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1 Background to the Consultation

1.1 This report sets out the background to the consultation undertaken by the Council on the Preferred Options for a Core Strategy Development Plan Document for Wirral, as required under Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

1.2 The results of the consultation have now been used to inform the publication of the Proposed Submission Draft Core Strategy (December 2012).

1.3 This section sets out the details of the consultation process that was followed. Later sections set out the responses that were received and how the Council has responded to them in the Proposed Submission Document.

1.4 The Core Strategy Development Plan Document is intended to set out the long-term vision, objectives and spatial strategy for the Borough, for a period of up to fifteen years. The Core Strategy Development Plan Document will replace the majority of the strategic policies set out in the Unitary Development Plan for Wirral, adopted in February 2000. It will be used to guide decisions on individual planning applications and will set the overall framework for site-specific proposals to be included in a future land allocations Development Plan Documents.

1.5 The timetable for the preparation of the Core Strategy Development Plan Document is set out in the Local Development Scheme for Wirral. A copy of the latest Local Development Scheme and a summary of progress can be viewed on the Council's website⁽¹⁾.

The Consultation Process

1.6 Consultation on the Preferred Options began on 15 November 2010 and ended on 7 January 2011. Consultation took place on the following documents:

- Core Strategy Preferred Options Report (November 2010)
- Core Strategy Preferred Options Assessment Report (November 2010)
- Core Strategy Preferred Options Revised Spatial Portrait (November 2010)
- Preferred Options Sustainability Appraisal Report (November 2010)
- Preferred Options Equality Impact Statement (November 2010)
- Preferred Options Habitats Regulations Assessment (November 2010)
- Preferred Options Draft Delivery Framework (November 2010)
- Preferred Options Implications for Unitary Development Plan Policies and Proposals (November 2010)

1.7 The consultation documents were accompanied by four reports of previous consultation:

- Initial Report of Consultation (July 2006)

1 <http://www.wirral.gov.uk/my-services/environment-and-planning/planning/local-development-framework>

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- Second Report of Initial Consultation (February 2009)
- Report of Consultation on Issues Vision and Objectives (January 2010)
- Report of Consultation on Spatial Options (November 2010)

1.8 Comments were invited on any part of these documents. The Preferred Options Report also invited comments on twenty-four Consultation Questions designed to focus attention on specific areas of the document.

1.9 Notification letters inviting comments on the consultation documents were sent to 622 contacts registered on the Council's Local Development Framework Consultation Database, with free copies of the consultation documents offered on request. A list of the people and organisations contacted is provided in Section 33 of this report.

1.10 Printed copies of the consultation documents, including a questionnaire, a colour A4 copy of the Key Diagram and an Extract of the Preferred Options were sent to local Members of Parliament, to elected Councillors and to 51 specific consultation bodies. A list of the bodies included is provided in Section 34 of this report.

1.11 Printed copies of the consultation documents were also placed on deposit for public inspection at the public counter of the Technical Services Department in Birkenhead, at all 24 public libraries and 13 One Stop Shops across the Borough during normal opening hours.

1.12 Public notices were published for two consecutive weeks in the Liverpool Daily Post and the Wirral Globe on 3 and 10 November 2010 and in the Wirral News on 10 and 17 November 2010. Press releases were also issued on 4 November 2010.

1.13 Consultation on the findings of a Wirral Open Space Assessment and a Strategic Housing Land Availability Assessment was undertaken alongside the Preferred Options Report and the Local Development Framework Annual Monitoring Report for December 2010 was also made available alongside the Preferred Options Report from 14 December 2010.

1.14 Electronic and downloadable versions of the documents were made available from 1 November 2010, free of charge, through the Council's Local Development Framework on-line consultation website⁽²⁾. A news item was placed on the Council website from 2 November 2010 and a link to the consultation was placed on the Council's Local Development Framework and Planning Applications (Development Management) website home pages with an additional link to the questionnaires on the "Have Your Say" section of the Council's Teen Wirral website at <http://www.teenwirral.com/>.

2 <http://wirral-consult.limehouse.co.uk/portal>

1.15 Electronic notifications were sent to respondents to previous consultation stages, where email addresses had been provided⁽³⁾.

1.16 Electronic notifications, containing a copy of the notification letter, a consultation questionnaire, a colour Key Diagram, a summary Extract of the Preferred Options and a link to the Council's on-line consultation website were also sent to members of the Council's eleven Area Forums, to the members of the Local Strategic Partnership Assembly and Executive Board and to the members of the Wirral Business Forum on 1 November 2010. Summary Extracts and a weblink were also sent to the Directors of each of the Council's Departments.

1.17 A Public Open Day was held between 10.00am and 8.00pm at Wallasey Town Hall on Monday 15 November 2010. Invitations to the Open Day were included in all the notification letters, e-mail notifications, press notices and press releases. 65 people signed the attendance register for the Open Day, although others who did not sign in were also in attendance. A further 11 booked but did not attend.

1.18 A short presentation introducing the Preferred Options consultation was repeated every hour throughout the Open Day. Printed copies of the consultation documents and copies of all the consultation documents on CD were available free of charge and planning officers were available throughout the day to answer questions and provide additional information.

1.19 The consultation documents were also presented to the Older People's Parliament on 3 December 2010, with a question and answer session⁽⁴⁾. A summary of the Preferred Options and the Strategic Housing Land Availability Assessment was provided to the Wirral Strategic Housing Partnership on 8 December 2010 and the consultation was also included in the Council's "One Council" internal staff newsletter for December 2010.

1.20 The national Planning Aid service had previously provided a free community training "Introduction to Planning" event, hosted by the Wirral Council for Voluntary Services, with sessions on the Local Development Framework and how to comment on planning applications and appeals during the day on 5 October 2010 and an informal drop in session during the evening on 12 October 2010, held at the St James Centre, Birkenhead.

1.21 The consultation drew 789 individual comments from 81 respondents. A list of respondents is provided in Section 35 of this report. 33 respondents replied by e-mail, 25 replied on-line, 18 by paper questionnaire and 5 by letter.

3 reminder e-mails were also sent automatically on 10 December 2010

4 comments made at the Older People's Parliament are marked by the prefix "OPP" in the following Analysis of the Responses Received

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1.22 Nine of the respondents were local residents; 13 were local businesses; 13 were local amenity societies or community groups; 23 were development interests such as landowners, developers and/or their agents; 14 were public bodies or associated agencies; 3 were Registered Social Landlords; 3 were utility or infrastructure providers; and 3 were national societies.

1.23 None of the comments were directed towards the Equality Impact Statement. Three comments were directed towards the Sustainability Appraisal and three towards the Habitat Regulations Assessment⁽⁵⁾.

1.24 All the comments received on the Preferred Options Report are set out in the tables below.

For further information please contact: Wirral Council, Regeneration Housing and Planning, Town Hall, Brighton Street, Wallasey, Wirral CH44 8ED - Telephone 0151 691 8192 - Email lauramyles@wirral.gov.uk

5 these comments are now also addressed within the revised reports prepared to accompany the Proposed Submission Document

2 Analysis of the Responses Received

2.1 The following sections summarise the comments received on the Preferred Options Report and the content of its accompanying supporting documents:

3 Responses to the Revised Spatial Portrait

3.1 The following sections set out the comments received on the Revised Spatial Portrait for the Borough:

Borough Profile

3.2 The following comment was received on the Borough Profile in the Revised Spatial Portrait:

ID	Summary of Responses Received
560	Pleased to see reference to the Wirral Landscape Character Assessment within the Spatial Portrait for the Borough with a figure summarising the landscape character types. Also pleased to see details of mineral sites and reference to the Merseyside Minerals Resource Study 2008 included in the Borough Profile. Inclusion of the nature and type of sites of geological importance in the Borough at paragraph 2.48 was welcome. Pleased to see that previous comments have been addressed and the wording in the list of Key Issues has been amended to "protect and enhance" locally distinctive assets including the landscape and all areas of importance for nature conservation.

Settlement Area Profiles

3.3 The following general comments were submitted in relation the Settlement Area Profiles:

ID	Summary of Responses Received
287	Three principal pipelines run from Tranmere to Stanlow (two lines) and from Tranmere to Eastham (one line). An Above Ground Installation facility is also located at Eastham. A map has been provided to identify their routes and locations.
313	National Grid's high voltage electricity overhead transmission lines / underground cables within the administrative area that form an essential part of the electricity transmission network in England and Wales include the following: the 4ZL line, 275kV route from Capenhurst substation in Cheshire West and Chester to Birkenhead substation in Wirral; and the 275kV underground cable from Birkenhead substation in Wirral to Lister Drive substation in Liverpool. Birkenhead substation 275kV is also located

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	<p>within the administrative area. Further information in relation to electricity transmission assets is available at: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW.</p> <p>National Grid has no gas transmission assets located within the administrative area. National Grid Gas Distribution owns and operates the local gas distribution network in the administrative area. Site-specific advice is available from National Grid Plant Protection.</p>
560	<p>Welcome the inclusion of a specific section within the Settlement Area Profiles on Open Space and Nature, which has improved the coverage of biodiversity and open space. Especially commend the reference to the Wirral Open Space Assessment as evidence.</p>
810	<p>The Revised Spatial Portrait includes information on local heritage in the Settlement Area Profiles, which will provide the context for developing the positive, proactive strategy for the conservation and enjoyment of the historic environment as required by PPS5 and noted in the Sustainability Appraisal Report (page 43). The Revised Spatial Portrait notes Heritage at Risk in the Borough. The Settlement Area Profiles will need to be supplemented by further information on historic area characterisation in order to enable the effective implementation of the Spatial Vision and the desired maintenance of local distinctiveness. At present a number of the Settlement Area profiles only note designated heritage assets and do not describe what is significant about the Settlement Area's character and appearance.</p>
836	<p>Welcome the fact that sport and recreation has been identified. Paragraph 2.52 of the Revised Spatial Portrait refers to Wirral containing a large amount of recreational open space but having a shortage of outdoor sports facilities, including playing fields. Paragraph 2.67 states that the reduction in the population has led to sports clubs being closed or rationalised. In relation to individual Settlement Areas, there is a description which includes existing sports facilities within each area. A common theme which emerges is that there are relatively low levels of provision of outdoor sport facilities but this does not always get identified as a key issue for each Settlement Area, which arises from deficiencies in the evidence base in relation to sport and recreation. Reference is also made in the Spatial Portrait to a number of sports facilities being made available for possible transfer to community ownership and management but it is not clear what the impact of these changes would be.</p>

3.4 The Council has responded to these general comments on the Settlement Area Profiles by:

- revising the Proposed Submission Draft Spatial Portrait
- referring to key cross-boundary infrastructure in Section 2 of the Proposed Submission Draft Core Strategy

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3.5 The following comments were directed towards the more detailed profiles for each individual Settlement Area:

Settlement Area 1 - Wallasey

3.6 No comments were received on the Spatial Portrait for Settlement Area 1.

Settlement Area 2 - Commercial Core

3.7 The following comment was received on the Spatial Portrait for Settlement Area 2:

ID	Summary of Responses Received
829	The boundary to the Strategic Regional Site should reflect the boundary of the New City Neighbourhood.

Settlement Area 3 - Birkenhead

3.8 The following comments were received on the Spatial Portrait for Settlement Area 3:

ID	Summary of Responses Received
296	<p>Paragraph 6.14 (Page 48) - There is no evidence of a "declining shopping role". The presence of Sainsbury's and Aldi make Prenton a shopping destination of choice for many local people. The environment is commented upon for other centres but not for Woodchurch Road, when it is at least as good as Claughton Village, which is noted as clean, well-maintained and pleasant (paragraph 6.18 refers).</p> <p>Paragraph 6.23 (Page 49) - North Cheshire Trading Estate is at Junction 3.</p> <p>Paragraph 6.29 (Page 49) - Don't believe it is true to say that the Council is looking to include Ridgeway in the academy merger, which only includes Park High and Rock Ferry High. There is no longer an aspiration for two new academies as stated.</p> <p>Paragraph 6.41 (Page 51) - Additional key issues may include safeguarding Prenton Town Centre and improving the retail environment at Laird Street, Grange Road West/Oxton Road and Prenton Park.</p>

Settlement Area 4 - Bromborough and Eastham

3.9 The following comments were received on the Spatial Portrait for Settlement Area 4:

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ID	Summary of Responses Received
829	<p>The Key Issues should seek to maximise, not simply maintain, the potential to attract investment and employment at a strategic port location at the entrance to the Manchester Ship Canal with multi-modal, water, rail and road access, through the development/redevelopment of port facilities at Eastham, as part of the Port Wirral concept, as a key component of a low carbon transport and regeneration corridor, not just as a terminal.</p> <p>Paragraph 7.32 should make clear which playing fields are being referred to as "high quality playing pitch provision serving a wider catchment" and should not include the playing field at QEII Dock, which falls within operational port land and is provided for private use on a discretionary basis only,</p> <p>A minor amendment is needed to Picture 7.4, at the Dock Estate at Eastham, to ensure the full extent of the oil storage depot is included, as a small part of its western extent appears to fall outside the blue line.</p>

Settlement Area 5 - Mid-Wirral

3.10 No comments were received on the Spatial Portrait for Settlement Area 5.

Settlement Area 6 - Hoylake and West Kirby

3.11 The following comment was received on the Spatial Portrait for Settlement Area 6:

ID	Summary of Responses Received
498	<p>A new hotel is not needed on the car park on the front, unless the car park is replaced or a park and ride system from, say, the so-called playing/football fields on Greenbank Road with an electric bus service is provided. Local business could take turns to offer incentives to customers who use the service. Beach huts could be provided along the promenade for rent or purchase.</p>

Settlement Area 7 - Heswall

3.12 No comments were received on the Spatial Portrait for Settlement Area 7.

Settlement Area 8 - Rural Areas

3.13 No comments were received on the Spatial Portrait for Settlement Area 8.

3.14 The Council has responded to these more detailed comments on the Settlement Area Profiles by:

- revising the Proposed Submission Draft Spatial Portrait

- providing for the safeguarding and enhancement of existing centres in Policy CS6 of the Proposed Submission Draft Core Strategy
- providing for port-related development at Eastham in the Broad Spatial Strategy (Policy CS2) and in Policy CS16 of the Proposed Submission Draft Core Strategy

4 Responses to the Preferred Options Report

4.1 The following sections set out the comments received on the Preferred Options Report:

Policy Context

4.2 The only comment received on the Policy Context for the Core Strategy, which set out the main changes to national policy; changes in the national economy; changes in national statistics; progress on major developments; key assets; and drivers for change related was that:

ID	Summary of Responses Received
832	Greater reference should be made to the beneficial proximity to Liverpool John Lennon Airport and the Airport should be listed as a Key Asset at paragraph 3.5.

4.3 The Council has responded to this comment by referring to the Liverpool John Lennon Airport in Section 2 and Policy CS42 of the Proposed Submission Draft Core Strategy.

5 Preferred Plan Period

5.1 The following comments were received in response to Consultation Question 1 - *Do you agree with Preferred Option 1 - Plan Period? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
7	Agree.
9	Agree.
16	Agree.
37	Agree.

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96	The plan period would allow for adjustment dependent upon the development (or not) of Wirral Waters. However given the cost and time of this current exercise, to have it repeated again so soon would seem an unnecessary drain on resources. Time period accepted if the process of defining the Plan is drastically streamlined.
120	Agree.
123	Given the apparent uncertainty over the timing of Wirral Waters, the plan period is long enough to cover at least some of the development of the site.
165	Agree.
171	Agree.
224	Agree.
227	The timetable is ambitious but does not appear to provide adequate time for production of each document before the next consultation/publication stage. The plan period proposed is consistent with the Waste DPD.
239	Agree, if the plan can be updated in response to changing circumstances.
258	Agree but should be further refined. There may be unforeseen delays which would mean the estimated date of adoption would be redundant. Planning Policy Statement 3: Housing (paragraph 54) states that sites identified should be deliverable at the point of adoption not the estimated date of adoption as indicated under Preferred Option 1.
381	Agree.
519	If it was extended and then reduced to the original deadline that is OK. If it was reduced to a shorter time than originally, why?
541	Disagree. Should be a maximum of ten years.
563	Agree but may change according to Government policy over the years.
574	15 years should be sufficient but a rolling programme of reviews and extensions on an ongoing basis would be preferred.
631	The end date should revert to 2031. 2027 is just over 15 years. Paragraph 53 of PPS3 states that "Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the Regional Spatial Strategy." There has already been significant slippage. If adopted post 2012, which is likely given delays to date, the plan will not have a plan period of at least 15 years. 2031 would not be out of conformity with RSS as Policy L4 states that the annual housing requirement can be continued beyond 2021. As RSS is unlikely to be reviewed, this Core Strategy can take the plan period

	<p>forward to an appropriate end date, which should be addressed in the Core Strategy in advance of the Examination. Whilst the plan period may be reviewed in subsequent stages, this demonstrates the acceptance that there will be further slippage and that 2027 is not a realistic date. We therefore see no reason why 2031 should not be planned for now as originally proposed by the Council. 15 years should be used as a minimum, not as a maximum as now proposed. Whilst the Core Strategy could accord with PPS3 if adopted in 2012, the following DPDs, such as the Allocations DPD, should also meet the 15 year requirement. Work on the Land Allocations DPD is not scheduled to start for at least another 12 months. On that basis, it would be extremely unlikely that the Allocations DPD would be adopted prior to 2013. This would result in that DPD only allocating land for the remaining 14 years of the Core Strategy. An end date of 2031 would therefore also provide the Land Allocations DPD with at least a 15 year plan period from adoption, within the plan period of the Core Strategy. An additional sentence should be added to Preferred Option 1 to say: "For any subsequent DPDs, including the Allocations DPD, the average annual requirement will continue for a period beyond 2027, to ensure those DPDs have the necessary strategic guidance in the Core Strategy to enable them to have a plan period of at least 15 years." This would give the Council the necessary flexibility to extend the plan period beyond 2027 and would not require the evidence base to be updated which may lead to further delay. It is also based on the wording of RSS Policy L4 and represents an approach that has already been deemed appropriate.</p>
637	<p>The principle of a 15 year plan period is supported in accord with national policy. However, it is questioned whether the plan period needs to be set to a particular month, given the potential for delay. It may be preferable to set the plan period on a yearly basis, to build in sufficient flexibility. The Council may also like to consider, given the likely long-term delivery of the Wirral Waters scheme which will extend well beyond the Core Strategy period, whether it might be helpful to add "beyond" to the plan period, to add flexibility should the aims of the plan not be delivered by March 2027.</p>
690	<p>Agree.</p>
750	<p>Agree provided the document is completed in the timescales indicated.</p>
752	<p>Agree provided the document is completed in the timescales indicated.</p>
816	<p>Planning for fifteen years in advance seems rather ambitious.</p>

5.2 The Council has responded to these comments by providing for a plan period of fifteen years to 2028 based on adoption during 2013.

6 Settlement Area Policies

6.1 The following comments were received in response to Consultation Question 2 - *Do you agree with Preferred Option 2 - Settlement Area Policies? If not, please give the reasons for your answer and explain how you would like to see it changed:*

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ID	Summary of Responses Received
17	Agree with eight Settlement Areas, each with their own priorities
38	Agree.
48	<p>Strongly support this approach but the following issues should also be included:</p> <p>define areas where new restaurants/wine bar/bar developments should be restricted. Liverpool are adopting policies where anti-social evening/night-time behaviour is becoming a problem. Hoylake and Grange Road, West Kirby, where concentrations exist, are concerns;</p> <p>a strategy for new allotments and standards of provision;</p> <p>agriculture - a key issue for local sustainability, pride, inward investment and visitors;</p> <p>Peak Oil and sustainability - nothing is more important over this time period yet the issue is being ignored at household, Borough and scheme level, with major developments in power generation such as the Mersey Barrage proposals;</p> <p>impact on habitats - a major concern including areas such as the Birket Valley that has so much potential for agricultural, market gardening, allotment, wildlife and natural habitat (linking to Dee Estuary Sites) and nature tourism, which should included rather than a Golf Resort with a manicured landscape devoted to an insulated external tourism development with minimal benefit to the local economy.</p>
97	Agree that the division of Wirral into similar spatial areas is best. However maps showing the interrelationship with other divisions of Wirral, such as Parliamentary Constituencies and Electoral Wards would help in understanding who is responsible for each area. Would also be of benefit to show other current divisions such as the rural and urban divisions used by the Merseyside Rural Economy Action Plan.
121	Agree.
125	Agree as it provides a mechanism for a very clear focus on the unique character of each area as a basis for appropriate development (in its widest sense).
149	There is no direct reference to the wealth of wildlife and nature conservation designations and the value of this wildlife to local areas. Words should be added to read "promote green infrastructure, including biodiversity conservation, and public access where appropriate"and/or "promote local distinctiveness including local biodiversity and its conservation". Local infrastructure must include sustainable energy, food and water as well as schools, surgeries, shops.
166	The approach is sound. Green Belt areas will need maintaining in the future.
172	Agree.

193	Support the principle, as a means of developing local policies to set out local priorities. However, the wide range and variety of character within Settlement Area 8 should not be over simplified and should recognise the operation of Major Developed Sites in the Green Belt at Clatterbridge and Arrowe Park, which must be specifically recognised as major healthcare establishments; significant generators of employment and related activity; and places where change and future development will be permitted, with a mix of uses, including appropriate housing on surplus land at Clatterbridge.
209	Agree subject to the Habitats Regulations Assessment being fully taken into account.
226	Agree.
240	Agree with the approach. Welcome the introduction of names for each Area.
259	Agree but a more detailed plan should be included to avoid any future ambiguity where sites may appear on the boundary and may or may not be located within Settlement Area 8.
286	Support the reference to Settlement Area 2 which will include the "New City Neighbourhood at Birkenhead and Wirral Waters" but reference should also be made to the series of "New City Neighbourhoods" within the wider Birkenhead and Wirral Waters study area, to reflect the approach to a series of connected/integrated partnership and catalyst neighbourhoods referred to under Preferred Option 21.
337	Generally supportive but strategic infrastructure such as the Strategic Road Network (SRN) should also be included and should be a key consideration when presenting the main priorities for growth, particularly at Birkenhead and Wirral Waters and at Bromborough and Eastham, given the focus of development in these locations and their proximity to the SRN.
347	Disagree. Business regeneration and development must be based on the identified needs of local communities. Needs in Hoylake and West Kirby have been overlooked. West Kirby is in desperate need of investment and new development.
364	Disagree. While accepting a need for re-structuring, the amount of development proposed for Hoylake and West Kirby would seem to be very, very small indeed.
383	Disagree. There may be need to recognise that Wirral comprises clearly differing areas but policies regarding housing and business regeneration should be based on the existing needs of local communities and not on some fanciful and grandiose vision of the future.
390	Disagree. Local requirements should govern regeneration.
400	Disagree. Housing regeneration should be subject to normal planning requirements.

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413	Disagree. More homes are needed for new young families and affordable housing in West Kirby and Hoylake.
440	Disagree. Business and housing regeneration should be based on local requirements.
445	Disagree. Planning decisions for regeneration should be based on local requirements and the size of the existing population.
455	Disagree. Housing regeneration should be subject to normal planning requirements.
473	Disagree. The local requirements should always be based on local needs.
480	Disagree. Hoylake, and West Kirby in particular, are always last in the queue for any Government assistance due to the misconception that it is full of wealthy people.
486	Disagree. Always needs to be based on local requirements.
500	Disagree. Housing and business regeneration should be based on local requirements and governed by normal planning requirements.
521	Agree, if money is shared equally between the Settlement Areas, with local autonomy over spending.
522	Disagree. Planning for housing and business must be subject to local requirements.
542	Disagree. Although there ought to be some form of structure to identify different areas, policies should be based on the identified needs of the existing local communities not assumptions.
558	Disagree. There must be a structure to identify areas within Wirral but there is no need to reinvent the wheel. What is already in existence should be adhered to.
564	Depends on how the policies are formulated and the information available. It is essential that local consultation takes place, so that hazard maps are fully comprehensive and up-to-date. All too often historic sites and environmental enhancement / safeguards are not considered, to the detriment of local communities and visitors. Local distinctiveness is eroded on a piecemeal basis, when joined-up thinking is required. Planning for industrial locations needs to be subject to careful scrutiny, so that the design, exact location and estimated environmental effects are subject to proper constraints.
576	Disagree. Each individual settlement needs to have its own district plan. A compilation of these individual plans would give a much more powerful and vibrant plan for Wirral as a whole, rather than what is on offer here, which could be viewed as being imposed on the individual settlements 'top down'.

619	Support the approach. It is important that Settlement Area Policies specifically address the conservation and enhancement of the historic environment, including designated and locally important assets and Heritage at Risk, as part of and in addition to priorities for maintaining local distinctiveness.
639	The introduction of Settlement Area policies is welcomed. The intention to both number and name the Areas is supported. The provision of specific policy content about the scale and location of new housing and employment development in each Settlement Area is supported. As several of the Preferred Options also include specific detail relating to each Settlement Area, it is not always clear whether an additional suite of Policies is intended. If they are, the fact that they have not yet been drafted means that the final opportunity to comment will be at publication stage, where comments can only be on soundness issues, which will severely limit the ability of local stakeholders to have their say. The Council should consider publishing the Settlement Area Policies for consultation prior to the publication of the submission version.
697	Agree. Pleased to see the inclusion of cross cutting issues.
754	The approach is generally acceptable but they should be identified as broad locations on the Key Diagram and should not be identified with definitive boundaries on an additional plan. The Settlement Area approach is not followed through into the remaining policies and it is therefore unclear whether this will simply be provided in the supporting text rather than in a policy. The latter would seem the most appropriate.
755	The Council seems intent on closing and disposing of public assets such as leisure centres, public halls and libraries even though they are very important. Wirral has a beautiful coastline, lovely buildings, museums and art galleries full of amazing treasures yet little seems to be made of them. The countryside has an abundance of pretty little villages so why is tourism so little promoted? Need to think beyond "build, build, build" and work on what the Borough already has to offer.
765	Agree in general. Accept that following the geographical units set out in the Regional Spatial Strategy should not be favoured due to revocation. As suggested by previous respondents (paragraph 4.5 refers), Settlement Area 8 should be further broken down to acknowledge the key settlements within this larger area (Raby, Thornton Hough, Storeton, Barnston and Brimstage), which together form a "string of pearls" which support the sustainable functioning of the majority of Wirral's rural area.

6.2 The Council has responded to these comments by:

- consulting on the content of draft Settlement Area Policies in January 2012⁽⁶⁾
- updating the background in the Proposed Submission Draft Spatial Portrait to reflect some of the more detailed comments received

6 for which a separate Report of Consultation on Settlement Area Policies is now available

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- including a statement of local priorities for each Settlement Area within Policies CS4 to CS11 of the Proposed Submission Draft Core Strategy
- including Policy CS27 in the Proposed Submission Draft Core Strategy to deal with the impact of food and drink uses
- including a standard for allotments in Policy CS31
- undertaking transport modelling to assess the impact of the Core Strategy
- clarifying the position with regard to restrictions on development in west Wirral in the Broad Spatial Strategy (Policy CS2)

7 Preferred Spatial Vision

7.1 The following comments were received in response to Consultation Question 3 - *Do you agree with Preferred Option 3 - Spatial Vision? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
10	Agree but doubt some of the assumptions, with regard to the housing market and attractive, safe and healthy residential areas within each main Settlement Area.
18	Broadly agree, especially to the protection of Green Belt. Concerned at Thurstaston being developed as a tourist destination. Would prefer this to be more clearly defined towards protecting rural character and heritage, as "tourism" can mean many things. Would not wish to see further inappropriate development in Thurstaston in the name of tourism.
39	Agree.
50	<p>In general happy with the vision but the potential impact on habitats should be better reflected, including the enhanced protection of rural areas as well as designated sites.</p> <p>In Settlement Area 2, it is imperative that the role of Birkenhead Town Centre is not eroded by the Wirral Waters project and that proper fixed link transport provision, such as a tram system, is inserted to link with the rail network and the Town Centre. The development of retail facilities should not undermine other town centres across Wirral, which have been badly affected by the development of supermarkets which the Council has made no attempt to control. Supermarkets might generate jobs at that location but destroy jobs and town centres elsewhere and undermine local, independent traders and local and UK production. Wirral's record in controlling, directing and guiding development and developers is poor, dominated by the fear that they will pull out of the locality if properly controlled. This is showing no sign of changing. The Wirral Waters development must also be sustainable in energy terms, to put Wirral on the map for sustainability as well as for new development. The height of the development must be controlled to not dominate the skyline. The development must also protect and allow maritime related industries to grow and provide skilled jobs. There is a danger of slow and weak development following over-development with offices.</p>

	<p>In Settlement Area 6 - the stress on preserving the character of Hoylake and West Kirby is strongly welcomed. The demolition of character buildings for poorly designed and controlled flat developments should be resisted and planning controls improved. Tourism and visitors, parks and open spaces are important to the area and its future but Wirral Council has failed to provide resources. There is no sign of this changing in budget decisions or the Open Space Assessment. This is not just about new investment but about maintaining, nurturing and promoting what is already there. The priority given to large and inappropriate developments, which are poorly managed by Special Initiatives and poorly controlled by planners needs to change. The Council's vision is also lacking. The West Kirby Sailing School should not just be replaced but expanded as a beacon for more national and international events, local training in marine sports with good and proactive, well-resourced management. The badly framed idea for the Dee Lane Hotel was ill-researched, flawed in concept and poorly managed. Its damage would have far exceeded the benefits. The Golf Resort proposals remain a concern, damaging the Green Belt, the environment and agriculture and reflects the wrong approach for the area and a potentially lost opportunity to create a sustainable and attractive area for locals and visitors rather a declining golf industry. The Golf Resort will require major development including a hotel, flats, chalets and other buildings to make it viable, which should not be allowed in the Green Belt and will have limited benefit to the local community and questions the Council's commitment to the Green Belt, the local community and sustainable development. This should be reviewed urgently in the light of the recent failure of the Sail Project.</p>
<p>98</p>	<p>Encouraged to see reference to a "tight Green Belt", given the Council's u-turn at the Warrens and the persistence in promoting the Hoylake Golf Resort ideas. The Strategy is, however, too idealistic and fails to address the main issues raised in the assessment of Wirral, identical to any other Councils strategy. How will this address the declining, ageing population? Will recession and reduction in benefit payments result in a drop in demand resulting in no need for new housing at all? How will the second hand housing market be considered in planning for housing needs. How will the Council raise the value of the workforce to enable them to earn a living and even buy a house through training, apprenticeships etc?</p>
<p>126</p>	<p>Support the general tenor but remain concerned over the viability of the Wirral Waters proposals. If words referring to geographical locations were removed, much of the statement could be describing any post-industrial conurbation. It misses something along the lines of "the unique attributes (natural and built) of Wirral are...and the attractiveness of these to both residents and potential new inhabitants (businesses and people) will be enhanced by...so that by 2027 Wirral will be..."</p>
<p>150</p>	<p>A sentence should be added to say "Policies will be set to retain, maintain and where possible improve these features" (coast, countryside and biodiversity). This would include getting all SSSIs into favourable or recovering condition, as</p>

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	required by law, and Local Wildlife Sites into good ecological condition to fulfil the Council's biodiversity duty under the Natural Environment and Rural Communities Act.
154	Disagree. The focus on development in East Wirral is a continuation of existing policies which has resulted in the exodus of middle and high income families from the area, in particular to Flintshire, Denbighshire and Chester, where quality affordable 3/4-bed detached houses are available, with associated economic and population decline with a drop in GVA / head and an increase in Council Tax Benefit (CTB). Whilst new dwellings increased by 2,278 between 2005-2010, the increase in number of properties paying Band D Council Tax was only 8 units. During this same period the number of recipients of CTB increased by 3,621 adding an additional cost of over £5 million pounds (Sourced from WBC Revenues, Benefits and Customer Service). The downturn in public funding will place more emphasis on market forces. There is a lower than national average of detached houses and a very high demand. Wirral should take a proactive approach to quality residential development in areas identified as making a significant economic contribution. Wirral's housing stock should attract entrepreneurs, investors and top managers to Settlement Areas 4, 5, 6 and 7 but Green Belt should be sacrosanct and should not be included for possible development.
167	Commendable but in the current economic climate, with significant cuts to local authority expenditure, it must be doubtful whether many will be achieved within the 15-year planning period. Urban parks, in particular Birkenhead Park, should also feature as potential tourist attractions.
194	The reference to Wirral's Rural Areas is too narrow. It only mentions an agricultural economy and does not recognise the wide variety of activities within Settlement Area 8, including the future role of existing Major Development Sites. Settlement Area 8 has much more to offer in terms of building on the existing assets the Borough, for example, in terms of improving the housing offer and catering for housing need and markets where people want to live. Stronger reference should be made to infrastructure and important services, such as health provision, which will need to have the resources and capacity to meet the demands arising from large scale regeneration and housing provision in the Borough.
210	Agree, subject to the Habitats Regulations Assessment being fully taken into account. The reference to placing greater emphasis on sustainable design and construction and waste management provides a useful link to the Waste DPD.
228	Agree.
243	Welcome recognition that there needs to be a tight Green Belt. Welcome inclusion of Birkenhead, Leasowe, Thurstaston and the Mersey coast as visitor and tourist destinations. Concern that more recognition is not given to role of agriculture and food production.

