD-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Leverhulme Estate   |
| <b>Agent ID</b>  | 1323897   |
| <b>Agent Name</b>  | Mr<br>Edward<br>Watson  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Strutt and Parker   |
| <b>Number</b>  | Policy WS 5.4   |
| <b>Title</b>   | Ecological Networks   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 5.4  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.31 WS5.4 Ecological Networks – As discussed in paragraph 1.42 later on in this document, major residential developments being located adjacent to protected/designated sites in the Wirral will pose a significant danger to the integrity of any protected European Site, thus failing to successfully protect Ecological Networks.<br>1.32 In relation to the Environmental Sensitivity Study which informed the Policies Map and the proposed Nature Improvement Areas (NIAs), we would recommend the Inspector should interrogate the basis for how extensive these proposed NIAs are, particularly in relation to land within the West Wirral Heathlands and Arrowe Park NIA (NIA-3) and the Dibbinsdale, Raby |

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| <b>as precise as possible.</b>  | <p>Mere and Eastham Country Park NIA (NIA-7) as after careful analysis we consider that sites have been included which do not match the priority habitats which are the purpose of granting protection to them. The excessive identification of landscapes that require recovery or enhancement gives a false perception that the environment of the Wirral is more sensitive to development than is in fact the case. This leads to the false impression that there are no other alternatives than urban renewal, due to the destruction of sensitive landscapes and habitats which may occur. This is not correct and the improvement of ecological networks and habitats that is sought by the proposed NIAs should be more accurately mapped so that the evidence base behind the land parcels that have been identified is of a higher quality and more utility in determining the strategy and, if necessary, appropriate alternatives.</p> <p>1.33 Land under Leverhulme's control does not need to be included in the proposed NIAs as they do not contain the habitat features that are being sought to be improved. In other words, Leverhulme land is not integral to the proposed NIAs. Accurate identification of the most appropriate areas to focus delivery of biodiversity recovery and enhancement within this policy is essential and, at present, we submit that this comprehensive analysis has not been adequately undertaken making policy WS5.4 unsound and unjustified.</p> |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No   |  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b> | No comment   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</b>                             | For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.   |

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

| hearing session(s)   |  |
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| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  | <p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p> |
| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p> | <p>Yes</p>   |



LPSP-970

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| <b>Comment ID</b>  | LPSP-970  |
| <b>Person ID</b>   | 1323898   |
| <b>Include files</b>   | <a href="#">LPSP-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Leverhulme Estate   |
| <b>Agent ID</b>  | 1323897   |
| <b>Agent Name</b>  | Mr<br>Edward<br>Watson  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Strutt and Parker   |
| <b>Number</b>  | Policy WS 5.5   |
| <b>Title</b>   | Mitigating Recreational Disturbance on International Sites for Nature Conservation              |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 5.5  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.34 WS5.5 Mitigating Recreational Disturbance on International Sites for Nature Conservation<br>1.35 Policy WS5.5 of the WLP seeks to address mitigation for recreational disturbance on International Sites for nature conservation. The policy states that "...contributions from developments will be secured towards mitigation measures identified in the LCR Recreational Disturbance Avoidance and Mitigation Strategy (RMS) which will be completed during the early part of the plan period". The policy goes on to state that: "Prior to the completion of the RMS, the Council will seek contributions as set out in the Information and Guidance Note: Approach to Avoid and Mitigate Recreational Pressure in Wirral (Interim Mitigation Approach IMA) where appropriate, from residential proposals of 10 or more dwellings". |

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| <p><b>as precise as possible.</b></p>   | <p>1.36 The IMA is projected to be in place until the adoption of the RMS. Whilst Wirral Council states that this may take up to the first five years of the Plan period, there is absolutely no certainty whatsoever that this RMS will be produced within 5 years, or will ever be produced. Wirral Council has a record of failing to adopt statutory documents – it has not adopted a Local Plan this century. In direct relation to this, it is of fundamental note that the content of the IMA itself does not yet appear to have been finalised with Natural England (NE) (paragraph 5.52 of the HRA).</p> <p>1.37 Paragraph 4.4.3 of the Duty to Cooperate Statement of Compliance Regulation 19 Submission Draft (March 2022), sets out that the Council is actioning the initial response provided by NE in February 2022. Paragraph 4.4.4 confirms that the Council will need to continue working with NE to seek to resolve issues relating to the IMA prior to submission, and thereafter during the Local Plan examination. It is held that Wirral Council has simply not completed the work required to support the progress of a deeply flawed draft Local Plan.</p> <p>1.38 Paragraph 5.47 of the Habitats Regulations Assessment of the Wirral Local Plan 2021-2037 (April 2022), states that due to the “highly urbanised nature of this area, there is insufficient space for the provision of an adequately sized Suitable Alternative Green Space (SANG)”. As alternative, both the IMA and RMS are likely to rely on Strategic Access Management and Monitoring Mitigation (SAMM).</p> <p>1.39 Regulation 63 of the Conservation of Habitats and Species Regulations 2017 prohibits the competent authority from agreeing to a plan without first ascertaining that it would not adversely affect the integrity of any protected European Site.</p> <p>Assessment</p> <p>1.40 After scrutinising the housing allocations proposed by Wirral Council in the Wirral Local Plan 2021-2037 Submission Draft, it is respectfully suggested that the appropriateness of the approach to recreational disturbance is likely to be a key issue for the examination. This is due to the significant environmental impact that the allocated residential sites are likely to have, including the disturbance from the construction and operational phases of the developments as well as the recreational pressures arising from them, The close proximity of the residential allocations to the sites of European Importance will, in our view, undoubtedly have a significant impact in terms of air, water and noise pollution. This brings into question the effectiveness of the Council's strategy and whether suitable alternatives have been given due consideration. As previously emphasised in Paragraph 1.12, the Leverhulme Vision would deliver undoubted improvements in the Green and Blue Infrastructure, Open Space, Biodiversity and Landscape Value of the Borough whilst moving some development away from the sites of European Importance. This should be a critical objective of the Local Plan in line with National Policy, such as Paragraph 180 of the NPPF which emphasises the need to protect biodiversity, habitats, amongst other factors. This would constitute a better and more balanced approach to development – a mixture of brownfield regeneration and greenfield development supported by landscape and habitat improvements – safeguarding the protected bird species, which would be subject to a significant impact from residential development currently proposed adjacent to their designated habitats.</p> <p>1.41 Unless the effectiveness of the mitigation to protect against the harms highlighted above can be shown to be certain beyond reasonable scientific doubt then the WLP cannot be legally adopted (unless the tests in regulation 64 of the Habitats Regulations are met).</p> <p>1.42 The above is a significant issue as there are housing allocations proposed in close proximity to Ramsar Sites, which are wetlands of international importance for biodiversity and wildlife (ecological networks). Firstly, site RES-SA4.7 (Former D1 Oils, Dock Road South, Bromborough) which is for a capacity of 1,225 dwellings is in a proposed location adjacent to RAM-2 (Mersey Estuary) and RES-SA1.2 (Gibson House, Seabank Road, Egremont) / RES-SA1.3 (Rear of Gibson House, Maddock Road, Egremont) for a capacity of 102 dwellings combined is also adjacent to RAM-3 (Mersey Narrows &amp; North Wirral Foreshore).</p> <p>1.43 The draft Local Plan places sites of International importance at severe risk.</p> |
| <p><b>omplies with the Duty to co-operate</b><br/> *       Yes<br/> *       No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>        |  |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p> |  |

