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Core Strategy for Wirral - Report of Consultation on Settlement Area Policies

1 Background to the Consultation

1.1 This report sets out the background to the consultation undertaken by the Council on the draft Settlement Area Policies to be included in 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 proposals to be included in a future site allocations Development Plan Document.

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 The Council consulted on the Preferred Options for the Core Strategy between November 2010 and January 2011. At that time, a number of respondents were concerned that they would not be able to comment on the content of the Settlement Area Policies proposed, before the final Core Strategy was prepared. The Council therefore decided to undertake additional consultation on the content of the draft Settlement Area Policies while the Proposed Submission Draft Core Strategy was being finalised.

1.7 Consultation on the draft Settlement Area Policies began on 30 January 2012 and ended on 12 March 2012. Consultation took place on eight documents, one for each of the Settlement Areas identified under Preferred Option 2 - Settlement Area Policies (Preferred Options Report, November 2010, page 12).

1.8 In each case, respondents were asked to comment on:

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

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- a draft Settlement Area Policy, which set out the principal spatial priorities that were to be applied within each Settlement Area;
- a short summary Vision Statement for each Settlement Area; and
- a Reasoned Justification, which summarised the background to why the priorities had been identified.

1.9 The documents were accompanied by a series of eight illustrative maps and a short background document setting out the scope and reasons for the additional consultation.

1.10 Comments were invited on all or any part of these documents.

1.11 Notification letters inviting comments were sent to 716 contacts registered on the Council's Local Development Framework Consultation Database, including 47 specific consultation bodies. A list of the people and organisations contacted is provided in Section 13 and 14 of this document.

1.12 Electronic and downloadable versions of the documents were made available, free of charge, through the Council's on-line consultation website⁽²⁾. A link to the consultation was placed on both the Council's Local Development Framework and Planning Applications (Development Management) website home pages from 27 January 2012 and was listed under the Council's "Current Consultations" from 31 January 2012.

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

1.14 Free copies of the all the consultation documents were offered on request.

1.15 Separate electronic notifications were sent to Members of Parliament; elected Councillors; members of the Council's eleven Area Forums; the members of the Local Strategic Partnership Assembly and Executive Board; members of the Wirral Business Forum; previous respondents to the Council's Area Forum Neighbourhood Plans; and to senior officers responsible for service delivery within each of the Council's internal Departments.

1.16 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 at ten One Stop Shops across the Borough, during normal opening hours⁽⁴⁾.

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

3 reminder e-mails were also sent automatically on 27 February 2012

4 the One Stop Shops at Bromborough and Hoylake were no longer operating and the One Stop Shop at Upton was operating a booking service one day a week and would not accept documents for public deposit

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1.17 The Local Development Framework Annual Monitoring Report for December 2011 was made available alongside the draft Settlement Area Policies. The Strategic Housing Land Availability Assessment Update (April 2011) was also made available for consultation alongside the Settlement Area Policies from 22 February 2012.

1.18 The consultation drew 262 individual comments from 56 respondents. A list of respondents is provided in Section 15 of this document. Thirty-four respondents replied by e-mail, seventeen replied on-line and five by letter.

1.19 Nineteen respondents were development interests such as landowners, retailers, developers and/or their agents; thirteen were local residents; ten were local amenity societies or community groups; seven were public bodies or associated agencies; five were utility or infrastructure providers; and two were national or regional societies.

1.20 The consultation documents were not accompanied by an Equality Impact Statement, Sustainability Appraisal or Habitats Regulations Assessment, which would be undertaken as part of the preparation of the final Core Strategy.

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

2 Analysis of the Responses Received

2.1 The following sections summarise the comments received on the Draft Settlement Area Policies for each of the eight Settlement Areas.

3 Settlement Area 1 - Wallasey

3.1 Settlement Area 1 includes New Brighton, Liscard, Egremont, Poulton, Seacombe and Wallasey Village:

Comments on the Draft Settlement Area Policy

ID	Summary of Responses Received
4	Points 5 & 6 - The Council should consider attracting a second Farmer's Market to Liscard (or possibly to New Brighton) in addition to the successful one at New Ferry/Port Sunlight but on a different Saturday. It would add to the convenience shopping facilities and enhance the quality of goods on offer at Liscard. At present the New Ferry Farmer's Market is not conveniently located for access by all the community - anyone in the northern part of the Borough reliant on public transport has a 45-50 minute bus journey and an interchange at Birkenhead. Adding an attractive new 'delicatessen-type' offer to the food retailing at Liscard should also have a knock on effect for surrounding shops, as when I shop at the New Ferry Farmer's Market I also shop for more basic foodstuffs in surrounding shops.
6	Support the policy, Point 11 and Paragraph 3.11 in particular.
11	References to Conservation Areas and designated heritage assets and their setting and references to the coastal resort are welcome.
13	The shortage of allotments should be reflected in accordance with Paragraph 3.11 and evidence from the Wirral Open Space Assessment 2011 (WOSA) which shows that, in terms of quantity of allotments, New Brighton has the worst provision in the borough, and Wallasey the 4th worst (apart from 3 Wirral Wards with no provision). WOSA also points out this current level of provision falls well short of the stated borough-wide provision standards. Furthermore, Wallasey also has documented unmet public demand for allotments - Council waiting lists are amongst the longest in the Borough, with several sites having more people waiting for a plot than there are plots actually on the site! The WOSA also notes that allotments offer "benefits for the promotion of sustainability, health and social inclusion".
14	<p>Point 7 - Areas of Cross Lane are within Flood Zones 2 and 3 and development/allocations in this area could be subject to the requirements to undertake the sequential test and a level 2 Strategic Flood Risk Assessment.</p> <p>Point 12 - Welcome that flood risk is highlighted but recommend the phrase "minimise flood risk" is replaced with "reduce flood risk", to place greater emphasis on reducing the risk of flooding and to provide more clarity on what would be expected from developers.</p>