260	Partly agree, as this is a general rather than a spatial vision, which is still very long and should be further simplified. The second paragraph does not include new residential development yet the Housing Market Assessment identifies a significant need for a mix of new housing to replace unsuitable properties and address future housing requirements. New residential development can act as a significant catalyst to growth and investment and will contribute to many of the other points, such as the promotion of jobs and increased economic activity, sustainable modes of travel and sustainable construction techniques.
288	Support the thrust but both East Float and Bidston Dock should be identified as 'catalyst' City Neighbourhoods, the latter as a leisure and retail destination. The vision should identify the integrated approach being taken to Wirral Waters and that these two core catalyst neighbourhoods will facilitate long term investment and renewal in the surrounding 'partnership neighbourhoods', which together comprise a series of New City Neighbourhoods at Birkenhead and Wirral Waters.
309	Welcome the greater emphasis on environmental issues such as water, flood risk, waste management, climate change.
345	Generally supportive, in particular with regard to the support given to more sustainable patterns of travel, reducing levels of traffic along major routes and increasing sustainable accessibility through more sustainable transport modes such as public transport, walking and cycling. It is essential that this is carried through to the more detailed aspects of the plan.
351	Disagree. 8% of the population lives in Hoylake and West Kirby and there is insufficient recognition of the identified needs of residents.
365	Disagree. Sufficient recognition is not being given to the identified needs of the existing 8% of the population who live here.
384	Disagree. Insufficient recognition is being given to the identified needs of the 8% of the population that lives in Settlement Area 6.
391	Disagree. There is not enough recognition that Hoylake and West Kirby have 8% of the population.
401	Disagree. 8% of the population lives in Hoylake and West Kirby and deserves more consideration.
441	Disagree. Look at the population in West Kirby and Hoylake.
450	Disagree. Not enough recognition is given to identified needs in Hoylake and West Kirby.
456	Disagree. 8% of the Wirral population in West Kirby are not being given sufficient recognition.
467	Broadly support. Pleased to see the reference to strengthening and enhancing the distinctive assets of the Borough, including the quality and value of the natural environment but a specific reference to a fully established network of high quality green infrastructure including enhancing and safeguarding

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	biodiversity and geodiversity resources should be re-instated given the strategic importance of green infrastructure in the Borough and its multiple functions including the benefits to health.
475	Disagree. Look at the existing population of the West Kirby and Hoylake areas.
482	Disagree. Existing identified areas of need should to be adequately provided for, pro rata, with particular attention to Hoylake and West Kirby
487	Disagree. Look at the population of Hoylake and West Kirby to make decisions.
501	Disagree. Insufficient recognition is given to Hoylake and West Kirby which has 8% of the Borough's population.
523	Disagree, given the percentage of population in West Kirby and Hoylake.
543	Disagree. Insufficient recognition is being given to the already identified needs of the population living in some of the Settlement Areas.
561	Disagree. Recognition is not being given to the identified needs of the existing population in Hoylake and West Kirby.
565	Generally agree. Green Belt considerations must take priority over any ambitious schemes such as a Golf Resort, which would cause permanent damage to the environment. While appreciating the need for jobs locally, too much speculative industrial/office construction has taken place in Bromborough and buildings remain unoccupied, whilst greenfield sites are earmarked for development. A proper strategic plan needs to be drawn up, to take full account of the historic and environmental character of the area. A long hard look needs to be taken at the older built-up areas like Tranmere, where refurbishment and updating should be the first priority rather than demolishing properties which are then replaced by cramped dwellings, such as along old Chester Road, which are singularly unattractive in appearance.
577	Disagree. Local communities will need to be more self-sufficient over the next 15 years, with less commuting, more home-working and a greater focus on sustainable living. Wirral should be setting out to take a lead in this transition.
621	Supported but should specifically explain that the Borough's distinctive assets include its historic environment.
640	Recognition of the contribution that Wirral can make to the prosperity and regeneration of the Liverpool City Region is supported but flexibility is needed to support the delivery of some of the objectives beyond 2027. "Moving toward regional average levels" for density of jobs and businesses and rates of economic activity is questionable and it may be preferable to set specific targets for these matters, rather than relying on comparative targets alone, particularly when every other district will be seeking to support economic growth in its own locality.
662	The revised Vision is no longer specific in its commitment to energy security, carbon reduction and climate change. Should this shortened version be carried forward, the supporting text should make that commitment more explicit. It is

	<p>essential that the Core Strategy and subsequent Development Plan Documents continue to positively plan to address the twin threats of climate change and energy security to make a transition from an unabated reliance on fossil fuels, to a more diverse energy mix, including a significant contribution from renewable energy, that is more secure and less vulnerable to fluctuations in the price and availability of any one fuel. Challenging goals should be set to secure renewable energy development. There is a robust and substantial evidence base and a suite of national, regional and sub-regional policy documents which specifically identify the UK potential to generate large amounts of low carbon energy. Tidal stream and tidal range could supply at least 10% of UK electricity, if fully exploited. NW resources, including the Mersey Estuary, are some of the most favourable in the UK. Support the recognition of the potential of the Mersey Coast as a visitor and tourist destination, which could provide complementary development opportunities for a Mersey tidal project, including facilities for education, recreation, enhanced green spaces and habitat.</p>
664 683 703	<p>Disagree. The Council has no Plan B if the over-ambitious reliance on Wirral Waters fails. The Vision would pull up the drawbridge on development elsewhere and consign the sustainability, growth and needs of the more prosperous areas to the rubbish bin. The aims and ambitions for a New City Neighbourhood at East Float are pure fantasy. The property investment market (office, residential and retail) will not deliver or be attracted to these locations. The level of public subsidy will not be available to support such wild dreams. The Vision is nothing more than a shopping list of desirable outcomes and ideas.</p>
700	<p>Pleased to see cross cutting issues, such as climate change, included. Welcomes that the reference to strengthening and enhancing the quality and value of the natural environment and sustainable economic regeneration. Supports the inclusion of promoting sustainable patterns of travel and a greater emphasis on sustainable approaches to issues including climate change and design and construction but still does not specifically refer to tackling diverging landscape character or put sustainable development at the heart of the Vision. The first sentence needs to makes clear that the overall Vision is advanced in the context of Sustainable Development, rather than putting it at the end.</p>
737	<p>Generally welcomed and supported but the scale of future housing provision proposed under Preferred Option 5 is insufficient to support the Vision's housing and economic development objectives and its intention to create a New City Neighbourhood based on the Birkenhead Dock Estate.</p>
755	<p>The New City Neighbourhood at East Float is not consistent with the description provided elsewhere in the document. Paragraph 3 indicates the re-balancing of the housing market with a focus on the east but should also make reference to meeting the needs of existing communities elsewhere. It is unclear where employment is being directed.</p>
766	<p>Object to Paragraph 2. Regeneration should be Borough-wide not just focused in urban areas, to achieve a wholly sustainable spatial strategy. The vision should be expanded to encourage development beyond just general agriculture</p>

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	<p>within rural areas. New housing, employment and tourism can be appropriately delivered through the re-use of rural previously developed land and the conversion of unused agricultural buildings.</p> <p>Paragraph 3 should be revised as Wirral Waters has significant viability and deliverability issues. Wirral Waters is part of a wider "Ocean Gateway" concept, dependent upon an investment of over £50 billion in the Liverpool to Manchester corridor, increasing its fragility over delivery. The Wirral Waters Strategic Regeneration Framework defines a 30 to 50 year period for delivery. New employment provision is linked to the successful completion of around 16,000 new dwellings to release the level of funding needed and is based on high rise flat development, which the current market will not deliver. Public funding will not be available, increasing the risks associated with a predominantly private sector led strategy.</p> <p>Paragraph 5 needs to recognise the potential of the local rural economy and promote managed economic growth within the Rural Area, with Thornton Hough as a key hub within Settlement Area 8, with inter-dependant surrounding satellites at Raby, Storeton, Brimstage, and Barnston. Tourism should be promoted in recognition of the attractive rural natural environment, built heritage and country parks, to help existing agricultural businesses diversify. The Commission for Rural Communities (September 2010) states that "spatial planning must support rural economic growth". A local definition of previously developed land should be set out to allow new housing to be delivered in sustainable rural areas, to include farmsteads and brownfield land within the rural area in line with the recent ministerial statement (Andrew Stunell, 21 October 2010) that Councils should make it easier for farm buildings to be converted into homes. PPS1 Supplement and PPS4 Policy EC12 recognises that "a site may be an acceptable location for (rural) development even though it may not be readily accessible by public transport." The Taylor Report (2008) also shows that rural dwellers are likely to commute further than urban dwellers, up to 1km distance (Paragraph 87 refers).</p>
779	<p>Would prefer to see a direct reference to sport and recreation. The Revised Spatial Portrait identifies a shortage of formal outdoor sports facilities. The Mersey Heartlands Growth Point is seeking to reverse the projected decrease in population, which will lead to further demand for sport and recreation facilities and is also likely to alter the geographical relationship between demand and the location of facilities.</p>
797	<p>Generally supportive of the approach to locating new housing and employment development. Particularly supportive of the approach to provide more sustainable patterns of travel, reduce levels of traffic along major routes and increase sustainable accessibility through the use of more sustainable transport modes such as public transport, walking and cycling.</p>

7.2 The Council has responded to these comments by:

- including references to sustainable tourism; protecting and enhancing heritage, biodiversity and the quality of the natural and semi-natural environment in rural areas; green infrastructure; the transition to a low carbon Borough; sustainable lifestyles and a sustainable pattern of development within the Spatial Vision.
- providing further detail including reference to existing key facilities and consideration of the impacts on landscape, heritage and biodiversity in rural areas in Policy CS11; reference to safeguarding the role of existing centres in Policy CS12; and the consideration of options with and without Wirral Waters in Section 20 of the Proposed Submission Draft Core Strategy.

8 Preferred Spatial Objectives

8.1 The following sections set out the comments submitted in response to Consultation Question 4 - *Do you agree with the Preferred Spatial Objectives? If not, please give the reasons for your answer and explain how you would like to see them changed. Please indicate the Objective(s) you are talking about by referring to their number and title:*

8.2 The following general comments were received in relation to the Preferred Spatial Objectives:

ID	Summary of Responses Received
19	Agree.
63	Agree.
174	Agree.
211	Disagree. Not sure that these objectives will entirely deliver the Spatial Vision.
245	Agree.
249	Agree.
416	Disagree. Objectives should be directed towards existing identified needs and provided in proportion to the existing population, particularly West Kirby and Hoylake.
442	Disagree. Needs to address identified needs in West Wirral.
488	Disagree. Needs to identify the specific needs of West Wirral.
573	Agree.
579	Centralisation should be avoided, to invest in a vibrant network of communities providing housing and employment opportunities locally, avoiding the need for travel whenever and wherever possible.

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665	Disagree.
684	Disagree.
705	Disagree.
738	Agree.

Preferred Spatial Objective 1 - Economic Revitalisation

8.3 The following comments were directed towards Preferred Spatial Objective 1 - Economic Revitalisation:

ID	Summary of Responses Received
40	Agree.
63	Agree. The focus of revitalisation in the poorer areas on the middle and east sides of the Borough is supported subject to maintaining the viability and attractiveness of all local and town centres
99	Agree. Essential for Wirral. Encouraging to read of investment in Broadband connectivity to aid economic growth but Wirral is competing with the rest of the North West for local investment and it is not clear what key factors Wirral is presenting as the case for investment and what the Council can or would do to facilitate that investment, apart from Wirral Waters.
128	Agree. This is critical for Wirral but could be written by any council. The objective should be "to increase the competitiveness of Wirral by..." Why should firms invest here rather than somewhere else?
164	Disagree. The objective is too simplistic. Economic revitalisation is linked to investment in jobs, factories etc. To encourage new start up businesses from outside Wirral requires an attractive package including schools, shops, leisure facilities and infrastructure. The most important consideration to a re-locating business leader will be where to live. The success of Deeside is associated with good quality residential development nearby in Denbighshire, Flintshire and Chester.
168	Agree.
195	Settlement Area 8 should be more broadly reflected within this objective,
261	Disagree. There is no need to focus solely on existing employment areas, which dictates very specific locational criteria to occupiers and may drive businesses and investment out of the Borough. There should be flexibility (within the realms of Planning Policy Statement 4) for the location of new employment activity. This also conflicts with Preferred Spatial Objective 3, as existing employment areas may not be very sustainable. The objective should be widened to encourage economic revitalisation with greater flexibility.

289	Agree.
350	Agree. Maintaining the safe and efficient operation of Strategic Route Network (SRN) is critical to enabling and supporting sustainable economic growth. Generally supports focusing new employment development in existing urban areas, particularly where access by sustainable transport mode is greatest and where the need to travel outside the Borough for employment can be reduced, especially where such trips would involve the SRN.
352	Disagree. Should be directed towards the identified needs of west Wirral
367	Disagree. Should be directed towards existing identified needs and provided in proportion to the existing population, with attention especially paid to Hoylake and West Kirby.
385	Disagree. Should be directed towards areas of identified need, in proportion to the existing population of Wirral as a whole, with special attention to Hoylake and West Kirby.
452	Disagree. There is a need to keep regeneration progressing in Hoylake and West Kirby and not a new city neighbourhood in east Wirral. Not everyone wants to work in Birkenhead or Bromborough.
527	Disagree. Reasonable to increase the scope of priorities.
545	Disagree. Should be directed towards areas of existing identified need and provided in proportion to the existing population in the proposed Settlement Areas.
562	Disagree. Should be directed towards already existing needs and provided in proportion to the existing population, with attention paid especially to Hoylake and West Kirby and Settlement Areas 5, 6 and 7. This is just common sense.
665 684 705	Disagree. The ambition for a high quality employment area in Birkenhead Docks is unrealistic. Support should be provided for the diversification, growth, expansion and replacement of existing employment sites across the Borough. It is difficult to see how anything beyond the Wirral Waters hinterland will ever gain policy support if all other economic development policies are biased towards this area and positively discourage growth elsewhere.
738	Agree.
756	Disagree. Should focus employment development both within and adjoining existing areas and centres, as development adjacent to these areas may be equally appropriate and on occasions more appropriate than development within them. For example, office developments adjoining a town centre may be sequentially preferable to those in an out-of-town location.
767	Disagree. The Objective should provide for extensions to established employment sites within the identified Assisted Areas and Centres and include sustainable locations within Settlement Area 8. The likelihood of delivering the required need (177ha) through the use of existing employment sites, is negligible. Excluding

	<p>Settlement Area 8 would also conflict with An Economic Strategy for Rural Merseyside (Rural Innovation, 2009) which explicitly promotes rural economic development. The Council should identify existing economic actors in the rural area with potential for sustainable economic growth and review the potential for the development of increased economic infrastructure in the larger rural settlements, including sites sites which could be developed as additional workspace for tenants that would be potential operators of new businesses. The contribution of the main rural settlements at Raby, Thornton Hough, Storeton, Brimstage and Barnston should be maximised to ensure the sustainable economic future of the district.</p>
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Preferred Spatial Objective 2 - Housing Growth and Market Renewal

8.4 The following comments were directed towards Preferred Spatial Objective 2 - Housing Growth and Market Renewal:

ID	Summary of Responses Received
40	Agree but a more balanced approach to new housing is appropriate in New Brighton to provide family homes, as there has been considerable recent development of smaller apartments.
63	Agree. The main thrust is supported alongside protection of existing centres of Hoylake and West Kirby from inappropriate development affecting the character of these centres.
99	Agree this needs to be focused within the area defined. However, there needs to be allowance for a change in housing needs resulting from the recession and the reduction in benefit hand-outs. Assuming an ever increasing housing need may not be correct for the future.
128	Agree on the need for focus. However "improvement" should also include upgrading the existing stock rather than wholesale replacement.
164	Disagree. The current policy of restricting new house building outside the regeneration priority areas has contributed to economic and population decline. The drop in GVA per head is attributable to the out-migration of middle and high income families to other areas, in part due to the lack of new affordable homes in Settlement Areas 4, 5, 6 and 7. Quality residential areas attract investors and attract and retain a highly skilled workforce which are an economic asset to the region. The drop in GVA per head also correlates with an increase in Council Tax Benefits (CTB). Whilst new dwellings increased by 2,278 (2005-2010), the increase in the number of properties paying Band D Council Tax was only 8. During this period the number of recipients of CTB increased by 3,621, costing an additional £5 million pounds (Source Wirral Borough Councils Revenues, Benefits and Customer Services). Additional housing in Settlement Areas 4, 5, 6 and 7 will contribute to the overall wealth of the peninsula, as these areas already have the highest skill and household incomes (highest 20% national index). If all the new houses provided had been in Council Tax Band D, the

	additional income would have been over £3.5 million pounds. The Council should address any shortfall in the supply of market housing by reviewing policy restraints in areas where need and demand are high.
168	Agree.
195	Settlement Area 8 should be more broadly reflected within this objective,
261	Agree but the focus is too restrictive with very little balance allowed across the Borough. Too great a focus on the Housing Market Renewal Areas will seriously overlook the needs and future demands of current residents in other Areas and the ability to increase the level of in-migration and attract highly skilled and economically active residents to the Borough. Picture 6.2 should be enhanced for the avoidance of doubt. Areas of Greatest Need and Areas of Housing Stress are not explained. Areas outside the boundary lines should also be included due to the level of deprivation and need for investment indicated by National Statistics. Leasowe is the 289th most deprived Ward in the country out of 8,414 in 2002. The objective should be amended to allow development where need can be demonstrated.
310	Some of the areas outlined on Picture 6.2 fall in areas within Flood Zones 2 and 3, which will need to be considered in line with PPS25, should new development and/or improvements to existing stock be proposed in areas in Flood Zone 2 and 3.
352	Disagree. Should be directed towards the previously identified needs of west Wirral.
355	Disagree. Provision of housing, including social and affordable dwellings, should reflect existing populations.
362	Agree. Supports new housing where it facilitates sustainable transport movements and reduces the need to travel, particularly via the Strategic Route Network and therefore generally supports the objective to regenerate and focus new investment and development in the older urban areas within the Newheartlands Pathfinder Area and the Mersey Heartlands Growth Point.
367	Disagree. Should be directed towards areas of already identified need and provided in proportion to the existing population, with attention paid especially to Hoylake and West Kirby.
385	Disagree. Should be directed towards areas of identified need, in proportion to all the existing population of Wirral as a whole, with special attention to Hoylake and West Kirby.
392	Disagree. Not everyone wants to live in east Wirral. Needs are already identified in west Wirral.
402	Disagree. Needs have been identified for west Wirral. Not everyone wants to live in Birkenhead or east Wirral.

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452	Disagree. Regeneration must keep progressing in Hoylake and West Kirby. There is no need for a new city neighbourhood in east Wirral. Not all people want to live in Birkenhead or Bromborough.
457	Disagree. Needs are identified in west Wirral. Not everybody wants to live in East Wirral.
476	Disagree. Identify the areas which people want to live in.
502	Disagree. Existing needs are identified in west Wirral, not a creation of a new east Wirral community. Not everyone wants to live in Bromborough and Birkenhead.
524	Disagree. Look at the population of West Kirby and Hoylake and realise that not everyone wants or needs to live in Birkenhead.
527	Disagree. Reasonable to increase scope of priorities.
545	Disagree. Should be directed towards areas of already identified existing need and provided in proportion to the existing population in each Settlement Area.
562	Disagree. It should be directed towards already existing need and provided in proportion to the existing population, with attention paid especially to Hoylake and West Kirby and in Settlement Areas 5, 6 and 7. This is common sense.
643	Picture 6.2 is unclear. Are the Mersey Heartlands Growth Point and the Newheartlands Pathfinder the same area? Are the vulnerable housing market areas referred to the areas of housing stress and areas of greatest need? The spatial relationship between the Growth Point, the Pathfinder and the Settlement Areas should be shown somewhere.
665 684 705	Agree to market renewal in Areas 1, 2 and 3 but not at the expense of growth in other Areas. Without growth there will be no incentive to invest or retain operations in Wirral, higher levels of out-commuting and migration and places like Heswall will become even more polarised and established as commuter settlements.
756	Disagree. The objective and the subsequent paragraphs 6.10 to 6.13 fail to demonstrate how this approach will meet housing needs. There is no evidence to suggest that allowing additional housing elsewhere in the Borough to meet local needs for market and affordable housing will in any way significantly affect the delivery of the regeneration of east Wirral. There is no indication of what the other vulnerable housing market areas are in Picture 6.2.
767	Disagree. Development and investment should be encouraged on a wider scale, to include all identified Settlement Areas, instead of limiting growth to east Wirral, to ensure the sustainable distribution of new dwellings across the Borough and increase the likelihood of achieving the projected housing targets. Sites within central and west Wirral are more viable and deliverable than sites in east Wirral, because of increased demand and appeal. The Objective is contrary to PPS3, which states that everyone should have the opportunity of living in a decent

	home, where they can afford, in a community where they want to live (Paragraph 9). Rural settlements such as Thornton Hough, Raby, Storeton, Brimstage and Barnston should be targeted for managed rural growth, as strategic community hubs, to help deliver the Borough's housing need in a manner which protects the natural environment whilst supporting the continued sustainability of the rural settlements.
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Preferred Spatial Objective 3 - Transport Accessibility

8.5 The following comments were directed towards Preferred Spatial Objective 3 - Transport Accessibility:

ID	Summary of Responses Received
40	Agree.
63	Agree.
99	Agree but why has the Council permitted an out-of-town GP surgery development at the Warrens, with the closure of three local surgeries. Figure 6.3 appears to emphasise that Wirral is a dormitory of Liverpool and that all routes lead to Birkenhead / Liverpool, which needs to be accepted.
128	Agree. Support the general principle, to strengthen existing centres. Critical that this is integrated with the plans of adjacent authorities.
164	Agree.
168	Agree.
261	Agree, as in line with PPS1 and PPS13.
352	Disagree. Should be directed towards the previously identified needs of west Wirral.
363	Agree. Support the intention to direct new development to locations which benefit from good access to existing centres and high frequency public transport, where it reduces the need to travel and provides a viable transport alternative to the private car to access employment, services and facilities. This approach must be followed in other areas of the Plan and be supported by the delivery of infrastructure.
367	Disagree. Should be directed towards areas of already existing identified need and provided in proportion to the existing population, with attention paid to Hoylake and West Kirby.
385	Disagree. Should be directed towards areas of identified need, in proportion to the existing population of Wirral as a whole, with special attention to Hoylake and West Kirby

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545	Disagree. Should be directed towards areas of existing identified need and provided in proportion to the existing population in each Settlement Area.
562	Disagree. Should be directed towards existing identified needs and provided in proportion to the existing population, with attention paid to Hoylake and West Kirby and Settlement Areas 5, 6 and 7. This is just common sense.
665 684 705	Agree but an investment programme should be linked to sustainable growth and development initiatives. Where, for instance, is there any mention that the Wirral Waters scheme will be looking to pay for its own impacts?
756	Agree but Picture 6.3 does not identify high frequency public transport corridors.

Preferred Spatial Objective 4 - Neighbourhood Services

8.6 The following comments were directed towards Preferred Spatial Objective 4 - Neighbourhood Services:

ID	Summary of Responses Received
40	Agree.
63	Agree but the Council's record has been poor, with the uncontrolled growth of supermarkets undermining local centres and local independent traders. Wirral Waters must not continue this trend. The handling of the health centre at Arrowe Park and the West Kirby youth centre underline these concerns as both will undermine the provision and viability of local community facilities. The Council must be proactive in supporting local centres, which does not appear to happen when large organisations and developers come up with proposals.
99	Agree. Essential, supported by the Green Belt, by preventing out-of-town developments and focusing development into existing developed towns and villages.
128	Agree, as a very critical view should in future be taken of further out-of-town developments for both shopping and public services.
164	Agree.
168	Agree.
195	Agree but refers to health and community facilities being focused only on existing centres. Whilst vital for many health facilities, it does not reflect the existing location and importance of acute hospital services or the scale of employment and visitor activity associated with them.
352	Disagree. Should be directed towards previously identified needs of west Wirral

366	Agree. Support strengthening and retaining services and facilities in locations easily accessible by a variety of sustainable transport modes, particularly where this will remove the need to travel longer distances using the Strategic Route Network.
367	Disagree. Should be directed towards areas of already existing identified need and provided in proportion to the existing population, with attention paid to Hoylake and West Kirby.
385	Disagree. Should be directed towards areas of identified need, in proportion to the existing population of Wirral as a whole, with special attention to Hoylake and West Kirby.
545	Disagree. Should be directed towards areas of already identified existing need and provided in proportion to the existing population in each Settlement Area.
562	Disagree. Should be directed towards existing needs and provided in proportion to the existing population, with attention paid to Hoylake and West Kirby and Settlement Areas 5, 6 and 7. This is just common sense.
573	Agree. In Bromborough this would mean retaining the present Civic Centre and Library and in Eastham retaining the library and One-Stop-Shop, the Acre Lane Centre of Excellence local youth facilities. Too much trade is attracted to Croft Retail Park, which is difficult to access with or without a car, virtually impossible by bicycle, and has harmed Bromborough Village where choice is now more limited.
625	Agree but small shopping centres and parades are not included. UDP Policy SH4 should be retained and the Objective 4 amended to small shopping centres/parades as well as higher order centres. An element of scale should also be included, to ensure that small shopping centres/ parades continue to meet the everyday needs of their local communities.
665 684 705	Agree but new services may not be capable of being provided by an existing centre and new centres may be required to provide for need and demand.
756	Disagree. Need to make clear that development adjacent to these areas would also be appropriate.

Preferred Spatial Objective 5 - Environmental Quality

8.7 The following comments were directed towards Preferred Spatial Objective 5 - Environmental Quality:

ID	Summary of Responses Received
40	Agree.

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63	Agree but needs to be backed up with Council resources and leadership.
128	Agree but must implemented and not over-taken by short-term pressures.
151	Agree but Picture 6.5 should show that the Mersey Estuary RAMSAR and Special Protection Area includes New Ferry Shore SSSI and rather more of the riverine sand and mud banks than just the the Mersey Estuary SSSI. Support the list of assets at 6.21. Should Dibbinsdale be shown as a country park rather a major park?
164	Agree.
168	Agree.
195	Disagree. Area Policies must recognise the value of assets at existing Major Developed Sites, like Clatterbridge and Arrowe Park Hospital. Settlement Area 8 should not be considered for the protection of the natural environment alone. The Settlement Area has more potential in terms of employment offer and housing growth than these very limited landscape / rural / environmental objectives.
211	Disagree. Increasing the amount of green infrastructure is also required, which could be achieved by rephrasing the statement to enhance, improve and add to local distinctive characteristics and assets.
261	Agree but needs to recognise the significant value and investment that new development such as housing can bring to an area and its ability to contribute to many (often overlooked) local priorities such as environmental improvements.
304	Agree but the one-line reference to green infrastructure and biodiversity is insufficient. The Spatial Options Report has a specific objective for green infrastructure (Objective 8, 2010) and woodlands were specifically mentioned in the supporting text. The absence of this objective fails to recognise the crucial contribution that green infrastructure and natural greenspace makes to the delivery of the other objectives. The Natural Economy North West programme, for example, identified eleven key economic benefits of green infrastructure and resources such as the countryside, coast, wetlands, urban parks, street trees and their ecosystems are seen as critical for sustainable economic growth and social goals, not just a way of supporting wildlife and 'the environment'. Establishing new woodland is an inexpensive way of restoring the quality of the landscape and soil whilst contributing to wider goals. Woodland can also greatly enhance the visual appearance and amenity value of regeneration schemes and tree planting can be an important mechanism for reclaiming and regenerating contaminated brownfield land. Planting fast growing trees such as willows and poplars can markedly enhance the natural degradation of many pollutants in the soil, including petroleum residues, oil, industrial solvents and paint. It has been estimated that a 20% general tree cover added 7.1% to house prices in rural areas of central England and the Welsh Borders. Objective 8 should be reinstated.

310	Agree but the water environment (including all watercourses, Main River and ordinary watercourses) should also be considered as distinctive characteristics and assets. Many Wirral watercourses are currently failing Water Framework Directive targets. Development and investment should ensure no deterioration and where possible seek to enhance and/or protect the water environment. This should be clarified in relation to the bullet points of paragraph 6.21.
472	Agree to retain and strengthen the quality of the Boroughs most distinctive assets. Support the inclusion of the character and quality of the landscape, coast and countryside, green infrastructure including biodiversity, geodiversity and public rights of way and designations of local, national and international importance in the list of assets.
622	Agree but must include both designated and locally important heritage assets and the wider historic landscape and townscape and underline the role of information on historic area characterisation.
665 684 705	Agree but fails to recognise the need to change and deliver development and growth which might result in the loss of certain features but which can also deliver benefits and mitigation.
704	Agree to the inclusion of an overall environmental objective, which includes references to heritage and biodiversity.

Preferred Spatial Objective 6 - Flood Risk

8.8 The following comments were directed towards Preferred Spatial Objective 6 - Flood Risk:

ID	Summary of Responses Received
40	Agree.
63	Agree, as this would rule out the hotel at Dee Lane and the Golf Resort.
99	Agree but concerned at the Council's insistence in pursuing a Golf Resort in an area of potential flooding.
128	Agree.
164	Agree.
168	Agree.
195	Agree but whilst not objecting to the principle, the Major Developed Site at Clatterbridge is being unreasonably constrained by the categorisation included in the SHLAA.

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261	Disagree, as this would deprive large areas of the north and eastern sections of the Borough from investment. Several regeneration areas would also be restricted by this Objective, including the strategic site at Wirral Waters. The objective needs to reflect PPS25, which says that developments subject to flood risk can demonstrate compliance with the Exception Test, subject to appropriate long term mitigation.
310	Agree but would appear to clash with Objective 2. Should be re-worded to steer new development away from areas that are liable to flood unless there are over-riding sustainable/economic reasons (such as market renewal and regeneration). There are also other forms of food risk, such as surface water flooding, especially in Critical Drainage Areas where there may be a requirement to reduce surface water flooding from a site.
643	Agree but Picture 6.6 should indicate the overlap with areas of Green Belt. One of these designations could be hatched to show the other designation underneath.
665 684 705	Disagree. Is this really a strategic objective or is it just a development management policy? It serves no purpose.
671	Disagree. Needs to be amended to be consistent with PPS25, to only avoid inappropriate forms of development within areas at risk of flooding.
756	This appears to conflict with with Objective 7, which seeks to establish a New City Neighbourhood, which at least in part lies within an area at risk of flooding.

Preferred Spatial Objective 7 - New City Neighbourhood

8.9 The following comments were directed towards Preferred Spatial Objective 7 - New City Neighbourhood:

ID	Summary of Responses Received
40	Agree.
63	Agree subject to maintaining the viability and attractiveness of all local and town centres. A fixed link transport facility should be required as part of the Wirral Waters development, to discourage more car use. Existing Merseyrail services are not as convenient as they are being made out to be.
99	Wirral Waters would, if successful, regenerate the area but if Wirral Waters does not develop, there is no alternative plan.
122	The balance between Birkenhead Town Centre and future levels of development in out-of-centre locations should be made clear, as Picture 6.7 includes Wirral Waters and the surrounding areas including Birkenhead Town Centre but the

	<p>New City Neighbourhood just refers to Wirral Waters. 72,000 square metres at Wirral Waters would be a very large retail centre, compared to 80,000square metres of comparison floorspace at Chester and 16,530msquare metres of comparison floorspace at Ellesmere Port (GOAD). This scale of development would not just serve a local need and could have a massive and unacceptable impact on Birkenhead and on centres in Cheshire West and Chester, including Ellesmere Port and Chester. This would also conflict with the aim of Birkenhead being a key centre. The level of floorspace at Wirral Waters should provide for local needs only.</p>
128	<p>Agree but whilst supporting appropriate development on the dock estate, this objective just appears to be Peel's plan. The objective needs to be set within the overall development of the Borough, so that the pressure points don't just move somewhere else.</p>
164	<p>Disagree. The financial implications of the downturn in public funding and revocation of RSS means a greater reliance on a market driven recovery. Developers and house builders will remain selective in their building activities. UK land agents accept that the market for large strategic sites will take much longer to recover and improve in value than the market for small scale housing and that this trend will continue for some years to come. Market finance will only be forthcoming for the best sites, where local demand and prices are high. This will not be in the area identified for the New City Neighbourhood. Increasing the housing stock over a wider area would be in line with Government policy to reduce prices to more affordable levels through market forces and will assist social inclusion, as some 40% would be required for social housing.</p>
168	<p>Agree.</p>
229	<p>Agree but the text indicates up to 72,500 square meters of retail floor space. The majority of respondents to the previous consultation were not in favour of a large, new retail complex. Whilst the Council have amended various options in this report to reflect this consensus, the inclusion of the 72,500 square metre figure gives the impression that the Council still see this as an option.</p>
289	<p>Agree but should be expanded to clarify that the Birkenhead and Wirral Waters study area includes a wider series of connected/integrated neighbourhoods, with East Float and Bidston Dock as the key catalyst neighbourhoods, West Float retained and enhanced for port-related uses, with a series of regeneration partnership neighbourhoods around them. Four Bridges should be added to Picture 6.7. Paragraph 6.25 should include education, community and leisure uses, allow for the envisaged retail development at Bidston Dock to meet the expenditure growth identified within the Council's Retail Study (rather than the day to day needs of the consented East Float/Northbank East schemes). An overall figure of 260,000 sq m should be established for neighbourhood services and attractions including community, education, health, leisure and retail, with the retail components in line with the Retail Study.</p>

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368	Agree but given the close proximity to the M53 Motorway, careful consideration of the traffic impacts, infrastructure requirements, and access by sustainable modes of transport will be essential to ensure the development able to be delivered without a detrimental impact on the operation of the Strategic Route Network. The transport implications must be appropriately considered; measures to bring the site forward sustainably must be embedded, with appropriate mechanisms to deliver them.
380	Disagree. The floorspace figures and development timescales go way beyond those endorsed by the planning permission for the redevelopment of East Float and the Core Strategy plan period. The Preferred Option needs to be presented much more clearly, to ensure that it does not mislead investors within the Borough and the wider region. Additional A1 floorspace, beyond that already approved, must be supported by a robust evidence base and clearly defined within the supporting text. Timescales should be made explicit and at this stage only relate to the Plan period.
452	Disagree. There is a need to keep regeneration progressing in Hoylake and West Kirby and not for a new city neighbourhood in east of Wirral. Not everyone wants to live or work Birkenhead.
502	Disagree. Should focus on existing identified needs in west Wirral, not the creation of a new east Wirral community. Not everyone wants to live in Birkenhead.
643	Agree but too reliant on Wirral Waters, which the market may not deliver and which could lead to an uneven distribution of development. The amount of out-of-centre floorspace being considered is too much and could have an unacceptable impact on Birkenhead.
665 684 705	Disagree. This is a way of giving special preference to Wirral Waters that effectively legitimises the unquestioned support that the Council is giving to Peel and makes the Core Strategy nothing more than a plan for Peel.
738	Agree with a major, mixed-use commercial and residential community on vacant and under-used land within the Birkenhead Dock Estate in recognition of the proposals for Wirral Waters. The boundary to the Birkenhead Docks Strategic Regional Site is different to that shown on Picture 6.7 and does not include Bidston Dock and Bidston Moss. Paragraph 6.27 should be amended to read 'Much of the area proposed for the new city neighbourhood was designated as a Strategic Regional Site by NWDA in 2009'. As Preferred Option 21, explains that the Core Strategy will identify the area as a broad location rather than a strategic allocation, we assume that the site-specific detail included in Picture 6.7 will not appear in the final Core Strategy.
756	The use of interchangeable terms, including "Wirral Waters" and "East Float" is not made clearer by this objective. Picture 6.7 does not accord with Picture 25.1 and Preferred Option 21. It is acknowledged that delivery will extend well

	beyond the plan period but there is no indication of what will be contributed during the plan period, which is concerning given that the Council appears to be significantly relying upon the delivery of this area to meet the Borough's needs. There are significant doubts about the delivery of this development in this location. It will also fail to meet the needs of the wider community, providing for apartment developments which will only meet a small part of the market and need for housing. Paragraph 6.27 states that the site was identified as a Strategic Regional Site in August 2010 but does not identify by whom and in what document.
767	Disagree. Too reliant on Wirral Waters, which is unlikely to be delivered under current market conditions and will fail to meet all the Borough's housing and employment needs.