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| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>   | <p>No comment</p>   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>  | <p>For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.</p>                     |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound.</b></p> | <p>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</p> |

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| 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>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>                                     | Yes, I wish to participate in hearing session(s)  |
| If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:   | Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard. |
| <p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p> | Yes   |

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| <b>Comment ID</b>  | LPSD-971  |
| <b>Person ID</b>   | 1323898   |
| <b>Include files</b>   | <a href="#">LPSD-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Leverhulme Estate   |
| <b>Agent ID</b>  | 1323897   |
| <b>Agent Name</b>  | Mr<br>Edward<br>Watson  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Strutt and Parker   |
| <b>Number</b>  | Policy WS 5.6   |
| <b>Title</b>   | Protecting Geodiversity   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 5.6  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.44 WS5.6 Protecting Geodiversity – Put simply, the policy does not appear to reflect the importance of the matter raised in the evidence base of geodiversity, and thus it is questionable whether the Local Plan will be able to adequately protect geodiversity due to the lack of text and intent in the WS5.6 Policy.<br>1.45 WS5.7 Maintenance of Green Infrastructure and Open Space Provision – Similar to the critique of Policy WS5.2 and WS5.3 it is unlikely that Open Space or Outdoor Sports Provision will be adequately provided as expressed in paragraphs 1.22 and 1.28, thus it is also questionable how this very vague maintenance policy will be able to be delivered if a number of new Open Space/Outdoor Sports Provision Areas are not implemented. This part of the Policy is not deliverable and there is no substantive evidence to the contrary. |

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| as precise as possible.   | <p>1.46 WS5.8 Landscape Character</p> <p>1.47 This policy seeks to protect and enhance the natural, built and historic environment as well as preserving the character of the landscape which should be recognised through decisions and policies. The policy also states that development should have regard to the recommendations of the most recent Landscape Character Assessment for the borough and that development must be appropriate in terms of character, appearance and landscape setting of the surrounding area.</p> <p>1.48 The delivery and success of this policy is solely based on the current Landscape Character Assessment for Wirral, published in 2019. On evaluation of WBC's Landscape Character Assessment, although the 2019 document does include some minor amendments to LCT and LCA boundaries, the defined LCTs and associated LCAs bear a striking resemblance to those defined by the previous Landscape Character Assessment by TEP in 2009. Therefore the appropriateness of this policy in creating successful green and blue infrastructure networks for the Borough of Wirral is highly questionable due to the lack of change noted in the newly updated Landscape Character Assessment from the previous one published in 2009, over 13 years ago. This is therefore in contradiction with Paragraph 174 of the NPPF as planning policies and decisions based off the Landscape Character Assessment for Wirral.</p> <p>1.49 WS5.9 Evidence of Approach</p> <p>1.50 This policy seeks to clarify the various evidence documents that can be submitted to satisfy the requirements of Green and Blue Infrastructure Networks. Depending on the scale and the nature of a development proposal, WBC's Landscape Character Assessment could be referenced within a Design and Access Statement, and/or a Landscape &amp; Visual Statement, a standalone Landscape and Visual Appraisal, a standalone Landscape and Visual Impact Assessment or within a Landscape and Visual Impact forming part of an Environmental Statement.</p> <p>1.51 The problem with this policy is due to the selection of evidence types suitable to be submitted to satisfy this policy requirement, the likely landscape and visual effects associated with a particular development are somewhat subjective and as a result, can often form contentious matters between a planning authority and an applicant.</p> <p>1.52 The wording of the policy also contains the word 'benefits' which is not appropriate in assessing the context of the evidence of approach concerning a planning application.</p> <p>1.53 These factors are in contradiction with Paragraph 9 of the NPPF as planning policies and decisions should play an active role in guiding development towards sustainable solutions whilst taking into account of local circumstances, to reflect the character, needs and opportunity of the area. Additionally, as emphasised in paragraph 1.2, the Plan is difficult to read as it sets out the aims of each policy, then states the policies, then explains how these may be implemented. It would be more helpful to include all text that relates to a policy in one place, as it is there to assist a decision maker in coming to a decision on any particular application, rather than having to go through multiple documents simultaneously.</p> |
| omplies with the Duty to co-operate<br>* Yes<br>* 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 | No comment  |



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| <b>Sustainability Appraisal, please make them here.</b>   |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>  | For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.                            |
| <b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b> | <p>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</p> |

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| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>                                     | <p>Yes, I wish to participate in hearing session(s)</p>  |
| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  | <p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p> |
| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p> | <p>Yes</p>   |

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| <b>Comment ID</b>   | LPSD-972  |
| <b>Person ID</b>  | 1323898   |
| <b>Include files</b>  | <a href="#">LPSD-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | Leverhulme Estate   |
| <b>Agent ID</b>   | 1323897   |
| <b>Agent Name</b>   | Mr<br>Edward<br>Watson  |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | Strutt and Parker   |
| <b>Number</b>   | Policy WS 5.7   |
| <b>Title</b>  | Maintenance of Green Infrastructure and Open Space Provision                                    |
| <b>To which part of the Local Plan does this representation relate?</b>   | Policy  |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul> |   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 5.7  |
| <b>Please state which Site ID/Reference this</b>  |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.45 WS5.7 Maintenance of Green Infrastructure and Open Space Provision – Similar to the critique of Policy WS5.2 and WS5.3 it is unlikely that Open Space or Outdoor Sports Provision will be adequately provided as expressed in paragraphs 1.22 and 1.28, thus it is also questionable how this very vague maintenance policy will be able to be delivered if a number of new Open Space/Outdoor Sports Provision Areas are not implemented. This part of the Policy is not deliverable and there is no substantive evidence to the contrary. |

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| as precise as possible.   |  |
| omplies with the Duty to co-operate<br>* Yes<br>* 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. | For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.                     |
| Please set out the modification(s) you consider necessary to make the Local   | 1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'. |

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| <p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> |  |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>  | <p>Yes, I wish to participate in hearing session(s)</p>  |
| <p><b>If you wish to participate in the hearing session(s), please outline why</b></p>  | <p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p> |

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

LPSP-973

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| <b>Comment ID</b>  | LPSP-973  |
| <b>Person ID</b>   | 1323898   |
| <b>Include files</b>   | <a href="#">LPSP-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Leverhulme Estate   |
| <b>Agent ID</b>  | 1323897   |
| <b>Agent Name</b>  | Mr<br>Edward<br>Watson  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Strutt and Parker   |
| <b>Number</b>  | Policy WS 5.8   |
| <b>Title</b>   | Landscape Character   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 5.8  |
| <b>Please state which Site ID/Reference this</b>   |   |



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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.46 WS5.8 Landscape Character<br>1.47 This policy seeks to protect and enhance the natural, built and historic environment as well as preserving the character of the landscape which should be recognised through decisions and policies. The policy also states that development should have regard to the recommendations of the most recent Landscape Character Assessment for the borough and that development must be appropriate in terms of character, appearance and landscape setting of the surrounding area. |

