

Part A


1. Personal details

(if an agent is appointed, please complete only the title, name and organisation in the boxes below but complete the full contact details of the agent in section 2 below)

Title	Mr
First name	Douglas
Last name	Johnson
Organisation (where relevant)	
Address	
Postcode	
Telephone number	
Email address	
Objective ID number (if known)	1311854

2. Agent's details (if applicable) NOT APPLICABLE

3. Data Protection Notice

	Please tick this box to confirm that you understand that your name and your response will be published, that your full name and details will be passed to the Planning Inspectors, and that you have read and understood the Council's privacy notice.
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Please note that all comments will be held by Wirral Council and made available in accordance with our privacy notice, which can be viewed at <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/forward-planning-privacy-notice> or obtained from one of the addresses below.

Please read all the information related to this consultation on the Council's webpage at <https://www.wirral.gov.uk/new-local-plan> or which has been placed in public libraries, and the Wirral Local Plan Modifications Response Form Background Note before you make your representations.

4. Completed Responses

Please submit your completed Response Form/s **to arrive at one of the addresses below no later than 5pm on Friday 8 November 2024.**

Part B for MM 1.

1. **To which Modification does your representation relate?** (insert as appropriate)

Main Modification Reference number: **MM [1]**

Additional Modification Reference number: AM [] – see Part C.

2. **If your comment is on a Main Modification, do you consider that the Main Modification is:**

Legally Compliant – **YES**

Sound – **YES**

3. **Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 1 (Delivering Growth through sustainable low carbon regeneration):

We strongly support the confirmation that “exceptional circumstances to justify alterations to the Green Belt boundaries set out in national planning policy do **NOT** exist in Wirral”.

4. **Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.**

No changes are required to make the MM legally compliant and sound.

Our comment is that “, subject to delivery,” is superfluous and should be omitted.

5. **Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

We have NIL comments on either Document.

6. **Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.**

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

Part B for MM 2.

1. **To which Modification does your representation relate?** (insert as appropriate)

Main Modification Reference number: **MM [2]**

2. **If your comment is on a Main Modification, do you consider that the Main Modification is:**

Legally Compliant – **YES**

Sound – **YES**

3. **Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 2 (Vision – Items H & K):

LP Page 47 Vision Item H: the district centre of **Irby** having a retail centre remaining vibrant should be included in the list of district centres.

LP Page 47 Vision Item K: suggest adding at end, “ , indeed a New Town within an historic Old Town.

4. **Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.**

No changes are required to make the MM legally compliant and sound, but we suggest amendments outlined in Box 3 above.

5. **Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

We have NIL comments on either Document.

6. **Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.**

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

Part B for MM 3.

- To which Modification does your representation relate?** (insert as appropriate)
Main Modification Reference number: **MM [3]**
- If your comment is on a Main Modification, do you consider that the Main Modification is:**
Legally Compliant – **YES** Sound – **YES**
- Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 3 (Housing Need); also MM5 new Para D; MM65 re Appendix 4, and MM6:

We support the LP with the Total Supply figure of 11,814 net additional dwellings over the Plan Period (up to 2040) as it more than adequately caters for Wirral's real 'Housing Need'.

We also support the recognition that the figure is “a reflection of levels that are currently demonstrably deliverable or developable” with the expectation that further sources of Supply will become available over time and as ‘Regeneration’ improves Market Confidence.

We do not support but accept the full reduction of 'Allowances' from 3,490 to just 1,934 as Wirral has a nationally exemplary Programme for returning 'Empty Homes back into Use' with a uniquely-consistent delivery of around 250 homes per year for more than a decade. We find it most improbable that there is NIL net gain, including through conversions. In any event, the exclusion of 'Empty Homes ...' entirely is to discourage rather than encourage such a successful Programme with its consequential support of local communities and improvement of local environment and quality of Housing Stock.

- 4. Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.**

No changes are required to make the MM legally compliant and sound, but we suggest an amended statement/footnote: “WMBC has an exemplary Programme of ‘Empty Homes back into Use’ which could augment Housing Supply were a net increase to be demonstrated.”

- 5. Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

We have NIL comments on either Document.

- 6. Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.**

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

Part B for MM 32.

- To which Modification does your representation relate?** (insert as appropriate)
Main Modification Reference number: **MM [32]**
- If your comment is on a Main Modification, do you consider that the Main Modification is:**
Legally Compliant – **YES** Sound – **YES**
- Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 32 (Pg 179, Policy WA 11 – New Ferry Regeneration Area):

Item A Table: RES-RA11.4 is **NOT** struck out, showing the wrong amended total of 84 dwellings rather than 73.

- 4. Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.**

No changes are required to make the MM legally compliant and sound, but we suggest correction as outlined in Box 3 above.

- 5. Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

We have NIL comments on either Document.

- 6. Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.**

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

Part B for MM 40.