Other Comments

8.10 The following additional comment was also received in response to the Preferred Spatial Objectives:

ID	Summary of Responses Received
211	There is no spatial objective which delivers the components of the final paragraph of the vision. For clarity and transparency, it would be beneficial if a further SO could be added, or reference made in another SO to the elements of the vision which have been missed i.e. sustainable design, construction, waste management, energy, water, carbon impact and mitigation, adaption and resilience to climate change.

8.11 The Council has responded to these comments on the Preferred Spatial Objectives by:

- including references to supporting economic growth and a higher density of jobs and businesses in Strategic Objective 1
- including references to the extent of employment provision in east and central Wirral and the role of existing centres in west Wirral in the supporting text
- including reference to meeting local housing needs and changing the focus to areas of greatest need in Strategic Objective 2
- including references to the promotion of sustainable travel in Strategic Objective 3
- reflecting the Borough's relationship with Liverpool and the surrounding areas in Section 2 of the Proposed Submission Draft Core Strategy
- including references to supporting provision within and then at the edge of existing centres and the need for facilities to be within easy reach of local communities in Strategic Objective 4
- including local priorities in Policies CS4 to CS11 and providing for green infrastructure in Policies CS30 to CS33, woodland creation in Policy CS11 and the protection of the water environment in Policies CS35 and CS36 of the Proposed Submission Draft Core Strategy

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- including references to a risk based approach to flood risk, surface water and opportunities for prevention and control in Strategic Objective 6
- deleting Preferred Spatial Objective 7 to replace it with Policy CS12 in the Proposed Submission Draft Core Strategy
- including a new Strategic Objective to promote sustainable approaches to the location, design, construction, operation and impact of new development⁽⁷⁾

9 Preferred Broad Spatial Strategy

9.1 The following comments were directed towards the analysis of the Broad Spatial Options set out within the Preferred Options Assessment Report:

Broad Spatial Option 1 - Focused Regeneration

9.2 No comments were directed towards the assessment of Broad Spatial Option 1 - Focused Regeneration set out in the Preferred Options Assessment Report.

Broad Spatial Option 2 - Balanced Growth

9.3 No comments were directed towards the assessment of Broad Spatial Option 2 - Balanced Growth set out in the Preferred Options Assessment Report.

Broad Spatial Option 3 - Urban Expansion

9.4 No comments were directed towards the assessment of Broad Spatial Option 3 - Urban Expansion set out in the Preferred Options Assessment Report.

9.5 The following comments were received in response to Consultation Question 5 - *Do you agree with Preferred Option 4 - Broad Spatial Strategy? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
41	Agree.
64	Broadly support -particularly the emphasis on existing centres, local residents, environmental assets, maintaining local character, development in east Wirral and supporting port industries. The focus on rural areas and the absolute ban on development in the Green Belt till 2027 is strongly welcomed. Proposals for tourism development should protect the environment, develop agriculture, aid existing centres, develop existing facilities such as the West Kirby Sailing School, aid local initiatives like the Hoylake Lifeboat Museum and the Charles Dawson Brown Museum in west Wirral and local visitor-led community developments. Concerned that the Council pay lip service to good principles but when practical issues arise not follow them.

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100	Broadly agree with the focus on the identified areas but a strategy for education is needed to enable people to work in and buy these new developments. Good that Green Belt will not be released but why then promote the Hoylake Golf Resort? Does this also mean that the Resort is to be suspended until 2027? Will the Council now stop spending money pursuing it?
129	Broadly agree. Welcome the commitment not to release Green Belt, which needs to be reflected in current projects like the Golf Resort. Tourism related improvements need not be major projects like new hotels. There is a desperate need for the Council to work with partners to make smaller but significant improvements. For example, the arcades and station in West Kirby give a very bad impression and detract rather than enhance the visitor's impression.
152	Agree. Especially pleased to see penultimate paragraph ("All new development will be required...") which includes consideration of green infrastructure, which must include nature conservation and the needs of wildlife to move as the climate changes.
173	Disagree. Focusing development in east Wirral, with a small amount allowed elsewhere, is basically a continuation of existing policies which has resulted in an exodus of middle and high income families to Flintshire, Denbighshire and Chester with a reduction in GVA per head and an increase in Council Tax Benefits, due in part to the lack of new affordable homes in Settlement Areas 4, 5, 6 and 7. Quality residential areas attract investors and attract and retain a highly skilled workforce which is an economic asset to the area. The focus should be placed on Settlement Areas that make a significant economic contribution to the area as a whole, to reverse the flow of middle and high income families, create and retain wealth within the Borough, generate more income from Council Tax, more businesses and income from Business Rates, create employment, increase the number of highly skilled, high income households, to mirror the economic prosperity already within these Areas and reduce the spending of high and middle income families outside the Borough. The Council should take a proactive approach to residential development in the Areas that contribute the most to the economy in terms of employment and wealth. This could also fund policies for social inclusion and the removal of deprivation, now Government funding has been withdrawn. Increasing the housing stock in Settlement Areas 4, 5, 6 and 7 would be in line with Government policy to reduce prices to more affordable levels and would assist social inclusion as 40% would have to be social housing. However, concerned that a large number of Green Belt sites are included in the SHLAA.
175	Agree. Would oppose the tabled alternative. Support the focus of development as stated. However, a modified version of the previous "Option 1" may be more difficult to hold against challenge than the previous "Option 1". The drafting must be as clear as possible. Strongly support no upper limit on homes and jobs in the specified parts of east Wirral. The sixth paragraph refers to homes and jobs "around existing centres" in one sentence and in another sentence to "outside these areas". The final sentence proposes a ceiling "within these areas". Support

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	a ceiling, if the ceiling is intended to apply to all the areas referred to in that paragraph but concerned that this might be interpreted as applying just to the "outside these areas" category. Any ambiguity must be removed.
196	The broadening of the Spatial Strategy is welcomed compared with the previous Focused Regeneration Option. However, the Preferred Option still undervalues the benefits which areas outside the urban core can bring in terms of the full range of housing required to support the varying market needs across the Borough. Object to the focus within rural areas, which does not mention the value of existing Major Developed Sites.
212	Agree, subject to the findings of the Habitats Regulations Assessment being fully taken into account. The Broad Spatial Strategy goes into significant detail but does not make reference to a number of issues that are raised at the end of the Spatial Vision, which questions the seriousness that is being attached to these critical resource issues. The Strategy should also be stronger in its ambition to promote the enhancement of environmental assets, where opportunity allows, rather than the defensive formula currently adopted, which refers only to protecting and preserving.
230	Agree in the main but concerned about statements relating to tourist development at Hoylake and West Kirby and the provision of outdoor sport and recreation in rural areas, in view of the clear opposition from previous respondents to the proposed Golf Resort, which must not be taken as a 'green light' for this development.
246	Agree. Welcome decision not to release Green Belt land.
262	Disagree. The Preferred Option is undeliverable and too narrow. Without continued investment across the Borough, areas that may not be in desperate need of investment now may be so in 10 years time. New areas of greatest need may arise and/or existing areas may worsen if sufficient flexibility is not included. Support the Alternative Broad Spatial Option, Spatial Option 2, which maintains the emphasis on development within the older inner urban areas of east Wirral and the promotion of development in sustainable locations, which would accord with PPS1 and PPS3 by promoting areas with good access to sustainable transport but also seeks to direct growth more widely across the existing urban areas. Option 2 should, however, also allow for the development of greenfield sites, where they can be demonstrated to be sustainable, as advocated by PPS3, which states that where need and demand are high, it will be necessary to identify and explore a range of options for distributing housing including the managed growth of settlements.
273	Disagree with maximum targets outside Newheartlands and the Mersey Heartlands Growth Point, which may jeopardise the regeneration of other areas, which are still in urgent need of intervention, such as Bromborough Pool.
291	Recognises the adjustment to allow for some additional development across the wider area. No objection is raised, provided there is no limit on jobs and housing at Wirral Waters and development outside the regeneration area is

	limited along the the lines set out. Support the recognition of the strategic importance of the Ports but request a more positive approach to port land at Eastham, to maximise the potential to attract investment and employment.
325	The Green Belt boundary should be revised in areas where the passage of time and changes within the landscape, mean that there would be no detriment to the general character and openness of the adjoining Green Belt or conflict with the purposes of including land within it.
327	Disagree. Balanced Growth is preferred, to give far more flexibility. Want to see regeneration in the less well-off parts of east Wirral but new development should be balanced across all areas of Wirral. Whilst the emphasis should be on east Wirral, the better-off districts should also be allowed to regenerate on a more modest scale to prevent further population decline and deterioration. Some houses last a long time but many others, perhaps poorly constructed or now the wrong size in the wrong place, will need to be regenerated over time with sensible, appropriate, well-designed new buildings. An additional sheltered development of say 30 units in Heswall would, for example, release up to 30 houses to which young aspiring families could move to, which would not be permitted under the existing or preferred regimes. This does not need incursions into the Green Belt or random large blocks of flats in mid- or west Wirral, simply sensible well-designed and well-planned developments which will over time gradually regenerate these attractive residential areas. While there may be quite a few sites available including sites with planning consent in the older areas of east Wirral, personal experience shows that many of these developments are unlikely to take place in the foreseeable future, as they are uneconomic to build in the current climate and this situation is unlikely to change for some years. In strained economic times, development in west Wirral will create income for the Council to help pay for regeneration in east Wirral.
353	Disagree. Population also needs to be encouraged in west Wirral. Many businesses (especially retail) are struggling to compete with Liverpool One and the Wirral Waters and New Brighton developments will make this worse.
356	Disagree. The proposals are not in proportion to the existing populations in each Settlement Area and do not address identified needs.
369	Generally supportive of the Broad Spatial Strategy and the principle of focusing new economic development towards the Strategic Regional Sites at Birkenhead and Bromborough and other existing accessible employment areas. Whilst supportive of providing new housing development where it will promote urban regeneration and make best use of existing infrastructure, placing no upper limit on the number of dwellings to be provided raises difficulties in effectively planning future infrastructure requirements. As growth may place increased demand on infrastructure which may require mitigation, understanding the potential increase in demand would enable the requirements for these measures to be better determined.

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370	Disagree. This is, once again, a strategy to socially engineer the population of the Borough, to the detriment of places like Hoylake and West Kirby. The strategy needs to direct investment and development in proportion to existing communities.
372	Welcomes additional housing and employment to be directed towards existing centres and along transport corridors which are served by well integrated high frequency public transport services and in locations which help to reduce the need to travel. Welcomes a limit on the number of dwellings in these locations, which can help to better plan the infrastructure requirements and potential mitigation measures to ensure the sustainable delivery of the development.
373	Would welcome the addition of delivering sustainable access measures and measures which reduce the need to travel, particularly by private car to the penultimate paragraph.
393	Disagree. Why are we being steered towards east Wirral? Why can't Settlement Areas be treated fairly and be allowed to grow within the parameters of normal planning rules and local demand?
403	Disagree. We should not all be steered towards east Wirral.
406	Disagree. Attempts to socially engineer the distribution of population within the Borough to the clear detriment of existing settlements such as Hoylake & West Kirby. The strategy should direct investment and development in proportion to existing communities.
417	Disagree. This is an attempt to socially engineer the population distribution in the Borough, which could only be detrimental to places such as West Kirby and Hoylake. It would force people to relocate, if housing became more difficult and businesses closed, which would lead to a deterioration in these areas.
444	Disagree. Each area should be subject to planning for their community.
453	Disagree. Each area should be treated fairly and be allowed to develop in line with the needs of residents, as long as it stays within the normal planning strategy.
458	Disagree. We do not want to be steered towards east Wirral. Housing growth should be subject to normal planning rules.
474	Pleased to see enhancing the environmental assets of the Borough in the first paragraph. Strongly support the requirement for all new development to demonstrate how it will "protect and provide a linked network of green infrastructure". Support and recognise the potential benefits of redeveloping brownfield sites as opposed to greenfield land and pleased to see the focus on the re-use of previously developed land in both urban and rural areas but brownfield land can also harbour valuable biodiversity assets, which will also need to be conserved and/or replaced. Pleased to see the provisions for outdoor sport and recreation, local distinctiveness, biodiversity and landscape in rural areas but the policy should seek to enhance as well as preserve biodiversity

	and landscape. This section of the policy should also be applied to development in urban areas, where open space and recreation and areas with biodiversity will be under pressure from development.
477	Disagree. Why can't each area be treated individually?
489	Disagree. Why only east Wirral for development?
490	Disagree. This strategy will harm areas such as Hoylake and West Kirby, which need new blood and new housing as much as any other area of Wirral.
503	Disagree. Why are we being steered towards east Wirral for residential and commercial development. How can any area survive on 2 houses per year for the next 17 years. Why can't each area be treated fairly to allow the natural regrowth and regeneration of the community subject to normal planning requirements.
525	Disagree. Each area of Wirral should be treated fairly and subject to planning.
528	Disagree. All areas should benefit from new population in line with projected growth.
546	Disagree. The strategy needs to direct investment and development in proportion to the existing communities.
566	Disagree. This is social engineering through the distribution of population, to the detriment of Hoylake and West Kirby, which will result in the closure of businesses and the adverse movement of population.
575	Paragraph 2 needs to be more area-specific. Too many hopes are being pinned on employment in Bromborough. Speculative units/offices are not occupied or have a series of short-term tenants and not all jobs go to local people. Some are not sufficiently accessible to the relatively unskilled. Access to the Wirral International Business Park is not always easy, despite recent improvements. Local character and distinctiveness are still important here. Peel Holdings / Peel Ports must not be seen as the answer to everything and must fully co-operate with the local authority, local residents and councillors and consult properly to take true account of local concerns in Eastham. Green Belt protection is essential.
581	Disagree. Instead, each settlement should be made more locally sustainable. Existing centres and transport corridors should not lose out to major developments in Birkenhead.
632	The Spatial Strategy should be informed by the housing requirement. The preferred Strategy cannot be sustained if the area's housing needs are to be met. The Council has ignored the evidence base to choose an annual housing requirement which will not address actual housing need, which would require sites to be released under Broad Spatial Option 3. Agree that solely focusing on the urban area would have implications on delivery due to contamination, existing use values and other environmental and technical constraints, that

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	<p>Broad Spatial Option 1 is too inflexible and there needs to be greater choice of potential areas to develop. This also applies to Broad Spatial Option 2, which would similarly not provide the range of sites required to deliver the RSS requirement or the published evidence base. RSS (Table 7.1) confirms that “at least 80%” of the requirement should be on previously developed land, confirming that 20% needs to be on greenfield land. This is without the Growth Point, which increases the RSS requirement by 20%, and the requirements set out in the SHMA. Paragraph 5.53 of the previous Spatial Options Report recognised that there may be a need for urban expansion sites towards the end of the plan period, particularly if the Council is unable to demonstrate that a long term supply of suitable and developable sites is likely to be available within the existing urban area to 2031. Disagree with the reduction in the plan period to 2027 and in the annual housing requirement to 250 dwellings per annum, particularly as housing need has increased since the previous consultation. Urban regeneration and urban extension sites are both required. Not all development would need to be located in urban extensions. Urban regeneration could still be the focus for development and a sequential approach could still be maintained. An alternative Broad Spatial Option based on “urban maximisation and urban expansion” is needed, to ensure that priority is given to deliverable previously developed sites within the urban areas, such as the New Heartlands Pathfinder and Mersey Heartlands Growth Point, but where development needs cannot be met within the urban area on deliverable sites, to allow urban expansion sites, with reliance on the Assisted Areas as shown on Picture 6.1 in line with Preferred Spatial Objective 1 - Economic Revitalisation and to create a close relationship between jobs and homes. This would include the area in and around Leasowe. Additional housing in this location would also accord with the Regeneration Priority Area identified in the Council’s Interim Housing Policy. This strategy would not require a strategic review of the Green Belt, although local alterations would be necessary, and would not therefore be out of conformity with RSS Policy RDF4. This option would provide the flexibility to meet national policy objectives, the RSS housing requirement and the Council’s own evidence base, by concentrating development on deliverable urban regeneration sites whilst recognising the need for urban extensions to meet the development needs to 2031. There should, therefore, be explicit recognition in the plan that urban expansion sites will be required outside the main urban areas in Settlement Area 5. This would also require the Settlement Area boundaries to be redrawn, as at present there is no flexibility for such sites to come forward to meet the identified need.</p>
645	<p>Agree but a disproportionate emphasis could be placed on the successful delivery of the Wirral Waters scheme. Although planning permission has been granted, there is still great uncertainty about the ability of the market to deliver the scale of change anticipated. Any significant delay to this project would undermine the ability of Wirral to deliver housing and employment land for the Liverpool City Region.</p>
666 685 706	<p>While the small move away from purely Focused Regeneration is welcome, a mix between Balanced Growth and Urban Expansion would best serve the needs of the of the Borough. Directing 400 units each year into the Mersey Heartlands Growth Point in Settlement Areas 1, 2 and 3 is unrealistic. There is no need to</p>

re-populate Settlement Area 1 and 2; no-one would choose to live there and this is a form of social engineering at its very worst. The Council have failed to demonstrate that the fourteen largest housing sites, all of which happen to be in east Wirral, are actually deliverable in this or any future market. Achieving 80% of all new housing on brownfield land is possible only if the target number of units is viable. Attempting to achieve 80% of 600 units/year on brownfield sites will be unsustainable under this spatial option, as the market will fail to deliver the required number of units. Not seeking to apply any "upper limits" on housing or jobs in east Wirral is a sign of desperation. The development of a retail-led sub-regional destination will achieve little and it will not contribute to making the Borough any more sustainable or solve economic and social problems. Attempts to create a high quality office-led employment hub in Birkenhead Docks will not be realised, as the market will not be interested in this location. The preferred option will also marginalise the most competitive areas of the Borough, consigning them to nil development, which is unsustainable and highly vulnerable to failure. By contrast, a Balanced Growth and Urban Expansion approach will actually deliver meaningful regeneration and will be attractive to the market, enabling the public purse to be spent on sensible projects, protecting the taxpayer from profligate expenditure and risk. There would be greater prospect of delivering significant opportunities for sustainable growth through a review of the Green Belt before 2027. Paragraph 3.6 reveals the problems the Council faces. The AMR confirms this is getting worse. No amount of policy "engineering" towards development only in east Wirral will tackle any of these problems, which will only get worse as a result. Settlement Areas 3 to 8 would require limited or nil public intervention to deliver accessible and sustainable growth, unlike Areas 1 and 2, where significant public funding would be required.

Settlement Area 1 - Newheartlands is laudable project but involves a like for like replacement that will deliver little in the way of significant levels of economic prosperity and wealth.

Settlement Area 2 - The emphasis on promoting this area over and above all other areas is a flawed and unsound strategy. The wider needs of the Borough will be harmed, if Peel, the Council and others fail to deliver on key projects. A policy that relies upon Wirral Waters (Peel) is pure fantasy. Peel has competing ambitions for other sub-regional projects; including Ellesmere Port Docks, another significant proposal of questionable commercial viability; together with the Liverpool Waters scheme. The plans for Birkenhead Dock Estate are undeliverable; will provide no discernible benefits and are based upon a singular ambition of Peel to impose its myopic vision on achieving a second "Trafford Retail Centre" in the area. Creating/attracting 27,000 new jobs into the area (through the development of high-rise office blocks and the like) is entirely unfeasible. The regional office market is firmly based in Liverpool, Warrington, Chester and Manchester. Birkenhead is industrial, will always be largely tertiary and play second fiddle to Liverpool. It is simply unrealistic to expect planning policy will shift a change in attitude and perception about this area. It is not a desirable area to live in; is practically devoid of a resident population; there are few services and amenities; it is not an aspirational location and the attempt by

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	<p>the strategy to attract and retain residential interest is bewildering. The market is not interested in this area and to suggest that the market will provide high density apartment living schemes here is nonsensical. It is not New East Manchester. The market has clearly indicated that it is not interested in the Woodside residential project, even during the "boom time", so there is little realisation that this ambition will be delivered</p> <p>Settlement Area 3 - displays a number of positive attributes, despite its contrasting economic and social range. Birkenhead School is the only remaining independent school in Wirral, provides an opportunity to promote a centre of excellence and to retain and harness aspiration, capable, supported properly, in attracting and retaining prosperity in the area. The focus in this Area should be to support educational objectives, to promote excellence and to also attract development that will serve to harness and retain higher earners. The most successful regeneration projects across the UK retain higher value uses as a platform to attract further high-end investment. Any restrictions in preventing development should be avoided.</p> <p>Settlement Area 5 - suffers from high levels of deprivation and rather than focusing and attracting new residential development into Areas 1 and 2 the emphasis should be towards more sustainable growth in areas such as Area 5 where existing community facilities, amenities and infrastructure are already located.</p> <p>Settlement Area 6 - acknowledge there is limited scope for new development because of physical constraints but limited growth is needed to prevent the area becoming dormant and slowly unsustainable.</p> <p>Settlement Area 7 - is a key service settlement in the west of the Borough and higher levels of growth should be supported, particularly for "care housing" and to maintain a dynamic, mixed and balanced community.</p> <p>Settlement Area 8 - provides fringe space, yet can provide for sustainable growth and expansion of the key settlement areas, which should not be ruled out.</p> <p>Development in Areas 3 to 8 offer potential for sustainable and accessible growth which would require limited or nil public intervention, unlike Areas 1 and 2, where significant public funds for infrastructure would be required.</p>
711	<p>Welcomes the inclusion of a specific reference to rural areas, including securing the protection of biodiversity, landscape and heritage. The need to protect and provide a linked network of green infrastructure is also supported.</p>
739	<p>Pleased to see the amendments to the preferred spatial strategy, which would retain the key priorities from Spatial Option 1 whilst allowing development in other urban areas in the Borough. While the reference to strategic regional sites is welcome, it would be more helpful to refer to the sites by name. Welcome the references to the strategic importance of Wirral's ports for cargo handling and freight movements and to tourism development to support the regeneration of</p>

	<p>Birkenhead and Wirral's coastal resorts. It is unclear from the final paragraph on page 29 and the related footnote, whether a full review of the Core Strategy will need to take place before Green Belt boundaries can be considered as part of the site-specific Allocations DPD.</p>
757	<p>The Preferred Broad Spatial Option is still essentially Broad Spatial Option 1, which achieved only limited support last time and prevents development anywhere other than within the regeneration areas, rather than allowing a wider range of local issues to be addressed alongside the regeneration of the older urban areas. Previous consultation also showed significant concern over the impact and delivery of Wirral Waters. PPS3 warns against assuming that a site is deliverable just because it has planning permission. The "areas of greatest need" will need to be properly defined. It is not clear what "local improvements to benefit local residents" means and businesses should also be included. The reference to medium to high density development will not address the need for family accommodation. The absence of an upper limit to support regeneration will harm other areas. Limits in other areas must not place an arbitrary cap on development, must allow local needs to be met and must provide flexibility to meet housing needs, if take-up in the regeneration areas is low. There is no evidence that a more balanced approach, with housing permitted elsewhere, will prevent the regeneration of east Wirral. Other employment areas could also accommodate development, to provide a balance of employment across the Borough and reduce the need to travel. It is unclear what "a lower proportion" of homes and jobs in and around existing centres means and a more balanced approach is needed to support the function of existing centres. The sentence on Green Belt should be amended to say that there will be no significant alteration to the boundary unless it proves necessary to meet delivery targets based on the findings of the AMR and to confirm that detailed boundaries will be set in a subsequent Site Allocation DPD. The list of requirements in paragraph 9 is unnecessary and unreasonable. The majority might be irrelevant to most developments and small scale development will not have any significant impact. This should, therefore, only apply to major new developments when appropriate or reasonable.</p>
768	<p>Disagree. The preferred alternative should be selected, to widen the focus of development still further to reflect the full extent of Broad Spatial Option 2. Employment growth should also be focused within central and west Wirral, not just to existing sites in east Wirral. Managed growth should be promoted at key rural settlements, at Raby, Thornton Hough, Storeton, Barnston and Brimstage, to ensure they continue to sustainability contribute to Wirral's rural economy. The Economic Strategy for Rural Merseyside (Rural Innovation 2009, Paragraph 2, page 43) shows that if new housing growth is not allowed in rural settlements, the working age population will decline; a problem which already exists in most rural localities. Sensibly managed new housing will help reverse this trend by attracting in-migration and a working-age population. Recent research from the North East found that rural in-migrants often start businesses that create higher levels of value added and employment than those established by indigenous residents. The settlements of Thornton Hough, Raby, Storeton, Brimstage and Barnston should also be included as rural centres. Although relatively minor in</p>

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	<p>an urban context, these settlements are vital to the functioning of the rural areas and proportionate future growth must be directed to these areas, if a sustainable future is to be secured for the affected communities. The ceiling on the amount of housing which can be delivered in and around existing centres should be removed, to provide flexibility and choice and confidence that the Borough's housing needs can be delivered. Paragraph 8 should be revised to read "The requirement of utilising land for the purposes of development within the Green Belt will be controlled through the adoption of a site specific Development Plan Document" to provide a more balanced approach to meeting future needs. The focus within rural areas should be expanded to include the conversion of agricultural buildings for employment or housing uses and the development of brownfield land within the countryside.</p>
780	<p>Providing for outdoor sport and recreation is supported but only refers to the rural areas, while the majority of development and likely additional demand is to be focused in urban areas in east Wirral, which could create a mismatch between the demand for and supply of sports facilities and create problems of accessibility. There is no reference to provision of indoor sports facilities. The evidence base must include a robust and up-to-date assessment of current and future needs and an audit of existing provision for both indoor and outdoor sport facilities.</p>
823	<p>Development should be focused in areas that are already well-served by existing, sustainable transport and the need to travel should be minimised, to allow walking and cycling to become much more prominent forms of transport.</p>

Key Diagram

9.6 The following comments were directed towards the proposed Key Diagram in the Preferred Options Report:

ID	Summary of Responses Received
196	Major Developed Sites are not shown (or on any other diagram).
212	The Key Diagram is too small to be easily read.
291	The Key Diagram is supported as it relates to Wirral Waters but should be amended to reflect a more positive approach to port land at Eastham.
645	The expression of the Broad Spatial Strategy in the form of a Key Diagram is supported but the Diagram could be improved by including some additional contextual information, such as the location of the regional centre in Liverpool and a clearer indication of the Borough boundary along the border with Cheshire West and Chester.
757	The Key Diagram should be significantly larger to make it easier to interpret.

9.7 The Council has responded to these comments on the Preferred Broad Spatial Strategy and on the Key Diagram by:

- including Policy CS2 and Policy CS3 in the Proposed Submission Draft Core Strategy
- clarifying the meaning of urban regeneration
- removing references to ceilings and limits
- defining areas of greatest need and higher, medium and lower density in the glossary
- requiring new development in priority locations to make a positive contribution to local character
- clarifying that improving access to the coast must protect protect European Sites
- including reference to diversifying the agricultural economy, providing rural services within established settlements and re-using previously developed land in rural areas
- clarifying that local character and distinctiveness includes visual amenity, biodiversity, landscape and heritage
- including specific references to indoor and outdoor sport and recreation, sustainable design and construction and reusing buildings of local quality
- enlarging the Key Diagram and including more information on the surrounding context

10 Preferred Scale of New Housing

10.1 Only one comment was received in response to the assessment of the Policy Options for the Scale of New Housing Development set out within the Preferred Options Assessment Report:

ID	Summary of Responses Received
280	The Assessment Report is not sufficiently robust to support a reduction from the RSS figure of 500 net additional dwellings per annum.

10.2 The following comments were received in response to Consultation Question 6 - *Is this a fair assessment of the available Policy Options for the scale of new housing development over the plan period? Please give the reasons for your answer. Do you agree with the Council's conclusion that Policy Option PO1 is most likely to be the preferred option for the future scale of new housing development? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference:*

ID	Summary of Responses Received
42	Agree with Policy Option PO1. Agree that a 3% total provision within the Wallasey Settlement Area is preferable, given that the Area is already densely populated.
65	Policy Option PO1A with Wirral Waters is supported.

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88	Agree that all the main options have been considered and that this is a fair assessment of the available Policy Options. Understand the rationale for concluding that Policy Option PO1 is preferred but the Council should be willing to support development ahead of the Policy Option PO1 figures, at least within the boundaries of Newheartlands, Mersey Heartlands and Wirral Waters, on the basis of available land and regeneration potential.
101	The recession, reduction of benefit hand-outs and declining population is likely to lead to little demand for new housing. The Council's targets must be founded on real need, real ability to pay and the state of the second hand market. If Wirral Waters does develop, it will effectively provide for its own housing needs.
130	Housing policy needs to be driven by the demands of demographics, as seen in the oversupply of some forms of housing such as flats. The number of empty properties should be taken into account. Wirral Waters will provide housing but it is not clear that the people who work there will want or be able to afford to live there, leading to a serious mismatch of supply and demand (wrong numbers, wrong formats, wrong places).
153	Agree with Policy Option PO1. Our society needs for environmental sustainability needs to return to fewer single-person households.
176	Agree with Policy Option PO1. Policy Option PO4 would rely excessively on greenfield sites.
192	Disagree. This is not a fair assessment. The policy options place excessive emphasis on development in east Wirral, which is not the only option available. A total reliance on Wirral Waters and Settlement Areas 1, 2, and 3 will not revitalise the economy, obvious from the reduction in GVA per head and population from following the Unitary Development Plan and Interim Housing Policy. None of the options take into account the need to attract more middle and high income families. The Council should seek to increase GVA/head and reduce the out-migration of investors, entrepreneurs and the highly skilled. Providing housing within desirable Settlement Areas will revitalise the economy. Additional housing outside Settlement Areas 1, 2 and 3, in Areas that already have the highest skills and incomes, will contribute to the overall wealth of the peninsula. Housing in Settlement Areas 4, 5, 6 and 7 would reduce prices, make properties more affordable and support social inclusion by providing social housing. Given the choice, most people would prefer to live outside Settlement Areas 1, 2 and 3. People should be able to live where they want, unconstrained by affordability.
231	Agree with Policy Option PO1 but this does not accord with the SHLAA, which still uses a figure of 500.
263	Disagree. Policy Option 2 is a fairer assessment, based upon independent evidence from the Strategic Housing Market Assessment (September 2010) and ONS demographic projections, which indicate a requirement for 570 new dwellings per annum, which are ignored under the Council's Preferred Option.

	Limiting the level of housing provision to half that of the former RSS is unjustified and will reduce the amount of affordable housing that can be provided to meet the needs identified in the SHMA.
280	Disagree that Policy Option PO1 provides the best balance between the prospects of market delivery and the need to offer flexibility. Limiting development to constrained urban areas with difficult local housing markets and relying upon Wirral Waters and HMRI to deliver development is not balanced. Policy Option PO1 is half the current RSS figure, which is still a statutory material consideration. Any departure from this must be based upon robust evidence. Wirral Council supported an even greater level of housing growth than in RSS, as partners in the Mersey Heartlands Growth Point. Policy Option PO1 would fail to deliver the need for affordable housing in Settlement Areas 5, 6, 7 and 8, identified in the SHMA. There is serious doubt whether Wirral Waters will be implemented in its current form. Developers are not currently building apartments and there is little evidence of this niche market returning. The Core Strategy cannot ignore market conditions. Lending is not available for apartment developments or potential purchasers. The economic outlook remains difficult. The national picture is more positive than locally. The Core Strategy should plan for growth into recovery not restricting supply and relying upon the delivery of Wirral Waters. Housing needs will not be met unless development is allowed elsewhere in the Borough. Progress on Newheartlands has been limited and Government is withdrawing financial commitments. New delivery mechanisms will need to come forward. Public sector funding will be needed to support development viability. Policy Option PO2 has a more robust evidence base, will not undermine regeneration and will allow a wider range of local needs to be met. A more balanced view of build rates across the whole plan period should allow for higher levels of growth. Policy Option PO3 is helpful but the primary issue is to meet housing needs.
297	The general approach and range of options identified is supported but disagree that Policy Option PO1 should be preferred, as it does not take into account the needs identified in the SHMA. National household projections are substantially ahead of 250 dwellings per annum and Policy Option PO1 does not address market recovery or provide flexibility in land capacity. Sustainability and economic development should also be taken into account. The 'Option 1' figure is untested, is out-of-date and provides an unsound basis for policy.
328	There is a lack of financial realism. Whilst most residents welcome the idea of a major new development at Wirral Waters, the current and likely future state of the residential property market is unlikely to support it. Major infrastructure is unlikely to be provided unless major new businesses can be attracted to the area. Wirral Waters should, therefore, be treated as a bonus and should not form any part of future planning for housing numbers.
374	Disagree as Policy Option PO1 does not address the identified needs in the other Settlement Areas. The provision and scale of new housing, including social and affordable housing, should be proportionate to existing populations, which is only addressed by Policy Option PO2 .

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382	<p>A broad level assessment of the potential implications of Policy Option PO1A with Wirral Waters indicates relatively minor impacts on the Strategic Route Network. Although the consequences for the northern elements of the M53 are likely to require further consideration, this Policy Option is likely to represent the most appropriate approach, as sustainability in transport terms is at its greatest in the core areas.</p> <p>A broad level assessment of the potential implications of Policy Option PO1B without Wirral Waters indicates moderate impacts along the M53, which are likely to require further consideration.</p> <p>A broad level assessment of the potential implications of Policy Option PO2 indicates major impacts along the M53 which are likely to require further consideration, with further impacts at other parts of the Strategic Route Network.</p> <p>A broad level assessment of the potential implications of Policy Option PO3A with Wirral Waters indicates major impacts along the M53, which are likely to require further consideration, with further impacts at other parts of the Strategic Route Network.</p> <p>A broad level assessment of the potential implications of Policy Option PO3B without Wirral Waters indicates major impacts, particularly along the M53, which are likely to require further consideration.</p> <p>A broad level assessment of the potential implications of Policy Option PO4A indicates that an early recovery could have major impacts at various locations on the Strategic Route Network, particularly on the M53, which are likely to require further consideration.</p> <p>A broad level assessment of the potential implications of Policy Option PO4B indicates that a prolonged recovery is likely to have major impacts at various locations on the Strategic Route Network, particularly on the M53, which are likely to require further consideration.</p>
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394	Disagree. Need has been identified. Try Policy Option PO2.
404	Disagree. Each area should be treated fairly. Everything should not be focused on East Wirral.
446	Disagree. The need for regeneration has already been identified.
459	Disagree. The need for housing and regeneration has already been identified under Policy Option PO2.
464	Disagree. Hoylake and West Kirby has an ongoing need for housing and regeneration.
478	Disagree. Need has been identified.
491	Disagree. Policy Option PO2 is fairer.