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| <b>as precise as possible.</b>   | 1.48 The delivery and success of this policy is solely based on the current Landscape Character Assessment for Wirral, published in 2019. On evaluation of WBC's Landscape Character Assessment, although the 2019 document does include some minor amendments to LCT and LCA boundaries, the defined LCTs and associated LCAs bear a striking resemblance to those defined by the previous Landscape Character Assessment by TEP in 2009. Therefore the appropriateness of this policy in creating successful green and blue infrastructure networks for the Borough of Wirral is highly questionable due to the lack of change noted in the newly updated Landscape Character Assessment from the previous one published in 2009, over 13 years ago. This is therefore in contradiction with Paragraph 174 of the NPPF as planning policies and decisions based off the Landscape Character Assessment for Wirral. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  |  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>   |  |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>        | No comment   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b> | For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.   |

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| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p> | <p>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>   | <p>Yes, I wish to participate in hearing session(s)</p>   |

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| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  | <p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p> |
| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p>   |

LPSP-974

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|---|---|
| <b>Comment ID</b>   | LPSP-974  |
| <b>Person ID</b>  | 1249638   |
| <b>Include files</b>  | <a href="#">LPSP-974-EM-Cove Form 2107_Redacted.pdf</a><br><a href="#">LPSP-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Agent ID</b>   | 1249640   |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove   |
| <b>Position</b>   | Director  |
| <b>Company / Organisation</b>   | Hive Land and Planning  |
| <b>Number</b>   | Policy WS 1.1   |
| <b>Title</b>  | Homes   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WS1.1   |
| <b>Please state which Site ID/Reference this</b>  |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment.<br>3.3 Richborough are of the view that this housing figure does not go anywhere near far enough if the Council are to realise what are rightly ambitious targets around job creation and economic growth in particular and addressing evidenced shortages in affordable housing. Planning Practice Guidance <sup>1</sup> also states that uplifts to the standard method can be applied where funding is in place to promote and facilitate additional growth, which is the case in Wirral. It is therefore surprising, and without justification, for the Council to not apply the necessary uplift to their housing requirement. |

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| as precise as possible.   | fails to match economic ambition  |
| omplies with the Duty to co-operate<br>* Yes<br>* No  |   |
| Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.  |   |
| Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.   |   |
| If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.        |   |
| If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here. |   |
| Please set out the modification(s) you consider necessary to make the Local   | The housing requirement for Wirral should be in the range of 1,045-1,300 dpa.<br>Allocate land at Mill Hill Road, Irby. |

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

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

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

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

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

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

We have fundamental concerns with regards to the soundness of the Local Plan, which are complex matters that would require detailed discussion



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| 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-975

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| <b>Comment ID</b>   | LPSP-975   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSP-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Policy WS 3.1  |
| <b>Title</b>  | Housing Design Standards   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS3.1  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>* Yes<br>* No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>* Yes<br>* No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | please refer to attachment<br>3.9 Richborough's view is that there should be a closer alignment between the policy requirements relating to carbon reduction and the standards that the housebuilding industry is working towards. For example, in the short term there should be an alignment towards an achievable betterment (19%) against Part L of the 2013 Building Regulations in respect of carbon reduction as this is a standard that the housing industry are currently striving to achieve. |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>Align policy requirements to housing industry standards for carbon reduction i.e. Building Regulations. reference the Future Homes Standard rather than 'zero carbon ready by design'</p> |

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| <p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> |   |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>  | <p>Yes, I wish to participate in hearing session(s)</p>   |
| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>   | <p>We have fundamental concerns with regards to the soundness of the Local Plan, which are complex matters that would require detailed discussion</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-976

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| <b>Comment ID</b>   | LPSP-976   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSP-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Policy WS 3.2  |
| <b>Title</b>  | Housing Density  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS3.2  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>* Yes<br>* No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>* Yes<br>* No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | Please refer to attachment<br>3.12 It is Richborough's view that successful plan making is much more nuanced than simply setting a minimum density policy to try and maximise the number of housing units on the least amount of land possible. There are many factors to be considered. Flexibility should be built into the plan making system to recognise that sites have different challenges and opportunities, which will influence what the optimum numbers of dwellings will be on a scheme. A pragmatic approach is more likely to ensure the appropriate level of development happens at the right time in the right place and is of the right quality.<br>[this would support achieving the right mix and size of dwellings] |



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

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

|   |  |
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| <b>Comment ID</b>   | LPSD-977   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSD-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Policy WS 3.4  |
| <b>Title</b>  | Housing Mix  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS3.4  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>* Yes<br>* No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>* Yes<br>* No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | Please refer to attachment<br>3.25 Richborough is supportive of the general principle to see larger dwellings delivered outside of regeneration areas. However, the policy requires a minimum of 70% of properties to be 3 bedroom or more and flexibility should still be allowed for within the wording of Policy WS 3.4 to allow for individual circumstances to be taken into account.<br>3.26 Ultimately the most up to date SHMA should be used to inform the most appropriate mix of housing in individual circumstances and so Policy WS 3.4 should align itself closer to up to date local housing needs assessments given the longevity of the plan period, rather than seek to establish a stringent target now. |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>The policy requirement for 70% of properties to be 3 bedroom or more should be flexible.</p> |

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

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| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> |  |
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LPSP-978

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| <b>Comment ID</b>   | LPSP-978   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSP-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Policy WS 3.5  |
| <b>Title</b>  | Self-Build and Custom Build Housing                                |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS3.5  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <p><b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b></p>  |   |
| <p><b>Legally compliant</b><br/> *        Yes<br/> *        No</p>   |   |
| <p><b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b></p>   |   |
| <p><b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b></p>   |   |
| <p><b>Sound</b><br/> *        Yes<br/> *        No</p>   | No  |
| <p><b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b></p>   |   |
| <p><b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br/> *        Not Positively Prepared<br/> *        Not Justified<br/> *        Not Effective<br/> *        Not Consistent with National Policy</p> | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| <p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>   | Please refer to attachment<br>3.27 Some more clarity is needed in respect of the specific requirements of this policy and Richborough have concerns regarding the appropriateness of the policy in general. For example:<br>• How transparent is the evidence relating to the demand for self-build plots and is this need effectively largely satisfied through small site or single dwelling completions? Double-counting could exist.<br>• What percentage of plots could potentially be required to be made available for self-build? |

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|  | <ul style="list-style-type: none"> <li>• Following the 12 month marketing period, why do any available plots need to be made available for Registered Providers? Does the self-build requirement form part of the affordable housing quota? Is there an option available for the developer to build out any remaining plots?</li> <li>• 6 months would be a more appropriate time period for the marketing of self-build plots as this would allow for buildout efficiencies if no interest is shown or plots remain unsold.</li> </ul> |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No  |   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>   |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>        |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b> |   |
| <b>Please set out the modification(s) you consider necessary</b>   | Clarify policy requirements and evidence for Policy WS 3.5.   |

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

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

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

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

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

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

We have fundamental concerns with regards to the soundness of the Local Plan, which are complex matters that would require detailed discussion

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| <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> |  |