- 1. To which Modification does your representation relate?** (insert as appropriate)
Main Modification Reference number: **MM [40]**
- 2. If your comment is on a Main Modification, do you consider that the Main Modification is:**

Legally Compliant – **YES**Sound – **YES**
- 3. Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 40 (Policy WP 8 Policy for the Rural Area – Agricultural Land):

We consider that modification of the text has gone too far, resulting in the watering down of prescriptive protection of 'Best & Most Versatile' (B&MV) Green Belt Agricultural Land and also there is no mention of the Council Policy (unanimously voted through) **NOT** to release **ANY** 'productive agricultural land' for development, thereby maintaining or enhancing the Rural Economy and 'food security' which is increasingly vital in an uncertain world of conflict, international competition, depleted Nature, and Climate Change.

New Para A: the sentence, “areas of poorer quality land should be preferred” would be better to read, “areas of poorer quality land must be prioritised and instances of non-use justified.”

New Para B: the addition of, “significant” in the phrase, “significant loss of agricultural land” is supported but undefined as to extent. Suggest adding, “in the opinion of the Council”.

- 4. Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.**

No changes are required to make the MM legally compliant and sound, but we suggest amendments outlined in Box 3 above.

- 5. Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

We have NIL comments on either Document.

- 6. Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.**

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

Part B for MM 42.

- 1. To which Modification does your representation relate?** (insert as appropriate)
Main Modification Reference number: **MM [42]**
- 2. If your comment is on a Main Modification, do you consider that the Main Modification is:**

Legally Compliant – **YES**Sound – **YES**
- 3. Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 42 (Policy WD 2 Heritage Assets)

Despite Para 6.10 saying, "... non-designated heritage assets ... are worthy of special protection in their own right", former Policy WD 2.3 Archaeological Assets Para H now I: seems to suggest (coupled with other deletions) an assumption, even presumption of development acceptability and mitigation rather than avoidance.

Regarding Para 6.17, re: “presumed archaeological site”, what is needed is a (better) register of ‘Non-designated’ but presumed assets of archaeological significance to provide would-be developers with an initial stage appreciation before incurring major costs.

Regarding 'Improvements to Heritage Assets' Para F, "demonstration of the building's environmental performance", in comparing performance before and after the works, excludes from consideration the energy expended in the works and materials themselves. This observation is also relevant to other sections where environmental performance applies.

- 4. Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.**

No changes are required to make the MM legally compliant and sound, but we suggest amendments outlined in Box 3 above.

- 5. Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

We have NIL comments on either Document.

- 6. Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.**

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

- To which Modification does your representation relate?** (insert as appropriate)
Main Modification Reference number: **MM [56]**
- If your comment is on a Main Modification, do you consider that the Main Modification is:**
Legally Compliant – **YES** Sound – **YES**
- Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

Deletions at the end of the Paragraph should not exclude reference to buildings over 15 storeys (“super-tall”) as such a landmark building is or buildings are to be encourage near the waterfront and at Wirral Waters as there are suitable opportunities for such landmark buildings which would give a real sense of change, place and progress, echo developments on the Liverpool side of the Mersey, encourage the Regeneration around it/them, deliver high density and dwelling numbers, and could include tourist access/attraction (e.g. viewing platform). Whilst the modified wording does not preclude such buildings, reference needs to be positive and encouraging, possibly even involving a Competition. We need ambition.

- No changes are required to make the MM legally compliant and sound, but we suggest amendments outlined in Box 3 above.

- We have NIL comments on either Document.

- We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

Part B for MM 70.

- To which Modification does your representation relate?** (insert as appropriate)
Main Modification Reference number: **MM [70]**
- If your comment is on a Main Modification, do you consider that the Main Modification is:**

Legally Compliant – **YES**Sound – **YES**
- Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 70 (Wirral Local Plan Monitoring Framework – Appendix 15)

It is not clear whether the monitored Categories include and differentiate between delivered results, secured future results and/or projected future results to recognise further that Regeneration-led projects and programmes often have different trajectories from early expectations that do not necessarily signal long term issues.

Overall net change in Population (and Households) should be monitored. Is this a by-product of RCON1?

There is no indication of 'Weighting' of individual Categories or details of 'Scoring'. Is this to be decided if/when a Review is thought necessary?

We are concerned at the resource implications if the majority of Categories are not routinely monitored, especially as a Regeneration-led Plan is resource and skills-intensive whilst also dealing with the anticipated load from speculative planning applications.

- 4. Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.**

No changes are required to make the MM legally compliant and sound, but we suggest amendments to take account of matters outlined in Box 3 above.

- 5. Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

We have NIL comments on either Document.

- 6. Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.**

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

Part B for MM 71.