504	Disagree. The need for housing and ongoing regeneration has been identified. Try Policy Option PO2.
513	Disagree. The need for housing is on-going.
526	Disagree. The need for housing and on-going regeneration has been identified.
529	Include housing across the board.
547	Disagree that this is a fair assessment. Policy Option PO1 does not address the identified needs of each Settlement Area. The provision and scale of new housing, including social and affordable housing, should be proportionate to the existing local population.
567	Disagree. Policy Option PO1 does not address identified need. The provision and scale of new housing, including social and affordable, should be in proportion to the Area's population. Policy Option PO2 is the correct way forward.
578	Disagree. Is there really a need for such a large percentage increase, given the downturn in the economy, the difficulty in the housing market and unoccupied properties. There is an over-provision of apartments. Careful refurbishment and adaptation is more desirable than demolition and re-building.
584	Disagree. Neither Policy Option PO1 nor Policy Option PO2 are sensible. Development should be allowed in Settlement Area 2 but homes should also be allowed throughout the Borough.
633	Disagree. Policy Option PO1 is contrary to the evidence base. Policy PO2 is supported. The starting point must be local and sub-regional evidence of need and demand, the impact on affordability, the latest household projections and the needs of the economy, having regard to economic growth forecasts (PPS3, paragraph 33). The Core Strategy must conform to RSS. Policy L4, which is the most recently publicly tested requirement, states that Wirral should accommodate 500 net dwellings per annum. The SHMA (September 2010) advises a build rate of 570 dwellings per annum, which should be the minimum for Wirral, and an affordable housing need of 2,784 dwellings per annum. Policy Option PO1 would not take either of these needs into account. The latest household projections indicate an annual need of around 400 dwellings per annum but the SHMA concludes that the actual need is substantially greater. Past completions show that the RSS requirement has not been fully met, with a shortfall of 1,131 from 2003. Adding this to 570 per annum would lead to a revised requirement for at least 637 per annum.
647	Disagree that Policy Option PO1 is the most appropriate. The indicative implications for each of the Settlement Areas, with and without Wirral Waters, is extremely helpful but local targets must still be based on robust evidence and be justified against reasonable alternatives. Policy Option PO1 is considerably less than the RSS, which was considered robust at examination in 2007/08; does not account for the backlog accrued up to 2012, the latest household projections or the existing capacity in the different urban areas; and could stifle housing market recovery, particularly outside Settlement Area 2. Assumptions

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	about housing densities, net developable areas and a risk assessment should be provided, linked to the shortfalls of different housing types from the SHMA. The target densities for each Settlement Area should be explicit.
667 687 707	Disagree. Only Policy Option PO2 would have any chance of being delivered and delivering the wider aims and ambitions of the Core Strategy. Housing numbers should be expressed as a minimum. All the other Policy Options fail to be underpinned by any evidence base. The SHMA and SHLAA cannot be ignored. The annual target of 500 has only been exceeded twice between 2003 and 2010, because the Council's policy of restraint has artificially limited the land supply in areas of prosperity.
719	Agree with Policy Option PO1.
740	Disagree. There is no justification for a return to 250 dwellings per annum. RSS is still part of the statutory development plan and should remain the starting point. 250 per annum was considered to be 'somewhat modest' by the EIP Panel who, at the Council's suggestion, recommended 500 per annum, to reflect the potential to accommodate a substantial amount of new housing on redundant dockland in Birkenhead to support the Newheartlands Pathfinder. 250 would fall below the Council's own needs assessment and both of the 'market recovery' figures set out under Policy Option PO4 and would appear to be incompatible with the housing trajectory approved for Wirral Waters and the Core Strategy's economic growth ambitions, which need to be supported by an adequate supply of good quality housing. There is no evidence to depart from the figure in RSS.
758	Disagree. There is no justification for a lower figure of 250 per annum. RSS (September 2008) remains part of the adopted Development Plan and provides the most up to date housing figures for Wirral. There is a shortfall in performance since 2003. NHPAU and 4NW indicate a figure of 577 per annum, alongside other scenarios between 380 to 768 per annum. The Mersey Heartlands Growth Point also envisaged housing above RSS. Wirral Waters alone would provide a 60 year supply at 250 per annum and under Policy Option PO1 would take 221 years to deliver. Policy Option PO2 is the most acceptable but still falls short of fully addressing the needs of individual communities. The calculations smooth out the greater levels of need identified in some locations within the SHMA, which for example identifies a need for 153 per annum in Hoylake and Meols whereas Policy Option PO2 indicates only 78. Policy Options PO3 and PO4 are really just "reality checks", neither of which represent a realistic approach, both totally unrelated to the figure of 250 per annum.
769	Disagree. Policy Option PO2 is preferred. The figure of 250 from 2006 is outdated and was superseded by the final RSS in 2008. Policy Option PO1 is too reliant upon Wirral Waters. All the Policy Options are too prescriptive over the numbers of new dwellings which should be delivered within each Settlement Area, failing to take account of choice and market change over time and should be removed to provide for greater flexibility. It is unacceptable to simply have a with or without Wirral Waters sub-option. If Wirral Waters is undeliverable, the capacity should just be redistributed Borough-wide. There is a greater need for new homes in existing rural settlements, as opposed to greenfield urban extensions. Policy

	Option PO2 is most in line with need, achievable against the capacity shown in the SHLAA and would allow a higher rate of development in west Wirral, where house prices show demand is located. Directing a higher level of growth to the central and western parts of Wirral will not compromise regeneration in east Wirral, which is mainly focused on replacing existing substandard stock for existing residents, and will provide for people who would otherwise leave Wirral for lack of choice. It is unreasonable for the Council to try to influence where people want to live.
781	The justification for Policy Option PO1 needs to be improved as it is not, a stated, a balance between the other options but is an alternative which would deliver lower levels of development.

10.3 The following comments were received in response to Consultation Question 7 - *Do you agree with Preferred Option 5 - Local Housing Targets? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
20	Broadly agree
43	Agree.
66	Agree.
102	Disagree. Target should be appropriate to the actual need. A zero (or even negative) target may be appropriate given the declining population, recession and benefits reduction.
178	Agree.
191	Disagree. The down-turn in public funding, revocation of RSS and associated financial implications, means that any recovery must be market driven. Developers will remain selective. Location is the key factor and market finances will only be forthcoming for the best sites where local demand and prices are high. There is a high demand for detached properties in certain areas. Housing targets must respond to the market with input from all stakeholders, including small building companies and local estate agents. Levels of house building were more buoyant prior to the restrictive policies introduced by the Unitary Development Plan and Interim Housing Policy, with over 800 units per year in the early to mid-80s and in one year in 1998/99. The Council should note any shortfalls in the supply of market housing where need and demand are high and review any policy restraints.
197	Disagree. RSS has been reinstated. The numbers of new dwellings implied for Settlement Area 8 is unrealistically low and the potential for housing at the Major Developed Site in the Green Belt at Clatterbridge has been understated.
213	Agree subject to the Habitats Regulations Assessment being fully taken into account.

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232	Agree.
247	Agree. Welcome recognition that there needs to be a Plan B - "Without Wirral Waters'.
264	Disagree. Only Policy Option PO2 will be able to create genuine investment and retain and attract the highly skilled and act as the catalyst for the associated local benefits from new residential development, including investment in local highway infrastructure; enhanced connections to employment areas; investment in green infrastructure; promoting health and well being, to reduce stress on local medical services; providing benefits to local education services to address deficits of provision where needed; and retaining and creating important local employment and training opportunities.
273	Disagree. Rigid housing targets for development within each Settlement Area could prevent sustainable development in areas such as Bromborough Pool, which has been subject to significant investment in social housing but requires an improved mix in the type and tenure of properties available to support an ongoing sustainable future. Discretion should be allowed where intervention outside the designated regeneration priority areas will enhance neighbourhood sustainability.
281	Disagree. The targets are too low, fail to reflect RSS and the Growth Point and will fail to meet identified needs.
294	Disagree. A figure of 250 per annum including Wirral Waters could not be justified now that planning permission has been granted for over 15,000 units, over half of which are shown to be delivered within the plan period. The Council has already accepted the higher figures put forward through the SHLAA and the Wirral Waters proposals. The Growth Point Statement identified land for up to 9,000 units without Wirral Waters and analyses of need/demand and deliverability all point to a figure in the region of 455-640 per annum. If the Council is to progress with 250, this figure should not include Wirral Waters including Bidston Dock, which should be treated as an exception with no upper limit. Otherwise, the Council should progress with a higher figure inclusive of Wirral Waters. The mixed use of maximum and minimum targets would be confusing and over-complicated, restricting development in other areas of need shown in Picture 6.2, which should also be excluded from any maximum target.
301	Disagree. Object to the use of maximum housing targets, restricting housing growth in sustainable urban areas outside the designated regeneration priority areas, which could jeopardise the regeneration of other areas in need of intervention, such as Bromborough Pool. There should not be an inflexible over-reliance on Newheartlands and the Mersey Heartlands Growth Point.
329	Disagree. The employment contribution of new housing should also be considered. Every new home constructed creates between three and five full time jobs in either the construction or ancillary industries. Most of this workforce will be local. A building programme of say 1,000 units per annum could create between 3 and 5,000 jobs. The Council's Preferred Option would only create between 750 and 1,250 jobs, would limit the benefits from the Government's

	New Homes Bonus and leave unemployed building workers as a further drain on the public purse. All new homes will be far more carbon neutral, with far higher levels of insulation, which whilst given lip service in the Core Strategy, could not be achieved without substantial re-building over time.
375	Disagree. The targets are not proportionate to the existing populations in the Settlement Areas and do not address the identified needs in these settlements.
395	Disagree. The Council has already identified needs.
405	Disagree. Does not address the needs identified by the Council.
411	Disagree. Does not address the identified needs in other Settlement Areas. The provision and scale of new housing, including social and affordable housing, should be proportionate to the existing areas of population. Only Policy Option PO2 would address this.
414	Disagree. It is completely disproportionate and would effectively limit the construction of new housing in Hoylake and West Kirby to just 2 new dwellings each year for the next 20 years.
420	Disagree. The targets do not fulfil the need in the existing areas and are not proportionate.
447	Disagree. Need has been identified by the Council.
460	Disagree. The Council have already assessed the need and this option does not cover this.
465	Disagree. The targets do not meet the identified needs that exist for regeneration in Hoylake and West Kirby.
479	Disagree. The targets do not address the requirements.
492	Disagree. The targets are not proportionate and do not address the pre-existing needs of the areas.
493	Support the development of brownfield land before previously undeveloped greenfield land, although there may also be a need to conserve biodiversity assets on brownfield sites.
505	Disagree. Need has been identified and this does not address those needs.
514	Disagree with the housing targets.
530	Disagree as the targets do not address the needs.
531	Disagree. Insufficient for growth.
549	Disagree. The targets are not proportionate to the existing population in the Settlement Areas nor do they address already identified needs in the Settlement Areas.

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568	Disagree. The proposals do not address needs that are already identified nor are they proportionate to the existing population.
582	Disagree. Not sure that the need exists for such a large increase, given the downturn in the economy and the amount of unoccupied properties.
585	Disagree. There needs to be more housing development throughout the Borough.
634	Disagree. The Core Strategy must conform to RSS. PPG3 which advises on the evidence to be used. The targets are not in line with this evidence and should be no less than 570 dwellings per annum to meet identified needs and address the shortfall against RSS. The requirements should be floors and not ceilings, to meet the expected upward trend in likely future housing requirements and the significant need identified in the SHMA.
648	Disagree. Minimum and maximum figures in different areas is difficult to understand and is essentially a "carte blanche" for housing development in the Commercial Core. Housing development elsewhere will be too tightly constricted. It is unclear how Newheartlands and the Growth Point relate to each of the Settlement Areas. It is not clear how the Growth Point can be delivered, at 20% above RSS, when the overall housing target has been reduced and how this will relate to Liverpool. If an uplift is no longer to be considered in Wirral, this needs to be clearly stated to avoid confusion.
668 686 708	Disagree. The housing targets are ridiculously low, do not reflect the RSS or market demand. The SHMA (2007) showed an annual requirement for 1,105 open market (68%) and 528 affordable (32%) units per annum or 1,633 units annually. 600 units per annum would represent a low to mid-growth strategy. 250 units would be very low. The evidence base supports a far higher growth rate which ought to be at around 1,000 units per annum.
741	Disagree. RSS is still part of the statutory Development Plan and should be the starting point. 250 per annum was considered to be 'somewhat modest' by the EIP Panel. The Panel recommended the higher figure of 500 per annum to reflect the potential to accommodate a substantial amount of new housing on redundant dockland in Birkenhead. There is no justification for a return to 250 dwellings per annum, which would fall significantly short of Wirral's own housing needs assessment and would fail to deliver regional priorities, Wirral Waters and the Council's economic aspirations.
759	Disagree. The scale of housing proposed is not based upon evidence or need and conflicts with other parts of the adopted Development Plan. The Council is being selective in the interpretation of the evidence base. The most recent, up-to-date evidence suggests a higher figure. 250 conflicts with RSS. The SHMA indicates a build rate of about 570 dwellings per annum. The needs identified in the SHMA would not be met. The third paragraph relates to matters dealt with under Preferred Option 6 and should be moved. The use of maximum targets is contrary to RSS and PPS3, will not promote regeneration, will limit the supply of family housing, force prices upwards, increase affordability issues and

	encourage out-migration, including wealth generating individuals and social groups who will be unable to find accommodation within the Borough, contrary to the objectives of the Core Strategy.
770	Disagree. The SHMA (2010) identifies a much greater housing need. The Borough-wide target should be nearer to 41,760 to 2027. Five year targets should not be rigidly enforced, would stifle housing development and fail to take account of changing local markets.
791	No significant concerns regarding the housing targets and phasing proposed. Support providing sufficient housing alongside employment opportunities and other services and facilities to reduce need to travel. Increasing housing provision could have an adverse impact on traffic congestion. Placing no upper limit on the number of dwellings to be provided within Newheartlands and the Mersey Heartlands Growth Point would make it difficult to plan effectively for future infrastructure requirements and additional development could have an adverse impact on the capacity of infrastructure that has already delivered.
826	Local housing targets should take more account of the fact that the era of cheap energy is over, whether or not we have yet reached "Peak Oil" and that this will have implications for every part of life.

10.4 The Council's response to comments on the Policy Options for the scale of new housing and Preferred Option 5 - Local Housing Targets is set out in paragraph 11.3 below.

11 Preferred Distribution of New Housing

11.1 No comments were directed towards the assessment of the Policy Options for the Distribution of New Housing Development set out within the Preferred Options Assessment Report.

11.2 The following comments were received in response to Consultation Question 8 - *Do you agree with Preferred Option 6 - Distribution of Housing? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
21	Broadly agree.
44	Agree.
67	Agree.
84	Disagree. Relies too heavily on the regeneration of east Wirral. The needs of west Wirral have been dis-regarded, especially in regard to sustainable development. Sites within established settlements with good access to public transport and services could provide for local housing needs in Hoylake and West Kirby and infill and larger plots within residential areas could provide a

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	valuable resource to enable the vitality and viability of these areas to flourish. The balance seems weighted in favour of regeneration when a mix of housing is required.
86	Disagree. The Council is over-emphasising regeneration in east Wirral. The Core Strategy states that allowing limited development in existing centres to utilise existing, good transport routes is the way forward yet proposes to allocate only 2% of the total to Hoylake and West Kirby which are existing centres served by excellent transport routes. The vitality of these areas also needs to be preserved and more residential development allocated to provide for a mix of housing.
91	Happy to see an emphasis on the re-use of previously developed land at the core of older more urban areas but some development should also be allowed over a wider area in appropriate urban locations outside east Wirral.
103	Broadly agree, given the commitment to no Green Belt release.
132	Critical to retain the character of the different communities with the proviso to improve the housing stock where that is needed.
148	The distribution of specialist housing should be Borough wide, as people with illnesses, disabilities and mental health problems need to be in areas they are familiar with, near to their families and where they will be safe.
177	Disagree. The focus should be on Areas that make a significant economic contribution to the Borough as a whole. The success of Deeside Industrial Park has been supported by the development of good quality 3/4 bed detached properties in the surrounding areas of Flintshire, Denbighshire and Chester. There is a shortage of such properties in Wirral compared to the national average. Given the choice, most people would prefer to live in Settlement Areas 4, 5, 6 and 7. Communities should be able to live where they want, unconstrained by affordability. Limits in public funds will mean greater reliance on a market driven recovery. Location is the key factor, as private funding will only be forthcoming for the best sites where local housing demand is high and people can afford to buy. UK land agents report that the market for large strategic sites will take much longer to recover and improve in value than the market for smaller scale developments. Increasing the stock over a wider area will be in line with national policy, reduce prices to a more affordable level through market forces and help social inclusion by providing social housing.
179	Agree.
198	Disagree. Given the size and variety of Settlement Area 8 a 3% allocation is not sufficient. The SHLAA has unreasonably categorised surplus land at Clatterbridge as "not currently developable".
214	Agree subject to the Habitats Regulations Assessment being fully taken into account.

234	Prefer the basic distribution under Preferred Option 6, as the housing market is likely to remain very fluid over a 15 year period and a degree of flexibility will be required.
265	Disagree. Does not meet Spatial Objective 2 which identifies several areas of need within Settlement Area 5. It is unreasonable to expect 3 new properties per annum to satisfy the needs of these areas. The SHMA shows Settlement Area 5 as the area with the greatest housing needs in the whole Borough at 2,242 new homes across the Plan Period or 23% of total need, which does not compare with the 1% provision shown under Preferred Option 6. This will not create the new private and affordable homes to meet the needs identified, provide new investment, financial contributions to local facilities or create jobs and training opportunities in areas in desperate need for regeneration. Only large scale housing development will be able to deliver the investment needed to create a difference to deprived areas such as Leasowe. A more balanced promotion of new housing across the Borough must be promoted.
282	Disagree. Only 7% of the annual target is to be met in Settlement Areas 5 to 8, with 93% in Settlement Areas 1 to 4. This will not support the investment needed to meet housing needs, including affordable housing, across the Borough. The Core Strategy must apply a higher growth rate and allow greater levels of growth in Settlement Areas 5 to 8 and elsewhere, to achieve local (and national) planning objectives.
295	Support the percentage distribution but the numbers of units are too low.
306	The proportion of new housing development in Bromborough should be increased to reflect the need for mixed use development at locations in and around Wirral International Business Park, which is required for viability reasons, to stimulate regeneration and increase housing choice in areas such as Bromborough Pool. The only prospect of high value employment being created is as part of a mixed-use development.
312	The delivery of the distribution of housing may be influenced by the findings of the Water Cycle Study which has recently been commissioned.
331	Disagree. The Council should encourage quality residential development throughout Wirral for the benefit of all Wirral residents. New housing creates income through Council Tax, New Homes Bonus, benefits the local economy through employment of building workers and the subsequent sale of new carpets, furniture etc., and supports local shopping centres and other local services by increasing the number of customers. High quality, sensibly sited developments, will provide visual improvements by renewing obsolescent or outdated buildings and re-using vacant land. All available land within urban areas should be put to best use to prevent building on the Green Belt. New housing is essential to offer the best chance of a decent home. New homes will be far more carbon neutral and use far less energy to heat than older outdated properties.
358	Disagree. Does not consider the existing populations in each Settlement Area and would prevent the Council from delivering thriving local communities.

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376	Disagree. Does not reflect the proportion of the population living in each Settlement Area and housing needs which have already been identified would not be met. Such policies would prevent the Council from delivering thriving local communities.
396	Disagree. Hoylake and West Kirby need a full 8% allocation to meet identified needs. 1% is not enough. Local planning rules should be applied.
407	Disagree. Hoylake and West Kirby have a need for housing that should be subject to normal planning applications.
415	Disagree with the preferred and alternative options, which do not reflect the proportion of the populations already living in the Settlement Areas and housing needs which have already been identified would not be met. Such policies would prevent the Council from delivering thriving local communities.
421	Disagree. These policies would prevent the delivery of thriving local communities.
443	Disagree. Hoylake and West Kirby should have 8% based on the current size of the population.
448	Disagree. Need has been identified.
461	Disagree. West Kirby and Hoylake already have an identified housing need which should be subject to normal planning considerations.
466	Disagree. Need has already been identified by the Council.
481	Disagree. Hoylake and West Kirby need a full amount of allocation.
494	Disagree. It is not proportionate and would ultimately have a detrimental effect on areas such as Hoylake and West Kirby.
506	Disagree. A need has already been identified by the Council. Hoylake and West Kirby need the full 8% allocation, subject to normal planning rules.
516	Disagree. Need has been identified by the Council.
532	Disagree. May rejuvenate poorer areas but needs a fairer distribution.
550	Disagree. West Kirby and Hoylake need the full amount of allocation, subject to normal planning rules.
551	Disagree with the preferred and alternative options, as they do not reflect the proportion of population already living in the Settlement Areas, where housing needs have already been identified and would prevent the Council from delivering thriving local communities.
569	Disagree. Does not reflect need or the proportions of the population living in specific areas.
583	Disagree. It is not reasonable to suggest such a high percentage in Settlement Area 4, given the local constraints.

586	Disagree.
635	Disagree. The Settlement Area boundaries have been tightly drawn around the existing urban areas. Land beyond will inevitably be required to meet the housing needs set out in RSS and the SHMA in Settlement Area 5 or Settlement Area 8. The annual requirements for Settlement Areas 5 and 8 are unrealistic and will not meet the housing needs in each of these Areas or the economic aims for the Assisted Areas identified in Picture 6.1. Paragraph 10 of PPS3 which seeks a mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural; housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure; and the need to create and maintain sustainable, mixed and inclusive communities in all areas, both urban and rural. There is an over-reliance on development within the Growth Point and Newheartlands.
649	Disagree. The uneven distribution of housing will have a negative impact in delivering sustainable communities in some parts of Wirral. It is unclear how Preferred Option PO6 can be separated from the scenarios for the scale of new housing development or how the preferred distribution relates to Policy Options PO1 to PO4 or to the SHLAA, which differs from what is presented here.
669 688 709	Disagree. Should as a minimum be more closely related to the scale of housing development presented under Policy PO2 and should in fact be much higher.
721	Agree.
747	Disagree. Wirral is in desperate need of housing development. Other areas in both east and west Wirral are also in need of regeneration and development. Sites such as at Garden Hey Nursery in Saughall Massie, which although within the Green Belt is already a developed site, could add substantial economic wealth to Wirral. This once profitable site employed nearly 20 people but for the last ten or more years has been of no economic gain to the Council or to the people of Wirral. Granting planning permission on small sites similar to this would have an instant impact on the economy, bringing huge benefits for little or no cost to the Council. 35 houses paying Council Tax of £1,500 would provide £52,500 annually; plus New Homes Bonus would provide £630,000. Only ten small developments would bring over £6 million, over three years. Over 1,000 much needed houses could generate over £18 million without any cost to the Council. This sort of economic regeneration should not be ignored. Regeneration in Birkenhead, Rock Ferry and Seacombe will take at least 10 years or more to complete. The development of a few readily available sites throughout Wirral could be achieved in a much smaller timescale and provide a better spread of regeneration across the Borough. Income generated by smaller land owners can only benefit the Council and people of Wirral. The local economy will stand still if entrepreneurs are not allowed to expand and reinvest. More freedom is



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	<p>necessary to create more wealth. The private sector has to expand to support the public sector. People are migrating away from Wirral because of a lack of housing in preferred areas. Inward investment by external companies must be encouraged by providing for a broad spectrum of people who may wish to take up residence in different parts of Wirral.</p>
760	<p>Disagree. The distribution is not based on any evidence or need but is simply designed to direct all new development into east Wirral, without providing for the needs of any other communities in a meaningful way. One nursing home could absorb the entire requirement for housing for the whole of the Core Strategy period in some Settlement Areas. Whilst the need for regeneration in east Wirral is accepted, this must not be to the detriment of the other communities in Wirral. The approach will not meet the needs identified in the Councils own SHMA for either market, affordable or special need accommodation, forcing up house prices where needs are not being met, reducing the delivery of affordable housing and investment in new jobs and homes; forcing people to look outside the Borough for accommodation, especially economically active people looking for good quality family housing in reasonable areas, amplifying the effects of an ageing population. A more balanced approach is needed to meet the needs of existing communities. It is accepted that there should be no cap on numbers in Settlement Area 2 but it is not apparent how the numbers in other areas will be controlled and what mechanisms will be put in place to ensure delivery in line with the distribution. Refusing development if the maximum target is exceeded may mean only granting one permission at a time. The deliverability of high density apartment schemes is questionable. The SHMA Viability Assessment 2010 indicates that Wirral Waters was not at present viable. There is no flexibility to address these issues, if delivery within the regeneration areas proves problematic in terms of numbers or phasing. The only prospect would be a lengthy review the entire Core Strategy and its associated documents.</p>
771	<p>Disagree. More housing should be directed towards the rural areas to deliver rural renaissance, PPS4, the Taylor Review (2008); and the Stuart Burgess Rural Advocates Study. Allowing sequentially assessed residential development throughout Settlement Area 1 to 8 would better address the shortfall in net new dwellings, provide the necessary population to sustain local jobs, infrastructure and services and support the settlements of Raby, Thornton Hough, Brimstage, Storeton and Barnston. A wider distribution would also aid the protection of built heritage by reducing the need to demolish, rebuild, convert or extend existing character buildings; enable flood risk to be minimised; reduce the pressure of over-development within Settlement Areas 1 to 3; and enable the delivery of Zero Carbon Homes in sustainable locations to meet Climate Change targets.</p>
792	<p>Generally support focusing the largest proportions of new housing development within the Commercial Core, Birkenhead and Bromborough, where previously developed land and access to a variety of services, facilities, employment and sustainable transport is more readily available. Previous assessments have indicated that the current level and distribution of growth proposed should be able to be appropriately mitigated to ensure that the efficiency of the Strategic Route Network is not compromised. Further evidence will, however, be needed to demonstrate that individual sites can be developed without detrimentally</p>

	impacting on the safe and efficient operation of the Network. Any necessary mitigation measures should be identified and assessed to ensure that they can be funded and delivered.
818	Applaud the intention to narrow the gap between east and west Wirral, which may eventually be possible through Wirral Waters but history shows that if you make good in the east, you will want to move to the west to increase the value of your property and 'move up in the world' and that this will continue for many years to come.

11.3 The Council has responded to the comments on the Policy Options for the scale of new housing; Preferred Option 5 - Local Housing Targets; and Preferred Option 6 - Distribution of Housing, by:

- basing the housing requirement figure in Policy CS18 of the Proposed Submission Draft Core Strategy on the requirement in the Regional Spatial Strategy
- including reference to the need to monitor the housing requirement figure against population and household projections and local housing needs and calculations with or without Wirral Waters in the Proposed Submission Draft Core Strategy
- removing the reference to maximum and minimum targets for provision within each Settlement Area and expressing the main spatial priorities within the Broad Spatial Strategy (Policy CS2)
- undertaking transport modelling to assess the impact of development against the likely capacity shown in the updated Strategic Housing Land Availability Assessment

12 Preferred Phasing of New Housing

12.1 No comments were directed towards the assessment of the Policy Options for the Phasing of New Housing Development set out within the Preferred Options Assessment Report.

12.2 The following comments were received in response to Consultation Question 9 - *Do you agree with Preferred Option 7 - Phasing Housing Development? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
22	Broadly agree.
45	Agree.
68	Agree.
104	Broadly agree, given the commitment of no Green Belt release.
133	Broadly agree. The commitment to reuse buildings is welcome since most of the energy consumed over a building's lifespan is in the materials of construction.

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155	Agree with all brownfield before greenfield but all sites must be evaluated for nature conservation when being brought forward for development. Some brownfield sites have developed nature conservation value, which can become of high local value to people, especially in urban areas where there is relatively little wildlife. Value for wildlife can arise over decades after abandonment. For example, the former railway goods yard to Bebington Station had been derelict for 30 years before the New Ferry Butterfly Park was established in 1993. Any sites left to develop naturally over more than 20 years should be treated as greenfield or at least evaluated carefully for wildlife before development is permitted. The phasing of housing will also need to take more account of the fact that the era of cheap energy is over, whether or not we have yet reached "Peak Oil" and that this will have implications for every part of life.
180	Agree.
189	Disagree. This should be used to support an alternative Broad Spatial Option to focus development on areas that make a significant economic contribution to the area, where increasing housing stock will revitalise the economic prospects of Wirral. Wirral should take a proactive approach to development in areas that contribute most to the economy in terms of employment and wealth. Creating wealth within the Borough will make policies of social inclusion and removal of deprivation achievable through self funding. Economic revitalisation is the solution now that Government funding has been withdrawn. Increasing the housing stock in Settlement Areas 4, 5, 6 and 7 will reverse the out-migration of middle and high income families (to Deeside). Quality residential areas attract investors, attract and retain a highly skilled workforce which is an economic asset to the region. The Council can introduce SPD to ensure that brownfield sites are considered before greenfield sites.
199	Support maximising the reuse of previously developed land
207	Agree brownfield land should be used before greenfield land to reduce the number of vacant sites, encourage redevelopment and reduce the legacy of land contamination (acknowledging that not all sites would be viable for such a sensitive end use). Support the continued commitment that the re-use of previously developed land will be at least 80 percent. The Habitats Regulations Assessment will, however, need to be fully taken into account.
235	Agree.
266	Disagree with the need for phasing. The order of preference should not be a strict requirement, does not state when and where it would be appropriate to deviate from this order and makes the emerging policy framework over complicated by adding even further layers of policy, which will simply serve to deflect development elsewhere outside the Borough.
275	Support phasing across the Borough, to encourage brownfield re-use in all areas of the Borough before any greenfield land is released, as this promotes a sustainable approach to development and protects against the loss of valuable urban green space. However, greenfield development can, within the context of a neighbourhood plan, help to ensure adequate provision of well designed

	and managed open space, support regeneration and improved sustainability and any loss could be compensated through land swaps. Discretion and flexibility should be applied.
283	Needs to be more specific as it is currently unclear.
307	Support phasing across the Borough as a whole, to encourage the reuse of brownfield land in all areas of the Borough before any greenfield land is released for development and as a sustainable approach to development that protects against the loss of valuable urban greenspace (but not the order of preference).
326	Support phasing housing across the Borough to maximise reuse of existing buildings and brownfield land.
359	Agree to re-using existing buildings and developed land.
397	Agree with reusing existing buildings or previously developed land before Green Belt.
408	Agree that existing buildings and previously developed land should be used rather than greenfield.
418	Broadly agree
423	Proposal is not clear and is not easily understood.
449	Agree with brownfield sites first.
462	Agree existing buildings and previously developed land should be used before Green Belt.
469	Agree to the use of brownfield sites first.
483	Agree brownfield should be considered.
495	Agree in principle
507	Agree with using brownfield sites first.
517	Agree must look at brownfield sites first.
552	Agree with brownfield first.
556	Agree.
570	Agree with using any brownfield site in the whole of the Borough before using any greenfield sites in any of the Settlement Areas.
587	Not Sure.
588	Support developing brownfield sites first but do not think it will happen without financial support. Should also support living over shops and converting redundant commercial buildings to housing.

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650	Support phasing housing to support brownfield regeneration priorities.
670 689 712	Disagree. Prefer phasing by Settlement Area under Policy Option HP2.
748	No time periods are mentioned.
761	Unclear how this will function in locations outside regeneration priority areas, which could provide another hurdle to the delivery of housing to meet the needs of particular communities. Should simply follow the RSS approach, preferring the re-use of existing buildings, then brownfield before greenfield, while considering the needs of individual communities. The policy assumes that all development on a greenfield sites is harmful, when developing an urban greenfield site may in some circumstances be more sustainable than developing other sites elsewhere, for example, to facilitate improvements to public open space nearby or as part of the phased regeneration of an area with the creation of new open space elsewhere. The policy as currently worded would preclude either of these options being considered.
772	Agree Borough-wide phasing is preferable. Generally agree with a brownfield priority but phasing in accordance with the Order of Preference (Preferred Option 8) should not be too rigidly applied.
793	Generally support phasing in line with the Broad Spatial Strategy, to maximise the use of previously developed land and sustainably accessible locations. The timely funding and delivery of supporting infrastructure that reflects the scale and type of development, addresses the needs of the locality and / or mitigates any adverse impacts created by the development will be critical to any phasing approach.
817	Concentrating development in Newheartlands and the Mersey Heartlands Growth Point is too reliant on previously developed sites. RSS Table 7.1 confirms that "at least 80%" should be on previously developed land, with 20% from greenfield land. The plan must recognise that urban expansion sites will be required outside the main urban areas.

12.3 The Council's response to comments on Preferred Option 7 - Phasing Housing Development is set out in paragraph 13.3 below.

13 Preferred Order of Preference

13.1 No comments were directed towards the assessment of the Policy Options for the Order of Preference for New Housing Development set out within the Preferred Options Assessment Report.