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| <b>Comment ID</b>   | LPSD-979   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSD-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Policy WS 10.1   |
| <b>Title</b>  | Provision of Infrastructure  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS10.1   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>*        Yes<br>*        No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>*        Yes<br>*        No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*        Not Positively Prepared<br>*        Not Justified<br>*        Not Effective<br>*        Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | Please refer to attachment<br>3.37 The Council must prepare a credible and robust evidence base in respect of how this infrastructure is to be delivered, taking all known viability considerations into account. What appears obvious at this stage is that an alternative housing strategy must be adopted through the identification of an alternative source of sites that are known to be viable, such as Richborough's site at Mill Hill Road in Irby.<br>3.38 An alternative strategy will be necessary in order that the WLP can be found to be sound and the key infrastructure needed to facilitate the level of housing growth needed in Wirral can be viably funded, without almost complete reliance on public subsidy as would currently be the case. |

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



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

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| <b>Comment ID</b>   | LPSD-980   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSD-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Part 4   |
| <b>Title</b>  | Regeneration Policies  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | Part 4 Regeneration Area Policies                                  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*        Yes<br>*        No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*        Yes<br>*        No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*        Not Positively Prepared<br>*        Not Justified<br>*        Not Effective<br>*        Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | Please see attachment<br>4.4 As such, the Council is adopting a risky strategy by focusing almost entirely on the objective of increasing densities on previously developed land and focusing solely on urban renewal objectives, largely within the same geographical area. It is anticipated that the Regeneration Areas won't actually deliver the scale of investment in social and physical infrastructure that's needed because of the viability concerns that exist. Nor will these locations deliver truly sustainable residential development which could offer a greater choice to the market, due to the fact that there are insufficient appropriate and available brownfield sites available. |

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|  | 4.5 This is an extremely blinkered approach to take and completely ignores the sustainability credentials of individual settlements. Richborough would like to see individual settlements identified in a clear settlement hierarchy assessed on their own individual merits and this should then be used to inform the most appropriate distribution of homes across the Borough as a whole, given the existence of a number of housing market sub areas which have differing needs. |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No  |   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>   |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>        |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b> |   |
| <b>Please set out the modification(s) you consider necessary</b>   | Identify a settlement hierarchy to inform distribution of homes across the Borough as a whole.  |

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

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

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

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

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

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

We have fundamental concerns with regards to the soundness of the Local Plan, which are complex matters that would require detailed discussion

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| <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> |  |

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| <b>Comment ID</b>   | LPSD-981   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSD-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Policy WP 7  |
| <b>Title</b>  | Policy for Irby, Thingwall, Pensby, Heswall and Gayton             |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WP 7   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |



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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*        Yes<br>*        No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*        Yes<br>*        No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*        Not Positively Prepared<br>*        Not Justified<br>*        Not Effective<br>*        Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | refer to attachment<br>5.6 The Strategic Housing Market Assessment confirms that affordable housing delivery is critical and that with reference to Technical Appendix C (Table C.12), in Settlement Area 7 (Heswall)(SA7) within which Irby is located, there is a net annual need of 74 affordable dwellings per annum. A failure to distribute a proportionate level of growth towards SA7 and in turn Irby, in favour of a skewed distribution towards the east of the M53 and in particular Wirral Waters/Inner Birkenhead, will mean that affordable housing needs will not be met in Wirral as a whole. |

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|  | 5.9 Given the clear evidence produced by Lichfields on behalf of the Consortium (Appendix B) at the Regulation 18 stage, that demonstrates exceptional circumstances exist for the release of land from the Green Belt, Richborough are of the view that a different approach should be taken in respect of housing distribution. The approach should realise the benefits associated with dispersing sites, together with a realistic view on viability and infrastructure delivery considerations as this would best meet the housing needs of Wirral over the next 15 years. |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No  |   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>   |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>        |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b> |   |
| <b>Please set out the modification(s) you consider necessary</b>   | Release Green Belt land for development.  |

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

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

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

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

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

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

We have fundamental concerns with regards to the soundness of the Local Plan, which are complex matters that would require detailed discussion

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| <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> |  |

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| <b>Comment ID</b>   | LPSD-982   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSD-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Policy WP 8.1  |
| <b>Title</b>  | Green Belt   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WP 8.1   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>* Yes<br>* No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>* Yes<br>* No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | 5.19 Richborough are firmly of the view that there is not enough deliverable and developable housing land on non-Green Belt sites in the Borough to meet housing needs during the plan period and so an amendment to Green Belt boundaries is necessary to accommodate housing needs. |

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

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| <p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> |   |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>  | <p>Yes, I wish to participate in hearing session(s)</p>   |
| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>   | <p>We have fundamental concerns with regards to the soundness of the Local Plan, which are complex matters that would require detailed discussion</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-983

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| <b>Comment ID</b>  | LPSP-983  |
| <b>Person ID</b>   | 1323898   |
| <b>Include files</b>   | <a href="#">LPSP-586, 966-973, 983 &amp; 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Nigel<br>McGurk   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Leverhulme Estate   |
| <b>Agent ID</b>  | 1323897   |
| <b>Agent Name</b>  | Mr<br>Edward<br>Watson  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Strutt and Parker   |
| <b>Number</b>  | Policy WS 5.9   |
| <b>Title</b>   | Evidence of approach  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 5.9  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | 1.49 WS5.9 Evidence of Approach<br>1.50 This policy seeks to clarify the various evidence documents that can be submitted to satisfy the requirements of Green and Blue Infrastructure Networks. Depending on the scale and the nature of a development proposal, WBC's Landscape Character Assessment could be referenced within a Design and Access Statement, and/or a Landscape & Visual Statement, a standalone Landscape and Visual Appraisal, a standalone Landscape and Visual Impact Assessment or within a Landscape and Visual Impact forming part of an Environmental Statement. |

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| <b>as precise as possible.</b>  | <p>1.51 The problem with this policy is due to the selection of evidence types suitable to be submitted to satisfy this policy requirement, the likely landscape and visual effects associated with a particular development are somewhat subjective and as a result, can often form contentious matters between a planning authority and an applicant.</p> <p>1.52 The wording of the policy also contains the word 'benefits' which is not appropriate in assessing the context of the evidence of approach concerning a planning application.</p> <p>1.53 These factors are in contradiction with Paragraph 9 of the NPPF as planning policies and decisions should play an active role in guiding development towards sustainable solutions whilst taking into account of local circumstances, to reflect the character, needs and opportunity of the area. Additionally, as emphasised in paragraph 1.2, the Plan is difficult to read as it sets out the aims of each policy, then states the policies, then explains how these may be implemented. It would be more helpful to include all text that relates to a policy in one place, as it is there to assist a decision maker in coming to a decision on any particular application, rather than having to go through multiple documents simultaneously.</p> |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No   |  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b> | No comment   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</b>                             | For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.   |

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

| hearing session(s)   |  |
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| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  | <p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p> |
| <p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p> | <p>Yes</p>   |

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| <b>Comment ID</b>   | LPSD-984   |
| <b>Person ID</b>  | 1249638  |
| <b>Include files</b>  | <a href="#">LPSD-974-982, 984-EM-Cove Attach 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Richborough Estates  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1249640  |
| <b>Agent Name</b>   | Mr<br>Justine<br>Cove  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Hive Land and Planning   |
| <b>Number</b>   | Policy WS 3.3  |
| <b>Title</b>  | Affordable Housing Requirements                                    |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS3.3  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*        Yes<br>*        No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*        Yes<br>*        No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*        Not Positively Prepared<br>*        Not Justified<br>*        Not Effective<br>*        Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | Please refer to attachment<br>3.24 Richborough consider that the housing requirement has not been uplifted to a significant enough degree to align itself with Wirral's economic aspirations and the identified sources of housing land supply will not deliver the step change required in order to meet the evidenced affordable housing need that exists in Wirral.<br>calculate far lower delivery (para 3.23) |