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15	Is Liscard still the main shopping area now that Morrisons has opened? Has the viability of shopping in New Brighton and Liscard been preserved or has the development merely moved the shoppers to the new superstore, speeding the decline of these areas? Where is the strategy to address over 25% worklessness? What is the policy to address 4% vacant premises? How many people are waiting for affordable housing and could they be housed in the vacant premises?
16	The Policy is generally on the right lines. Some years ago a plan was produced to concentrate the Egremont local shops into a new shopping centre. Government money ceased to be available and the plan was dropped. Such a local shopping centre remains very important for the people of Egremont and should be kept on the agenda as part of the Core Strategy, so that if the money becomes available again over the next fifteen years, the plan can be revived.
17	Whilst development in allocated centres is supported, the Policy should explicitly state the scale of development that is appropriate to both the scale and function of the centre.
20	All previously developed land should be effectively used to deliver sustainable economic growth. Alternative employment generating or mixed use developments should be considered on existing or former employment sites where higher value uses could enable employment uses to come forward or information is available to show that a site is unsuitable or unviable or no longer in demand. Employment sites can be suitable for new homes and can be used to provide the local community with access to a range of shops and services.
26	'Safeguard and enhance' should be explained and additional provision to serve top-up shopping needs should be provided for. Existing employment sites could be suitable for alternative employment generating uses and mixed developments. Employment and market trends, viability, suitability, demand for employment uses and the need for higher value uses should be taken into account.
28	The Policy should recognise the potential value of the many contrasting historic and modern designed parks and gardens in the Area, which may be of value in their own right and which may in future be added to a Local List prepared under PPS5.
29	Development in allocated centres is supported but the Policy should also set out the scale of development that will be appropriate in each centre.
30	Welcome the reference to green issues in terms of open spaces, habitats, protected natural sites and sustainability. Maintaining the existing Green Belt and the physical separation of settlements must be retained into the future as stated.
32	Wirral Waters and the surrounding areas should be identified as an opportunity for the development of an energy distribution grid / district heating network. Support reducing the number of vacant properties and previously developed sites, to reduce the number of sites affected by land contamination and improve the environment. Maintaining the national and international importance of the intertidal foreshore could be expanded to ensure that biodiversity is "protected, maintained, enhanced and reconnected".

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33	<p>Broadly support the overall strategy.</p> <p>Point 10 - will help to ensure that the condition of the adjacent Dee Estuary SAC/ SPA and Ramsar site and the Mersey Narrows and North Wirral Foreshore SPA/ Ramsar/ SSSI are maintained but would be improved by adding a reference to enhancement.</p> <p>Point 11 - Welcome but should also refer to the need to strengthen the area's green infrastructure and enhance opportunities access the natural environment.</p>
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Comments on the Draft Vision Statement

ID	Summary of Responses Received
7	Support the vision to create a framework of green infrastructure. Green infrastructure has a multitude of functions including formal and informal sport and recreation opportunities e.g. cycling, walking, running routes or linking playing fields and other sports facilities to greenspace.
34	Support the Vision Statement, which ought to have a positive impact but the Vision should come before the Policy.

Comments on the Reasoned Justification

ID	Summary of Responses Received
5	Paragraph 3.17 - There is a need to improve Liscard Bus Station and traffic management across the Borough. At present the traffic management at Liscard Bus Station is very poor. There is only a very small area between all the metal barriers for passengers to get on and off the buses, which means that if one bus is already at one of the stops it can prevent any other bus arriving to load and unload until the first bus has moved on. This can add up to 5 minutes to the whole procedure, lengthening journey to work times. Journey to work times have been further lengthened from the New Brighton area (whether to Liverpool or elsewhere in the Borough) by Arriva buses lengthening their schedules at peak hours from every 15 minutes to every 20 minutes and introducing an interchange at Birkenhead Bus Station for cross Borough buses such as those from New Brighton to Clatterbridge Hospital via Port Sunlight/Bebington.
8	Paragraph 3.5 - "Achieving the higher level would involve the provision of housing on greenfield sites..." appears to contradict paragraph 3.11 which states "Open space is, however, limited and the majority is already intensively used..." Any decision to allow development on greenfield sites including playing fields should be supported by an up to date and robust PPG17 compliant Open Space, Sport and Recreation Assessment and/or a Playing Pitch Strategy. Sport England is a statutory consultee on any development that affects a playing field and would lodge a statutory objection to any proposal to develop a playing field unless it is specifically identified as surplus to need in an up to date PPS that has followed the methodology set out in 'Towards a Level Playing Field'. Even if sites are currently disused