13.2 The following comments were received in response to Consultation Question 10 - *Do you agree with Preferred Option 8 - Order of Preference? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
11	Agree.
23	Agree.
46	Agree, if operated in firm conjunction with Preferred Option 15 - Better Design and Preferred Option 16 - Development Management.
69	Agree with priorities 1 to 5 but priorities 6 and 7 should not even be considered as the need for green space is so very important. The erosion of green space at the Warrens at Arrowe Park and the sustained lack of maintenance, management, renewal and improvement of green infrastructure needs reversing not accelerating through disposal for development.
85	The removal of residential garden land from being "previously developed" should not be construed as designating such land as greenfield land. Many sites within residential areas, especially within west Wirral, can provide a valuable resource for a mix of housing developments. There should be an equal preference between east and west. Too much emphasis is placed on regeneration in east Wirral when appropriate sites are available in west Wirral. Whilst not agreeing that the phasing proposed is correct, residential sites in sustainable residential areas should not be considered to be "greenfield" and drop further down the order.
89	Agree.
105	The exemption of Green Belt land must be added.
134	Broadly agree. The earlier commitment not to release Green Belt needs adding.
156	"Other forms of green infrastructure", under preference 6 - urban greenfield in east Wirral and preference 7 - urban greenfield in west Wirral, must include sites for wildlife conservation and the appreciation of nature, which should include corridors and stepping stones for the movement of wildlife in response to climate change in line with Prof Sir John Lawson's report "Making Space for Nature". The order of preference will also need to take account of the fact that the era of cheap energy is over, whether or not we have yet reached "Peak Oil" and that this will have implications for every part of life.
181	Agree.
188	Agree. Whilst garden land has been removed from the definition of "previously developed land", this does not mean that all garden land should be excluded from development as "...it is for local authorities and communities to take decisions that are best for them and decide for themselves the best locations and types of developments in their area..." Including garden land will reduce the need to take up greenfield sites and urban sprawl; place little demand on

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	infrastructure; allow better utilisation of land where people and lifestyle no longer demand large gardens; provide small sites for local builders to employ local people; protect other greenfield sites for the use and enjoyment of the community; and allow other greenfield sites to provide suitable habitat for local wildlife and flora and fauna. Over-development can be controlled by SPD.
200	Disagree. This will potentially cause a conflict between Settlement Areas. The focus should be on delivering realistic targets within each Settlement Area, maximising the use of previously developed land within each Area.
208	Agree brownfield should be used before greenfield but brownfield sites could also be a Habitat of Principal Importance or provide a refuge for Species of Principal Importance under NERC or provide opportunities to provide needed open space, which are material considerations for both strategic and site-specific planning. The definition of east and west does not fit well with the Settlement Area boundaries.
236	Agree.
267	Disagree when the Core Strategy promotes several other policy objectives. The Core Strategy is in danger of being unable to meet its Spatial Vision. The order of preference is more likely to stifle development than encourage economic revitalisation. Only allowing land in lower categories to be released when land of a higher category is inadequate conflicts with the national objective of providing a flexible supply of land.
277	Disagree. Objects to any rigid application of the Order of Preference which does not allow for the early regeneration of other areas of need outside the designated regeneration priority areas, such as Bromborough Pool. An over-reliance on Newheartlands and Wirral Waters will limit choice and the ability to meet different needs in different geographical areas; may not be deliverable at the scale envisaged; will over-rely on apartments which only meet a very specific type of need and will not provide sufficient family housing; concentrating on a limited areas will skew local housing markets and could delay the achievement of output milestones, particularly where housing markets are already delicately balanced. Bromborough Pool suffers from relatively high unemployment; insufficient family housing with gardens; a high proportion of social rented housing; a relatively poor environment; heritage assets which will degrade over time; and a combination of low house prices, high turnover, low demand and voids which contributes to social exclusion; which could be tackled by a high quality mixed-use development incorporating residential and employment uses. A staggered release of all land types is preferred.
284	Disagree. Preferred Option 8 should be revised to allow development on both previously developed and greenfield sites at the correct level across the Borough.
298	One or more operational pipelines run through the priority areas shown on Picture 6.2. While the promotion of regeneration and increased opportunities for housing and employment is supported, the Council will need to be aware of

	the implications of new developments encroaching within the areas surrounding the pipelines, in particular from the proximity of new housing and increased housing densities in existing residential areas.
308	Disagree. The order of preference would not allow the early regeneration of areas of need outside the designated regeneration priority areas. There should not be an over-reliance Newheartlands and Wirral Waters to meet housing needs, which is not limited to the identified regeneration priority areas. The information supplied by Turley Associates, used in the SHLAA (paragraph 3.76), indicates that 1,500 residential units can be delivered at Wirral Waters by 2013, which is very ambitious, given that the outline planning application for the largest area (East Float) was only submitted in December 2009. Even achieving 900 completions at East Float by 2013 is optimistic. Newheartlands can also not be relied upon to deliver as much housing as was envisaged, as a significant proportion of public sector funding has been withdrawn. Not allowing development elsewhere in the early years of the plan period could prevent overall housing targets from being met. There is also a need to ensure the delivery of a housing mix with a balanced range of housing types to meet different housing needs, rather than having an over reliance on the provision of apartments. The Wirral SHMA Update (2010) suggests that 44% of new market housing should be three- bedroom, 37% two- bedroom and just 19% one- bedroom. Bromborough Pool requires urgent intervention to improve quality of life for the local community. The former Croda factory is suitable, available and deliverable for a mixed-use development, which could comprehensively address the problems that the area faces by remediating a contaminated site to provide modern business space and a mix of housing types and tenures within an attractive environment with new and improved community facilities, which Preferred Option 8 is currently too inflexible to allow. Cardiff Council has recently withdrawn their Local Development Plan because of a lack of provision to meet an identified need for family housing; a too heavy reliance on windfall and brownfield sites; not providing for a range of house types in places where people want to live, by concentrating nearly all new housing in only four areas of the city; failing to provide enough flexibility to deal with the failure of sites listed to come forward; too much emphasis on apartments; and not enough provision for affordable homes.
332	Agree with giving first priority to urban brownfield land in regeneration priority areas identified on Picture 6.2.
334	Broadly agree but a balanced approach should be adopted in difficult economic times to keep building workers employed and our villages, suburbs and towns regenerated. Policies should allow sensible development to take place. The Council may also wish to maximise the income from the New Homes Bonus.
360	Disagree. The focus on east Wirral will not address identified needs in west Wirral.
377	Disagree. The order of preference would curtail any significant development in West Kirby, where there are already areas of identified need, for an unacceptable period of time.



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398	Disagree. Why should Birkenhead take the vast majority of residential allocations, when the Council has identified needs in west Wirral.
410	Disagree. A need has been identified in west Wirral. The full allocation should not be taken by Wirral Waters.
419	Disagree. The order of preference would curtail, for an unacceptable period of time, any significant development in west Wirral where there are areas of identified need.
427	Disagree. The order of preference would curtail, for an unacceptable period of time, any significant development in west Wirral where there are already areas of identified need.
451	Disagree. Housing should be allowed in west Wirral.
463	Disagree. A housing need has been identified elsewhere and the full allocation should not be taken up by Wirral Waters.
470	Disagree. There is a identified need in west Wirral. Why should east Wirral take all the allocation.
484	Disagree. There is a need for housing and development in west Wirral.
496	Disagree. Development in west Wirral would be curtailed for an unacceptably long period.
499	Agree with the order of preference, subject to proper consideration of any biodiversity assets present on brownfield land. It will be important to ensure that Preferred Option 15 - Better Design and Preferred Option 16 - Development Management take a robust approach to avoiding any negative effects on natural environmental assets. Strongly opposed to any development that would result in the loss of valuable urban greenspace. Agree that both urban and rural greenspace will be subject to an assessment of the need for open space and other forms of green infrastructure before any development would be permitted.
508	Disagree. There is an identified need for housing and development in west Wirral. Why should Wirral Waters take all the allocation, meagre as it is.
518	Disagree. There is a need for housing and development in west Wirral.
533	Agree, with proper consultation before brownfield land is used.
553	Disagree.
557	Disagree. The order of preference would curtail, for an unacceptable period of time, any significant development in other Settlement Areas with areas of identified need.
571	Disagree, The order of preference would not allow any building in any Settlement Area except 1 and 2 for some 15 - 20 years, despite identified needs elsewhere.

589	The land has not yet been correctly categorised. Not happy about preference 4 - rural brownfield land in east Wirral or preference 6 - urban greenfield land in east Wirral.
593	Disagree. Priority should be given to any brownfield site that is viable and developable. Shelving good plans and opportunities because that are not in a priority area will be counter-productive for the Borough as a whole.
651	The detailed mechanism proposed may unintentionally delay housing delivery and blight some areas, especially if the capacity of brownfield land in urban areas is over-estimated. It is unclear how the Council proposes to calculate the quantity of land to be released from the lower categories, once the supply of land in higher categories dips below the five-year supply mark. These technical details should be outlined and consulted on within the next version of the Core Strategy.
691 713 815	Agree but this is only relevant to windfall sites.
722	Support the order of preference. Agree that it is in line with the Broad Spatial Strategy. Notes the Sustainability Appraisal has found this to be a sustainable approach.
773	Disagree. Preferred Option 8 should be amended to prioritise previously developed land irrespective of any spatial priority. Flexibility is required to increase the likelihood of delivering the housing and employment needs of the Borough, to recognise the merits of proposed developments, the changing nature of the housing market and to enable choice over where people want to live, in line with PPS3 (paragraph 9), especially taking account of the market fragility in east Wirral and the lack of incentive for developers to deliver housing in these areas, due to low house prices. Rural brownfield land should include conversions of agricultural buildings and farmsteads.
782	Broadly agree but development under preferences 6 and 7 should only be allowed subject to the findings of the assessment (rather than it just being carried out) and the consideration of the needs of the wider area (rather than just the immediate locality). The wording should therefore be "... subject to an assessment of the need for open space, sport and recreation facilities (or other forms of green infrastructure) identifying the land or buildings as surplus to requirements." All land and buildings used for sport should be protected. Some of these, such as a swimming pool or a health and fitness suite, could be regarded as previously developed land. Their loss should also be opposed unless it could be demonstrated that they were genuinely surplus to requirements or replacement facilities of an equivalent quantity and quality were to be provided in a suitable location.
800	Generally supported. Welcomes the priority given to previously developed urban brownfield sites.

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819	Oppose the development of greenfield sites. Concerned that we could lose sites like bowling greens to potential development which, with an ageing population, are very well used by over fifties' groups. Also concerned about proposed development of land south of Gills Lane (SHLAA site ref. 884).
822	The definition of east and west Wirral should be consistent throughout or be explicit, to avoid the over-use of footnotes.

13.3 The Council has responded to the comments on Preferred Option 7 - Phasing Housing Development and Preferred Option 8 - Order of Preference, by:

- expressing the main spatial priorities within the Broad Spatial Strategy (Policy CS2)
- including Policies CS19 and Policy CS20 in the Proposed Submission Draft Core Strategy
- including a simplified order of search, in line with the Broad Spatial Strategy, in Policy CS19
- ensuring that new housing development must comply with Policy CS21
- ensuring that previously undeveloped sites are considered subject to Policy CS30
- providing for housing in and around existing centres in Policy CS26

14 Affordable and Specialist Housing

14.1 No comments were directed towards the assessment of the Policy Options for the provision of Affordable and Specialist Housing set out within the Preferred Options Assessment Report.

14.2 The following comments were received in response to Consultation Question 11 - *Do you agree with Preferred Option 9 - Affordable and Specialist Housing? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
4	The target for 85% affordable rent and 15% intermediate market rent is now out-of-date. All new lettings should now be at intermediate market rent levels, generally recognised as 80% of open market rent. In addition, they should be fixed term tenancies, reconsidered as people's financial circumstances improve. Social housing grant will now effectively be unavailable in most circumstances, making it financially unviable for Housing Associations to build social rented housing unless developers pay the equivalent subsidy or a commuted sum to make them social rent levels.
24	Agree.
47	Agree.

70	Agree with Borough-wide targets. Would only fall back on Settlement Area targets as a second choice.
90	Agree Borough wide targets are more appropriate than Settlement Area targets which could result in an over concentration of certain client groups with corresponding consequences for economic objectives. However, the Council will need to reconsider this issue in the light of 80% market rents and the exact details of the New Homes Bonus. An analysis of the potential consequences will need to be thoroughly assessed before a final decision is published.
106	Broadly agree but the recession and changes to the benefits system will require flexibility in the provision of affordable housing.
147	There is a need for specialist housing throughout the Borough, especially for people with learning and or physical disabilities or mental health problems who need to be in areas that are familiar to them and near to their families. It is unclear how to make these affordable, given the cutbacks in benefits. Mortgage payments through income support have already been cut and there are likely to be changes to housing benefit rates. Housing costs not met in these ways will have to come out of other income. Many people currently receiving Income Support or Employment Support Allowance as a result of illness or disability are likely to be reassessed as being capable of work, however unrealistic that is in the current economic climate, with a subsequent drop in benefits. A replacement for Disability Living Allowance from 2013 will mean that fewer people, including wheelchair users, will qualify for this non means-tested benefit. People who are currently in shared ownership properties, where their mortgage is paid through income support and the rental element through housing benefit, are at risk of losing their home if they are assessed as being capable of work and made to take a low paid job, as there is no mortgage component of working tax credit. It also means that they would not be able to sell their home, as anyone needing specialist housing who would rely on income support to pay the mortgage would not buy it in case they found themselves in the same position. Most of them are single which means, if they are working, that a larger proportion of their income would be taken up by housing costs than for a couple. It would appear that specialist housing for these groups should be on a rental only basis unless affordable housing really can be provided for single people on very low incomes.
201	Disagree. The approach should be refined to take account of local needs and set targets for geographically specific areas where evidence shows specific local needs.
268	Disagree. The SHMA identifies a Borough wide need for 2,874 affordable dwellings per annum. 250 dwellings, which includes the provision of market dwellings, is significantly below this threshold. The Council is not seeking to address this deficiency or use all the means available. The overall annual housing target should be increased to 570 as prescribed by the evidence base. This will, however, delay the yield of affordable housing from the outset. PPS3 (Paragraph 29) requires the Council to set a plan-wide target, tested for deliverability through an assessment of economic viability. Object to reconsidering these targets on a regular basis, as this will give little guidance on likely future requirements. This

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	<p>will simply allow the Council to increase requirements, because targets have not been met. The Dynamic Viability approach advocated in the Affordable Housing Viability Assessment allows these targets to be adjusted but must work both ways, take account of market conditions and allow developers to demonstrate on a site by site basis whether the affordable housing targets are viable. Object that specific requirements will be sought for land allocations through the Site Specific Development Plan Document, which goes against the aspiration to identify a plan-wide target.</p>
285	<p>Disagree. 20% affordable housing within regeneration priority areas will not deliver the housing needs identified in the SHMA. The Preferred Option advocates up to 40% elsewhere (subject to viability) but given that just 7% of development will go to Settlement Areas 5-8 (under Preferred Option 6), this will apply to few schemes and deliver few affordable homes. The 40% target is clearly challenging and will affect viability. If maintained, greenfield land must be released to deliver viable schemes and meet affordable housing needs. Otherwise, a lower level (up to 25%) should be sought.</p>
333	<p>The general approach and overall method appear to reflect PPS3 and case law. Wirral Waters was, however, excluded from the viability testing exercise and is a very different type and scale of development to the tested schemes. The permissions for East Float require viability assessments to be undertaken and measured against prevailing targets. The only phase of Wirral Waters to have been designed and tested to date in detail was found to be unable to support any affordable housing. In the short term affordable housing will not be possible at Wirral Waters even at the initial 10% target. Given that the targets have been proposed without reference to Wirral Waters, these targets cannot be applied to Wirral Waters. The 40% aspiration is wholly unrealistic, given that most of the housing will be delivered within the areas that cannot financially support such a scale of contributions. Retaining an unrealistically high overall plan-wide target will undermine the confidence and ability of the private of sector to invest in areas of need. The Council should reduce its plan-wide target over the life of the Core Strategy within the areas shown on Picture 6.2 to a much lower figure (for example, the 10% target) whilst retaining a higher plan-wide target (25-40%) for the rest of the Borough.</p>
336	<p>Disagree. The Council are not being realistic. In current market conditions, it will be difficult to find developers to work in the Pathfinder area never mind subsidise much affordable housing. In some areas, terraced homes and small apartments can still be secured for under £100,000 so the need for affordable housing is far less than in other areas where housing is far more expensive. At these prices, in less well-off areas development only makes sense if the land is very reasonably priced. Some provision of affordable housing may be acceptable on larger developments in better-off areas but as most of these developments will be small scale, it will not be of great significance. There is a shortage of sheltered housing for the continually ageing population in Heswall.</p>
361	<p>Disagree there is a requirement for affordable and specialist housing in west Wirral.</p>

379	Disagree. Affordable and specialist housing should be provided in areas that have been identified as being in need and not governed by Settlement Area housing targets.
399	Disagree. There is an identified need for affordable and specialist housing in in west Wirral.
412	Disagree. Affordable housing and specialist housing needs have been identified for Settlement Area 6.
422	Disagree. Affordable and specialist housing should be provided in areas that have been identified as being in need and not governed by Settlement Area housing targets.
433	Disagree. Affordable housing should be provided in areas that have been identified as being in need and not governed by Settlement Area housing targets.
454	Disagree. There is a need for affordable and specialist housing in Hoylake and West Kirby.
468	Disagree. Affordable and specialist housing needs have been identified for Settlement Area 6.
471	Disagree. There is a need for affordable and specialist housing in Hoylake and West Kirby, which has already been identified and should not be governed by Settlement Area housing targets.
485	Disagree. There is a need for affordable and specialist housing in West Kirby and Hoylake.
497	Disagree. West Kirby & Hoylake has already been identified as needing more affordable housing, in particular in the current economic climate. We need more young people, their money, enthusiasm and ideas to continue to grow the Area's population and finances.
512	Disagree. There is an identified need for affordable and specialist houses in Hoylake and West Kirby.
520	Disagree. There is a need for affordable and specialist housing in West Kirby and Hoylake.
555	Disagree.
559	Disagree. Affordable and specialist Housing should be provided in areas that have been identified as being in need and not governed by Settlement Area housing targets.
572	Disagree. Areas of identified need need should be provided for and not governed by an arbitrary target such as the Settlement Area housing targets.
590	Generally in agreement.
596	Disagree. Affordable and specialist housing is required throughout the Borough.

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652	<p>Setting aside one third for specialist housing is commendable and represents a significant effort to meet the housing needs of older and vulnerable people and those with specialist accommodation requirements. A few matters are however unclear: is the one-third proportion of based on land area or on housing capacity, which could be significant given the high density of residential development proposed in some parts of the Borough? Will the specialist housing target be sought within each development and if not, how will specific sites be identified to be developed for this purpose? Would the one-third specialist housing target apply to the Commercial Core and Wirral Waters, which would represent an extremely high proportion in this Area, as not doing so could undermine the Borough-wide application of the Preferred Option? Could seeking such a high proportion of specialist housing have implications for the economic viability of market housing developments? Site-specific viability is mentioned in relation to affordable but not specialist housing. Are there any circumstances where the Council would consider lowering the proportion of specialist housing sought? How will specialist housing needs be met in the western and rural areas of Wirral, based on the very small proportion of new housing (of any kind) to be developed outside east Wirral? The aspiration to move to a 40% affordable housing target is commended. The proviso that site specific viability will be taken into account is also supported. However, it is not clear whether the initial, lower proposed target of 20% / 10% has been set with regard to the SHMA and/or economic viability evidence. Is there any more detail available than that set out within paragraph 12.5?</p>
673	<p>Agree but this is only relevant to windfall sites.</p>
674 692 714	<p>Disagree. The long term aspiration of 40% is unrealistic and undeliverable. Simple development economics will show that achieving this level on even the very best sites would break the viability of a site. 85% provision for social renting is equally undeliverable; there is little social grant and there is a move towards intermediate tenures.</p>
723	<p>Agree. The assessment is generally fair and a Borough wide target is supported.</p>
762	<p>A third of all housing should not equate to a third of the land supply, as this form of housing tends to be at a significantly higher density than typical family housing which is likely to form the bulk of the remainder of supply, which will need to be adjusted to properly reflect the land take requirements of this form of housing. It is unclear how land will be set aside and what process the Council will use to do this. It would not be practical to reserve a third of a site, for example of 10 dwellings, for such uses as they would not be deliverable on such a small site. The Council appears to be being selective in the interpretation of the evidence base. Here they have picked up an identified need for specialist housing but elsewhere are ignoring the overall scale of the need identified in the SHMA (under Preferred Option 5), restricting the supply of dwellings below identified need, resulting in an upward pressure on prices which will worsen affordability. The Council are then requesting a greater proportion of affordable housing from developers than would be the case if the needs of the community were actually being met. The SHMA itself indicates that lower affordable housing targets would</p>

	be required if a balanced housing model was considered and when adjusted to take into account the regeneration of East Wirral suggests that only 33% might be necessary. The national indicative minimum site size threshold in PPS3 is 15 dwellings. The viability appraisal does not justify the need for a lower threshold, other than it might be viable to do so, rather than showing that it is necessary because of the types and nature of the sites coming forward to ensure delivery of an appropriate amount of affordable housing.
774	Disagree. Preferred Option 9 implies a target of 1,250 specialist dwellings over a 15 year period. The SHMA Update (2010) states that 3,922 specialist dwellings should be delivered over a 20 year period. Provision should therefore be increased. The need within Settlement 8 Area (Spatial Options Report, January 2010) should continue be recognised. The SHMA also established a need of 2,784 affordable dwellings per annum or 41,760 new dwellings over a 15 year period, which has not been identified. The affordable housing policy needs to be applied Borough-wide to address all areas of deprivation, including within Settlement Area 8. Policy Option AH2 would direct affordable and specialist housing to areas in greatest need, which could be supported as appropriate development under PPG2, to encourage the delivery of affordable housing in rural communities where it can also aid local employment, rural diversification and support communities in line with the objectives for the countryside contained in PPS4.
801	Agree. Generally support providing for a range of housing, which can help to reduce the need to travel.
828	The provision of affordable and specialist housing will need to take more account of the fact that the era of cheap energy is over, whether or not we have yet reached "Peak Oil" and that this will have implications for every part of life.

14.3 The Council has responded to the comments on Preferred Option 9 - Affordable and Specialist Housing, by:

- including Policy CS22 and Policy CS23 within the Proposed Submission Draft Core Strategy
- extending the lower 10% rate for affordable housing to all areas of greatest need
- clarifying that the rates applied may be altered incrementally up or down to reflect ongoing changes in development viability
- providing additional flexibility over the mix and tenure of provision to reflect assessed needs, affordable rents and Welfare Reform
- removing the reference to a 30% target for the provision of specialist housing in favour of a criteria based approach in Policy CS23

15 Gypsies and Travellers

15.1 No comments were directed towards the assessment of the Policy Options for the provision of accommodation for Gypsies and Travellers set out within the Preferred Options Assessment Report.

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15.2 The following comments were received in response to Consultation Question 12 - *Do you agree with Preferred Option 10 - Gypsies and Travellers? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
25	Broadly agree but an emergency phone number should be provided in the event of a weekend camp appearing overnight. The situation in south Wirral adjacent to the Brook Meadow Hotel is a worrying development which should be avoided in Wirral.
49	Agree.
71	Agree.
107	Broadly agree but given the example of illegal development in the Green Belt at Childer Thornton, would strongly urge strict enforcement and a special process to counter the "weekend invasion" tactics currently being used.
135	Broadly agree.
182	Agree.
215	Agree subject to the Habitats Regulations Assessment being fully taken into account.
315	Welcome that flood risk will be a consideration, as some sites might be proposed in inappropriate locations.
424	Agree.
509	Pleased to see the impact of local character and amenity and other environmental considerations, including flooding, biodiversity and landscape included.
534	Areas must be provided after proper public consultation.
591	Essential to have a robust policy, with Council staff ready to act at any time in an emergency.
600	Agree.
653	Whilst the broad criteria are acceptable in principle, the Council's intentions are not clear. Does the Council intend to update its evidence base to calculate the need and demand for additional accommodation? Will the Council seek to identify a site(s) for the accommodation of Gypsies and Travellers in the future? Will the Council work with neighbouring local authorities and have regard to the need and demand in the surrounding area, identified in the 2008 GTAA? More detailed guidance should be set out within a Development Plan Document rather than a Supplementary Planning Document. The current approach provides for Gypsies and Travellers but not Travelling Showpeople, who a separate group with specific needs, as set out in CLG Circular 04/2007.

724	Generally agree but the environmental criteria need to include potential heritage impacts.
802	Generally agree, in particular with the requirement to include evidence of travelling patterns, highway access and access to local services.

15.3 The Council has responded to the comments on Preferred Option 10 - Gypsies and Travellers, by:

- including Policy CS24 in the Proposed Submission Draft Core Strategy
- reflecting recent changes to national policy
- including references to Travelling Showpeople

16 Preferred Distribution of Employment

16.1 The following comments were directed towards the assessment of the Policy Options for the Distribution of Employment set out within the Preferred Options Assessment Report:

ID	Summary of Responses Received
830	In the Preferred Options Assessment Report, the implications of the Preferred Spatial Strategy for Settlement Area 4 at paragraph 9.14 should include maximising the potential to attract investment and employment at identified port land at Eastham.
830	Paragraph 16.23 of the Preferred Options Assessment Report refers to a 22 hectare port-related project at Eastham, which should be amended to refer to a project in excess of 30 hectares, to better reflect the site area of Port Wirral within the Borough boundary.

16.2 The following comments were received in response to Consultation Question 13 - *Do you agree with Preferred Option 11 - Distribution of Employment? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
15	Disagree. A more flexible approach is preferred to relying solely on an employment land review. Opportunity sites may come forward, before or after any Borough wide review, when existing employment premises become obsolete, require uneconomic investment to modernise or where continued employment use would adversely affect the amenity of nearby residents or conflict with wider regeneration proposals. The premises may be old, unattractive to new tenants, may not warrant a landlord's investment and enter a spiral of decline. The second paragraph should be amended to read "If before or after the employment land review has taken place, an applicant demonstrates that a site is no longer in

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	viable economic use or that it could be put to an alternative use, which contributes to the regeneration of the locality, such a proposal will be considered on its merits".
26	Broadly agree.
51	Agree. It is important that major developments provide training and job opportunities and ongoing employment for local people.
72	Agree subject to land being reserved for the retention and expansion of maritime-related industries and unused speculative office space not being over-provided within Wirral Waters.
108	Broadly agree but the Council should not turn away a valid employment opportunity if it falls outside the development areas identified, if it does not counter any major principles such as Green Belt.
136	Broadly agree. The improvement to the Bidston/Shotton line could potentially reduce unemployment by giving better access to adjacent employment centres.
183	Agree.
202	Disagree. Needs to be more flexible to reflect potential development opportunities elsewhere. Major Developed Sites in the Green Belt, which are already major employment locations, need to be recognised with an ongoing role in the local economy.
216	Agree subject to the Habitats Regulations Assessment being fully taken into account. The Preferred Option is consistent with the site allocations proposed in the emerging Waste DPD.
237	Agree.
278	Disagree with the lack of flexibility, to reflect the need for a mixed-use redevelopment of an under-utilised/derelict site which could bring benefits that could far outweigh the loss of employment land and could be more sustainable and viable than development for employment uses alone. The Preferred Option may also prevent the quick release of such sites for development, in the event that the Borough wide employment land review is not regularly updated. The Wirral Employment Land Study (2009) identifies the need to address the viability of future employment development where recent development has relied on public sector gap funding and the same level of grant aid is not now available and the measures suggested included allowing mixed-use development.
299	Agree with promoting land for regeneration and increasing employment in the area but the Council need to be aware of the implications of any new developments encroaching within the land surrounding the operational pipelines running through the Bromborough area and Wirral International Business Park.
317	PPS25 on flood risk should also be applied to the distribution and allocation of employment land, including the requirement for a sequential test.

318	<p>Disagree. Understand the need to restrict the loss of designated employment land but a Borough wide employment land study will not be able to identify and assess each and every existing employment site which may be surplus or viable and will be quickly out of date. A more flexible approach is needed, which requires applicants to demonstrate why their site is not suitable to be retained, in terms of current employment market requirements, the impact on neighbouring uses and/or any benefits which could outweigh the 'loss' of employment land. The Wirral Employment Land Study recognises the need to address the commercial viability of future employment developments and notes that recent development has relied on public sector gap funding of between 35-40% on industrial schemes and 25-30% on office schemes, even where the site is already cleared (paragraph 9.16). The same level of grant aid is now not available. The measures recommended included allowing mixed-use development to fill the financial gap (paragraph 10.36), which should be reflected in the Core Strategy, to allow enabling development where justified by viability issues.</p>
335	<p>Agree but a separate, additional port and intermodal freight policy should be included. The wider context includes the NPPF and NPS for Ports; the abolition of RSS Policies RT6 and RT8, which contained a clear position of support for a multi-modal facilities, including at Eastham; Our Shared Priorities (4NW), which re-stated the priorities for the North West and the relevance of the RSS evidence base; the priority given to Ports within the Atlantic Gateway initiative and the priorities of the Liverpool City Region, established in the City Region Development Programme and SuperPort initiative and emerging through the Local Enterprise Partnership; and the Peel Ports Master Plan for the Port of Liverpool and Manchester Ship Canal. Support the approach taken to Birkenhead Docks to retain West Float and Twelve Quays for port related use, with East Float redeveloped. Waste and energy uses are also supported within the Dock Estate provided they do not undermine the delivery of Wirral Waters. A more positive wording is, however, needed to maximise the potential to attract investment and employment at port sites at Eastham, where a new multi-modal world class port facility is proposed, to build upon existing port infrastructure at the entrance of the Ship Canal, bring inward investment, create jobs, make best use of vacant/ underutilised land and maximise the sustainable transportation of freight, which would contribute positively to the vision and objectives of the Core Strategy. Previous representations have only been partly addressed. More than just a safeguarding approach is required. A commitment to pre-planning application public consultation has already been confirmed. The Mersey Ports Master Plan will be the subject of public consultation later in 2011. References to Cammell Lairds should consistently support port-related, industrial, waste and energy development.</p>
426	Broadly agree.
436	Employment is needed in all existing Settlement Areas.
535	Support existing businesses

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592	A 40% increase in Bromborough appears extremely over ambitious, unless this includes the full occupancy of all the units/offices currently vacant units. If not, where is this land to be provided? Local consultation would be needed.
601	Disagree. The percentages in Preferred Option 11 do not reflect Policy Option EL2.
654	It is unclear how the target of 177ha relates to the sub-regional scenarios previously set out within RSS and now set out within the emerging LCR Overview Study. Greater consideration should be given to the role of Wirral within the wider Liverpool City Region, in comparison to other employment areas in the sub-region.
675 693 715	Disagree. 90% within Settlement Areas 2 -Commercial Core and Settlement Area 4 - Bromborough with just 10% in other estates and centres is naive, ignores the need for existing businesses to grow, is too prescriptive and is not supported by any geographically or market based evidence. It ignores the fact that greenfield sites might be needed to deliver new sustainable economic inward investment. The distribution ought to be far wider and reflect a more balanced approach to growth, without the reliance upon single areas. There is no mention of whether this is just B1, B2 and B8 uses, excluding all others and no assessment of how deliverable the sites identified as priority locations will be.
725	Agree, as this will reduce the need to travel and resist the loss of designated employment land and premises to non employment uses unless a Borough wide employment land review has identified them as no longer viable and surplus to requirements.
763	Disagree. Neither the scale nor the distribution of employment development is based upon evidence or need. Sufficient land should be identified for employment development in all areas of the Borough to ensure that local needs are met, facilitate the creation of sustainable communities and reduce the need to travel. There is a significant imbalance in the distribution of existing and proposed employment land. A more sustainable approach would balance the distribution by providing for more employment in individual Settlement Areas. It is unclear whether the percentages are expressed in land terms or numbers of jobs. There is no definition of "employment development". It is unclear how this policy will be implemented and the balance of uses controlled. This approach will fail to meet the objectives set out elsewhere in the document.
775	Disagree, as this approach will rely too heavily upon the highly questionable delivery of Wirral Waters. 40% of the Borough's total future employment land will not be deliverable within Bromborough, as opportunities to expand at Wirral International Business Park will be compromised by a lack of funding, unfavourable market conditions and limited infrastructure (such as electricity supply). A higher percentage of new employment development should be directed towards other estates and centres, which are in more accessible and sustainable locations to ensure that a more robust and flexible delivery mechanism is secured. The Employment Land Study shows that Wirral has a poor stock of existing sites.

803	Generally agree with the scale and broad distribution identified, which is generally in the most accessible, sustainable locations but new employment development could potentially have a detrimental impact on the safe and efficient operation of the Strategic Route Network, which would need to be appropriately mitigated. A detailed analysis has not been undertaken at this stage given the lack of detail in relation to the specific aspirations of each of the sites. The supporting evidence base and infrastructure requirements should be further developed to ensure that the measures proposed in the Draft Delivery Framework will be linked to the sustainable delivery of site-specific proposals, to ensure that the transport implications are appropriately considered and that any necessary mitigation can be funded and delivered.
834	Business rates need to be fairer across the Borough.

16.3 The following site-specific comments were also received:

ID	Summary of Responses Received
15	Our client is the owner of two adjoining employment sites in Birkenhead, both of which are approaching the end of their economic life as viable business premises. The existing 1950s buildings and yard areas are unsuitable for other commercial activities. Although designated as part of a Primarily Industrial Area, they are in proximity to regeneration proposals in Birkenhead and the Docks area, including the major mixed-use scheme at Wirral Waters. The changing future character and pattern of development in the area may make the sites more appropriate for alternative land uses to provide a comprehensive and complementary mix of development.
278	The development of sites like the ex-Croda factory at Bromborough Pool should be supported for viable mixed-use developments including housing, to broaden the mix of housing mix, generate investment, support the community and protect important heritage.
318	The release of part of the currently vacant former Croda site for a mixed-use development incorporating high quality small/starter units and/or office development together with residential development, would deliver significant benefits for local residents in Bromborough Pool; would not have a negative impact on strategic or local employment land issues; the existing premises are of poor quality and unsuitable for modern industrial purposes; the majority of the site is occupied by redundant plant, dedicated to a particular industrial process, for a specific occupier; the site is not currently making any positive economic contribution; redevelopment would not be removing a 'scarce' industrial unit from the local market; Bromborough already accounts for over a third of the Borough's total land supply; nearly 14% of total industrial floorspace is vacant and Bromborough has the highest number of vacant industrial properties in the Borough; the provision of new employment buildings as part of a mixed use development could match emerging trends in demand, including industrial units, workshops and start-up premises, reflect the shift toward offices and the aspirations of the Council's Investment Strategy.

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ID	Summary of Responses Received
767	<p>The likelihood of delivering the required need through the use of existing employment sites, is clearly negligible. · Only 13% of the identified land supply is serviced.· Over half of the sites are only suitable for industrial uses, incompatible with the emerging knowledge based economy. Only 9% is appropriate for offices. Only 14 sites are immediately available. Only 46ha is expected to come forward with 5 years and 78% of the supply will only be available in the longer term. 39 sites could potentially be unavailable because they are either reserved for specialist uses, the landowner has higher value aspirations or they are likely to cost too much to remediate. None of the sites scored higher than 67 and only 16% achieve market scores of 25 or above. There are few good quality sites and although sites in west Wirral tend to have a slightly better environment, they are less accessible and have a smaller workforce catchment. There is a need for new and extended employment sites. A new site could be provided in the Green Belt at Woodchurch Road opposite Asda to balance the existing development at Prenton to the east of the M53.</p>

16.4 The Council has responded to the comments on Preferred Option 11 - Distribution of Employment, by:

- clarifying the role of Wirral within the wider sub-region in Section 2 of the Proposed Submission Draft Core Strategy
- expressing the main spatial priorities within the Broad Spatial Strategy (Policy CS2) and local employment priorities within Policies CS4 to CS11
- including the overall requirement for future provision in Policy CS13
- restating the Council's opposition to the release of employment land from the Green Belt because of the scale of the opportunities at Birkenhead and Wirral Waters
- identifying priority growth sectors in Policy CS14
- including general criteria for new employment development in Policy CS15 and applying controls over flood risk through Policy CS42
- providing for port and marine-related development in Policy CS16 and including additional information on Eastham in the accompanying Proposed Submission Draft Spatial Portrait
- setting out criteria for the protection of employment land in Policy CS17
- retaining the reference to securing training and job opportunities in Policy CS45

17 Preferred Town Centre Hierarchy

17.1 No comments were directed towards the assessment of the Policy Options for a hierarchy of town centres set out within the Preferred Options Assessment Report.