- To which Modification does your representation relate?** (insert as appropriate)
Main Modification Reference number: **MM [71]**
- If your comment is on a Main Modification, do you consider that the Main Modification is:**

Legally Compliant – YES	Sound – YES
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- Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 71 (Areas of Coastal Erosion – Appendix 17)

There is no explanation for the omission, and Coastal Erosion is particularly significant in several ways at Thurston Cliffs – according to information provided by Wirral Wildlife.

- 4. Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.**

No changes are required to make the MM legally compliant and sound, but we suggest reinstatement of Appendix 17 wording.

- 5. Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

We have NIL comments on either Document.

- 6. Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.**

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

Part C for AM 106 - Comments in the box below.

We highlight below our principal comments and/or suggestions:

Regarding AM 106 (Paragraph 5.1)

“13,360 new dwellings” still in text – figure is surely out-of-date?

Needs correcting for consistency despite the figure being highly-inflated and not based on best Data or Methodology.

Part C for AM 130 - Comments in the box below.

We highlight below our principal comments and/or suggestions:

Regarding AM 130 (Para 5.60 – The priorities for Irby, Thingwall, Pensby, Heswall and Gayton are to:) Suggested new items 7, 8 and 9 (with context)

7. In addition to the heritage matters in item 4 above for the Scheduled Monument Irby Hall, preserve or enhance the vista from Irby Village across the protected ‘surrounds’ (historically-linked fields) of Irby Hall (between the Anchor PH and Irby Hall moated site), across farmed fields to the Dee Estuary and distant Welsh Hills.

Some years ago, this vista was included in the Council’s booklet on the Character of Wirral, appeared in a photograph, and was held to be an outstanding feature of Wirral to be preserved. In addition, the Council accepted ITPAS’s opinion that this view and the red sandstone buildings around the T-junction (Irby Road / Thingwall Road), which included a Scheduled Monument, Listed and other historic Buildings, together formed the highly valued and significant setting and gateway to the ancient (and modern) settlement of Irby.

8. Preserve or enhance the vital wildlife corridor from Limbo Lane (Irby) and adjacent fields, across Thingwall Road to Harrock Wood (Ancient Woodland owned by the National Trust) and on to fields beside and beyond, through which runs Arrowe Brook.

This featured significantly (inter alia) in the Leverhulme Estates Inquiry 2023 and was supported unanimously in the Public Meeting Session of the Inquiry by the over 500 Wirral Residents present.

9. Preserve or enhance the unique and highly valued open vista from Thingwall Road (between the distinct communities of Irby and Thingwall), extending seven kilometres across open farmland to the shore at Meols and the Irish Sea beyond.

This featured significantly (inter alia) in the Leverhulme Estates Inquiry 2023 including in respect of the need to keep the distinct communities of Irby and Thingwall separate (in line with the Purposes of Green Belt, NPPF Para 143 (b) – to prevent merging) and was supported unanimously in the Public Meeting Session of the Inquiry by the over 500 Wirral Residents present.

Part C for AM 172 - Comments in the box below.

We highlight below our principal comments and/or suggestions:

Regarding AM 172 (Appendix 13 - Page 354, LGS-SA7.16)

LGS-SA7.16 is known as ‘Irby Park’ and not ‘Irby Recreation Ground’; but thank you for correcting the OS Typology to the categories given in Reg 19 Representation and earlier.

Part C for Various – Comments and Questions in the box below.

We highlight below our principal comments, questions and/or suggestions:

Appendix 12: SA7 – Irby Park (not Recreation Ground) seems to be omitted – Park & Garden with Play Area and Urban Sports Facilities. Also, Gayton Park?

Appendix 13: SA7 – Greenfield Estate (WK Sheep Field) is shown as being omitted but the approved development includes a large area of publicly-accessible greenspace – LGS. Put back in?

Appendix 16 Heritage Designations: Despite past Representations by ITPAS and WGSA, 'Londymere', the sandstone Roman Well remains with access steps 'for the sick' at the junction of SA7 and SA8 beside Footpath FP44 (subject of an archaeological dig, recording and protective covering up) is not mentioned here or anywhere in the LP. Could it be, not least because it is on a potential entry onto the Green Belt from Dawlish Road, Irby?

Appendix 17 (and elsewhere), why is Heswall Golf Course not mentioned, anywhere?

Various positions to mention 'Basements': Despite WGSA, ITPAS and other's past Representations, there is no mention of '**Basements**' anywhere in the Local Plan, especially for larger developments, where there would be obvious benefits to efficient use of land, servicing, extent and value of ground floor lettable space, appearance from the public zone, car parking, etc. – why not?

Several Maps/Plans are not clearly associated with their appropriate text:
e.g. WP4.2 Page 205 to 211 – Title to RES SA4.1 is on Pg 205 but Map of RES SA4.1 is on Pg 206 immediately above title for RES SA4.2 and RES SA4.3 on Pg 207.
Another example is Pg 224/225, EMP-SA5.4 – title is against the wrong site shown on the next page.