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

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

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|---|---|
| <b>Comment ID</b>   | LPSD-985  |
| <b>Person ID</b>  | 1324015   |
| <b>Include files</b>  | <a href="#">LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Andrew<br>Leyssens  |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | United Utilities  |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WS 10.1  |
| <b>Title</b>  | Provision of Infrastructure   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 10.1   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>*        Yes<br>*        No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>*        Yes<br>*        No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*        Not Positively Prepared<br>*        Not Justified<br>*        Not Effective<br>*        Not Consistent with National Policy |   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | <p>United Utilities has concerns regarding any large site allocations which are in multiple land ownerships. The experience of United Utilities is that where sites are in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently.</p> <p>We welcome the inclusion in Policy WS10.1 – Provision of Infrastructure of the requirement for development proposals in masterplan areas to be accompanied by an infrastructure strategy, including for surface and foul water drainage as well as phasing and a timetable for mitigation. This should also include reference to water supply. However, under WS10.1D we would wish to reinforce the need for strategies to be allocation-wide and demonstrate coordination between separate phases of development by different developers.</p> |

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|  | We encourage you to make early contact with all landowners/site promoters and challenge those landowners on how they intend to work together, preferably as part of a legally binding framework or masterplan. We believe that raising this point at this early stage is in the best interests of achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner.   |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No  |  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>   |  |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>        |  |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b> |  |
| <b>Please set out the modification(s) you consider necessary</b>   | <p>As such, we would again suggest the following wording in Policy WS10.1D:</p> <p><i>Where applications are submitted on land which is part of a wider allocation, applicants will be expected to submit allocation-wide infrastructure strategies to demonstrate how the site will be brought forward in a co-ordinated manner. The strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and</i></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.**

*ensure coordination between phases of the development over lengthy time periods and by numerous developers. Where necessary, the strategy must be updated to reflect any changing circumstances between phase(s) during the delivery of the development.*

**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),**

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| <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> |  |



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| <b>Comment ID</b>  | LPSD-986  |
| <b>Person ID</b>   | 1248823   |
| <b>Include files</b>   | <a href="#">LPSD-406, 986-990-EM-Storey Attach 3 of 8 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Ian<br>Mellor   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | North Point One LLP   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy WS 3.4   |
| <b>Title</b>   | Housing Mix   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS3.4   |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please find attached<br>We understand the need for a mix of house types and sizes and is generally supportive of providing a range and choice of homes to meet the needs of the local area including ensuring there is appropriate provision of family homes. We recommend a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. However, it is not clear from this policy how all new residential developments will be |

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| <p><b>as precise as possible.</b></p>   | <p>able to address the mix of housing particularly where this is a small site for example. It is also not clear how the needs for older people or specialist housing can be addressed on all sites or how it will be determined whether it is appropriate. This policy states that outside of regeneration areas a minimum of 70% of market dwellings will be developed for larger dwellings of three or more bedrooms, within the regeneration areas this should be a minimum of 30%. We consider that flexibility in this policy will be important, as there are some concerns how this policy will sit alongside other policy requirements such as the housing density requirements, which may be difficult to achieve with significant numbers of larger homes, and the optional housing standards which may lead to viability issues where significant numbers of 3-bed or more homes are provided.</p> |
| <p><b>omplies with the Duty to co-operate</b><br/> * Yes<br/> * No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |  |

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

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| <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> |  |

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| <b>Comment ID</b>  | LPSD-987  |
| <b>Person ID</b>   | 1248823   |
| <b>Include files</b>   | <a href="#">LPSD-406, 986-990-EM-Storey Attach 3 of 8 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Ian<br>Mellor   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | North Point One LLP   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy WS 1   |
| <b>Title</b>   | The Development and Regeneration Strategy for Wirral 2021 - 2037            |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS1.1   |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |  |
| Please give details of why you consider the Local Plan is unsound. Please be   |  |

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| as precise as possible.   |                         |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   | release green belt land |



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

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| 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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| <b>Comment ID</b>  | LPSD-988  |
| <b>Person ID</b>   | 1248823   |
| <b>Include files</b>   | <a href="#">LPSD-406, 986-990-EM-Storey Attach 3 of 8 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Ian<br>Mellor   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | North Point One LLP   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy WP 7.2   |
| <b>Title</b>   | Residential Sites   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WP7.2   |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>The Council have not provided any evidence that this policy is positively prepared and that the homes planned in Settlement Area 7 will meet the objectively assessed needs of this Settlement Area including affordable housing needs over the plan period. To address this issue, the Council should provide evidence on how the identified supply of homes in SA7 will address these needs over the plan period. If found to be unsound, more sites would be required in the housing supply to address housing needs, including affordable housing needs which |

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| <p><b>as precise as possible.</b></p>   | <p>could be delivered during the middle and latter end of the plan period. This is an exceptional circumstance to alter Green Belt boundaries in this area and identify sites which currently lie on the edge of the Settlement Area to boost the supply of homes.</p> <p>The Council have not provided any evidence to justify the limited housing growth planned in Settlement Area 7, and thus that the Development and Regeneration Strategy is not sound –the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified. If found to be unsound, further consideration would need to be given to housing growth needed within Settlement Area 7, to ensure the Development and Regeneration Strategy is sound. If more housing growth is required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt</p> |
| <p><b>omplies with the Duty to co-operate</b><br/> *     Yes<br/> *     No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>        |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p> |   |

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

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

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| <b>Comment ID</b>  | LPSD-989  |
| <b>Person ID</b>   | 1248823   |
| <b>Include files</b>   | <a href="#">LPSD-406, 986-990-EM-Storey Attach 3 of 8 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Ian<br>Mellor   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | North Point One LLP   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy WS 3.2   |
| <b>Title</b>   | Housing Density   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS3.2   |
| <b>Please state which Site ID/Reference this</b>   |   |



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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>The Council have not provided any evidence to justify how the housing density requirements respond to the needs of the Borough and how this will deliver the quantum of larger family housing required. If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver lower density schemes and provide for larger family housing and affordable housing. |

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| as precise as possible.   |   |
| omplies with the Duty to co-operate<br>* Yes<br>* 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 new residential allocations that are viable and can deliver lower density schemes and provide for larger family housing and affordable housing. |

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

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| <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> |  |

LPSP-990

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|--|---|
| <b>Comment ID</b>  | LPSP-990  |
| <b>Person ID</b>   | 1248823   |
| <b>Include files</b>   | <a href="#">LPSP-406, 986-990-EM-Storey Attach 3 of 8 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Ian<br>Mellor   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | North Point One LLP   |
| <b>Agent ID</b>  | 1248751   |
| <b>Agent Name</b>  | Mr<br>Jonathan<br>Storey  |
| <b>Position</b>  | Senior Planner  |
| <b>Company / Organisation</b>  | Pegasus Group   |
| <b>Number</b>  | Policy WS 3.3   |
| <b>Title</b>   | Affordable Housing Requirements   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.3  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>the Council have not provided any evidence to justify how they will deliver the quantum of affordable housing required. There is reference to the need for a 'robust' affordable housing policy which has not been forthcoming. This will further lead to a greater undersupply of affordable homes and inequalities across the Borough. If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver affordable housing to respond to the needs of the Borough |