17.2 The following comments were received in response to Consultation Question 14 - *Do you agree with Preferred Option 12 - Retail Network? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
14	Pleased that out-of-centre retail parks are recognised. Thresholds for the scale of development should be realistic and not unduly restrictive to facilitate the reconfiguration and refurbishment of older facilities. A modest increase in floorspace should be considered to allow for new investment and to deliver environmental improvements which would not prejudice the function of existing centres within the proposed retail hierarchy.
27	Pensby should be included as a local centre. The recent addition of Tesco next to Pensby library has created a centre which extends from the Pensby Hotel to Lower Pensby Post Office, taking in the parades of shops adjoining the Fishers Lane crossroads and those between Tesco and the Post Office, plus the Library, GP and dental surgeries and the convenience store within the BP petrol station. The new Parish Church Hall provides a central focus and bus services/routes are excellent.
52	Agree with the hierarchy of centres. Support the need to improve the environment of Victoria Road in New Brighton as a local centre. Would welcome investment in Liscard Town Centre.
73	Agree with supporting existing town centres and containing further expansion of supermarket and out-of-town developments. Wirral Waters must not undermine these clear policies in the light of the Council's light touch, permissive approach to large development in the past. Past supermarket and out-of-town developments have undermined the role, viability and vitality of traditional centres and smaller, independent local traders, which should be supported and encouraged to produce a more local, sustainable retail economy. There is, however, a danger that the policy will allow more supermarkets within local centres, which despite their location will continue to undermine small traders. This also applies to mini-supermarkets on main road sites which also undermine existing centres. Site specific plans are only welcomed if the whole town centre is realistically assessed rather than using retail consultants that seek to promote more retail development for business development reasons, as supermarkets create few or no jobs despite the headlines but undermine local traders and local town centre communities. The key issue is whether the Council will uphold this policy.
109	Broadly agree but concerned that Hoylake will be run down to meet its new definition. The question of village viability has to be questioned following the U-turn on the Warrens, which will result in the closure of surgery facilities in Irby and Thingwall.
124	Agree with the hierarchy of centres but the level of retail development at Wirral Waters must not conflict with Birkenhead's role as a sub-regional centre. It is not clear how the emphasis on existing centres will meet the retail capacity figures in the retail study. Is the intention to create a new town centre at Wirral Waters at Bidston Dock? The proposed balance between Birkenhead Town Centre and future levels of development in out-of-centre locations should be clarified.

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137	Broadly agree but much work is needed to turn aspiration to reality, such as the station / street infrastructure in West Kirby, and planning decisions need to actively promote the vitality of local businesses.
157	Agree, in particular to no increase to out-of-town shopping, which is car-based and probably unsustainable in the longer term.
184	Agree.
217	Agree subject to the Habitats Regulations Assessment being fully taken into account.
238	Agree but 'edge-of-centre' and 'out-of-centre' development should be prohibited if there is sufficient vacant floorspace within the centre.
339	The following future potential centres should be identified: East Float as a district centre serving a mixed-use city waterfront (the designation of Salford Quays / MediaCityUK demonstrates the approach required); and Bidston Dock as a leisure/retail destination to operate in a complementary manner to existing centres and deliver major regeneration benefits for surrounding communities.
388	Agree as a town centre first approach is advocated by national and regional planning policy.
425	Broadly agree.
536	Funds should be distributed evenly according to population trends or seasonal visitors.
594	Free parking is needed in the centres in Bromborough and Eastham.
603	Agree to the hierarchy but does not seem to reflect that centres like West Kirby also provide facilities and attractions for visitors and not just the local community.
626	Smaller order centres should be identified by a marker indicating the general location of the centre, as opposed to a rigid boundary line, to more adequately reflect the role, function and turnover of uses that occurs in lower order centres that are ever changing during a typical plan period.
655	Agree with the retail network, including the recognition of Birkenhead as a sub-regional centre but it is not realistic or helpful to provide for it to be by-passed in favour of additional retail floorspace at Wirral Waters, which could undermine investment that should ideally be focused in the existing centres and Birkenhead.
676 695 716	Disagree. Cannot see the logic behind attempting to designate Birkenhead as a Sub-Regional Centre; it has no attractiveness as a destination other than to those within a limited catchment area.
726	Agree.

745	Agree.
776	Thornton Hough, Raby, Storeton, Brimstage and Barnston should be included as rural centres. Although relatively minor in comparison to urban centres, these settlements are vital to the functioning of the rural areas and to Wirral's rural population and proportionate future growth must be directed to them if a sustainable future is to be secured for the affected communities.
796	Broadly with ensuring that the level of retail provision reflects the scale of the centre and an identified level of need. Focusing development in larger centres where sustainable accessibility to a range of retail provision, employment opportunities, services and facilities is at its greatest is particularly supported. Welcomes the approach to give consideration to transport accessibility when defining the boundaries of each centre. Supportive of focusing development towards existing centres prior to edge-of-centre and out-of-centre locations.
812	The reduced status of Hoylake will not help to justify additional much needed local improvements.
821	Liscard should be made into a cleaner, safer place to live or work in, shop or otherwise pass through, to allow quality of life and the right to the quiet and peaceful enjoyment for residents. Funding should be sought for appropriate projects.

17.3 The Council's response to comments on Preferred Option 12 - Retail Network are set out in paragraph 18.3 below.

18 Preferred Distribution of Retailing

18.1 The following comment was directed towards the assessment of the Policy Options for the Distribution of Retailing set out within the Preferred Options Assessment Report:

ID	Summary of Responses Received
342	The future assessment of retail issues should recognise and support the bringing forward of Bidston Dock as a major leisure and retail destination capable of delivering significant local regeneration benefits and providing a high quality, differentiated leisure/retail offer that cannot be accommodated in existing centres.

18.2 The following comments were received in response to Consultation Question 15 - *Do you agree with Preferred Option 13 - Distribution of Retailing? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
28	Agree.

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53	Agree. A large comparison retail development at Wirral Waters would be at odds with current trends such as increased internet shopping and would have a negative effect on the main regional comparison site at Liverpool One.
74	The presentation is clear but flawed, as the amount of existing floorspace is not provided to allow people to gauge the relative increase in floorspace proposed. The restraint on convenience floorspace is welcomed - proposals should be judged on the impact on existing town centres and the impact of local, sustainable local traders. Despite the restraint and caution implied on comparison floorspace, there is a concern that Wirral Waters will further undermine existing local centres in making the limited amounts of trading still present in town centres untenable, further reducing the viability and variety in these centres, including Birkenhead Town Centre. There is a concern that the Council will not defend these policies robustly against the developers of Wirral Waters and that any retail provision at Wirral Waters will be poorly served by public transport, generating further use of the car and exacerbating road congestion. A fixed tram link needs to be built into the plans down the spine of the development. Concerned that the comparison floorspace indicated will be an over-provision and will be sited in the interests of the developers rather than something that fits into the future needs of Wirral across all the town centres as a whole.
110	Broadly agree but concerned at the reality of Wirral Waters within this time period. Question the definition of areas since an increase in economic activity is needed, so long as it fits within broader strategies such as the preservation of the Green Belt.
127	Agree. The need for retail development at Wirral Waters is supported so far as this relates to the need to support Birkenhead as a key centre for Wirral and a primary service centre. However, a large retail centre at Wirral Waters is likely to serve a wider than local need and could have a massive impact on Birkenhead and on centres in Cheshire West and Chester, particularly Ellesmere Port and Chester, which could conflict with the aim of Birkenhead being a key centre. The wording should be amended to "...ensuring that the development does not have a significant detrimental impact on centres within the Borough and neighbouring areas". The Core Strategy must also comply with PPS4. There is currently no evidence to show whether the hierarchy of centres can meet the needs of the catchment and, if not, how this will be resolved and what impact it will have. This includes making choices about which centres will accommodate the identified growth in comparison retailing, including the potential expansion of existing centres and showing how a sequential approach will be followed. The Wirral Retail Study has been prepared on the basis of increasing retention rates. It is not surprising that it has concluded that a high level of comparison floorspace was needed to achieve this. The scheme at East Float includes restrictions on non-food retail and the phasing means that this will not be delivered within the Core Strategy Plan period. It is not clear how the assumptions for growth at Wirral Waters and meeting retail need reflect the permissions granted. The Study also says that Birkenhead Town Centre is not a feasible option for accommodating this level of growth and that Wirral Waters is the most suitable location for achieving this. If the level of need in the retail study is not realistic and Birkenhead is too constrained to accommodate development, we are concerned that this will be used to justify

	<p>a development at Bidston Dock that will be a freestanding out-of-centre 'major nationally important retail and leisure destination' (Roger Tym & Partners planning application submission for Wirral Waters), which would not comply with PPS4 and could have detrimental impacts on Birkenhead Town Centre and other nearby centres. The potential impacts and alternatives should be assessed in more detail. The primary catchment area in the Study is effectively the administrative area of Wirral Council. Increasing retention rates within such an artificial area does not necessarily reflect the relationship with centres external to Wirral. If Wirral wants to compete with the city centres at Liverpool and Chester, this should be through supporting improvements to existing centres and not through a regionally significant out-of-centre development.</p>
138	<p>Broadly agree but begs the question of the economic viability of the retailing at Wirral Waters, given no intrinsic need for further space, the development of Liverpool One and Cheshire Oaks and the impact this development would have on Birkenhead Town Centre. It is highly unlikely that the sub-region could support all these plus the Trafford Centre and out-of-town at Warrington, all within easy access.</p>
185	<p>Agree. Reiterate the importance of maintaining the viability and attractiveness of existing centres as a priority compared with direction to Wirral Waters.</p>
190	<p>Much of the development envisaged already has outline planning permission. Clarification is, however, still sought over the future development of Bidston Dock, which comprises the third element of the Wirral Waters development, for which planning consent has not yet been sought. A major mixed-use retail and leisure development would be wholly different in character to what is proposed in the rest of Wirral Waters, potentially creating a significant free-standing out-of-centre development in a location most likely to damage Liverpool City Centre, which is the primary retail centre for the City Region. The Core Strategy should reinforce the safeguards put in place by legal agreements and planning conditions with respect to the role of Liverpool City Centre and the links between the retail and residential elements of Wirral Waters; explicitly acknowledge the role of Liverpool City Centre as the Regional Centre within the City Region and the objective for development at Wirral Waters to complement and reinforce that role; and clarify the strategy for Bidston Dock, amplifying and explaining the reference to a "mixed-use retail and leisure development".</p>
241	<p>Disagree with both options. Previous consultation showed almost no support for a retail centre at Wirral Waters, yet the Preferred Option still gives voice to such a retail development, albeit secondary to development of existing centres. Whilst there is still a chance of a retail development at Wirral Waters, little investment will be forthcoming in existing centres. A far more robust option, in favour of existing centres, is needed.</p>
251	<p>Agree. Welcome recognition of the role of Birkenhead.</p>
342	<p>The possibility of convenience floorspace coming forward where future assessments establish a case for it must not be ruled out. The phasing of new comparison floorspace up to a ceiling of 121,814 sq m gross by 2026, is broadly</p>

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	<p>supported. Statements that new floorspace will first be directed to existing centres and then to Wirral Waters are unclear and open to interpretation. The delivery of significant change in the town centre has not occurred despite major public investment, public sector support and favourable market conditions across a number of years. Sequentially preferable, central sites have not come forward and may continue not to do so, as recognised in the Council's last two Retail Studies and the Wirral Waters Baseline Study. Wirral Waters needs to integrate with the town centre with enhanced physical links through public realm and transport enhancements. The mix of uses must be complementary. Opportunities for the town centre that will arise through Wirral Waters that must be positively planned for but an increased economic profile, increased population and improved links and connections to Birkenhead can only occur with the delivery of Wirral Waters and the proposed leisure/retail destination at Bidston Dock, brought forward to differentiate it from the town centre and other centres. A dual approach of regenerating the town centre and providing a differentiated offer that assists wider growth and delivers local regeneration is the optimum strategy for the area. Wording should be included to say that "Bidston Dock, as part of the Wirral Waters initiative, has been identified as a major leisure and retail destination capable of delivering significant local regeneration benefits and providing a high quality, differentiated leisure/retail offer that cannot be accommodated in existing centres. The Council will work with both the owners / operators of existing town centres and the promoters of the Bidston Dock project to ensure that proposals brought forward are complementary to existing centres. Proposals will be subject to impact assessment and sequential testing in accordance with national policy in PPS4, to ensure that out-of-centre uses are fully justified, sustainable and do not undermine centres."</p>
389	<p>The Preferred Option is now a more balanced approach which focuses on both Birkenhead Town Centre and the regeneration opportunity at Wirral Waters as the key locations for accommodating future comparison retail growth in line with the hierarchy set out under Preferred Option 12 - Retail Network. More detailed controls are, however, needed to ensure that development coming forward at Wirral Waters will be consistent with the vision for the area and is in line with what has already been approved. Details such as maximum unit size, proportions of food / non-food and phasing need to be explicit, particularly as the extant planning permission at East Float Quay may not necessarily come forward as currently approved, to ensure that implementation is tightly aligned with generated need and that the retail and commercial elements of the scheme can still be supported when delivered. The need generated should be regularly reviewed to ensure that the capacity for additional floorspace remains, ideally on an annual basis, particularly given the large quantum of floorspace proposed and fluctuations in consumer retail expenditure over the past three years. The need to regularly review the expenditure capacity position of the Borough should be explicitly recognised within the Core Strategy.</p>
428	<p>Broadly agree.</p>
537	<p>Diversify town centres, instead of encouraging easy retail such as cafes, to encourage visitors to the area.</p>

666	There is still scope for retail investment to be directed towards Wirral Waters instead of Birkenhead. The detailed mechanisms to direct investment to existing centres will, therefore, need to be explained within the Core Strategy. The scale of additional comparison retail floorspace appears high and ambitious, particularly as a large proportion of this may be delivered outside existing centres like Birkenhead.
677 694 717	The proposed distribution of retailing is not credible. The suggestion that retail demand will appear because of the Wirral Waters scheme is highly speculative and relies upon the delivery of all the new housing that this development is promising. The Council is right to see any new retail phased with the delivery of new housing but this should only commence once at least 50% of the promised housing has been occupied by all these new residents. The suggestion is that Wirral suffers from significant comparison goods retailing leakage is ridiculous. 20% leakage is low compared to other areas around Liverpool and Manchester. Proximity and ease of access to Liverpool One and other nearby retailing destinations such as Cheshire Oaks and Chester will always result in this level of leakage and benefits from excellent sustainable access to Liverpool. Wirral is generally self-sustaining in terms of retailing and leisure and does not attract significant levels of inward migration, with residents gravitating towards Birkenhead, Bromborough and Heswall for key retail services. Another retail-led destination at Wirral Waters would be illogical and unsustainable, would have difficulty in altering residents shopping patterns and would generate unsustainable trips from neighbouring authority areas.
746	Support the preferred growth strategy and the recognition that proposals for convenience floorspace intended to address a local deficiency will be first directed to existing centres, as this will allow district and local centres to continue to serve the retail needs of local communities.
804	Generally support the focus of new retailing in locations that are sustainably accessible, where the development could reduce the need to travel longer distances. Consideration should be given to the potential impact on existing transport infrastructure and the measures which may be required to mitigate its impact.
835	The Council does not appear to look at the bigger picture. Large supermarket projects only produce a small number of minimum wage jobs making supermarket chains rich. Supermarkets have only a limited range of products. They have their own car parks which are usually free. Road side shops do not have the finance to provide free parking facilities and the Council controls parking with meters and double yellow lines, which discourage shoppers from shopping in these areas. Farmers and other suppliers are held to ransom by supermarket prices. The impact of the price war on small traders is decimating smaller shopping centres, leaving owners and staff unemployed and shops empty. The shops that do survive, such as betting offices, bargain booze shops, chip shops, lauderettes, restaurants, sweetshops and charity shops bring problems to neighbourhoods. How many little shopping centres now look like ghost towns, with metal shutters down. High rates also break them financially. Small shopping areas can only survive where parking is free and no yellow lines exist.

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18.3 The Council has responded to the comments on Preferred Option 12 - Retail Network and Preferred Option 13 - Distribution of Retailing, by:

- setting out the broad approach to the location of Borough-wide and district level facilities and services in the Broad Spatial Strategy (Policy CS2)
- including Policies CS25 to CS29 in the Proposed Submission Draft Core Strategy
- clarifying the approach to development at Wirral Waters in Policy CS12
- providing for local impact assessments in Policy CS28
- including reference to the impact on centres in neighbouring authorities in Policy CS29
- providing additional information on the size of existing centres in the accompanying Proposed Submission Draft Spatial Portrait

19 Renewable, Decentralised and Low Carbon Energy

19.1 No comments were directed towards the assessment of the Policy Options for Renewable, Decentralised and Low Carbon Energy set out within the Preferred Options Assessment Report.

19.2 The following comments were received in response to Consultation Question 16 - *Do you agree with Preferred Option 14 - Decentralised Energy? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
8	Agree.
29	Broadly agree.
54	All new development should aim to be energy efficient.
75	While the content and policy is broadly supported, this gives the impression of a lack of urgency or priority and gives no impression of the range of small renewable, energy installations that are now possible and which should be encouraged notwithstanding the new Building Regulations. For example, Wirral Waters should not only be built with a district heating scheme but to the very highest renewable design standards as a model for the rest of the UK and Europe, to stimulate the UK renewables industry. This is a lost opportunity to show leadership in the largest planned UK development of its kind. This section also fails to address issues related to the local economy, including the use of public transport and discouragement of car travel and needs to fully reviewed in its content, range and thrust.
111	Broadly agree but what power does the Council have to intervene to promote green energy?
139	Broadly agree.

158	<p>The reference to tidal power should be amended in light of the decision to scrap plans for a barrage on the Severn Estuary to say: “Opportunities to use tidal power from the Mersey will be encouraged providing a project-level Habitats Regulations Assessment shows that the environmental damage is acceptable and can be limited by choice of suitable design, location, construction, operation and demolition, and relevant environmental controls. The final state of the Mersey when the project is finished must be taken into account.” “Acceptable” must consider the effects of the whole project, cradle-to-grave, and the net energy it will produce (after construction, operation and demolition energy costs), compared to the costs to biodiversity and people of the global climate change which could be mitigated by the project. The policy should explicitly recognise the value of biodiversity in Wirral, both to wildlife and to people, and the need to take all means to protect, maintain and enhance it. The policy should also take more account of the fact that the era of cheap energy is over, whether or not we have yet reached "Peak Oil" and that this will have implications for every part of life.</p>
218	<p>Agree with the thrust but the policy will need to be strengthened as national policy continues to develop to deliver a low carbon economy/society. There is potential to link to the Waste DPD. Recognition of the potential for district heating and the positive framework for other forms of sustainable energy is welcomed. The reference to tidal power may, however, be overly positive, as some forms of tidal scheme can have negative effects on other areas of economic activity that cannot be assessed until a scheme reaches an advanced stage of design, which should also be taken into account. The reference to a District Heating Scheme at Wirral Waters is welcomed and should assist the Council in working with the developer to ensure delivery.</p>
242	<p>Agree.</p>
252	<p>Agree but concerned that a Mersey barrage would have an adverse impact upon wildlife.</p>
319	<p>Agree with encouragement of renewable sources of energy, subject to appropriate environmental controls. Impacts on the environment need to be robustly investigated.</p>
343	<p>Supports the inclusion of a standalone policy on energy generation and the recognition of the potential to use tidal power to generate energy from the Mersey Estuary.</p>
429	<p>Broadly agree.</p>
511	<p>Agree with the inclusion of a policy on renewable, decentralised and low carbon energy but the name of the policy should not be shortened. The first paragraph should be amended to read "The Core Strategy will include a general policy to encourage energy efficiency, and the use and development of renewable, decentralised and low carbon energy in appropriate locations". Pleased to see opportunities to use tidal power in the River Mersey will be encouraged subject to appropriate environmental controls including project level HRA. Pleased to see reference to the emerging Liverpool City Region Renewable Energy Capacity</p>

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	<p>Study (Arup 2010), which should inform the next version of the Core Strategy. There is a need to support renewable and clean energy developments in appropriate locations in order to reduce greenhouse gas emissions but because the impacts of all technologies are dependent on scale and location, every case will have to be assessed on its merits. In some locations, micro and community scale energy generation schemes will be highly effective with minimal impacts on the environment but the policy could be more focused on delivering renewable energy whilst considering all relevant environmental concerns, for example, impacts on the landscape, habitats and biodiversity. Concerned about the statement that "while Preferred Option 14 may have an adverse effect on biodiversity and local heritage, ignoring climate change will, in any case eventually damage biodiversity and natural habitats." Whilst agreeing that climate change is one of the most significant long-term threats facing the natural environment, renewable energy should also be delivered in a sustainable manner, with no net loss to biodiversity. The policy should follow a sequential approach to conserve the most valued environmental assets before considering the need for mitigation, with compensatory measures considered only as a last resort.</p>
538	Agree, if all areas are treated equally and grants are available on a non area basis.
595	Discussions on tidal energy are only at an early stage.
606	What about encouraging individuals/ home owners/ business owners to consider energy generation/ diversification?
672	Support the intention to include a general policy to encourage energy efficiency and renewable, decentralised and low carbon energy and to specifically encourage tidal power in the Mersey Estuary, subject to appropriate environmental controls. Assessment criteria should be adopted to enable the proper consideration of impacts, which should also recognise the major economic benefits of the project for Wirral and for the rest of Merseyside, West Cheshire and the North West Region as a whole, which will include direct and indirect job creation, training in renewable energy technologies and opportunities for advanced manufacturing and engineering, as a key part of the regional economy and the Borough's economic development strategy. The policy should also reflect the Liverpool City Region Multi-Area Agreement objective to become energy self-sufficient and a net energy exporter by 2030, through a combination of greater energy efficiency and renewable energy supply and to become the biggest low carbon goods and services city-region economy in the UK, increasing the number of people directly employed in the environmental technologies sector from 9,000 to 15,000 by 2015.
678 698 718	Disagree. There is insufficient detail. The use of the word "possibly" in relation to the the New City Neighbourhood, immediately lets the developers off the hook. The Mersey tidal project could turn out to be Europe's most ecologically damaging tidal power scheme.

727	Pleased that the Core Strategy will now include a general policy to encourage energy efficiency but this should also refer to energy conservation and minimisation as a separate objective requiring distinct but complementary actions.
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19.3 The Council has responded to the comments on Preferred Option 14 - Decentralised Energy, by:

- including references to the transition towards a low carbon economy in the Spatial Vision, and Strategic Objective 7
- reflecting the potential for district heating in Policy CS5 and Policy CS12
- identifying the low carbon economy as a priority sector in Policy CS14
- promoting low and zero carbon development through Policy CS21, Policy CS43 and Policy CS45

20 Better Design

20.1 No comments were directed towards the assessment of the Policy Options for Better Design set out within the Preferred Options Assessment Report.

20.2 The following comments were received in response to Consultation Question 17 - *Do you agree with Preferred Option 15 - Better Design? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
12	Agree.
30	Agree
55	Agree that new development should enhance local distinctiveness - not just in Conservation Areas.
76	Agree with the mixed approach. Local distinctiveness and sustainability are very important and should be followed in approving designs, including orientation, positioning and height. Wirral Waters threatens to dominate the Wirral skyline from afar with the height of its buildings, which should be resisted under this policy. Local flat developments in West Kirby have intruded badly into the skyline and views, including the flats on Grange Hill and the Concourse development looking up from Dee Lane to Grange Hill. Other flat developments on Banks Road have been built to maximise the use of the site rather than to fit in with the street scene or building lines. It is important that these principles are also applied to Council developments and regeneration projects. The Sail Project at West Kirby was framed without proper consideration, encouraged on the basis that any development would be good rather than by robustly reviewing and managing the development. While the policy is good, the Council needs to support it robustly and realistically and manage developers accordingly.
112	Agree.

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140	Agree. Actions which support the local distinctiveness of communities through appropriate urban design should be encouraged
203	The design policy should recognise that Major Developed Sites in the Green Belt are an established component of Settlement Area character.
219	Agree the overarching approach is beneficial with specific design requirements specified elsewhere, as long as what is specified is equitable across the area and different types of development. Consideration should be given to using BREEAM/CfSH standards to guide developers. This would also provide consistency with the Waste DPD.
244	Agree but the policy must be applied. A more robust policy against the effects of 'terracing', in relation to maintaining 'gaps' between properties with side extensions, is included in future SPD.
253	Agree. Consideration of design is long overdue.
269	Agree that individual land allocations should be set design requirements to ensure that local character and distinctiveness can be given due consideration within new developments.
344	Agree.
430	Broadly agree.
510	Agree with promoting the maintenance and enhancement of local distinctiveness and sustainable construction and design. Pleased to see that local requirements will be based on an assessment of the character of the assets identified under the Settlement Area Policies, to include visual, landscape and biodiversity assets.
597	Agree.
608	Disagree. It is not determined enough. It does not give the impression that good design is important and improves the way buildings and environments work or fundamentally improves quality of life. Phrases like "detailed requirements will be based on additional guidance..." are too vague and non-committal. Wirral should underpin all development with a fundamental commitment to the best design, especially at Wirral Waters.
623	Agree with securing high quality contextual design which supports the enhancement and maintenance of local distinctiveness, which will go part of the way to achieving the positive, proactive strategy for the conservation and enjoyment of the historic environment required by PPS5 but will need to be supplemented by specific references to the historic environment in the Settlement Area policies. Additional guidance in SPD or design guides will need to address the specific requirements of development affecting the historic environment, heritage assets and their settings.
728	Agree to the approach based on the distinctive characteristics of different parts of Wirral. Pleased to see that reference to sustainable construction is now included.



825	The policy should include an explicit statement about the value of biodiversity in Wirral, both to wildlife and to people, and the need to take all means to protect, maintain and enhance it.
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20.3 The Council has responded to the comments on Preferred Option 15 - Better Design, by:

- including references to local character and distinctiveness in the Broad Spatial Strategy (Policy CS2)
- setting local priorities in Policies CS4 to CS12
- setting out a series of more detailed design principles in Policy CS43 of the Proposed Submission Draft Core Strategy

21 Development Management

21.1 No comments were directed towards the assessment of the Policy Options for Development Management set out within the Preferred Options Assessment Report.

21.2 The following comments were received in response to Consultation Question 18 - *Do you agree with Preferred Option 16 - Development Management? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
31	Agree.
56	Agree that reliance on national policy alone will not deliver high quality buildings on small or large developments.
77	Agree although sustainability (not just travel sustainability) should be added, alongside the impact on anti-social behaviour and the disturbance of residents. Hoylake has experienced a clustering of new wine bars, restaurants and bars resulting in a severe impact on the community including disturbance, vandalism and anti-social behaviour. This is now threatening to spill over to other town centres with under-utilised retail space. While one or two such developments can be a benefit, a cluster becomes a nuisance, which should also be taken into consideration under this policy.
113	The Green Belt must be included as a specific consideration.
141	Agree, though there is some reservation over the Council's ability to hold to these principles given the loss of Green Belt at the Warrens.
159	Agree subject to the comments from the draft Habitats Regulations Assessment being included in the policy. The policy should also include an explicit statement about the value of biodiversity in Wirral, both to wildlife and to people, and the need to take all means to protect, maintain and enhance it. Protected sites

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	<p>should include Local Wildlife Sites (LWS) as well as SSSIs and European Sites. Protected species should include BAP species as well as legally protected species in line with the Lawton Report "Making Space for Nature". The policy also needs to take more account of the fact that the era of cheap energy is over, whether or not we have yet reached "Peak Oil" and that this will have implications for every part of life. Local facilities and supplies will become increasingly important; all buildings will have to become more energy efficient; decentralised energy will rise in importance; and reducing the need to travel, reducing waste and generally increasing local resilience will be vital.</p>
220	<p>Agree subject to the Habitats Regulations Assessment being fully taken into account. Historic assets are absent from the list of specified considerations but should be included given its potential prominence in development management. There is no mention of sustainable resource consumption, an area linked to delivering the vision.</p>
300	<p>The list should include the impact on pipeline corridors and their safeguarding zones or include a further clarifying point under public safety.</p>
321	<p>Agree that many of the issues may require further advice set out within an SPD, including flood risk and drainage (including reducing surface water run-off) and wider environmental requirements (protection to ground, air and water). Further thought will be required on how to implement it robustly.</p>
431	<p>Broadly agree.</p>
515	<p>Generally support an overarching policy on development management. Pleased to see that impacts on local distinctiveness, protected sites and species, mitigation, adaptation and resilience to climate change and impacts on the wider environmental requirements have been included but the impact on BAP habitats and species and the impact on local character areas (included alongside landscape in the list of impacts on local distinctiveness) should also be included. A number of other policies refer to Preferred Option 16 - Development Management to mitigate the potential negative effects associated with development. It will be important to ensure a robust approach to avoid negative effects on natural assets such as biodiversity and local distinctiveness under this policy. The HRA report indicates that an additional commitment may be needed to prevent an adverse impact on European sites through measures to prevent disturbance to wildlife and loss of habitat, which could include suitably located green infrastructure, habitat management, enhanced access management, appropriate water treatment infrastructure etc. The inclusion of this additional commitment is strongly supported and should appear as policy in the next version of the Core Strategy.</p>
598	<p>Agree, provided strict controls are enforced</p>
610	<p>Disagree. Design quality should be more prominent.</p>
624	<p>It is not clear whether this Option is to be developed with one policy for each bullet or as a composite policy. It is unfortunate that the list of footnotes is in danger of becoming longer than the policy itself. The Core Strategy does not</p>

	include a specific standalone policy on the historic environment. The development management policy will have to cover the conservation and enhancement of the historic environment, heritage assets and their settings, as more than just the impact on local distinctiveness, even if these are included in the Settlement Area policies.
657	It would be helpful to indicate whether these will be drafted into more detailed criteria or whether the intention is to incorporate them within an SPD and/or other DPDs (where they would be part of the statutory development plan). It would also be helpful to explore the extent to which development management-focused UDP policies will be deleted subsequent to the adoption of this and other Core Strategy policies to enable a better understanding of the range of policies that will in the future be used to determine planning applications.
729	Agree. The reference to local distinctiveness is satisfactory as far as it goes but nowhere are the wider considerations of nationally (or indeed internationally) important heritage sites covered, which will in the main be designated sites, which may well add to or be a key element of local distinctiveness but are also of wider importance. Designated heritage assets need to be specifically included in this policy.
742	The list of impacts makes no reference to job creation or economic development.
783	Agree but could be improved by explicitly including open space, sport and recreation within the list of issues to be considered. National planning policy may be relied upon to protect, enhance and provide open space, sport and recreation facilities but given that existing deficiencies and issues are identified within the Spatial Portrait, a local policy would be best placed to address the local issues.
805	Generally agree with ensuring that the impact on transport, access and sustainable transport choices is considered when determining the appropriateness of new proposals or allocations.
833	Welcomes the inclusion of aerodrome safeguarding within footnote 215 but this matter should be given more prominence. Liverpool John Lennon Airport is an officially safeguarded aerodrome, as defined in DfT/ODPM Circular 1/2003: Safeguarding, Aerodromes, Technical Sites and Military Explosives Storage Areas. All of the Borough falls within the Airport's 30 km wind farm consultation circle and about 50% of the Borough falls within the 13 km bird hazard and 15 km safeguarding circles. Circular 1/2003 includes advice on the treatment of aerodrome safeguarding in development plans and in respect of consultation on planning applications with implications for safeguarding.

21.3 The Council has responded to the comments on Preferred Option 16 - Development Management, by:

- including Policy CS42 as a gateway to the range of development management considerations contained elsewhere within the Proposed Submission Draft Core Strategy

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- including criteria for new employment, housing and town centre development in Sections 19, 20 and 21 of the Proposed Submission Draft Core Strategy
- including policies for green infrastructure, including recreation and biodiversity in Section 22; environmental protection, including flood risk and coast protection, drainage management, pollution and risk, contamination and instability in Section 23; transport requirements in Policy CS40; phasing and infrastructure in Policy CS44; and developer contributions in Policy CS45
- including provision for the impact of food and drink uses in Policy CS27
- setting out the approach towards the Green Belt in Policy CS3
- providing for the protection of European Sites, pipelines and airport safeguarding in Policy CS42; biodiversity assets through Policy CS33 and heritage assets through Policy CS43
- setting out a series of design principles in Policy CS43

22 Developer Contributions

22.1 No comments were directed towards the assessment of the Policy Options for Developer Contributions set out within the Preferred Options Assessment Report.

22.2 The following comments were received in response to Consultation Question 19 - *Do you agree with Preferred Option 17 - Developer Contributions? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
13	Agree.
32	Agree
57	Agree, as this will provide the necessary infrastructure for good development.
78	Agree but the availability of funds and support for wider community development is not well addressed. The Community Infrastructure Levy should be promoted more prominently. The Big Society dictates an approach that will support the community and self-help groups. While the range of likely provision is welcome, decision-making needs to be more open to community consultation. Highways functions have in the past had too much prominence rather than supporting a wider range of community facilities. Mechanisms to guard against this need to be built in.
114	Agree but will they apply to significant developments such as Wirral Waters, where the political pressure to accept the development plans will be immense.
142	Agree. Wirral Waters will be a major test, as the infrastructure impacts will be dramatic and the need for new community facilities significant.

160	Agree but Green Infrastructure must include land for biodiversity as well as for people. It cannot always be both, as some wildlife is vulnerable to disturbance by people and especially by their dogs. The policy should, therefore, include an explicit statement about the value of biodiversity in Wirral, both to wildlife and to people, and the need to take all means to protect, maintain it.
221	Agree. A positive commitment to avoiding and mitigating adverse impact on European Sites is welcomed and fits in well with recent discussions in the wider City Region about working across authorities. It would be beneficial to provide a link to waste infrastructure and the Waste DPD.
248	Disagree. In favour of developer contributions but the proposals still leave room for 'conniving' between the planning authority and the developer. The Sail project in West Kirby is a prime example of 'give me the planning permission and I will build you a new sailing venue'. All developer contributions should be open and transparent and made available for public scrutiny, comment and acceptability in advance of any development.
254	Agree. Developer contributions should be both on and off site.
270	Disagree. The Core Strategy must not pre-empt the likely developer contributions for each forthcoming allocation or subsequent application. Circular 05/2005 Planning Obligations sets out the statutory framework for planning obligations and their use. The Core Strategy must be mindful that a planning obligation must be: i) relevant to planning; ii) necessary to make the proposed development acceptable in planning terms; iii) directly related to the proposed development; iv) fairly and reasonably related in scale and kind to the proposed development; and v) reasonable in all other respects. It is inappropriate to seek a plan-wide requirement, as each site must be assessed individually on its own merits.
338	The whole economy has changed. Financial constraints are being imposed. Developers will not be willing to build within Newheartlands without additional support. The New Homes Bonus will now also apply.
432	Broadly agree.
539	Should not be developer led and should be progressed in the best public interest.
540	Agree with the use of developer contributions to improve infrastructure. Pleased to see specific reference to green infrastructure. Welcome the inclusion of contributions towards measures to avoid and mitigate adverse impacts on European Sites but would like to see this widened to include contributions to avoid and mitigate adverse impacts on all habitat and biodiversity assets.
599	Agree but with respect for local distinctiveness and heritage.
612	Agree but with a commitment to design quality and to paying for 'good design'.

