

| Person ID | ID | Question 8.13 - Do you think there is anything else that the Council could do to address or plan for flood risk and coastal change within the Local Plan? (Please select) | Question 8.13a - If other, please describe: | Question 8.13b - Please explain why: | Question 8.13c - Do you have an alternative approach? | Attachment 1 | Attachment 2 | Attachment 3 | Attachment 4 | Attachment 5 | Attachment 6 |
|-----------|------------|---|---|---|---|---|--------------|--------------|--------------|--------------|--------------|
| 1245044 | LPIO-10336 | Climate change adaptation; Location, layout and design of development; Coastal flooding; Surface-water flooding; Sustainable Urban Drainage Systems (SUDS); Flood risk management practices; Flood defences; Improved water quality; Other (please state) | | Areas of Green Belt and Green Spaces which are currently designated as areas of low flood risk (i.e not identified as flood plain) also currently hold back and slow the flow of water and reduce peak run off into drainage and river systems. As such, all Green Belt Land and Green Spaces, regardless of their designated flood risk, should be preserved to mitigate against climate change. | | | | | | | |
| 1246544 | LPIO-10594 | Surface-water flooding; Flood risk management practices | | More could be done to reduce flood risk with tree-planting Rivers should not be canalised where they could spread on to surrounding land in times of heavy rainfall Homeowners should be discouraged from paving over front gardens | | | | | | | |
| 1246724 | LPIO-10604 | Other (please state) | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | | |
| 1246242 | LPIO-11001 | | | As per answer 8.12, There is no requirement or need to build on flood plain. Develop Wirral Waters and Brownfield sites which are NOT ON A FLOOD PLAIN. Therefore not at risk. | | | | | | | |
| 1247066 | LPIO-11247 | Sustainable Urban Drainage Systems (SUDS) | | Drainage in the Barnston area is already a problem. Discharges from Thingwall Reservoir have caused major erosion and I understand was found to have major construction defects in 2017, so the weir is useless and does not stop the erosion. There is already flooding at the entrance to the dale and further housing will only make matters worse. There are many factors which highlight the problems building housing on this green belt area, and the above are just some of these key issues. In short we are strongly opposed to the plan to construct housing on the green belt site 7.18, and we urge you to reconsider this option. | | | | | | | |
| 1243890 | LPIO-1147 | Flood defences | | | | | | | | | |
| 1247196 | LPIO-11623 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1242183 | LPIO-11706 | | | | The existing Green Belt is already making an important contribution towards tackling Climate Change, reducing harmful pollution and promoting health and wellbeing through leisure activities and its attractiveness. And further measures will include: • Increasing tree cover through large scale tree planting; • Encouraging local food production, reducing unnecessary food miles; • Creating and restoring flood plains, protecting homes and businesses from flooding; • Improving wildlife habitats by creating and maintaining wildlife corridors, linking with urban parks and open spaces; • Improving air quality, reducing high incidence of asthma; • Providing further opportunities for recreation. Clearly we should be investing in the Green Belt as a positive measure of tackling Climate Change and improving the quality of life of all local residents, most particularly those who live in urban areas. We are fortunate to have Green Belt within the Borough and we need to protect and cherish it. It was created specifically to direct development into run-down areas and to prevent further decline: the need for Regeneration remains as evident as ever. Building houses in Green Belt would directly reduce still further the viability of housing in the north and east of the Peninsula, delaying their rejuvenation and improved quality of life. Wirral is the fastest growing visitor destination in the Liverpool City Region and the economic benefits of a Green Belt which creates the landscape background for so many of the visitor attractions must be recognised. Tourism and Leisure are vital to Wirral's Local Economy and Green Belt plays a major role. We cannot afford to lose any. Rather than releasing land from the Green Belt, the social, environmental and economic arguments would all suggest that we should be investing in the management of this Green Space. See my answer to Question 8.13b | | | | | | |
| 1241176 | LPIO-1205 | Other (please state) | Ban of future housing developments in the flood plain (and especially in the high risk flood plain) | I would suggest extending open space OS 239 (Birket Walkway Leasowe) in north direction to cover the whole high risk flood zone (marked with a red arrow on the attached map). On the current version of the local plan map this area is designated for Primary residential /Housing but it is not suitable for this purpose due to the very high risk of flooding. The same problem exists in another area on the left bank of Birket (e.g the area to the west of OS 238) but this better be protected from development by designating it as part of Ditton Lane Local Wildlife site (application currently in progress) | | https://wirral-consult.objective.co.uk/files/5613163 | | | | | |