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	<p>paragraph 10 of PPG17 requires the Local Authority to carry out an assessment of what other open space function the site can perform. Disuse is not an indication of lack of demand but could be the result of deliberate abandonment in order to change the use. Again a PPG17 compliant assessment would identify sites that are genuinely surplus to requirement or should be brought back into use. An increase in housing also results in an increase in demand for sport. Any Playing Pitch Strategy should take into account proposed locations of new housing to assess the impact on demand and supply for pitches. Sport England also advise undertaking a corresponding Built Facilities Sports Strategy to assess the impact of new development on the demand and supply for sports facilities in the area. Sport England has a range of strategic planning tools to aid Local Authorities when assessing current and existing demand and supply for indoor and outdoor sports facilities www.sportengland.org/facilitiesandplanning</p>
9	<p>Source water availability is acceptable subject to review of service reservoir sizing and performance but there will be potential for pressure issues at times of peak demand. Supply will require upgrades after first 5 years.</p> <p>The Area is served by the Birkenhead Waste Water Treatment Works, in Settlement Area 2, which has some headroom (dry weather flow) but is close to consented levels and will be impacted by Wirral Waters. Connection dependent, local up-sizing works and wastewater pumping station up-sizing (or new pumping stations) could be required.</p>
10	<p>Paragraph 3.5/ Paragraph 3.5 - Very concerned about the higher housing numbers suggested, which would require building on greenfield land. This should be avoided as we have many people in Wirral and need our remaining open space for food production and recreation. This need is particularly great in Wallasey where there is a shortage of open space. Housing numbers projected should avoid building on what little there is.</p>
12	<p>Understanding the components contributing to local character will be key. Additional characterisation work may be necessary to support implementation. Conservation Area Appraisals should be referred to and reference should be made to Understanding Place: Character and Context in Local Planning.</p>
24 25	<p>There is nothing aspirational or ambitious. This Policy will not successfully address the problems of the reducing population and housing growth at the lower or higher levels, travel to work patterns, the need for additional open space or transport infrastructure.</p>
27	<p>Non-designated historic designed garden landscapes are not recognised unless they happen to coincide with another designation or function. The list of potential sites for future investigation includes Liscard Hall.</p>
31	<p>The scope for additional housing appears to be over-estimated. The higher figures would not be compatible with retaining open green spaces, the existing Green Belt with separation of settlements, the provision of attractive (not too crowded) residential areas and protected habitats. Only the lower figures should be adopted with new housing only allowed on infill and demolition / brown sites.</p>

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35	No specific reference is made to the Dee Estuary SAC or to the North Wirral Foreshore and Mersey Narrows SPA/ Ramsar/ SSSIs and their condition (unfavourable recovering). Support showing open space on the Map, which should also show nationally and internationally important nature conservation sites.
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4 Settlement Area 2 - Commercial Core

4.1 Settlement Area 2 includes the Birkenhead and Wallasey Docks, Twelve Quays, Birkenhead Town Centre, Woodside, Cammell Lairds and Tranmere:

Comments on the Draft Settlement Area Policy

ID	Summary of Responses Received
4	A more focused policy is needed to encourage families with children to move closer to the commercial core. A wider mix of income groups and household types is needed to make the Area more sustainable. There is too little emphasis upon meeting the needs of the resident community outside working hours. Many shops only stay open to serve the office-based population. There have been too many changes of use from retail (A1) to A2. Betting shops, for example, do little to contribute to the sustainability of the community or to improving the economic situation of individual residents. A careful eye needs to be kept on unsympathetically sited entertainment uses (e.g. "Fight Club" in Lorn Street), which are too close to existing residential properties. The streets off Argyle Street are surprisingly quiet at night and more residential accommodation, preferably for families, would constitute a more sustainable use for vacant B2 sites. A masterplan for the Hind Street/Mollington Street area should include family housing. All new housing should be built to CSH Level 6 for physical accessibility to address the serious lack of wheelchair-accessible housing and reduce the need for costly conversions or substantial rebuilding to meet the needs of a disabled person. There is no longer capacity to accommodate freight trains along former freight line from Rock Ferry South Junction to Bidston Dock because of the recent increase in the frequency of passenger rail services from Liverpool to Chester and Ellesmere Port. A better use would be as a light rail passenger route linking the newly regenerated housing area of Rock Ferry with emerging employment sites (and later shopping too) at Wirral Waters and to improve linkages across Birkenhead, where stops could be created at Mollington Street area, Rock Park, Blackpool Street, Argyle Street/Conway Street, Bridge Street (for the transport museum) and along the edge of the Docks and the International Trade Centre. This would be an example of "transit-oriented development", which has been very successfully pioneered in Portland, Oregon, USA. Public investment in light rail infrastructure can lift land values, make development viable and could attract smaller developers to bring forward proposals to regenerate the Docks hinterland around Corporation Road and Beaufort Road. There may be sufficient capacity on the Bidston to Wrexham line to open it to freight, if only to allow North Wales to Crewe trains to be diverted when the Chester to Helsby section of track is unavailable.
8	Point 9 - Should identify Bidston Moss as a key adjoining open space to which green infrastructure must link.