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617	A permanent funding allocation should be established to held maintain the many listed buildings on Wirral on a grant / loan basis so that if the property is sold the money is recovered and put in a pot to be used over and over again on listed buildings in a rolling fund arrangement.
658	Thresholds and levels of contribution will not be contained in a SPD if CIL is pursued. Policy could benefit from more explicit reference that CIL could be applied on a cross-boundary or sub-regional basis.
730	It would be helpful to make specific reference to heritage, for example, in terms of dealing with issues such as buildings at risk.
777	Disagree. Policy Option DC1 should be supported to ensure that undue restrictions are not placed upon developers which could render schemes unviable as investments. ODPM Circular 05/2005 Planning Obligations, states that "it may not be feasible for the proposed development to meet all the requirements set out in Local, Regional and National Planning Policy and still be economically viable" (Paragraph B10).
784	Agree, to provide a mechanism for dealing with additional demand for sport and recreation facilities. It is important that a range of mechanisms is incorporated, including conditions, section 106 agreements, CIL etc., as financial contributions will not always be appropriate. For example, the development of a playing field could be made acceptable by means of a Grampian type planning condition and/or section 106 planning obligation which secures replacement provision off-site and a financial contribution alone would not provide enough certainty to mitigate the impact of a development on a playing field. Financial contributions would, however, be more appropriate towards meeting the additional demand for sports and recreation facilities arising from residential development. The wording would currently only provide for new or replacement facilities. It is also important that developer contributions are sought for the enhancement of existing facilities. Sports and leisure facilities are currently included under "community services" but without the footnote it would not be immediately obvious that sport and leisure was captured within the scope of the policy. The final wording should, therefore, be more explicit.
806	Agree the approach, to secure physical infrastructure improvements. Support the inclusion of public transport, walking and cycling. Priority should be given to sustainable transport and other measures which can reduce the need to travel by private car prior to any physical improvements. Welcomes the use of contributions to deliver infrastructure improvements which mitigate the impacts of development on the locality but particularly supports the use of planning obligations for major developments where strategic infrastructure is required to mitigate cumulative impacts of multiple developments, which could include improvements to the Strategic Route Network. Support securing contributions under CIL and agreements under the Highways Act. A partnership approach should be taken when coordinating and delivering infrastructure.

811	Future maintenance should be taken into account in the Delivery Framework. The provisions of the Community Infrastructure Levy and the Localism Bill should allow funding to be directed to local improvement projects such as the improvement of Hoylake and Meols promenade.
824	Developers should be expected to contribute to the cost of public transport access in areas that are not well served by existing public transport services. Transport funding has been substantially reduced from April 2011 and it should no longer be assumed that the LTP process will be able to provide funding to support all of the aspirations that may exist in relation to accessibility and transport improvements. Despite the creation of the Regional Growth Fund and Local Sustainable Transport Fund, Government funding will be very tight in the next few years. These funds will be accessed through a competitive bidding process with each local area only allowed a single bid. It is vital that Merseyside works together in order to submit a high quality single bid, in order to have the best possible chance of success.

22.3 The Council has responded to the comments on Preferred Option 17 - Developer Contributions by including Policy CS45 in the Proposed Submission Draft Core Strategy.

23 Green Infrastructure

23.1 No comments were directed towards the assessment of the Policy Options for Green Infrastructure set out within the Preferred Options Assessment Report.

23.2 The following comments were received in response to Consultation Question 20 - *Do you agree with Preferred Option 18 - Green Infrastructure? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
33	Agree.
58	Agree this is the most sustainable and recognises local distinctiveness.
79	Welcomed because of the wide-ranging neglect of parks, open spaces, nature, wildlife and allotments over the last two decades arising from lack of interest, weak leadership, poor supervision, lack of funding and an inability to consider the wider roles of parks and open spaces as a whole, including public use, sport, health, nature, heritage and visitors, which has been consistently overlooked for other budgetary priorities. This new policy points towards a new future, if the Council takes the new policy statement seriously. The policy statement is also welcomed as the Open Space Assessment was poor, the Ward-based methodology ill-directed, site surveys ignored the state of the crumbling buildings and infrastructure and exaggerated the quality of the parks and open spaces of Wirral. Borough-wide standards for quantity and accessibility are welcomed, as well as the hierarchical approach to provision but there is no mention of the involvement of the community and user groups. Local application to Settlement

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	<p>Areas is also welcomed. Heritage is not, however, listed. An assessment of requirements for and within individual spaces is welcomed. However, to date, the larger proportion of these have been poor and superficial (those for parks with Friends Groups generally being an exception) without target dates or costings and without any information drawn from an asset register or condition survey. It is important that this work is comprehensive, consistent and wide ranging for all locations with local consultation including user and community groups.</p>
87	<p>Agreed but the Preferred Option does not fully clarify the potential of green infrastructure to contribute to the delivery of the plan's aspirations. For example, the Preferred Spatial Vision makes no reference to green infrastructure, although it does include a whole range of outcomes which could be influenced. Preferred Option 18 should clarify the multi-functional potential of green infrastructure, cross-referenced to a more comprehensive definition in the glossary such as that used in the NW Green Infrastructure Guide, linked to the Spatial Vision and Spatial Strategy, through text such as "The Core Strategy will recognise that green infrastructure is a key infrastructure, performing a wide range of functions contributing to the delivery of the Spatial Vision and Strategy".</p>
115	<p>Agree but unsure how enforceable these will prove to be.</p>
131	<p>Agree. Green infrastructure should be a high priority, as Wirral has so much to offer residents and visitors if its natural attributes can be managed and protected effectively.</p>
143	<p>Agree with the principles but unclear about how good the borough-wide standards will be when benchmarked against other comparable authorities. A commitment to benchmark and then set standards would be an improvement.</p>
161	<p>The multi-functional emphasis is in danger of obscuring conservation responsibilities. Wirral has a large amount of valuable biodiversity, because of its geology and coastline, much more than neighbouring local authorities. Valuable biodiversity is not just European Sites but all SSSI, Local Wildlife Sites and protected/Biodiversity Action Plan species and needs active protection to survive climate change and the pressures of 300,000 residents plus visitors. Much existing green infrastructure is in private hands and management of all wildlife sites, private and public, is problematic. An additional bullet point should seek to deliver a coherent ecological framework, linking to that in Cheshire, to allow biodiversity to move in response to climate change. Assessment criteria should include avoidance and mitigation of adverse impacts on all designated sites and species including LWS and BAP species, in line with the Lawton Report Making Space for Nature (DEFRA, October 2010) and A Space for Nature (Natural England, 1996) and amendments to accessible greenspace standards.</p>
169	<p>A great deal will depend on how quality and quantity indicators are defined. Simply taking the existing level of provision as the recommended standard for the future in the Open Space Assessment (November 2010) is insufficient. A commitment is needed to improve the overall level of provision. Similarly, the recommended minimum quality standard for parks is 46 per cent. Twelve of the</p>

	21 Ward-based parks are currently below that standard and there should be a commitment to achieve an average quality standard of 61 per cent over the 15 year plan period.
186	Agree.
205	Agree but the Council have included at least 94 Green Belt sites in the current SHLAA, including a number of Major Developed Sites and Infill Villages in the Green Belt, meaning that the Council may have other ideas, inconsistent with protecting the Green Belt. As only 40% of Wirral is Green Belt this must be sacrosanct. There are sufficient brownfield and greenfield sites to satisfy housing need without going into the Green Belt.
222	Agree but the quality of natural and semi-natural greenspace should not be assessed on the basis of the physical infrastructure and the impression of the facilities alone.
250	Agree.
255	Agree with Borough-wide standards to protect existing features and facilities but requirements that only embrace the protection and maintenance of existing natural features ignore the need for enhancement and do not take into account the erosion of natural assets that has been allowed to take place through lack of resources. A specific Green Infrastructure Strategy is needed.
305	There should be stronger protection for irreplaceable semi-natural habitats, such as ancient woodland. The significant economic, social and environmental benefits which trees and woodland can provide for local communities should be included and a significant programme of tree planting and woodland creation promoted. The Woodland Trust 2010 edition of Space For People, still indicates a significant deficiency in access to woodland for people in Wirral, even though the figure has risen from 7 to 11% over the last five years. Disappointed that Policy Option 11 has been rejected. Would like to see the Access to Woodland Standard included. Disappointed that separate policies on the protection of existing woodland and the creation of new woodland have not been taken forward. The North West Forest Forum has adopted a manifesto for a doubling of woodland cover in the North West by 2050. Wirral should adopt equally ambitious targets as woodland creation is a key component of quality of life and trees capture carbon, hold soils together, prevent flooding and help control our climate.
322	Generally agree on the basis of the benefits to be gained from areas for flood storage and ecological improvements. Clarification is needed that the delivery of other related initiatives and strategies refers to River Basin Management Plans, Catchment Flood Management Plans and Shoreline Management Plans.
434	Agree.
544	Agree. Pleased to see a hybrid approach, with overarching numerical standards but allowing for specific types of green infrastructure to be prioritised within each Settlement Area. Further explanatory information should be provided on the multiple functions and benefits of green infrastructure including the benefits to

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	health. Pleased to see reference to the Wirral Open Space Assessment and reference to further work to join up data for landscape, river corridors, biodiversity, heritage and other related green infrastructure including the identification of off-site feeding and roosting areas for qualifying species from European Sites. Pleased to see reference to emerging sub-regional studies but disappointed that the strategic importance of green infrastructure has not been introduced earlier in the document. The HRA findings that delivery of suitably located green infrastructure, habitat management and enhanced access management may be necessary to prevent disturbance to wildlife and loss of habitat and supporting habitat at European Sites, must be taken into account.
602	Agree.
611	The main problem is the lack of satisfactory management and maintenance. In Hoylake and Meols, a lack of investment over many years has resulted in the present unsatisfactory condition of the promenade and associated gardens. Several studies and improvement programmes have been prepared but no significant action has taken place. More explicit and robust policies are required to ensure adequate future investment to reverse decline and secure needed improvements. While the intention to strengthen quality standards and standards of management is welcomed, the standards and how they have been derived have not been included. Rewording should make clear that management includes the effective monitoring of quality.
614	Needs to include green design and building policies with emphasis on low impact technologies and sustainable development policies.
731	Agreed. The inclusion of "corridors and linkages" is especially important, to provide an overall network with good accessibility, including by foot and where appropriate by bicycle and horse, to allow animals to forage and flora and fauna to migrate, for example, in response to climate change.
785	Support the intention to set quantity, quality and accessibility standards but effectiveness will depend on the strength of the evidence base and the method used to calculate standards. There are concerns about the evidence base. The policy does not include the full range of outdoor facilities set out in PPG17, such as golf courses and athletics tracks. It is also unclear how the standards would be used. The wording currently suggests that the standards would be used to protect existing facilities. This implies that if standards were met or exceeded that facilities would not be protected. Standards should not be used in isolation for protection and a Borough-wide standard could mask more localised deficiencies.

23.3 The Council has responded to the comments on Preferred Option 18 - Green Infrastructure, by:

- including a reference to green infrastructure in the Spatial Vision
- setting out general requirements for green infrastructure in Policy CS30 of the Proposed Submission Draft Core Strategy and local priorities in Policies CS4 to CS11

- providing for the protection of recreational land and buildings in Policy CS31
- providing for the provision of open space in housing development in Policy CS32
- providing for the protection of biodiversity assets through Policy CS33
- providing for potential developer contributions through Policy CS45

24 Minerals

24.1 No comments were directed towards the assessment of the Policy Options for Minerals set out within the Preferred Options Assessment Report.

24.2 The following comments were received in response to Consultation Question 21 - *Do you agree with Preferred Option 19 - Minerals? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
34	Agree.
59	Agree.
80	Agree.
92	National policy requires a minerals policy in the Core Strategy, including a commitment to contribute to national needs. Future major redevelopment proposals will require vast amounts of aggregate to be imported which will involve road traffic movements which could affect the road network in Cheshire West and Chester unless provision is made for alternative methods of movement and to identify and safeguard sites that can accommodate importation such as wharves and rail sidings. The Preferred Option confuses Mineral Safeguarding Areas with "areas of search". Any Mineral Safeguarding Area will need to be shown on the Proposals Map not just on the Key Diagram. There is no consideration of which minerals are of economic importance to Wirral. Local stone may need to be safeguarded to provide a source of repairs to local buildings in conservation areas. The area could also have the potential for oil, gas or coal bed methane.
162	The detailed boundary at Carr Lane needs to consider whether the fields on the northern edge should be included. Exploitation would have to be done carefully as parts of Meols Meadow SSSI lie adjacent.
223	Broadly supported. However, existing mineral permissions will be subject to regular review through the planning system under the Review of Old Minerals Permissions (ROMP) regime to ensure that operating conditions are reviewed and kept up-to-date. Development management arrangements for ROMPs are typically less onerous than for other planning applications, which will need to be recognised within the appropriate development management criteria.
323	Mineral applications will need to assess all potential impacts to the environment during all stages of its life.

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437	Agree.
604	Agree.
607	Agree.
613	Agree.
733	A policy on minerals should also include reference to the recycling and reuse of aggregates.
807	Opportunities for minerals to be transported by using more sustainable means of transport such as rail or water should be considered.

24.3 The Council has responded to the comments on Preferred Option 19 - Minerals by including Policy CS38 in the Proposed Submission Draft Core Strategy.

25 Waste Management

25.1 No comments were directed towards the assessment of the Policy Options for Waste Management set out within the Preferred Options Assessment Report.

25.2 The following comments were received in response to Consultation Question 22 - *Do you agree with Preferred Option 20 - Waste Management? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
35	Agree.
60	Agree.
81	Agree.
93	National policy requires a waste policy in the Core Strategy. The Core Strategy should support the Joint Waste DPD and state that it will meet the requirements for dealing with its waste in accordance with the Joint DPD. It should also state that the Joint Waste DPD will form an integral part of the Local Development Framework. The role of SPD is unclear in terms of the documents that are being referred to and what they are seeking to achieve.
117	Broadly agree but the Council's desire to have a Golf Resort on flat ground in north Wirral is likely to need landfill to create a golf course and there is concern that this will become a landfill site disguised as a Golf Resort.
144	Should be consistent with the Joint Waste DPD.
187	Agree.

225	Agree but St Helens Core Strategy promotes the Waste DPD more positively and makes reference to key elements of the Waste DPD vision. A statement should be added to ensure that due consideration is given to the provision of storage areas for recycling boxes / bags in new developments.
324	Generally agree, as it appears to capture the principles of the waste hierarchy and incorporates data and evidence provided for the production of the Joint Waste Development Plan Document.
371	Agree with the inclusion of a waste management policy and reference to the Joint Waste DPD.
435	Agree.
615	Any plans for an incinerator over the next 15 years? If so where would it go?
734	Agree with promoting the prevention, minimisation, reuse, recycling and recovery of waste and to minimise the need for residual landfill.
808	Generally agree, particularly with regard to allocating sustainable locations for new waste management facilities. However, the unnecessary import or export of waste should be avoided, as this could also result in additional pressure on the Strategic Route Network.

25.3 The Council has responded to the comments on Preferred Option 20 - Waste Management, by:

- including Policy CS39 in the Proposed Submission Draft Core Strategy
- including a reference to the need to make appropriate provision for on-site waste management in Policy CS42

26 Strategic Locations

26.1 No comments were directed towards the assessment of the Policy Options for Strategic Locations set out within the Preferred Options Assessment Report.

26.2 The following comments were received in response to Consultation Question 23 - *Do you agree with Preferred Option 21 - Strategic Locations? If not, please give the reasons for your answer and explain how you would like to see it changed:*

ID	Summary of Responses Received
36	Agree.
61	Agree.
82	Agree.

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94	Agree with the identification of Birkenhead and Wirral Waters as a strategic location and as a broad location for the development of a New City Neighbourhood. However, very little detail has been provided about what this actually means or how it will be delivered. Additional details should be provided in the next version of the Core Strategy, particularly with regard to location, scale, phasing, infrastructure requirements and transport impacts, to show that the New City Neighbourhood is feasible and deliverable. The transport impacts are important, as the M53 is likely to be at capacity within the next 10 years and the New City Neighbourhood will have a significant impact. Evidence should be provided about the increases in traffic on the M53 that will result from the development of this strategic site, how this will be reduced and mitigated and whether the increase is acceptable to the Highways Agency.
118	Agree.
145	Agree on the need for development but concerned about the appropriateness of some of the development. There is a need to retain and enhance the distinctiveness of the Borough through its natural and built environment so that its attractiveness, to inward investment and as a place to live and work, is improved.
346	Agree but the definition of Birkenhead and Wirral Waters should be clarified to include the wider study area to include the regeneration of a series of 'City Neighbourhoods' for which the catalysts will be East Float and Bidston Dock, with West Float retained and enhanced for port-related use. A proposed delivery vehicle for the partnership neighbourhoods should be included. The identification of Woodside as a partnership neighbourhood for mixed-use residential, office, leisure and ancillary retail, is supported as part of the Strategic Location. The Assessment Report identifies a fuller range of uses, which should be reflected in the description, alongside a reference to culture as well as tourism.
409	The majority is in principle supported but concerned about the manner in which the Wirral Waters proposals are being presented, with little provision to ensure that the quantum of retail and commercial floorspace will be consistent with the recent approvals, providing little comfort that development in this location will be controlled in a way that will not undermine / harm investment decisions in more central locations elsewhere in the region.
438	Agree.
609	How will the site-specific DPD be drawn up for Settlement Area 4. Will there be local consultation / input/ exhibition?
616	Agree but do not forget the development of the rest of the Borough.
660	Agree but the formal designation of Birkenhead and Wirral Waters as a Strategic Location is not explicitly stated and it is not clear whether this area is any different from Bromborough and the Wirral International Business Park. It would be beneficial to identify all the changes anticipated, including timescales for delivery alongside a clearer supporting diagram, which could detail the different actions required.

679	Disagree. It is basically unsound and should not be identified.
699	
720	
743	Agree, which coincides with the decision to designate a Strategic Regional Site but it is unclear whether Wirral Waters or the much larger area including the surrounding areas are included in the broad location; the Strategic Regional Site was designated in July 2009, only the purpose and boundary were agreed in August 2010; the Wirral Waters boundary shown on Picture 25.1 includes Bidston Dock, which lies outside the boundary of the Strategic Regional Site and paragraph 25.9 should be expanded to describe the extent of the Strategic Regional Site more clearly.
778	Disagree. An over-reliance on these schemes may severely compromise the ability of the LDF to meet the Borough's wider housing and employment needs. A more reliable and flexible mechanism is needed. Land in the Green Belt between Woodchurch and Landican would form a viable and deliverable extension to the North Cheshire Trading Estate, should schemes at Wirral Waters and the Wirral International Business Park prove undeliverable, as expected.
809	Generally support the approach and the intention to prepare a series of AAPs and a site specific DPD to support the delivery of new development in these key locations to ensure that the proposed development can be safely and efficiently accommodated or appropriately mitigated to ensure that the safe and efficient operation of the Strategic Route Network is not compromised.

26.3 The Council has responded to the comments on Preferred Option 21 - Strategic Locations, by:

- expressing the main spatial priorities within the Broad Spatial Strategy (Policy CS2) and including Policy CS12 in the Proposed Submission Draft Core Strategy
- undertaking transport modelling to assess the likely cumulative impact of the scale of development being promoted within the Proposed Submission Draft Core Strategy

27 Other Comments

27.1 The following comments were received in response to Consultation Question 24 - *Do you have any other comments on the content of the Preferred Options Report or any of its supporting documents? Please state the name of the document you are referring to and the paragraph or section number in that document in your answer:*

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ID	Summary of Responses Received
83	<p>The absence of an opportunity to comment on the exclusion of additional policy options suggests a closed mind and an unwillingness to consult openly. Important exclusions include anti-social behaviour (bearing in mind the problems of licensed bars, wine bars and restaurants in areas like Hoylake); allotments (which suggests they have now been excluded from the Green Infrastructure policy?); agriculture, local production and market gardening (reflecting their image and visitor value and the need to promote sustainable and productive local economies); and peak oil (as a key issue in future planning considerations and our way of life).</p>
119	<p>This whole process has been very lengthy, produced tons of paper and could have been derived from the current UDP with a few "tweaks". This system is wasteful and needs to be concluded as quickly and as cheaply as possible. The Strategy does not tackle the fact that Wirral is a dormitory to Liverpool, with a declining working population, less jobs of value and an ageing population and should address the possibility that the number of houses may need to fall to match the declining population, rather than assuming that it will always rise; does not address the legal requirement to maintain Special Natural sites to the legal minimum status, below which they have fallen; and does not consider the longer-term international issues of food miles or peak petrol. Allotments provide a healthy opportunity for the residents to produce their own food, addressing both health and food miles but the Council's performance, selling off the Warrens nurseries and not developing the allotments in Hoylake, is most distressing. It is not clear how the strategy sits with the wider Merseyside sub-region such as the Mersey REAP Green Zone 2025.</p>
146	<p>This has been a daunting process with many documents that are not always easy to relate. There is a continuing concern, expressed in previous consultations, that this is largely an inward looking document and does not set the Wirral in its wider context with unique assets as part of a wider sub-region</p>
163	<p>Will the Council adhere to the policies set out in this Strategy in its own initiatives? Currently part of the Council is promoting a Golf Resort on land which is Green Belt, in flood risk zone on land used by birds from the Dee Estuary & North Wirral Foreshore European Sites, well outside the preferred areas for economic and housing development. International golf with a heavy reliance on air travel is unsustainable. It is vital that Development Management adheres to the Core Strategy, not, as at the Warrens, being overturned by a persistent developer.</p>
204	<p>There is limited consideration for the ongoing provision, protection and improvement of major and existing healthcare facilities, which needs to be provided alongside any large scale housing developments.</p>
206	<p>Research should be undertaken on the link between out-migration to Deeside and the availability of affordable housing in that area; the ability of Deeside Industrial Park in attracting investors and the proximity of good housing stock; and the correlation between the decrease in traffic flow to Deeside and the out-migration of middle and high income families.</p>

233	There are a large number of documents to review, and it is not entirely clear which are the most pertinent. The fact that it has been produced in so many different documents makes it unwieldy and difficult to get a grasp of exactly what is being proposed.
256	Agriculture, including horticulture, market gardening, local production and food security also requires a policy.
257	The previous consultation document was strongly criticised for its length and complexity. Only 32 local residents responded out of a total population over 300,000, a response rate of 0.01%. This latest consultation is just as long and just as complex and, no doubt, will result in a similar response from local residents, yet the Council will be basing the future development of Wirral on the proposed options. How can this possibly represent the consensus of opinion of the people of Wirral? Many of the respondents complained that insufficient weight had been given to proposals concerning biodiversity, the Green Belt and local heritage. This consultation is no different and appears to be heavily slanted towards unsustainable development. The vast majority of residents do not want Wirral to be over-developed and live here for the much valued aspects of Green Belt, biodiversity, coastline and heritage not to be at the beck and call of Peel Holdings and their vision of a high-rise, concrete and glass Wirral.
279	The next version of Core Strategy should fully incorporate concepts and initiatives including the Ocean Gateway; the wider Atlantic Gateway Framework (NWDA, 2010); the priorities identified in Future North West:Our Shared Priorities (4NW); the Liverpool SuperPort, including the Port of Liverpool and Manchester Ship Canal, Liverpool John Lennon Airport; and Liverpool Waters, which represents the "other half" of Wirral Waters. Clarification should also be provided on the current position with the Regional Spatial Strategy (RSS), which remains part of the statutory development plan but is expected to be abolished, to state that the evidence for RSS will remain a relevant evidence-base. The Core Strategy should also recognise the emerging NPPF and the series of thematic NPS, including the NPS for Ports and Energy.
348	More specific guidance is required on culture, arts and community facilities to provide the necessary framework for subsequent DPDs, AAPs and SPDs. The Town Centres, Retail and Commercial Leisure Report which states that "Liverpool City Centre is by far the most important location for visits to theatres and concert halls for residents of all 11 zone" (paragraph 4.114), should not sidetrack the Council into overlooking its own local leisure and cultural attractions and providing for their general promotion and protection as an important contribution to the vibrancy of town centres and their evening economies. PPS4 Policy EC4.2 requires local planning authorities to manage the evening and night-time economy by encouraging leisure, cultural and tourism activities such as cinemas, theatres. There is a general deferment of decisions to subsequent reports and plans, which should be avoided, to prevent ad-hoc, topic by topic or area by area decisions.
439	The mass of associated documents are a triumph of deliberate obfuscation over clarity and logic. The Plain English Society would be proud.

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580	<p>Wirral has an opportunity to develop as a real tourism destination, with the success of Wirral Waters, including trading links and revenue generation. But the Council needs to plan ahead to make the most of this opportunity to use the development as a catalyst for wider regeneration. Wirral must be marketed correctly. The tourism pamphlets found in the various racks around Wirral and surrounding areas encourage visitors to go elsewhere. Most of the new leaflets are the wrong size to fit in the tourism leaflet racks and are too expensive to reproduce on a regular basis. Cheap A4 size three fold leaflets which can be easily reproduced should be flooding the leaflet racks. Local historical landmarks, historical sites and public parks and open spaces should play an important role. Wirral has an incredible coastline and views from Bidston Hill and Thurstaston Hill and 23+ Conservation Areas with their unique identity and historical personality. Very little attention is given to promoting and publishing these facts. Wirral history is incredible and if marketed will be a must see-must visit component. Bidston Observatory was identified as one of the seven wonders of Wirral in a public newspaper survey. Yet, sadly we find the Council impotent in achieving the logical sensible conclusion, by making it a Heritage Centre. The Bidston Observatory complex should be a landmark centre-piece of Wirral's Tourism Strategy and has not been treated with dignity and respect for its place in history, with the community hindered by bureaucracy, red tape, obstructive behaviour and apathy. Just about every redundant building asset across Wirral has been offered to community groups but not this. This is discrimination. Time is passing. A new report by the Heritage Lottery Fund shows heritage tourism contributes £20 billion to the UK economy, makes a bigger contribution to UK GDP than the advertising, car manufacturing or film industries, highlighting the importance of continued investment from leisure, culture and heritage budgets in supporting tourism and its ability to help with post recession recovery. Last year, domestic and overseas visitors grew while the wider UK economy was shrinking. We must keep investing in heritage tourism so that it continues to flourish, bringing with it key economic benefits, particularly while Wirral is losing jobs at an alarming rate and very few businesses are interested. The Bidston Observatory Complex could change this.</p>
618	<p>"Bargain booze" drink shops are being granted licenses at an alarming rate, producing a new negative street culture, with youths loitering around them and intimidating older people. Alcohol being so readily available is having a serious impact on people's health and adds an unnecessary cost burden on the health service budget.</p> <p>The closure of public toilets may produce a small cost saving for the Council but is devastating to many people in the community, particularly the elderly who have to regularly visit them. The lack of public toilets will destroy progress in promoting tourism and the greater use of public transport.</p>
627	<p>On the whole support the Preferred Options Report. It is a well thought out and presented document.</p>

628	The public transport system is totally inadequate. More buses are needed with a more reliable bus service across Wirral. The reduction in the use of Woodside Ferry Terminal and the closure of the Tourism office has reduced the potential of Wirral as a major tourist link to Liverpool. Train links are reliable but stations and track sides are very run down with inadequate toilet facilities and poor disabled access at some stations such as Bidston Station.
629	Birkenhead Town Hall and Hamilton Square, recognised as the finest collection of Grade 1 Listed Buildings outside London, should become the Town Hall for Wirral Council rather than the inaccessible Wallasey Town Hall, as the transport system including rail and bus routes is designed to give easy access for all to Birkenhead. This would also save time any money in Council employees having to travel between Birkenhead and Wallasey. It has been said that Birkenhead Town Hall is too small for the number of Councillors we have, so why not reduce the number of Councillors, which would also reduce administration costs. Wallasey Town Hall would make a ideal riverside Hotel.
630	Lack of time, the 1200 pages of material presented at the Public Open Day, the extra pages of consultancy studies, the freezing conditions of December 2010 and the timing of the consultation over Christmas and New Year, when contact with the Council is curtailed, limits people's ability to respond. A extension of time for comment was requested but refused, contrary to legislation requiring public involvement and the Coalition Government's intention to empower local communities within their own neighbourhoods. The timescale was not satisfactory and could open the Council to a Court challenge. The Council should think hard about this, recognise their failure and work more closely with properly constituted tenants and residents groups, some of which are being discouraged by lack of funding.
638	The layout and format of the Preferred Options Report is excellent and clearly tells the story of progression from the Spatial Options consultation, which will assist those who were consulted on the last version. Whilst at the time of publishing the Preferred Options Report the Regional Spatial Strategy had been revoked, the Courts have since determined that this revocation was not lawful. The fact that RSS will remain in place until abolished should be recognised. This is not to say that the Council is incorrect to plan for its eventual abolition; rather that as the abolition has not yet taken place, the text is technically incorrect at the current time. Subsequent references to the "revoked" RSS will need to be similarly altered to reflect the latest situation.
735	Generally pleased to support the overall approach set out in the latest consultation document and in particular the alterations that have been made which reflect comments that were previously submitted. Look forward to future opportunities to comment on the details of the proposed policies prior to submission.
736	The decision to revoke RSS in July 2010 was the subject of a successful legal challenge and the current NW RSS will continue to form part of the statutory development plan until it is formally repealed through legislation. The high court ruling applies to both RSS and the Regional Economic Strategy.

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753	The reference in paragraph 3.4 (first bullet) to the revocation of the Regional Spatial Strategy is now incorrect and will need to be addressed throughout the document.
786	It is unclear how the protection, enhancement and provision of indoor sports facilities will be dealt with in the Core Strategy. This is an important omission as the Core Strategy will result in pressure to develop land, which lead to additional demand. Sport England's Sports Facility Calculator has been developed to help local planning authorities quantify how much additional demand for selected community sports facilities, such as swimming pools, sports halls and synthetic turf pitches could be generated. Applying the figure from paragraph 5.39 of the Spatial Portrait, profiled using the existing age / sex structure of the local population, estimates that the additional demand generated by the Mersey Heartlands Growth Point alone would equate to 122 sqm of water space (0.6 of a 25m, 5-lane swimming pool, costing £1.2 million); 3.4 courts (0.9 of a 4 court sports hall, costing £2.2 million); 0.9 rinks (0.15 of an indoor bowling centre, costing £0.2 million); 0.4 of a synthetic turf pitch (costing £0.25 million), illustrating the importance of providing for additional facilities in the Core Strategy.
798	Transport/infrastructure policies should be further developed. While transport and infrastructure requirements are an overarching issue which needs to be considered alongside issues such as housing and employment, a standalone policy should be provided which includes specific provisions for sustainable accessibility, promoting integrated transport and development, reducing congestion, improving accessibility, encouraging public transport and sustainable travel and the transport and infrastructure schemes required to deliver the Spatial Vision, Spatial Objectives and Broad Spatial Strategy.
837	Transport modelling should be undertaken to assess the impact of the proposals on the capacity of the M53 and the Strategic Route Network. The infrastructure requirements to mitigate these impacts should be identified and their feasibility and deliverability should be assessed, to demonstrate that the policies in the Core Strategy are deliverable and will not have a significant detrimental impact. The deliverability of demand management measures, sustainable transport and physical infrastructure improvements is critical and sufficient evidence needs to be provided to demonstrate the requirements for new or improved infrastructure and to present details of costs, phasing, funding and the identification of those responsible for delivery, in accordance with PPS12.

27.2 The Council has responded to these other comments by:

- clarifying the role of Wirral within the wider sub-region in Section 2 of the Proposed Submission Draft Core Strategy
- including provision for the impact of food and drink uses to be considered in Policy CS27
- including a standard for allotments in Policy CS31
- setting out the approach towards the Green Belt in Policy CS3 and including references to agriculture in the Broad Spatial Strategy (Policy CS2) and Policy CS11

- providing for the protection of biodiversity assets through Policy CS33
- including references to local character and distinctiveness in the Broad Spatial Strategy (Policy CS2) and setting out a series of more detailed design principles including the protection of heritage assets in Policy CS43
- providing for culture, arts, community, indoor recreation and health facilities through Strategic Objective 4, Policy CS26 and Policy CS29
- providing for tourism in the Broad Spatial Strategy (Policy CS2) and through the local priorities identified in Policies CS4 to CS11
- basing the housing requirement figure in Policy CS18 on the requirement in the Regional Spatial Strategy
- including references to indoor recreation in the Broad Spatial Strategy (Policy CS2), Policy CS31 and Policy CS45
- undertaking transport modelling to assess the impact of the Core Strategy and providing for transport improvements through Policy CS40, Policy CS41 and Policy CS45

28 Document List

28.1 No comments were received on the document list.

29 Glossary

29.1 The following comments were received on the glossary:

ID	Summary of Responses Received
813	<p>The glossary defines "NWDA" as 'A public body set up to promote economic development within the North West Region'. It may be helpful to add 'The Government has announced its intention to abolish Regional Development Agencies by March 2012 and replace them with Local Enterprise Partnerships'.</p> <p>The glossary defines "Wirral Waters" as being , ... focused upon the East Float of the Birkenhead and Wallasey dock system, together with a distinctive leisure and retail destination at Bidston Dock, now designated as part of a strategic regional site'. As Bidston Dock is not part of the Strategic Regional Site, we suggest this is amended to: Wirral Waters - A project to create an internationally recognised city waterfront, focused upon the East Float of the Birkenhead and Wallasey dock system, which has been designated as a strategic regional site by NWDA, together with a distinctive leisure and retail destination at Bidston Dock.</p>

29.2 The Council has responded to these comments by updating the references in the glossary to the Proposed Submission Draft Core Strategy.