| 1247214 | LPIO-12456 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247492 | LPIO-12558 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1240843 | LPIO-12714 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247578 | LPIO-12913 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247510 | LPIO-13038 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246335 | LPIO-13176 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246853 | LPIO-13429 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246852 | LPIO-13555 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247746 | LPIO-13710 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1242183 | LPIO-14027 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247218 | LPIO-14122 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247219 | LPIO-14225 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247220 | LPIO-14322 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247222 | LPIO-14451 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247226 | LPIO-14541 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247245 | LPIO-14639 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247829 | LPIO-14679 | | | In this context I like to mention as an aside the Langfields and the whole low-lying area South of Hoylake towards Frankby and Newton. This acts like a huge sponge holding water after rainy periods while most normally flows down the Birket and eventually into the Mersey, without endangering properties. There was a threat to that functionally vital area when the creation of a Golf Resort was proposed for (at least) part of it. I urge the Council never to engage again with a development proposal in such an important part of Wirral as far as (natural) flood defence is concerned! Altogether, residential and industrial developments should be kept off Flood zones, including zones of Surface Flooding, eg in Moreton unless substantial (acceptable) defence and mitigation measures are put in place. | | | | | | | |
| 1246827 | LPIO-14757 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |

| Person ID | ID | Question 8.13 - Do you think there is anything else that the Council could do to address or plan for flood risk and coastal change within the Local Plan? (Please select) | Question 8.13a - If other, please describe: | Question 8.13b - Please explain why: | Question 8.13c - Do you have an alternative approach? | Attachment 1 | Attachment 2 | Attachment 3 | Attachment 4 | Attachment 5 | Attachment 6 |
|-----------|------------|--|---|---|--|---|---|---|--------------|--------------|--------------|
| 1243700 | LPIO-1522 | Climate change adaptation; Location, layout and design of development; Coastal flooding; Surface-water flooding; Sustainable Urban Drainage Systems (SUDS); Flood risk management practices; Flood defences; Improved water quality | | All of the points in Q13 are relevant to flood prevention as is the retention of our green belt land. Don't build on it. | | | | | | | |
| 1247246 | LPIO-15377 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247248 | LPIO-15507 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247251 | LPIO-15599 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247252 | LPIO-15686 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247274 | LPIO-15790 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247275 | LPIO-15944 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247287 | LPIO-16252 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247344 | LPIO-16340 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247349 | LPIO-16427 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247353 | LPIO-16515 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247354 | LPIO-16610 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247434 | LPIO-16711 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247436 | LPIO-16818 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247935 | LPIO-16944 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247437 | LPIO-17012 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247439 | LPIO-17013 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247441 | LPIO-17114 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247960 | LPIO-17235 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247962 | LPIO-17325 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247966 | LPIO-17435 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1244969 | LPIO-1744 | Climate change adaptation; Location, layout and design of development; Surface-water flooding; Sustainable Urban Drainage Systems (SUDS); Flood risk management practices; Improved water quality | | | Climate change is an unknown quantity. Coastal flood defence once engaged could escalate beyond economic justification . New development should be in locations where flood risk is minimal but not in locations which may contribute to further flooding beyond those locations. Suds management may slow down the movement of surface water but may still contribute to localised flooding | | | | | | |
| 1241726 | LPIO-17633 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247979 | LPIO-17799 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247980 | LPIO-17800 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1245502 | LPIO-17929 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247541 | LPIO-18028 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247539 | LPIO-18136 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1247996 | LPIO-18309 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1237857 | LPIO-18351 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1245060 | LPIO-1929 | Other (please state) | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1241669 | LPIO-195 | Location, layout and design of development; Coastal flooding; Flood defences | | In setting out approaches for defence against coastal flooding long term, suitable analyses for determining the potential for wave intrusion need to be used to predict as far as possible what mitigating measures are suitable. For example, there has been a proposal to build a sea wall along the sea front at West Kirby (following the flooding experienced in 2014). For defences such as these to represent good use of public funds the wall needs to be of sufficient height to safeguard against future increases in sea levels whilst not being excessive, which is a waste of public money. The National Oceanographic Centre (NOC) in Liverpool has developed a system for analysing potential wave overtopping rates which may help in determining suitable design criteria for sea wall defences. The system is called 'WireWall' - see link below. Is there any intention to utilise emerging technologies such as this to assist in developing forward plans of maximum functional and economic benefit for sea encroachment protection? https://noc.ac.uk/projects/wirewall | | | | | | | |