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9	Welcome references to Conservation Areas and designated heritage assets and their setting.
11	Point 10 - Welcome that flood risk is highlighted but recommend the phrase "minimise flood risk" is replaced with "reduce flood risk", to place greater emphasis on reducing the risk of flooding and to provide more clarity on what would be expected from developers.
13	How does the approved provision of some 13, 000 up-market flats at Wirral Waters square with what is actually happening? How successful are the flat developments in Liverpool, with low occupancy or at Priory Wharf? Why is it needed in Wirral as well? If Birkenhead Town Centre is to be the principal focus for leisure, why is Pacific Road being offloaded/ closed and what is planned for the beam engine site, the museum at the Town Hall and the Tram Museum?
15	Settlement Area 2 presents an opportunity to highlight a distinctive strategic contribution to sustainable development and the transition to a low carbon economy. The previous Core Strategy report indicated the potential for district heating as part of the Wirral Waters-related development. The contribution of port infrastructure to the offshore renewable energy sector should also be made more clearly. These strategic sustainable energy infrastructure issues should be reflected in the Settlement Area Policy. The Policy should also reference the role of green and blue infrastructure in mitigating the urban heat island effect as part of climate adaptation. The need for flood resilient design should be made clearer in addition to flood prevention measures. The Policy might also usefully highlight the role of limiting water demand from development to address the supply issues identified.
17	<p>Point 1 does not identify the wider range of principal elements that will make up the New City Neighbourhood and should be expanded to reflect the need for a mixed use approach and the components of the East Float planning approval, to say: "Establish a New City Neighbourhood at East Float to secure major economic growth, jobs and training alongside investment in significant levels of new high quality housing and the provision of supporting leisure, retail, community and education uses. The approach will significantly reduce the amount of vacant and under-used previously developed land."</p> <p>Point 3 should "maintain and enhance" the activities listed. Cammell Laird and ongoing investment in port related activities and associated infrastructure, including masterplan and legal obligations to relocate some activities and the importance of international trade connections are omitted.</p> <p>Point 4 should be more positive in promoting socio-economic and physical enhancement of the hinterlands and their integration with East Float.</p> <p>The reference to SuperPort (Part 3), Part 6, Part 7 and Part 10 is supported.</p> <p>Part 9 is supported but should recognise the Great Floats as key landmarks and identify the opportunity to create major new green infrastructure and public realm resources focused on East Float and connected to the wider Area.</p>

21	Support development in allocated centres but the scale of development must be appropriate to both the scale and function of the centre.
23	All previously developed land should be effectively used to deliver sustainable economic growth. Alternative employment generating or mixed use developments should be considered on existing or former employment sites where higher value uses could enable employment uses to come forward or information is available to show that a site is unsuitable or unviable or no longer in demand. Employment sites can be suitable for new homes and can be used to provide the local community with access to a range of shops and services.
30	'Safeguard and enhance' should be explained and additional provision to serve top-up shopping needs should be provided for. Existing employment sites could be suitable for alternative employment generating uses and mixed developments. Employment and market trends, viability, suitability, demand for employment uses and the need for higher value uses should taken into account.
31	Support the aims set out for the Commercial Core. Agree that establishing a New City Neighbourhood at East Float and around Birkenhead Town Centre and promoting the regeneration at Woodside and Hind Street, could be a catalyst for economic growth, jobs and training and will significantly reduce the amount of vacant and under-used previously developed land. Support additional retail in Birkenhead Town Centre but the Policy should acknowledge the key role that Wirral Waters will play in accommodating growth both during and beyond the plan period. Given the scale of the development and the timescales involved, the potential to increase the amount of retail as the area evolves should also be acknowledged.
32	The Policy should recognise the potential value of the many contrasting historic and modern designed parks and gardens in the Area, which may be of value in their own right and which may in future be added to a Local List prepared under PPS5.
34	Welcome the reference to green issues in terms of open spaces, habitats, protected natural sites and sustainability. Maintaining the existing Green Belt and the physical separation of settlements must be retained into the future as stated.
36	The Commercial Core is crossed by high voltage underground electricity transmission cables running between Birkenhead substation and Lister Drive substation in Liverpool. Underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under licence, which grant legal rights that enable the efficient and reliable operation, maintenance, repair and refurbishment of the electricity transmission network. No permanent structures must be built over or under cables or within a zone specified in the agreement and materials or soil must not be stacked or stored on top of the cable route or its joint bays and unrestricted and safe access must be maintained at all times. Cables installed deeper underground may be affected by activities such as piling. Ground cover above cables should not be reduced or increased. No trees and shrubs should be planted either directly above or within 3 metres of the existing underground cable. The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact.

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37	Wirral Waters and the surrounding areas should be identified as an opportunity for the development of an energy distribution grid/ district heating network. Support reducing the number of vacant properties and previously developed sites, to reduce the number of sites affected by land contamination and to improve the environment.
38	<p>Broadly support the overall strategy.</p> <p>Point 9 will contribute towards enhancing the natural environment and ensuring it is accessible to the local population but there is no reference conserving and enhancing the natural environment in proximity to the Commercial Core or the internationally designated nature conservation sites, including the Mersey Estuary SPA and Ramsar site and the Mersey Narrows and North Wirral Foreshore SPA/ Ramsar and SSSI.</p>