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| as precise as possible.   |   |
| omplies with the Duty to co-operate<br>* Yes<br>* 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 new residential allocations that are viable and can deliver affordable housing to respond to the needs of the Borough |

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



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| <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> |  |

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|---|---|
| <b>Comment ID</b>   | LPSD-991  |
| <b>Person ID</b>  | 1324015   |
| <b>Include files</b>  | <a href="#">LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Andrew<br>Leyssens  |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | United Utilities  |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WD 4.2   |
| <b>Title</b>  | Flood Risk  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WD4.2   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>* Yes<br>* No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>* Yes<br>* No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Consistent with National Policy  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | <p>Please refer to attachment.</p> <p>Policy WD 4 When considering flood risk policy and the location of development, we believe it is important to highlight that the preparation of the local plan should give sufficient emphasis to all forms of flood risk. This is clear from the National Planning Practice Guidance (NPPG) which defines flood risk as (underlined sections identify our emphasis):</p> <p>What is “flood risk”? For the purposes of applying the National Planning Policy Framework, “flood risk” is a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources. Paragraph: 002 Reference ID: 7-002-20140306</p> <p>Having regard to the above definition, Paragraph 161 of the National Planning Policy Framework is clear that:</p> |

All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

In addition, we note the following sections from the NPPG.

The sequential, risk-based approach to the location of development. What is the sequential, risk-based approach to the location of development? This general approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible. Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds. According to the information available, other forms of flooding should be treated consistently with river flooding in mapping probability and assessing vulnerability to apply the sequential approach across all flood zones. Paragraph: 018 Reference ID: 7-018-20140306

The aim of the Sequential Test What is the aim of the Sequential Test for the location of development? Within each flood zone, surface water and other sources of flooding also need to be taken into account in applying the sequential approach to the location of development.' Paragraph: 019 Reference ID: 7-019-20140306.

Diagram 2: Application of the Sequential Test for Local Plan preparation Notes to Diagram 2: Other sources of flooding also need to be considered. Paragraph: 021 Reference ID: 7-021-20140306.

The NPPG also states:

How should the Sequential Test be applied to planning applications? See advice on the sequential approach to development and the aim of the sequential test. The Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans through the Sequential Test, or for applications for minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site). Nor should it normally be necessary to apply the Sequential Test to development proposals in Flood Zone 1 (land with a low probability of flooding from rivers or the sea), unless the Strategic Flood Risk Assessment for the area, or other more recent information, indicates there may be flooding issues now or in the future (for example, through the impact of climate change). For individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with the development plan, the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases it may be identified from other Local Plan policies, such as the need for affordable housing within a town centre, or a specific area identified for regeneration. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives. When applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken. For example, in considering planning applications for extensions to existing business premises it might be impractical to suggest that there are more suitable alternative locations for that development elsewhere. For nationally or regionally important infrastructure the area of search to which the Sequential Test could be applied will be wider than the local planning authority boundary. Any development proposal should take into account the likelihood of flooding from other sources, as well as from rivers and the sea. The sequential approach to locating development in areas at lower flood risk should be applied to all sources of flooding, including development in an area which has critical drainage problems, as notified to the local planning authority by the Environment Agency, and where the proposed location of the development would increase flood risk elsewhere. See also advice on who is responsible for deciding whether an application passes the Sequential Test and further advice on the Sequential Test process available from the Environment Agency (flood risk standing advice). Paragraph: 033 Reference ID: 7-033-20140306 Revision date: 06 03 2014

For consistency with the above national policy and guidance, we request that the preparation of the local plan reflects the above. The local plan should clearly state that a Sequential Test will be required in circumstances where:

- there are other sources of flood risk that affect a site;
- where there has been no sequential testing of the allocations in the development plan; and
- when more recent information indicates that there may be flooding issues.

**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.**

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| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>   |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>  |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You</b></p> | <p>The local plan should clearly state that a Sequential Test will be required in circumstances where: - there are other sources of flood risk that affect a site; - where there has been no sequential testing of the allocations in the development plan; and - when more recent information indicates that there may be flooding issues. Policy WD4.2</p> <p>In accordance with our above comments, we recommend that the flood risk policy WD4.2 in the local plan includes the following wording: The risk of flooding from sewers will need to be considered for all development sites. Applicants should consult with the sewerage undertaker to confirm the nature and extent of any flood risk from public sewers. Applicants should also refer to the reservoir flood risk map available at gov.uk. With respect to sewer flood risk, this should include consulting with the wastewater undertaker to understand: a) if there are any sewerage surcharge levels at the point of connection that could influence site design; b) whether there is an incident of sewer flooding at or in the vicinity of the proposed development site; and c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding to the proposed development site. This consultation will inform the Local Planning Authority of whether there is a need to apply the sequential approach to new development proposals. In all cases, applicants will need to demonstrate that the proposed development would be safe and not lead to increased flood risk elsewhere e.g. through careful masterplanning of a site. Applicants should not assume that changes in levels or any proposed diversion of the public sewerage system will be acceptable as such proposals could increase / displace flood risk.</p> |

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| <p>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>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<br/>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</p>  |  |

**Inspector's  
recommendations  
and adoption of the  
Plan).**

\* **Yes**  
\* **No**

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| <b>Comment ID</b>   | LPSD-992  |
| <b>Person ID</b>  | 1324015   |
| <b>Include files</b>  | <a href="#">LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Andrew<br>Leyssens  |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | United Utilities  |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WD 4.3   |
| <b>Title</b>  | Sustainable Drainage Systems (SuDS) and Natural Flood Management  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WD 4.3  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |



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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | 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,<br>Drainage Policy WD4.3<br>We are broadly supportive of Policy WD4.3, however, we would welcome the opportunity to liaise with you more closely on the wording of this policy.<br>Groundwater Source Protection Zones |

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|   | <p>The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency.</p> <p>We wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance given the presence of SPZs in the Wirral.</p> <p>We welcome the inclusion of wording for the protection of the drinking water supply in Policy WD14 (E).</p> <p>With respect to development in groundwater source protection zones, we are concerned that criterion R of Policy WD4.3 is inconsistent with national policy and requires amendment. For example, sealed infiltration systems which discharge clean roof water to ground in a groundwater source protection zone may be appropriate subject to detailed assessment.</p> |
| <b>omplies with the Duty to co-operate</b><br>*      Yes<br>*      No   |   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b> |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</b>  |   |