| 1246851 | LPIO-21209 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246918 | LPIO-21442 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246924 | LPIO-21443 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246928 | LPIO-21444 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246920 | LPIO-21631 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246926 | LPIO-21632 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1245112 | LPIO-2193 | Location, layout and design of development; Sustainable Urban Drainage Systems (SUDS); Flood risk management practices; Improved water quality | | | | | | | | | |
| 1241770 | LPIO-23651 | | | Flood risk. No building must take place on areas which are prone to flooding. Planning decisions must be transparent and include rigorous environmental impact assessments. | | | | | | | |
| 1241770 | LPIO-23652 | | | Coastal risk; Dune systems must be allowed to develop and council must work with independent authorities e.g. Natural England, RSPB to establish the way to take the beach management forward positively. Nature will provide the best flood defence whilst protecting and encouraging the area's biodiversity. | | | | | | | |
| 1248424 | LPIO-23684 | | | We have seen in recent years the sea level is gradually rising and have also experienced recent floods (on west kirby promenade and the eroding cliffs) . This is at some point linked to the extensive housing development on the peninsula. | | | | | | | |
| 1242185 | LPIO-23952 | | | The Council should avoid over development and locating new development in the floodplain. Local Plan policies should seek to ensure that the design of development to mitigate flooding through sustainable urban drainage. There are many ways to slow the flow of rainwater run off to prevent local and downstream flooding. | | https://wirral-consult.objective.co.uk/file/5659121 | https://wirral-consult.objective.co.uk/file/5684263 | https://wirral-consult.objective.co.uk/file/5657006 | | | |

| Person ID | ID | Question 8.13 - Do you think there is anything else that the Council could do to address or plan for flood risk and coastal change within the Local Plan? (Please select) | Question 8.13a - If other, please describe: | Question 8.13b - Please explain why: | Question 8.13c - Do you have an alternative approach? | Attachment 1 | Attachment 2 | Attachment 3 | Attachment 4 | Attachment 5 | Attachment 6 |
|---------------------------------|------------|--|---|--|---|---|--------------|--------------|--------------|--------------|--------------|
| 1248152 | LPIO-24093 | | | If more attention was paid to the loss of existing open spaces then flooded properties would, by and large, be avoided. | | | | | | | |
| 1248496 (United Utilities) | LPIO-24210 | | | United Utilities would like to outline a preference for the site selection process having regard to the availability of alternatives to the public sewer for the discharge of surface water. Such alternatives include local watercourses/land drains, which are preferable to the discharge of the public combined sewer for the discharge of surface water. Sites that have more sustainable options than the combined sewer for the discharge of surface water should be preferred as site allocations are being finalised. | | https://wirral-council-objective.co.uk/file/5684806 | | | | | |
| 1248496 (United Utilities) | LPIO-24213 | | | United Utilities believe it would be more appropriate to split the issues of flood risk and surface water management into two policies. It is our view that a separate planning policy would set out a clear process in relation to Surface Water Management, creating an approach to drainage for all new development, rather than applications within certain criteria. Reducing the amount of surface water discharging to the public sewer network will reduce the risk of sewer flooding and reduce the pressure on combined sewer overflows and therefore resulting in environmental benefits for regions watercourses, subsequent water environment and adding potential benefits such as a net gain in biodiversity. A suggested policy for the management of surface water has been provided in our response to Q9.2. | | https://wirral-council-objective.co.uk/file/5684806 | | | | | |
| 1248557 (Environment Agency) | LPIO-24463 | | | We have left a legacy of heavily modified watercourses that often no longer provide effective transportation and/or storage of water which can lead to flooding. Structures such as redundant weirs, hard banks and/or culverts often increase flood risk and should be considered for removal. It is worth noting UKCP18 figures for the level of allowance to be applied to tidal flooding over the lifetime of the development have been updated and the Wirral Level 1 Strategic Flood Risk Assessment (SFRA) does not consider this update. Given the SFRA has only recently been adopted and considering the tight time frames for the Local Plan, it may be considered unreasonable to ask this be undertaken now and for the SFRA to be updated at such short notice. If this is indeed the conclusion, and we would not object to this at this stage (although if time frames for the Local Plan adoption start to slip we may recommend this work be undertaken), we would suggest for the avoidance of doubt the requirement for planning applications to consider climate change for all forms of flooding using most up to date allowance figures be made completely clear in the Local Plan. The Council should seek to update the SFRA post adoption of the Local Plan to ensure it remains a live document with the most up to date information on flood risk. We encourage the use of sustainable alternatives to hard defences where appropriate. Further detail on the selection of measures to use, and ways in which the effects of flood defences on the natural environment can be minimised or mitigated, would be beneficial in demonstrating the protections and net gains for the aquatic environment and ecology. | | | | | | | |