Comments on the Draft Vision Statement

ID	Summary of Responses Received
5	Development of the New City Neighbourhood at East Float is incompatible with the overall strategy to "safeguard and enhance the role of Birkenhead Town Centre as the Borough's principal focus for retail, office and town centre uses". Any investment will automatically be sucked into the East Float development and Birkenhead Town Centre (along with other retail centres on Wirral) will be left to deteriorate even further. Any jobs created at the proposed new retail centre would only be at the expense of jobs at present retail centres. The 'pie in the sky' East Float development should be forgotten. There is no requirement for additional retail floorspace. There is already an over abundance of floorspace at Liverpool One, Cheshire Oaks and Chester. The massive and continuing increase in on-line shopping makes more retail floorspace completely unnecessary. An 'out of town' development of this nature at East Float will only encourage more car use, contrary to the objective of reducing reliance on the car. Any investment should be primarily directed towards redeveloping and enhancing our present retail centres.
6	Support the vision to create a framework of green infrastructure. Green infrastructure has a multitude of functions including formal and informal sport and recreation opportunities e.g. cycling, walking, running routes or linking playing fields and other sports facilities to greenspace .
14	What are the proposals for "green infrastructure and sustainable transport"?
16	The opportunity to highlight a distinctive strategic contribution to sustainable development and the transition to a low carbon economy should be included to reflect the potential for district heating as part of Wirral Waters-related development and the contribution of the port infrastructure to the offshore renewable energy sector.
19	Supported.



39	Support the Vision Statement, which should contribute towards enhancing the natural environment and ensure accessibility to the local population but there is no reference to protecting and enhancing the natural environment in close proximity to the Commercial Core. The Vision should come before the Policy.
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Comments on the Reasoned Justification

ID	Summary of Responses Received
3	Agrees with Merseytravel regarding protection of public transport routes. Consider the whole journey for the passenger/ traveller and ensure safety and pleasant environment are encouragements to use a mix of active and public transport modes.
7	<p>Area is supplied from Sutton Hall Water Treatment Works. Reinforcement is required on the link-main between Crosshill and Gorsehill service reservoir, with potential for pressure issues at peak times. Supply will require upgrades after first five years. There are concerns over the availability of infrastructure and the need to review source water availability for significant development at Wirral Waters, which will require new mains laying, costing several £million.</p> <p>Area is served by Birkenhead Waste Water Treatment Works, which has some headroom (dry weather flow) but is close to consented levels. Wirral Waters could have a significant impact on capacity and space constraints around the existing works could require positive support for planning applications and/or the provision of an alternative site for additional wastewater facilities. Connection dependent, local up-sizing works and wastewater pumping station up-sizing (or new pumping stations) could be required.</p>
10	Understanding the components contributing to local character will be key. Additional characterisation work may be necessary to support implementation. Conservation Area Appraisals should be referred to and reference should be made to Understanding Place: Character and Context in Local Planning.
12	Paragraph 3.11 - The statement that "The theoretical potential for flooding associated with the dock system and along the Mersey waterfront has not, however, prevented permission from being granted for major development within the Area, subject to flood mitigation conditions", should be removed. It does not add to the justification for the consideration of flood risk but actually reduces its significance as it indicates that development could be considered appropriate regardless of the findings of any detailed flood risk assessment and could be inappropriately used to justify development in other areas where flood risk is an issue. While flood outlines around the docks may require further assessment at site level, using the term theoretical potential for flooding implies a low probability. While a number of permissions have already been granted, including Wirral Waters and the International Trade Centre, future allocation(s) may be subject to the requirement to undertake the sequential and exception tests. Paragraph 3.7 indicates a Master Plan is in place for Woodside, which appears to contain some areas of Flood Zone 2 and 3, which will require additional consideration.

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26	The over-reliance on Wirral Waters is not a robust position as the delivery of that scheme and the level of apartments envisaged is clearly in doubt in this economy. This is made worse by the continuation of a restrictive housing policy which focuses upon regeneration areas, including HMRI which has failed to deliver its objectives and whose funding is now threatened.
27 28	This is too dependent on the delivery of vast amounts of hugely ambitious development over the plan period and beyond at Wirral Waters (East Float) for which there is no 'Plan B'. No evidence on deliverability is presented. No reference is made to sports provision, there are no plans to address the declining vitality and viability of Birkenhead Town Centre, utility infrastructure is poor and transportation requirements are significant. This is the only Area that will be allowed to grow despite the total lack of residential based amenities, facilities and services.
35	Additional clarity should be provided over the precise location, type and status of the 705,000 sqm of commercial floorspace, which should be explicitly controlled to not undermine or harm investment decisions in more central locations. The supporting text should clearly define the quantum of additional A1 convenience and comparison floorspace proposed in the 'New City Neighbourhood' and surrounding area, over and above that which has already been approved, supported by a robust evidence base and delivery should be phased in relation to the other land uses proposed. Timescales should be explicit and relate only to the Plan period. The scale of development in Birkenhead should be commensurate with the scale, function and realistic capacity of the Centre during the Plan period. Support the approach to out-of-centre facilities which should be assessed against national policy.
40	The need to address the threats to nature conservation sites from the proposed Wirral Waters development should be noted within the Reasoned Justification recorded in the Preferred Options Habitats Regulation Assessment which include potential water quality impacts during construction and the potential for coastal squeeze. Support showing open space on the Map, which should also show nationally and internationally important nature conservation sites.

5 Settlement Area 3 - Suburban Birkenhead

5.1 Settlement Area 3 includes suburban Birkenhead including Beechwood, Bidston, Claughton, Noctorum, Oxtan, Prenton, Tranmere and Rock Ferry:

Comments on the Draft Settlement Area Policy

ID	Summary of Responses Received
5	Support this Policy, Point 11 in particular
10	Welcome references to Conservation Areas and designated heritage assets and their setting and references to other older residential areas.
13	Support the Policy. Point 6 - Welcome the designation of Oxtan Village centre as a "local centre".