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30 Responses to the Draft Delivery Framework

30.1 The following comments were submitted on the Draft Delivery Framework:

ID	Summary of Responses Received
95	The Core Strategy identifies proximity to the M53 as an asset and the draft Delivery Framework states that there will be new traffic signals at the M53 Junction 3/ Woodchurch Road but does not provide details of any other proposed improvements to the M53. It is not clear what the impact of the Preferred Options will be on the M53 or how the impacts will be mitigated. This is important, as the M53 is likely to be at capacity within the next 10 years and without this information the soundness of the Core Strategy could be questioned.
794	The Draft Delivery Framework currently provides a list of schemes and some of the detail identified by PPS12 as being essential to good infrastructure delivery planning, such as the identification of delivery partners and timescales, for each of the proposed Settlement Areas. Whilst this provides a good starting point, we would like to see this developed further into a more detailed programme. It is, in particular, important to ensure that the delivery framework provides the evidence and linkages between what physical infrastructure is required to enable the amount of development proposed for Wirral and how it will be delivered. Any shortfalls in provision or funding should, for example, also be identified. In addition to the requirements identified by PPS12 in relation to good infrastructure planning and the need to identify infrastructure needs, costs, phasing of development, funding sources and those responsible for delivery, existing key issues, concerns or deficiencies with existing infrastructure should be clearly identified alongside how the development proposed in the strategy will interact and impact on existing provisions. The requirements of new or improved infrastructure and how this can mitigate any identified impacts and / or address existing deficiencies in provisions can then be identified, particularly in relation to the Strategic Route Network, to ensure that it is capable of contributing towards the sustainable economic growth of the Borough.
838	It is not clear from the Proposed Delivery Framework whether this is where delivery mechanisms are being proposed, or if this is just identifying who will deliver what, by when, and that the actual delivery item is referred to elsewhere. If this is the case, then we have not been able to identify where these infrastructure items are referred to in the main document. Page 19 of the Delivery Framework refers to the Clatterbridge Household Waste Recycling Centre replacement /extension. During the Waste DPD Preferred Options consultation we were advised that there are now no proposals to replace this HWRC site.

30.2 The Council has responded to these comments by publishing a revised Delivery Framework and an Infrastructure Plan alongside the Proposed Submission Draft Core Strategy.

31 Responses to the Sustainability Appraisal

31.1 The following comments were submitted on the Interim Sustainability Appraisal Report:

ID	Summary of Responses Received
330	<p>In the "Links to Other Plans, Policies & Programmes" section (Page 31), the references to EU Framework Directives should cover the Water Framework Directive (WFD). Although improving water quality is listed as one of the key objectives relevant to WFD, improving the physical state of watercourses and improving in-channel habitat should also be included. One of the main constraints in improving the ecological value of river corridors is physical modification, such as weirs, canalisation, artificial bank revetment and culverts, features that are largely a remnant of the Borough's industrial past. Support the objective to "maintain and improve biodiversity and natural habitats" in the "Sustainability Objectives, Decision Criteria and Indicators" section (Page 70). The number of rivers reaching "good ecological status/potential" by 2027, in line with North West River Basin Management Plan objectives would be a good indicator to use.</p>
554	<p>Welcome the inclusion of a non-technical summary. Pleased to see that it has been expanded to include a summary of the SA conclusions in relation to each of the Preferred Options. Pleased to see that the table setting out the links to other plans and programmes has now been included in an appendix to the main report. Note that baseline environmental information is currently being updated and has not been included in this version of the SA. However, pleased to see that earlier comments have been addressed and reference to evidence that has informed the assessment has been included in the appraisal tables in section 12. Also pleased to see that monitoring, mitigation and enhancement measures have also been included in these tables.</p>
795	<p>Generally supportive of the Sustainability Appraisal (SA) and the sustainability objectives identified to evaluate each policy option, especially the objectives to: promote sustainable travel choices and reduce the need to travel; promote the accessibility of services and facilities to all sectors of society; and reduce the impact of traffic intrusion in residential areas. The appraisal is generally comprehensive. The identification of mitigation and enhancement measures is welcomed, particularly where these identify impacts on transport and infrastructure and proposed measures to mitigate these impacts. However, as can be seen in Paragraph 3.11 of the SA, there is no preferred option specific to transport and infrastructure and therefore such a policy has not formed part of the appraisal. It is recommended that a transport and infrastructure policy is included in the Core Strategy to enable it to be subject to Appraisal.</p>

31.2 The Council has responded to these comments in the Sustainability Appraisal accompanying the Proposed Submission Draft Core Strategy.

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31.3 Policies for transport and for infrastructure have now been included in Sections 25 and 26 of the Proposed Submission Draft Core Strategy.

32 Responses to the Habitats Regulations Assessment

32.1 The following comments were submitted on the Habitats Regulations Screening Report:

ID	Summary of Responses Received
548	<p>Pleased to see a map illustrating the location of European sites in the Habitats Regulation Assessment. Also pleased to see comments on the previous consultation have been addressed and that the Wirral Waters development as a whole and not just its individual elements has been included in the list of in-combination plans. Pleased to see that the HRA recognises the importance of off-site roosting areas and that they have been included, alongside designated sites, in the assessment of significant effects. However, we note that the HRA concludes that adverse effects could occur on five European Sites in the absence of amendments to Core Strategy policy. Trust that recommendations from the HRA will be incorporated into the next iteration of the Core Strategy to enable the avoidance or mitigation of adverse effects on European sites.</p>
659	<p>Notes the statement in the Habitats Regulations Assessment (HRA) that the Natural England advice on the Runnymede LDF in respect of diffuse air pollution has "not set a precedent" and would question why, in the light of this acknowledgement, this HRA does not further consider the issue. At the very least would expect this HRA process to recommend that the Wirral Core Strategy includes policies aimed at avoiding/mitigating air pollution emissions that would further contribute to diffuse air pollution loads.</p> <p>In many cases, the report recommends that the requirement for assessment under the Habitats Regulations is deferred down to the project level as a mitigation measure. Options, policies and proposals where a plan makes provision for a development type change, magnitude or location may be appropriately assessed "down-the-line". However, reliance on a lower tier plan or project assessment is only appropriate where the latter appraisal and option selection will ensure that there would be no adverse effect on European Site integrity. It will only be appropriate to consider relying on lower tier appraisals to assess whether a higher tier plan would not have an adverse effect on the integrity of a European Site where: the higher tier plan appraisal cannot reasonably assess the effects on a European Site in a meaningful way; the HRA of the lower tier, which will identify more precisely the nature, scale or location of the development, and thus its potential effects, will be able to change the proposal if an adverse effect on integrity cannot be ruled out, because the lower tier is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European Site and is not constrained by location specific policies in a higher tier plan; and the HRA of the plan or project at the lower level is required as a matter of law or government</p>

policy. In many instances, the policies and projects identified as being suitable for HRA at a lower level as mitigation measures, are not necessarily subject to HRA as a matter of law or policy.

1.10: Notes and welcomes the acknowledgement and understanding that the Core Strategy and relevant assessments is being undertaken in a period of rapid change however, an additional acknowledgement that the HRA may, as policies develop, require iteration and reconsideration would be welcomed.

2.3: Reference should be made to the draft Countryside Council for Wales guidance on the HRA of plans (2009).

2.6: Notes and supports the premise that "the plan is never given the benefit of the doubt" in respect to European Sites.

Box 2: Reference should be made to the Conservation Objectives of European Sites.

2.18: Surprised that "it was not possible to confirm boundaries" with the Countryside Council for Wales. Clarification of would be welcomed because the boundaries and Conservation objectives for all European Sites are available on the CCW website.

Table 1: Notes and agrees with the list of European Sites potentially affected by the Wirral Core Strategy.

2.26: Acknowledgement should be made of the role of Welsh water resources in supplying Wirral.

3.1: Notes and welcomes the comprehensive consideration of pathways of impact within this assessment. However, consideration of disturbance derived from light pollution would have been welcomed as well as noise and physical disturbance.

3.6: Consideration should have been given disturbance to flight-lines between roosting/foraging and European Sites. In many cases, overwintering or breeding species associated with European sites use areas outside Site designation boundaries. The HRA process needs to take account of and consider impacts on these mobile species.

3.27: Notes the statement that the Natural England advice on Runnymede LDF has "not set a precedent" and would question why this HRA does not further consider the issue. At the very least, would expect this HRA process to recommend that the Wirral Core Strategy includes policies aimed at avoiding/mitigating air pollution emissions that would further contribute to diffuse air pollution loads.

Figure 6: Suggest that areas of water stress within Wales should be included, especially given the acknowledgement that 500MI/d of water originates from Wales. Reference should be made to the developing Water Resource Management Plan for DWR Cymru and to the completed WRMP for Dee Valley Water including HRA and SEA.

3.31: Notes that 20% of United Utilities water resources for the area are derived from Vyrnwy.

3.32: Reference should be made to the Environment Agency's Review for Consents for the Dee and Bala Lake SAC.

3.34: Notes that the Heswall STW discharges into the Dee Estuary. Consideration should also be given, in the context of in combination effects, to other STW discharging into the River Dee and the Dee Estuary

3.39: Notes and supports the intention to consider water quality impacts further however, a similar and explicit commitment to additional consideration of water resource issues would be welcomed.

3.44: Notes and supports the intention to consider dredging and port construction impacts further within the assessment process.

3.48: Consideration should be given to relevant Shoreline Management Plans. In respect of site allocations and coastal squeeze, the Wirral LDF and Core Strategy will also need to consider and take account of compensatory measures likely to be considered as part of the Habitats Directive appraisal of Shoreline Management Plans.

4.10: Reference should be made to the Dee Estuary Conservation Objectives.

4.11: Consideration should be given to relevant Shoreline Management Plans. In respect of site allocations and coastal squeeze, the Wirral LDF and Core Strategy will also need to consider and take account of compensatory measures likely to be considered as part of the Habitats Directive appraisal of Shoreline Management Plans.

4.20: Consideration should be given to relevant Shoreline Management Plans. In respect of site allocations and coastal squeeze, the Wirral LDF and Core Strategy will also need to consider and take account of compensatory measures likely to be considered as part of the Habitats Directive appraisal of Shoreline Management Plans. Consideration should have been given disturbance to flightlines between roosting/foraging and European Sites. In many cases, overwintering or breeding species associated with European sites use areas outside Site designation boundaries. The HRA process needs to take account of and consider impacts on these mobile species.

4.24 Notes and welcomes the acknowledgement of potential impacts on flightlines.

4.25: Notes and welcomes the acknowledgement that local authorities and other relevant plan and project developers should work together in respect of avoidance/mitigation of adverse in combination effects. Clarification would be welcomed as to whether any proposals exist for cooperative working on this issue.

4.26.4: Notes and, in principle, welcomes the proposal to commit to cooperative working and access management however, in the context of the Habitats Directive, avoidance and mitigation measure against adverse effects to integrity of European Sites should be demonstrable, not aspirational. Not convinced that a commitment to cooperative working, access management etc would constitute a valid mitigation measure in this instance.

4.40: Notes the finding that implementation of Core Strategy policies has the potential to adversely affect water quality within the Dee Estuary both alone and in combination with other plans and projects.

4.44 Notes and supports the recommendation that Policies 16 and 17 should be strengthened in order to more effectively ensure and demonstrate that the proposals will not adversely affect water quality within the Dee Estuary. The recommendation that a Water Cycle Study should be undertaken is also supported.

4.44.1: Whilst notes and in principle, welcomes the recommendations contained in 4.44, in the context of the Habitats Directive, avoidance and mitigation measures against adverse effects to the integrity of European Sites should be demonstrable not aspirational.

4.44.5: Reference should be made to the developing Water Resource Management Plan for Dwr Cymru and to the completed WRMP for Dee Valley Water including HRA and SEA.

4.45.2: Notes the premise that "avoiding adverse effects on European Sites as a result of increased scales of abstraction must be the responsibility of the water companies". Whilst this premise might be technically accepted, local authorities have the responsibility not to promote unsustainable development and/or development which would exceed environmental capacities. Reference should be made to the Inspector's Report for the West Midlands Regional Spatial Strategy (phase 2) in respect of the issue of housing development and water supply.

4.45.5: Notes and, in principle, welcomes the proposed mitigation measures however, in the context of the Habitats Directive, avoidance and mitigation against adverse effects to the integrity of European Sites should be demonstrable, not aspirational. Local authorities have the responsibility not to promote unsustainable development and/or development which would exceed environmental capacities.

4.52: Notes and in principle welcomes the proposed mitigation measures however, it is suggested that in order for these mitigation measure to be effective in the context of the Habitats Directive, they need to be built into policy within the LDF and not deferred down to project level where the precedent for development has already been established and options reduced.

4.55: Notes and, in principle, welcomes proposed mitigation measures however, it is suggested that in order for these mitigation measure to be effective in the context of the Habitats Directive, they need to be built into policy within the LDF and not deferred down to product level where the precedent for development has already been established and options/alternatives are limited.

4.55.1: Notes and in principle, welcomes the recommendations for mitigation measures however, in the context of the Habitats Directive, avoidance and mitigation measures against adverse effects on the integrity of European Sites should be demonstrable, not aspirational and not defer the assessment down to lower tiers.

4.66 and 4.67: Notes and welcomes the recommendation that avoidance and mitigation measures within the Core Strategy require strengthening. Consideration should be given to relevant Shoreline Management Plans. In respect of site allocations and coastal squeeze, the Wirral LDF and Core Strategy will also need to consider and take account of compensatory measures likely to be considered as part of the Habitats Directive appraisal of Shoreline Management Plans.

4.68.2 and 4.71: At the very least, would expect this HRA process to recommend that the Wirral Core Strategy includes policies aimed at avoiding/ mitigating air pollution emissions that would further contribute to diffuse air pollution loads.

7.1: The designation status for Liverpool Bay should be updated.

7.41.1: Notes and, in principle welcomes the proposal to commit to cooperative working and access management however, in the contact of Habitats Directive, avoidance and mitigation measures against adverse effects to the integrity of European Sites should be demonstrable, not aspirational. Not convinced that a commitment to cooperative working, access management etc would constitute a valid mitigation measure in this instance.

7.23: Notes and supports the recommendation that Policies 16 and 17 should be strengthened in order to more effectively ensure and demonstrate that the proposals will not adversely affect the water quality within Liverpool Bay. The recommendation that a Water Cycle Study should be undertaken is also supported.

7.24: Whilst notes and in principle, welcomes the recommendations contained in 7.21 to 7.24 in the context of the Habitat Directive, avoidance and mitigation measures against adverse effects to the integrity of European Sites should be demonstrable, not aspirational.

	<p>7.26: Reference should be made to port policies and proposals within The Liverpool City LDF.</p> <p>7.33 Notes and, in principle, welcomes the proposed mitigation measures however, it is suggested that in order for these mitigation measures to be effective in the context of the Habitats Directive, they need to be built into policy within the LDF and not deferred down to project level where the precedent for development has already been established and options reduced.</p> <p>7.36: Notes and, in principle, welcomes the recommendations for mitigation measures however, in the context of the Habitat Directive, avoidance and mitigation measures against adverse effects to the integrity of European Sites should be demonstrable, not aspirational and assessment should not be deferred down to lower tiers.</p> <p>7.43: In respect of offshore energy development and potential tidal energy initiatives on the Mersey, notes the recommendation to defer responsibility for assessment down to the project level. This would, however, compromise the ability to consider potential in combination effects.</p> <p>10.6 At the very least, would expect this HRA process to recommend that the Wirral Core Strategy includes policies aimed at avoiding/ mitigating air pollution emissions that would further contribute to diffuse air pollution loads.</p> <p>11.7 Local authorities have the responsibility not to promote unsustainable development and/or development which would exceed environmental capacities. Reference should be made to the Inspectors Report for the West Midlands Regional Spatial Strategy (Phase 2) in respect of the issue of housing development and waster supply. Notes and in principle, welcomes the recommendations for mitigation measures against adverse effects to the integrity of European Sites that should be demonstrable, not aspirational.</p>
831	<p>The Habitats Regulations Assessment Report, on three occasions, states that an Appropriate Assessment (AA) will be required for the development of new docks/ports and associated channels or dredging, which appears to pre-judge individual project details. An AA will not necessarily be required for all such development. The report should clarify that promoters of schemes will consider the issues for each project in consultation with the Council, Natural England and others, with AA screening undertaken where necessary and that if the screening exercise determines that an AA should be undertaken, it should then be scoped and undertaken in accordance with relevant legislation and guidance.</p>

32.2 The Council has responded to these comments by ensuring that they have been taken into account in the preparation of the Habitats Assessment Report accompanying the Proposed Submission Draft Core Strategy.

33 List of Contacts

A Power	Mr A Royle
A2 Architects Ltd	Mr B Legan
Abacus Organics	Mr Badenoch
Age Concern Wirral	Mr Brown
Ainsley Gommon Architects	Mr C M Brand
Airbus Operations Ltd	Mr C P Hales
Alinbrook Ltd	Mr C R Hutchinson
Allerton Trust	Mr C S Thomson
Alpha Homes	Mr C Simpson
Alyn Nicholls & Associates	Mr C T Moore
Anchor Trust	Mr C W Dent
Ancient Monuments Society	Mr C Wellstead
Arena Housing	Mr Campbell
Arriva North West Limited	Mr Casement
Athertons	Mr D Allan
Atisreal Limited	Mr D Birkett
Axis Planning	Mr D Clamp
B Wagstaff	Mr D Cross
Barnston Conservation Society	Mr D Hollett
Barnston Womens Institute	Mr D McKaigue
Barratt Chester	Mr D Nooman
Barton Willmore	Mr D Taylor
BE Group	Mr D Taylor
Beechwood & Ballantyne EMB Ltd	Mr Davies
Beechwood Community Association	Mr E Fewtrell
Bell Developments Ltd	Mr E J Norton
Bellway Homes Ltd	Mr F Burgana
Bett Limited	Mr F Howell
Bidston Moss Steering Group	Mr F Hyde
Bidston Preservation Trust	Mr F J Bloore

Bidston Residents Association	Mr G Bryan
Bidston Village CAAC	Mr G D Evans
Biffa Waste Services	Mr G Ellison
Birkenhead Market Tenants Association	Mr G Noble
Birkenhead Town Centre Forum	Mr G S Nagra
Birkenhead YMCA	Mr Gorman
Black Macadam	Mr Grey
Bloomfields Limited	Mr H S Cameron
Blue Sky Planning Limited	Mr H Turnbull
Bluemantle Ltd	Mr Hogg
BNP Paribas Real Estate	Mr Hussenbux
Bovis Homes Limited	Mr I Coulthard
Braithwaite Associates	Mr J A Wright
Bremners Solicitors	Mr J Baird
Bride Hall Holdings Ltd	Mr J Barrington
Bridgewater Meeting Room Trust	Mr J Davies
Bridscape	Mr J M Corfe
Bristol-Myers Squibb	Mr J Noble
British Aerospace	Mr J O'Neil
Broadway Malyan Planning	Mr J Thompson
Brock Plc	Mr Johnson
Brockway Dunn Limited	Mr K Collins
Brodies Solicitors	Mr L Burman
Bromborough Society	Mr L Parker-Davies
Bullivant Jones & Company	Mr Lynchy
Burton Property	Mr M Curtis
C A Planning	Mr M Dewhirst
C D Hughes	Mr M F Lewis
Caldy CAAC	Mr M G Laurenson
Campaign for Real Ale	Mr M Rattenshaw
Carey Jones Architects	Mr M Studley

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Carr Gomm	Mr M Webster
Cass Associates	Mr Mahoney
CB Richard Ellis	Mr Martin
CDP Limited	Mr McCormick
CDS Housing	Mr Mighall
Central Liscard Area Residents Association	Mr N Ferguson
CgMs Consulting	Mr N Poole
Cheshire & Wirral Partnership NHS Trust	Mr P Barton
Cheshire Gardens Trust	Mr P Berry
Cheshire RIGS Group	Mr P Douglas
China Plate Farm	Mr P Fitzgerald
Chris Thomas Limited	Mr P Haywood
Church Commissioners	Mr P Jackson
Claire House Children's Hospice	Mr P McCann
Clatterbridge Oncology NHS Foundation Trust	Mr P Pendleton
Cloughton Community Group	Mr P Swift
Cliff Walsingham & Company	Mr Prandle
Clifton Park Residents Group	Mr Quaile
Clive Watkin Partnership	Mr R Braithwaite
CLM Services	Mr R Hardman
Colin Buchanan & Partners	Mr R J Wood
Colliers CRE	Mr R L Shelbourne
Contour Homes	Mr R Miles
Corporate Property Solutions	Mr R Watson
Cosmopolitan Housing	Mr Reade
Council for British Archaeology	Mr Rowland
Country Land & Business Association	Mr S Davies
Countryside Properties	Mr S Dykes
Crosby Homes NW Ltd	Mr S Palin
Crown Estate	Mr T Clark
Cuff Roberts Solicitors	Mr T Kirkham

Cunnane Town Planning	Mr T Roberts
D Bamber	Mr T Rock
D J Cooke & Company Ltd	Mr T Tarr
D Morgan Plc	Mr Van Ingen
D S & E J Webster	Mr W Cates
D2 Planning	Mr W Cushion
Dalton Warner Davies	Mr W Eastwood
Daly International	Mr W Mitchel
Dawn Ralph	Mr W O'Dowd
De Pol Associates	Mr Watts
Dee Estuary Conservation Group	Mr Wilkinson
Denbighshire County Council	Mrs B Murthwaite
Denis Wilson Partnership	Mrs Clarke
Denton Clark	Mrs D M Bentley
Design Planning Developments	Mrs Duncan
Development Planning & Design Services	Mrs E M Hale
Devonshire Park Residents Association	Mrs G Nicholas
Dickinson Dees	Mrs G Wollers
Dickman Associates Ltd	Mrs J Andrews
Diocese of Chester	Mrs J M Smith
Diocese of Shrewsbury	Mrs J McIlhatton
Disabled Motorists Federation	Mrs Johnson
Dixon Webb	Mrs K M Ives
Doyle Developments	Mrs Lewis
DPP	Mrs M Callaghan
Drivers Jonas LLP	Mrs N L Ratcliff
DTZ Piedad Consulting	Mrs S Charlesworth
E M Enterprises	Mrs S Shaw
Eastham Preservation Association	Mrs Testo
Eastham Village Preservation Association	Mrs V Doodson
EDAW Plc	Mrs Weston

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Edmund Kirby	Ms A Gillett
Emerson Group	Ms A Holcroft
Emery Planning Partnership	Ms C Radford
Energy Projects Plus	Ms D Toony
English Churches	Ms Foster
Entec UK Ltd	Ms Gordon
Envirolink Northwest	Ms H Butler
Environmental Resources Management	Ms J Benfield
Family Housing Association	Ms J M McIlhatton
Fisher German	Ms J M Stafford
Forestry Commission	Ms K Robinson
Forster and Company	Ms K Truman
Fort Perch Rock	Ms L Rutter
Forthview Limited	Ms L Woodhead
Forum Housing	Ms M Bowman
Frankby CAAC	Ms M Johnson
Friends of Arno and Oxton Fields	Ms S Colquhoun
Friends of Arrowe Country Park	Ms S J Wall
Friends of Ashton Park	Ms S Magee
Friends of Bidston Hill	Ms S Noyce
Friends of Birkenhead Park	Ms Seager
Friends of Central Park	Ms V A Ferris
Friends of Coronation Gardens	Ms V P James
Friends of Dibbinsdale	Muir Associates
Friends of Eastham Country Park	Multiple Sclerosis Society
Friends of Flaybrick	N Power Renewables
Friends of Gilroy Nature Conservation Society	Nathaniel Litchfield & Partners
Friends of Grange Community Park	National Farmers Union
Friends of Greasby Outdoor Activity & Leisure	National Trust
Friends of Harrison Park	National Wind Power Limited
Friends of Heswall Open Spaces	Network Rail

Friends of Heswall Shore	New Brighton BRAVO
Friends of Higher Bebington Park	New Brighton Community Association
Friends of Hilbre Nature Reserve	New Brighton Community Partnership
Friends of Hoylake & Meols Gardens	New Brighton Environmentalists
Friends of Leasowe Lighthouse	New Brighton Football Club
Friends of Meols Park	New Ferry & Rock Ferry Conservation Society
Friends of Ness Gardens	New Ferry Regeneration Action Group
Friends of North Wirral Coastal Park	NJL Consulting
Friends of Rock Park	Norland
Friends of Royden Park	Norman Street & Area Residents and Tenants Association
Friends of Storeton Woods	North Birkenhead Neighbourhood Forum
Friends of Tam O'Shanter Urban Farm Trust	North Country Homes Group Limited
Friends of Vale Park	North West Association of Sea Angling Clubs
Friends of Victoria Gardens	North West Strategic Health Authority
Friends of Warwick Park	North Western Baptist Association
Friends of Wirral Country Park	North Western Confederation of Passenger Transport
Fuller Peiser	Northern Trust
FWT	Overchurch Residents Association
G Jones	Oxton Society
Garden History Society	P H Property Holdings Limited
Garry Usherwood Associates	Paddock Johnson Associates
Gauchwin Group	Pareto Retail Ltd
General Aviation Awareness Council	Partnership for Racial Equality
Georgian Group	Patrick Farfan Associates Ltd
Gerald Eve	Paul Butler Associates
Gilling Dod Architects	Peacock & Smith
Gilmore Developments Limited	Peel Holdings Limited
GL Hearn	Persimmon Homes
Gladman Developments	Phil Major Waste Disposal Limited

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Goodwin Planning Services	Phoenix House Residential Rehabilitation
Gough Planning Services	PHP Developments Ltd
Gregor Shore	Pierhead Housing
Grosscurth & Co	Pine Court Housing
GroundSure Limited	Planning and Environmental Services Ltd
Guardian Retirement Housing	Planning Bureau Limited
GVA Grimley	Planning Potential Ltd
H M Jones	Port Sunlight Village Society
Halcrow Consulting Business Group	Poulton & District Residents Association
Halcyon Properties	Premier Brands UK Limited
Hallam Land Management Ltd	Pulford Road Residents Association
Halliwells LLP, Planning Section	R G Drake
Harlor Homes	Ramblers Association (Wirral Group)
Haston Reynolds Partnership	Reclaim Our Quarry
Hawarden Airport (Airbus)	Reddington Developments Limited
Health & Safety Executive	Redrow Homes
Heatons Stationery Ltd	RES Northern Europe
Henry Boot Developments Limited	Rev Father Ostaszewski
Heswall & District Business Association	RGB
Heswall Congregation of Jehovah's Witnesses	Riverside Housing
Heswall Society	Robinson & Neal
Hickling Gray Associates	Robinson Architects
Higham & Co.	Rock Ferry Community Partnership
HM Coastguard	Rodney Housing Association
Hooton Park Trust	Roger Tym & Partners
Hornby Homes	Roman Catholic Church
Hourigan Connolly	Royal Estates
Housing 21	Royal Liverpool Golf Club
HOW Planning LLP	Royal National Lifeboat Institution
Hoyle Civic Society	RPS Planning Transport & Environment

Hoylake Conservation Areas Advisory Committee	RSPB
Hoylake Village Life	Rural Development Service
Hylgar Properties	Safety Layne (Investments) Limited
Indigo Planning Limited	Salisbury Developments
Inglewood Properties	Salvation Army
Irby, Thurstaston & Pensby Amenity Society	Sanderson Weatherall LLP
Irvin Consultants	Saughall Massie CAAC
J Barnard	Savills
J Bowen	Seacombe Community Partnership
J Smith	Seddon Homes Limited
J10 Planning	Seven Waves Community Radio
JMP Consultants Limited	Signet Planning
Job Centre Plus	SLR Consulting Limited
John Millar (UK) Ltd	Smith & Sons
Jones Lang LaSalle	Society for the Protection of Ancient Buildings
JWPC Limited	Sommerville Primary School
Kemp & Kemp	Spawforth Planning Consultants
Kersh Commercial	St James Area Regeneration Action Team
King Sturge	St. Mary's Catholic College
Kings Lane Supporters Association	Stanton Estate Residents Association
Knight Frank LLP	Steer Davies Gleave
L Masterman	Steven Abbott Associates
Lairdside Communities Trust	Stewart Ross Associates
Lambert Smith Hampton	Storey Sons & Parker
Lamont	Street Design Partnership
Land Planning Group	Strutt & Parker
Land Projects UK Associates	Sure Start (Birkenhead Central)
Landmark Information Group Ltd	Sustrans
Lawn Tennis Association	Taylor Wimpey UK Limited

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Leasowe Community Centre	Taylor Woodrow Developments
Leasowe Community Homes	Taylor Young
Leasowe Community Homes	Terrence O Rourke
Leith Planning Limited	Tetlow King Planning
Leverhulme Estates	The Co-operative
Liscard and Egremont Partnership	Theatres Trust
Liverpool Housing Trust	Thermal Ceramics UK Ltd
M Graham	Thomas Estates Limited
MacIntosh Communications Limited	Thornton Hough Community Trust
Malcolm E Lloyd	Tower Action Group
Malcolm Judd and Partners	Townswomen Wirral 101-25
Manor Egremont Mast Action Group	Tranmere Alliance
Maritime (Regenda Group)	Tranmere Parks
Maritime Housing Association	Tranmere Together
Mason Owen Property Consultants	Transition Town West Kirby
Matthews & Goodman	Tribal MJP
McCormick Architecture	Turley Associates
McDyre & Co.	Tweedale
Mersey Docks and Harbour Company	Twentieth Century Society
Mersey Estuary Conservation Group	Unichema Chemicals
Mersey Estuary Development Co-ordinator	Unilever UK Home and Personal Care
Mersey Forest Offices	Unilever UK Property
Mersey Waste Holdings Limited	Union Street Day Resource Centre
Merseyside & West Cheshire Ramblers	V David
Merseyside & West Lancs Bat Group	VCA Wirral
Merseyside Civic Society	VCAW Bebington
Merseyside Cycling Campaign	VCAW Heswall
Merseyside Fire Service Headquarters	VCAW Wallasey
Merseyside Police	Venture Housing Association
Merseytravel	Villa Medical Centre
Methodist Church Property Division	Wainhomes (Developments) Limited

Michael Cunningham Architects	Wallasey Civic Society
Miller Town Planning	Wallasey Village Community Partnership
Mineral Products Association	Welcome Home Developments
Miss J Marguerie	Wellington Road CAAC
Miss S Poole	West Cheshire Cleaning Services
Mitsubishi Electrical Europe B.V.	West Kirby Village CAAC
Mono Consultants Ltd	Westwood Road Residents Association
Morecrofts Solicitors	White Young Green
Morris Homes (North) Limited	Williams Estate Management
Mouchel Parkman	WIRED
Mr R Neale	Wirral & Cheshire Badger Group
Mr & Mrs A & Y Salisbury	Wirral Association for Disability
Mr & Mrs A Pasterfield	Wirral Autistic Society
Mr & Mrs Anderson	Wirral Barn Owl Trust
Mr & Mrs Arnold	Wirral Black & Racial Minority Partnership
Mr & Mrs B & R Walsh	Wirral Chamber of Commerce
Mr & Mrs D Gleave	Wirral Change
Mr & Mrs Dunne	Wirral CVS
Mr & Mrs E & B Bushell	Wirral Environmental Network
Mr & Mrs Edwards	Wirral Fire Safety Command
Mr & Mrs G Archibald	Wirral Footpaths and Open Spaces Society
Mr & Mrs J & C Thomas	Wirral Friends of the Earth
Mr & Mrs J & H Wesencraft	Wirral Green Belt Council
Mr & Mrs Jacques	Wirral Green Party
Mr & Mrs L & B Bell	Wirral Hospitals Trust
Mr & Mrs L & S Hurst	Wirral Investment Network
Mr & Mrs M & A Hudson	Wirral Jehovah's Witnesses
Mr & Mrs M & N Davies	Wirral Methodist Housing Association
Mr & Mrs M Cook	Wirral Metropolitan College
Mr & Mrs N & M G Dyson	Wirral NHS Trust
Mr & Mrs Neeson	Wirral Partnership Homes

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Mr & Mrs PM & UR Weston

Mr & Mrs S & B Irving

Mr & Mrs Woods

Mr A Kennaugh

Mr A Love

Mr A Nuttall

Mr A P McArdle

Wirral Society

Wirral Transport Users Association

Wirral Urban Farm Association

Wirral Victim Support

Wirral Waste Action Group

Woodchurch Neighbourhood
Management

Woodland Trust

34 List of Specific Consultation Bodies

4NW	Merseyside Police Authority
Airwave MMO2	Merseyside Policy Unit
Bell Ingram Pipelines Ltd	Merseyside Waste Disposal Authority
BT	Mobile Operators Association
Cheshire Association of Local Councils	National Grid
Cheshire West and Chester Council	Natural England
Coal Authority	North West Development Agency
Countryside Council for Wales	O2 UK Limited
Dwr Cymru Welsh Water	Puddington & District Council
English Heritage	Scottish Power
Environment Agency	Secretary of State for Transport
Flintshire County Council	Sefton MBC
Fusion Online Limited	Shell UK Pipelines
Government Office for the North West	Showmens Guild of Great Britain
Halton Borough Council	SP Manweb
Helsby Parish Council	Sport England
Home Builders Federation	St Helen's MBC
Homes and Communities Agency	T Mobile (UK) Ltd
Hutchinson 3G UK Limited	United Utilities
Ince Parish Council	Vodafone Ltd
Knowsley Council	Willaston Parish Council
Liverpool City Council	Wirral Magistrates
Mersey Partnership (TMP)	Wirral NHS Trust
Merseyside Archeological Advisory Service	Wirral Primary Care Trust
Merseyside Environmental Advisory Service	Wirral Voluntary and Community Services Network
Merseyside Fire & Rescue Service	

35 List of Respondents

Anna May Couture	Mr A M Harrison
Avantgarde	Mr A McArdle
Barnston Conservation Society	Mr B Owens
Bellway Homes Limited	Mr I Bradshaw
Bidston Preservation Trust	Mr M Parry
Birkenhead School	Mr N Ferguson
Bollinwater Estates LLP	Mr P Burgess
Bromborough Society	Mr P Exley
Central Liscard Area Residents Association	Mr P Hinton
Cherish the Bride	Mr P Miller
Cheshire West and Chester Council	Mr S Eaves
Clive Watkin Partnership	Mr S Ramsey
Coal Authority	Mr s V James
Councillor S Kelly	Mr T Roberts
Countryside Council For Wales	Mr T Wolf
D M Williams	Mrs S Charlesworth
Derwent Holdings Ltd	Myles Parry Estates
Dibbin Estates & Equipment Ltd	National Grid
Emery Planning Partnership	National Trust
English Heritage	Natural England
Environment Agency	New Brighton Partnership
Equfund (IPS) Limited	North West Regional Development Agency
Family Tree	Paisleys Emporium Ltd
Friends of Birkenhead Park	Party Paraphernalia
Friends of Hoylake & Meols Gardens	Peel Energy
Gary Strother Builders	Peel Holdings
GL Hearn	Precious Moments
Grosvenor Liverpool Fund	Riverside Housing Association
Heswall Society	Sainsbury's Supermarket's Limited

Highways Agency	Shell UK
Hoylake Civic Society	Sport England
Irby Thurstaston and Pensby Amenity Society	Taylor Wimpey UK Limited
JASP Planning Consultancy	Taylor Young
Knowsley MBC	Theatres Trust
Lattitude	Vyner Estate
Leverhulme Estates	Wirral Green Belt Council
Liverpool City Council	Wirral Partnership Homes
M Real	Wirral Society
Mersey Forest	Wirral Wildlife
Merseyside Environmental Advisory Service	Woodland Trust
Merseytravel	