| 1248567 | LPIO-24524 | | | Historic England recognises the importance of managing the impact of flooding in the Plan area. Flooding and its prevention as well as the management of water resources can have impacts on the historic environment and the significance of heritage assets including the contribution made by their setting. Historic England has a technical advice note Flooding and Historic Buildings which provides further information (https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/). Changes to the management of the water environment can affect the historic environment in a number of different ways. The construction and operation of new infrastructure and sustainable drainage systems (SUDS) and changes in land management, have the potential to impact on the significance of heritage assets and their settings; this includes impacts on water-related or water-dependent heritage assets. The abstraction of water resources and the impact of changes in groundwater flows and chemistry can have an impact on buried, waterlogged archaeological and palaeo-environmental remains of significant interest and fragility. In addition, the alteration of the physical characteristics of a water system (hydromorphological alterations) comprising: the modification/ removal of weirs or other in-channel structures which may be significant heritage assets; and other physical changes to rivers such as decanalisation or re-cutting old meanders that have the potential to destroy or harm archaeological and palaeo-environmental remains. Finally the introduction of measures that reduce the vulnerability to and improve the resilience of heritage assets (designated and non-designated) to flooding, including occasional flooding may harm their significance. It is important that in the management and reduction of flood risk and in the management of the water environment it is done in a manner that ensures the conservation and enhancement of the historic environment, heritage assets and their setting, this includes sustaining and enhancing local character and distinctiveness of historic townscapes and landscapes. | | | | | | | |
| 1244826 | LPIO-2478 | Climate change adaptation; Location, layout and design of development; Coastal flooding; Surface-water flooding; Sustainable Urban Drainage Systems (SUDS); Flood defences; Improved water quality | | | | | | | | | |
| 1246458 | LPIO-25826 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1246459 | LPIO-25827 | | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1237870 | LPIO-2620 | Flood risk management practices; Surface-water flooding; Coastal flooding; Location, layout and design of development | | Very simply - if there is a risk of flooding then there should be NO DEVELOPMENT on that land. The Council should look at existing coastal defences and assess their suitability with regards to rising sea levels. | | | | | | | |
| 1250036 | LPIO-26859 | Surface-water flooding; Sustainable Urban Drainage Systems (SUDS) | | The references to the National Planning Policy Framework are correctly stated however the section misses references to Paragraph 20 (see above) and Paragraph 165: "Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits. 8.64 There are no Internal Drainage Boards within Wirral 8.68 – 8.70 The LLFA supports the application of Sequential and Exception tests and welcomes the inclusion of surface water flood risk when applying the tests. 8.71 Flood risk should not be increased elsewhere as a result of development is an important consideration. It is equally important is to ensure that the risks associated with increased surface water runoff within the site are managed appropriately through good design and through the use of appropriate SuDS. It is also imperative that the future risk to development through lack of maintenance of SuDS features is given equal importance. These three matters have to have equal consideration by the LPA to ensure that they have been addressed appropriately. The LPA should be aware that from 1 January 2012 onwards all new properties built are ineligible for government flood defence grant aid funding to resolve flooding issues. Therefore it is imperative that a site's design for SuDS and for current and future flood risk management is suitable. "8.82 Foul sewer system does not accept surface water. Should read 'combined sewer system'. | | | | | | | |
| 1245180 | LPIO-2788 | Other (please state) | | There is more that Council can do to address flood risk. It is NOT to build on flood plains. | | | | | | | |
| 1245058 | LPIO-2813 | Location, layout and design of development; Sustainable Urban Drainage Systems (SUDS); Flood risk management practices; Other (please state) | Allow natural processes, such as the development of (protective) salt marsh at Hoylake. Conserve trees and hedgerows. | | | | | | | | |
| 1245159 | LPIO-3093 | Climate change adaptation; Location, layout and design of development; Surface-water flooding; Sustainable Urban Drainage Systems (SUDS); Flood risk management practices | | We must recognise the importance of dealing with climate change on Wirral and be more proactive including stopping unsuitable development like the Golf Resort | | | | | | | |