	Point 6 - Welcome recognition of conservation as a priority.
15	The Interim Planning Policy for New Housing Development should be lifted now to allow fair and reasonable development in east Wirral. The policy has harmed the local economy, denied tradesmen work and limited the number of homes that can be built. Hundreds have been missed out on since 2005. Peel have not yet built a single house.
16	Point 12 - Welcome that flood risk is highlighted but recommend the phrase minimise flood risk is replaced with reduce flood risk to place greater emphasis on reducing the risk of flooding and to provide more clarity on what would be expected from developers.
20	Support development in allocated centres but the scale of development must be appropriate to both the scale and function of the centre.
22	All previously developed land should be effectively used to deliver sustainable economic growth. Alternative employment generating or mixed use developments should be considered on existing or former employment sites where higher value uses could enable employment uses to come forward or information is available to show that a site is unsuitable or unviable or no longer in demand. Employment sites can be suitable for new homes and can be used to provide the local community with access to a range of shops and services.
28	'Safeguard and enhance' should be explained and additional provision to serve top-up shopping needs should be provided for. Existing employment sites could be suitable for alternative employment generating uses and mixed developments. Employment and market trends, viability, suitability, demand for employment uses and the need for higher value uses should taken into account.
29	Support safeguarding and enhancing the role of Prenton (Woodchurch Road) as the main focus for district-level shops, offices, services and community facilities within this Settlement Area.
30	The Policy should recognise the potential value of the many contrasting historic and modern designed parks and gardens in the Area, which may be of value in their own right and which may in future be added to a Local List prepared under PPS5.
31	Development in allocated centres is supported but the Policy should also set out the scale of development that will be appropriate in each centre.
32	The Area is crossed by high voltage underground electricity transmission cables running between Birkenhead substation and Lister Drive substation in Liverpool. Underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence, which grant legal rights that enable the efficient and reliable operation, maintenance, repair and refurbishment of the electricity transmission network. No permanent structures must be built over or under cables or within a zone specified in the agreement and materials or soil must not be stacked or stored on top of the cable route or its joint bays and unrestricted and safe access must be maintained at all times. Cables installed deeper underground may be affected by activities such as piling. Ground

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	cover above cables should not be reduced or increased. No trees and shrubs should be planted either directly above or within 3 metres of the existing underground cable. The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact.
33	Welcome the reference to green issues in terms of open spaces, habitats, protected natural sites and sustainability. Maintaining the existing Green Belt and the physical separation of settlements must be retained into the future as stated.
35	Support reducing the number of vacant properties and previously developed sites, to reduce the number of sites affected by land contamination and improve the environment. Maintaining the national and international importance of the intertidal foreshore could be expanded to ensure that biodiversity is "protected, maintained, enhanced and reconnected".
36	<p>Broadly support the overall strategy.</p> <p>Part 10 - Will help to ensure that the condition of the adjacent Mersey Estuary SPA and Ramsar site and New Ferry SSSI but would be improved by reference to enhancement.</p> <p>Part 11 - welcome but should also refer to the need to strengthen the Area's green infrastructure provision to enhance access to the natural environment.</p>

Comments on the Draft Vision Statement

ID	Summary of Responses Received
6	Support the vision to preserve and enhance Green Infrastructure as this affords opportunities to link informal and formal sport and recreation activities.
17	What is the "green infrastructure" referred to?
37	Support the Vision Statement, which ought to have a positive impact on enhancing the natural environment and ensuring access to the local population but there is no reference to protecting and enhancing the natural environment in close proximity to the Area. The Vision Statement should come before the Policy.

Comments on the Reasoned Justification

ID	Summary of Responses Received
4	Paragraph 3.12 refers to Wirral Open Space Assessment 2011 as part of the evidence base for the LDF. This Assessment provides evidence to show that the Birkenhead & Tranmere Ward has one of the lowest provision of allotments in Wirral. It also points out that provision in the Ward falls well short of the stated borough-wide provision standards for both accessibility and quantity of provision. Furthermore, the Assessment identifies that allotments offer "benefits for the promotion of sustainability, health and social inclusion". The Settlement Area Policy should not ignore this evidence.