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| <b>Habitats Regulations Assessment, please make them here.</b>  |  |
| <b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b> | <p>Please refer to attachment</p> <p>Drainage Policy WD4.3</p> <p>For example, we request that criterion Q includes a further element to the surface water management hierarchy through the introduction of 'on-site re-use' as the first criterion in advance of infiltration. This is consistent with criterion K which references rainwater recycling.</p> <p>We also wish to highlight that criterion N should be amended to state that all applications should submit clear management and maintenance details for drainage systems. We wish to note that if United Utilities adopts a SuDS, there are still shared responsibilities for maintenance as land ownership is not within the responsibility of United Utilities. United Utilities will not carry out general landscaping activities such as grass cutting, on adopted SuDS components. As such, we would suggest that the LPA / LLFA should review and be happy with the management and maintenance arrangements in all circumstances, particularly with regard to any landscaping and planting that have been submitted as part of the agreed submission. Similarly, it is important to note that adoption remains voluntary in England. Therefore whilst applicants may intend to adopt, this could change later in the development / adoption process. The planning system needs to safeguard against this scenario occurring to ensure management and maintenance arrangements are in place alongside a verification process to ensure that the drainage is constructed as approved. With regards to a verification process for the delivery of the drainage as approved, this should be introduced to the policy as a new criterion.</p> <p>We also wish to note that management and maintenance regimes should cover on-site / riparian watercourses. The maintenance of these should not become fragmented as a result of new development taking place.</p> <p>Groundwater Source Protection Zones</p> <p>Whilst no allocations are identified in SPZ1, the following sites are identified to be within SPZ2.</p> <ul style="list-style-type: none"> <li>• RES-SA6.8 Ridge Rowans, 25 Wetstone Lane, West Kirby</li> <li>• RES-SA3.7 4 Dingle Road, Tranmere</li> <li>• RES-SA6.11 7 Caldys Road, West Kirby</li> <li>• MPA-RA4.2 Charing Cross Quarter</li> <li>• RA4 Birkenhead Regeneration Framework Area</li> <li>• RA4 Central Birkenhead Regeneration Area.</li> </ul> <p>We suggest that this is referenced in the site-specific policies for the respective sites.</p> <p>Policy WD4.3</p> <p>Therefore this criterion [criterion R of Policy WD 4.3] requirements amendment and we would wish to discuss this with you in more detail.</p> |
| <b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b><br>* <b>No, I do not wish to participate in hearing session(s)</b>  |  |

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

## LPSD-993

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| <b>Comment ID</b>  | LPSD-993  |
| <b>Person ID</b>   | 1324015   |
| <b>Include files</b>   | <a href="#">LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf</a><br><a href="#">LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 1 of 9 2507_Redacted.pdf</a><br><a href="#">LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 3 of 9 2507_Redacted.pdf</a><br><a href="#">LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 9 of 9 2507_Redacted.pdf</a><br><a href="#">LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 6 of 9 2507_Redacted.pdf</a><br><a href="#">LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 4 of 9 2507_Redacted.pdf</a><br><a href="#">LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 7 of 9 2507_Redacted.pdf</a><br><a href="#">LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 8 of 9 2507_Redacted.pdf</a><br><a href="#">LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 5 of 9 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Andrew<br>Leyssens  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | United Utilities  |
| <b>Agent ID</b>  |   |
| <b>Agent Name</b>  |   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 7.3   |
| <b>Title</b>   | Agent of Change   |
| <b>To which part of the Local Plan does this representation relate?</b>  | Policy  |
| * Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment |   |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |

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| <b>Please state which Policy Number this representation relates to.</b>   | WS 7.3 |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |        |
| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |        |
| <b>Legally compliant</b><br>*      Yes<br>*      No   |        |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |        |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |        |
| <b>Sound</b><br>*      Yes<br>*      No   | No     |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |        |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*      Not Positively Prepared<br>*      Not Justified<br>*      Not Effective |        |

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| <p>* <b>Not Consistent with National Policy</b></p>   |  |
| <p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>                                  | <p>Please refer to attachment.</p> <p>Development next to Wastewater Treatment Works and Pumping Stations We would urge you to carefully consider our existing wastewater treatment works and pumping stations. It is important to explain that:</p> <ol style="list-style-type: none"> <li>1. Wastewater treatment works are key infrastructure for the borough which may need to expand in the future to meet growth needs or respond to new environmental drivers. Maintaining a space around a treatment works is therefore desirable to respond to any future investment requirements.</li> <li>2. As a waste management facility, a wastewater treatment works is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. A wastewater treatment works is also subject to vehicle movements from large tankers which need to access the site.</li> </ol> <p>The position of United Utilities is that when considering a range of sites to meet development needs, it would be more appropriate to identify new development sites, especially sensitive uses, such as housing, which are not close to a wastewater treatment works. This position is in line with the 'agent of change' principle set out at paragraph 187 of the NPPF.</p> <p>Paragraph: 009 Reference ID: 30-009-20190722 of the National Planning Practice Guidance expands on this</p> <p>Similarly Paragraph: 005 Reference ID: 34-005-20140306 of the NPPG states: Plan-making may need to consider:</p> <ul style="list-style-type: none"> <li>• whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).</li> </ul> <p>United Utilities has a number of wastewater treatment works in Wirral. We have enclosed site plans for the some of our wastewater treatment works / pumping stations in the borough as follows.</p> <ul style="list-style-type: none"> <li>• Land East of Birkenhead Road, Seacombe (Wallasey Wastewater Treatment Works)</li> <li>• Bromborough Wastewater Treatment Works</li> <li>• Greenbank Road Pumping Station</li> <li>• Meols Wastewater Treatment Works</li> <li>• Moreton Wastewater pumping station</li> <li>• Upton Wastewater Treatment Works</li> <li>• Birkenhead Wastewater Treatment Works</li> <li>• Barnston Storm Tanks</li> </ul> |
| <p><b>omplies with the Duty to co-operate</b><br/>         * <b>Yes</b><br/>         * <b>No</b></p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>        |  |
| <p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p> |  |

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| <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><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound.</b></p> | <p>On this basis, we wish to recommend the following additional wording for inclusion in Policy WS7.3 – Agent of Change.</p> <p><i>New development should ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by neighbouring uses and vice versa. When applicable, applicants will be required to submit the relevant impact assessments, outlining any adverse effects from the neighbouring site, and any required mitigation.</i></p> <p>United Utilities wishes to emphasise its strong preference to avoid development in the vicinity of our works. We wish to note that the following allocations are within proximity to our wastewater treatment / pumping stations as such we would like to discuss with you further the need for assessments relating to, inter alia, odour and noise as a result of the proximity to these wastewater assets. It may be necessary to reflect the need for these assessments in site-specific policy and to inform the preparation of masterplans.</p> <ul style="list-style-type: none"> <li>• Morpeth Waterfront, Birkenhead Employment Allocation;</li> <li>• Woodside and A41 Gyratory Masterplan Area;</li> <li>• Morpeth Dock Mixed Use Area;</li> <li>• Hamilton Square Mixed Use Area;</li> <li>• Birkenhead Waterfront Regeneration Area;</li> <li>• Birkenhead Regeneration Framework Area;</li> <li>• and Central Birkenhead Regeneration Area.</li> </ul> |