7	<p>Paragraph 3.7 - "Achieving the higher level would involve the development of greenfield land, including sites currently used for recreation..." appears to contradict Paragraph 3.12 which states "There is a shortage of parks and gardens, natural and semi-natural greenspace and outdoor sports facilities across most of the Area..."</p> <p>" Any decision to allow development on greenfield sites including playing fields should be supported by an up to date and robust PPG17 compliant Open Space, Sport and Recreation Assessment and/or a Playing Pitch Strategy. Sport England is a statutory consultee on any development that affects a playing field and would lodge a statutory objection to any proposal to develop a playing field unless it is specifically identified as surplus to need in an up to date PPS that has followed the methodology set out in 'Towards a Level Playing Field'. Even if sites are currently disused paragraph 10 of PPG17 requires the Local Authority to carry out an assessment of what other open space function the site can perform. Disuse is not an indication of lack of demand but could be the result of deliberate abandonment in order to change the use. Again a PPG17 compliant assessment would identify sites that are genuinely surplus to requirement or should be brought back into use. An increase in housing also results in an increase in demand for sport. Any Playing Pitch Strategy should take into account proposed locations of new housing to assess the impact on demand and supply for pitches. Sport England also advise undertaking a corresponding Built Facilities Sports Strategy to assess the impact of new development on the demand and supply for sports facilities in the area. Sport England has a range of strategic planning tools to aid Local Authorities when assessing current and existing demand and supply for indoor and outdoor sports facilities www.sportengland.org/facilitiesandplanning</p>
8	<p>Area is supplied from Sutton Hall Water Treatment Works. Reinforcement is required on the link-main between Crosshill and Gorsehill Service Reservoir, with potential for pressure issues at peak times. Supply will require upgrades after first five years.</p> <p>Area is served by Birkenhead and Bromborough Waste Water Treatment Works. Birkenhead WWTW, in Settlement Area 2, has some headroom (dry weather flow) but is close to consented levels and will be impacted by Wirral Waters. There is potential capacity from reduction in trade effluent at Bromborough WWTW, in Settlement Area 4. Connection dependent, local up-sizing works and wastewater pumping station up-sizing (or new pumping stations) could be required.</p>
9	<p>Paragraph 3.13 - Land with biodiversity interest also includes the lowland heathland at Bidston Hill and Wirral Ladies Golf Course. Lowland heathland is a highly threatened habitat and Bidston is important both locally and regionally. The sentence about Bidston Hill should record its biological importance for heathland and woodland (it is a Site of Biological Importance)</p>
11	<p>Understanding the components contributing to local character will be key. Additional characterisation work may be necessary to support implementation. Conservation Area Appraisals should be referred to and reference should be made to Understanding Place: Character and Context in Local Planning.</p>
12	<p>Concerned about any loss of the remaining open land at Bidston Village, the potential impact on Listed Buildings and the need to keep to the Conservation Area Appraisal and Master Plan to retain the village's unique attributes.</p>

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14	Paragraph 3.11 of the supporting text refers to the Oxton Village "evening economy", which has not appeared in previous consultation documents. The evidence for this is unclear. The Cabinet report associated with the Town District and Local Centre Study and Delivery Framework refers to Oxton as one of the seven "healthiest" local centres which as a result "are likely to require only limited interventions related to policy changes such as shop front design and building on the strengths through appropriate supported marketing". Growth in the evening economy has raised local concern about disturbance and loss of residential amenity, particularly late in the evening. While the evening economy can bring benefits, it would be appropriate to qualify this statement to recognise the need to safeguard residential amenity.
18	If there is a shortage of parks and gardens, is there a commitment to keep Tranmere's grounds at Ingleborough from development?
25 26	There is nothing aspirational or ambitious. Market renewal activity is hugely vulnerable. There is not enough open space, utility and transport infrastructure needs upgrading and the policy, which will derive the majority of new housing from market renewal activity, will not successfully address these problems.
27	Non-designated historic designed garden landscapes are not recognised unless they happen to coincide with another designation or function. Birkenhead Park and Flaybrick are already designated but other sites for potential future investigation include Bidston Hall; The Priory, Bidston; Claughton Manor House; and Derby House.
34	The scope for additional housing appears to be over-estimated. The higher figures would not be compatible with retaining open green spaces, the existing Green Belt with separation of settlements, the provision of attractive (not too crowded) residential areas and protected habitats. Only the lower figures should be adopted with new housing only allowed on infill and demolition / brown sites.
38	No direct reference is made to the Mersey Estuary SPA and Ramsar site or the New Ferry SSSI and its condition (favourable). Support showing open space on the Map which should also show national and international designated nature conservation sites.

6 Settlement Area 4 - Bromborough and Eastham

6.1 Settlement Area 4 includes Bebington, Bromborough and Eastham including New Ferry, Poulton-Spital, Brookhurst and Mill Park:

Comments on the Draft Settlement Area Policy

ID	Summary of Responses Received
4	Point 6 - No mention is made of the national and even international importance of the Lady Lever Art Gallery, which is part of the area's wider attractiveness as a commercial/retail area. Although Wirral doesn't have to bear any of its costs, which are paid for by the Government, it benefits from almost all its staff being Wirral Council Tax payers and doing most of their convenience shopping in the area. Nor is there any mention of the local importance of the Port Sunlight Garden Centre.

5	<p>Bromborough and Eastham can be viewed from the perspective of their development in the 19th and 20th centuries. There was cheap land and access to the river along the Mersey, leading to the development of Bromborough Dock and the Manchester Ship Canal, with residential development further inland. This symbiotic development can best be seen at Port Sunlight. For the future, a geographical closeness between commerce and housing will be an advantage.</p> <p>If the Business Park in Bromborough is to compete and flourish, there is a need to consider access to the area. Access along the A41 is poor. It is not easy to design a master plan which would give substantial improvements to traffic flow, but we need a detailed look at signing, the streetscene from the Motorway to the Business Park, and so on.</p> <p>The area around the Ship Canal entrance in Eastham needs a proactive approach. There is a large tank farm next to a historic village and a country park. The country park has one of the largest visitor footfalls of any free attraction in Wirral. There needs to be a green theme. A barrier between the village and any future development is important and should be a selling point for potential business use.</p> <p>The wider function of the centres at Bromborough Village and Mill Park Drive, Eastham should be considered. Libraries should be further developed as centres of the communities. People go to centres for many reasons apart from shopping. The clinic in Eastham Rake is a valuable addition. The Day Centre needs to continue to develop to support people in danger of living in isolation, to help with the maintenance of physical and mental health. The Library needs to be a gateway to local services in all sectors including business and the voluntary sector.</p> <p>Work with young people is important. There is a youth hub at Eastham. Could the Civic Centre at Bromborough also be used? Could more information for young people be given at the library? Access audits are needed to identify problems for older people and people with prams and wheelchairs, for example, by drivers parking cars and vans so as to block pavements and to identify where drop kerbs are needed. The library should be seen as the centre for work of this nature, so that the community can help to solve their own problems.</p> <p>Cycling should be encouraged, with a more radical approach to separating cyclists from other traffic on the A41. Excess railway land from Hooton to Rock Ferry could be used as a footpath and cycle way, to join the various communities and providing for journeys to work.</p>
6	Support this Policy, Point 8 in particular
9	Welcome references to Conservation Areas and designated heritage assets and their setting.
13	Point 11 - Welcome that flood risk is highlighted but recommend the phrase "minimise flood risk" is replaced with "reduce flood risk", to place greater emphasis on reducing the risk of flooding and to provide more clarity on what would be expected from developers.