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

LPSP-994

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| <b>Comment ID</b>   | LPSP-994   |
| <b>Person ID</b>  | 1248823  |
| <b>Include files</b>  | <a href="#">LPSP-994-EM-Storey Attach 4 of 8 2207_Redacted.pdf</a><br><a href="#">LPSP-994-EM-Storey Attach 8 of 8 2207_Redacted.pdf</a><br><a href="#">LPSP-994-EM-Storey Attach 7 of 8 2207_Redacted.pdf</a><br><a href="#">LPSP-994-EM-Storey Attach 6 of 8 2207_Redacted.pdf</a><br><a href="#">LPSP-994-EM-Storey Attach 1 of 8 2207_Redacted.pdf</a><br><a href="#">LPSP-994-EM-Storey Attach 2 of 8 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ian<br>Mellor  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   | North Point One LLP  |
| <b>Agent ID</b>   | 1248751  |
| <b>Agent Name</b>   | Mr<br>Jonathan<br>Storey   |
| <b>Position</b>   | Senior Planner   |
| <b>Company / Organisation</b>   | Pegasus Group  |
| <b>Number</b>   | Policy WP 8.1  |
| <b>Title</b>  | Green Belt   |
| <b>To which part of the Local Plan does this representation relate?</b>   | Site   |
| * Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>Regulations<br>Assessment |  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |

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| Please state which Policy Number this representation relates to.  |            |
| Please state which Site ID/Reference this representation relates to.  | SHLAA 1765 |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.   |            |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective |            |

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

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| <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>allocate site SHLAA 1765</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>   |                                 |

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| <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> |  |

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| <b>Comment ID</b>   | LPSD-995  |
| <b>Person ID</b>  | 1324015   |
| <b>Include files</b>  | <a href="#">LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Andrew<br>Leyssens  |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | United Utilities  |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WD 14  |
| <b>Title</b>  | Pollution and Risk  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WD 14   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* No   | Yes  |
| Please give details of why you consider the Local Plan is sound. Please be as precise as possible.   | We welcome the inclusion of wording for the protection of the drinking water supply in Policy WD14 (E) |
| If you consider that the Local Plan is not sound, please indicate the reason(s) why:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |  |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   |  |



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

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

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

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

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

**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**

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| <b>Comment ID</b>  | LPSD-997  |
| <b>Person ID</b>   | 1247740   |
| <b>Include files</b>   | <a href="#">LPSD-386,387 &amp; 997-EM-Underwood Attach 2107_Redacted.pdf</a><br><a href="#">LPSD-386-EM-Underwood Form 1 of 2 2107_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Universities Superannuation Scheme  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Agent ID</b>  | 1323663   |
| <b>Agent Name</b>  | Mr<br>Mark<br>Underwood   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 4.2   |
| <b>Title</b>   | Designated Employment Areas   |
| <b>To which part of the Local Plan does this representation relate?</b>  | Policy  |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul> |   |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 4.2  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | USS supports the principle of encouraging employment in this location, in general terms. However, USS is not supportive of the proposed allocation of the Site as a 'primarily employment area'. This is due to the heavy focus on employment areas being for industrial uses without mention of retail which is the Site's major use, which would interfere the ongoing success of the Site as a retail park. Therefore, USS would like to ensure the draft Local Plan policy is supportive of its commitment to retail uses. |

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| as precise as possible.   |   |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   | We therefore recommend that the draft Local Plan (2022) allocates the Site for future 'mixed-use development' or explicitly supports retail uses at the Site. |

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

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

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

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

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

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



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| <b>Comment ID</b>  | LPSD-998   |
| <b>Person ID</b>   | 1324088  |
| <b>Include files</b>   | <a href="#">LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Mike<br>Horner   |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  | Wirral Growth Company  |
| <b>Agent ID</b>  | 1324087  |
| <b>Agent Name</b>  | Mr<br>Greg<br>Dickson  |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  | Barton Willmore (Stantec)  |
| <b>Number</b>  | Part 2   |
| <b>Title</b>   | The Places and Our Vision  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>  | 3.28 Vision  |
| <b>Please state which Policy Number this representation relates to.</b>  |  |
| <b>Please state which Site ID/Reference this</b>   |  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* No   | Yes   |
| Please give details of why you consider the Local Plan is sound. Please be as precise as possible.   | Please refer to attachment WGC has reviewed Part 2 of the emerging Local Plan and is very supportive of the Vision for the regeneration of Birkenhead. WGC's masterplan and hybrid planning permission (reference 20/1138) align fully with the Council's vision for the adaptation of the town centre to provide new homes, offices, market, creative businesses, and leisure uses. WGC's masterplan for Birkenhead is, therefore, critically important to ensuring that early progress is made in delivering the future vision for the town centre. |
| If you consider that the Local Plan is not sound, please indicate the reason(s) why:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |   |
| Please give details of why you consider the Local Plan is unsound. Please be   |   |

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| as precise as possible.   |  |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   |  |

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

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| 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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| <b>Comment ID</b>  | LPSD-999   |
| <b>Person ID</b>   | 1324088  |
| <b>Include files</b>   | <a href="#">LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Mike<br>Horner   |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  | Wirral Growth Company  |
| <b>Agent ID</b>  | 1324087  |
| <b>Agent Name</b>  | Mr<br>Greg<br>Dickson  |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  | Barton Willmore (Stantec)  |
| <b>Number</b>  |  |
| <b>Title</b>   | The Strategic Objectives of the Local Plan   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>  | 2.39, Strategic Objective 12   |
| <b>Please state which Policy Number this representation relates to.</b>  |  |
| <b>Please state which Site ID/Reference this</b>   |  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* 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<br>WGC is also supportive of the sustainable approach to future development as set out in the Strategic Objectives. However, in order to align the Strategic Objectives with the Vision for Birkenhead, it is suggested that Strategic Objective 12 should be extended to include reference 'leisure pursuits and activities' as well shopping patterns. |

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| as precise as possible.   |   |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   | Strategic Objective 12 should be extended to include reference 'leisure pursuits and activities' as well shopping patterns. |



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

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

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

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

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

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

LPSP-1000

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| <b>Comment ID</b>  | LPSP-1000  |
| <b>Person ID</b>   | 1324088  |
| <b>Include files</b>   | <a href="#">LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Mike<br>Horner   |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  | Wirral Growth Company  |
| <b>Agent ID</b>  | 1324087  |
| <b>Agent Name</b>  | Mr<br>Greg<br>Dickson  |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  | Barton Willmore (Stantec)  |
| <b>Number</b>  | Part 3   |
| <b>Title</b>   | Strategic Policies   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>  | Part 3   |
| <b>Please state which Policy Number this representation relates to.</b>  |  |
| <b>Please state which Site ID/Reference this</b>   |  |

|  |  |
|--|--|
| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* No   | Yes  |
| Please give details of why you consider the Local Plan is sound. Please be as precise as possible.   | Please refer to attachment<br>As explained in response to Part 2 above, WGC's masterplan and hybrid planning permission for Birkenhead is central to the future of the town centre. As such, WGC is very supportive of the preparation of the Birkenhead 2040 Framework and has played an active role in the identification of Central Birkenhead as a key regeneration area. More specifically, WGC's approved masterplan seeks to build on the town's existing strengths, assets and maritime location, to create a dynamic, modern centre, with a focus on delivering a new commercial quarter and residential neighbourhood for Birkenhead. The first phase (which is currently under construction on site) includes Two Grade A office buildings which will offer energy efficient accommodation to help meet the requirement for quality workspace in the town and attract new businesses to the area. WGC also supports the Vision for Birkenhead and the focus on growing the town into a thriving urban community which encourages families and entrepreneurs to live, work, have fun and lay down roots. |
| If you consider that the Local Plan is not sound, please indicate the reason(s) why:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* 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<br>* Yes<br>* 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)

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

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

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