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14	Where is the preservation of Eastham Village identified as a priority?
15	<p>Point 2 - Support the intention to maximise the economic contribution of these strategically important facilities.</p> <p>Point 6 and 12 - Issues related to Eastham Village Conservation Area and HGVs in Eastham is recognised in the Mersey Ports Masterplan.</p> <p>Point 13 - The physical separation between Eastham and Ellesmere Port must not restrict the strategic development of Port Wirral / the Dock Estate which stretches between the two settlements along the MSC as direct linear connectivity to the freight railway and motorway junctions supports the potential for enhanced multi-modal facilities.</p>
20	Support development in allocated centres but the scale of development must be appropriate to both the scale and function of the centre.
24	All previously developed land should be effectively used to deliver sustainable economic growth. Alternative employment generating or mixed use developments should be considered on existing or former employment sites where higher value uses could enable employment uses to come forward or information is available to show that a site is unsuitable or unviable or no longer in demand. Employment sites can be suitable for new homes and can be used to provide the local community with access to a range of shops and services.
28	'Safeguard and enhance' should be explained and additional provision to serve top-up shopping needs should be provided for. Existing employment sites could be suitable for alternative employment generating uses and mixed developments. Employment and market trends, viability, suitability, demand for employment uses and the need for higher value uses should be taken into account.
29	Support the safeguarding and enhancement of Bromborough Village as the main focus for district-level shops, offices, services and community facilities and of other centres in the Area including New Ferry, Lower Bebington and Eastham (Mill Park Drive/New Chester Road) for neighbourhood level shops, services and community facilities to serve everyday needs. This Area also plays an important role in driving the local economy and the A41 is a key route that has and continues to shape the nature of development in the area. The prominence of land and buildings that front onto the A41 plays an important role in shaping perceptions about the wider area. Derelict, underutilised and unattractive sites and buildings can have a detrimental impact on the area's ability to attract investment. Conversely attractive and vibrant developments can help to portray the important role the area plays in the Wirral economy. The policies for this Area should therefore acknowledge and encourage economic growth along this key corridor and should incorporate appropriate incentives to promote development which could help to prevent buildings falling into disrepair, becoming unsightly and land lying vacant or under-used.
30	The Policy should recognise the potential value of the many contrasting historic and modern designed parks and gardens in the Area, which may be of value in their own right and which may in future be added to a Local List prepared under PPS5.

31	Point 6 - Please add that the Historic Environment Record contains the undesignated local assets.
35	Development in allocated centres is supported but the Policy should also set out the scale of development that will be appropriate in each centre.
36	<p>Point 1 - Should maintain attractive tenure balanced residential areas.</p> <p>Point 6 - Add "while ensuring that these locations remain as sustainable communities".</p> <p>Point 14 - Should recognise that some mixed-use developments will have a positive impact in regenerating the economy and enhancing and sustaining existing settlements such as Bromborough Pool Village, particularly in light of the ongoing reduction in public sector funding.</p> <p>Point 15 - Seek to redevelop older industrial sites which make no positive contribution to the environment or economy with more suitable mixed-use developments, to stimulate economic growth, job creation and to sustain and enhance existing settlements such as Bromborough Pool Village.</p>
39	Welcome the reference to green issues in terms of open spaces, habitats, protected natural sites and sustainability. Maintaining the existing Green Belt and the physical separation of settlements must be retained into the future as stated.
40	Although there is no specific priority to reduce the number of previously developed sites in Bebington, Bromborough and Eastham, there is a priority to further develop vacant land at Wirral International Business Park, Levers and the dock estate at Eastham to enable land affected by contamination to be identified and remediated. Maintaining the national and international importance of the intertidal foreshore could be expanded to ensure that biodiversity is "protected, maintained, enhanced and reconnected".
41	<p>Point 2 - The high level of economic activity focused in this Area lies in very close proximity to sensitive internationally designated nature conservation sites of strategic importance in terms of habitats and species and supporting the wider network of migration and wintering sites. The Preferred Options Habitats Regulations Assessment should be referred to.</p> <p>Point 7 - Should be expanded to explain that the intertidal foreshores are nationally and internationally important for nature conservation, supported by further detail in the Reasoned Justification to list the national and international site designations, refer to their qualifying features and the importance of the habitat in supporting these features and the extent of the designation, including those that lie outside but in close proximity to the Area. The supporting text should also refer to the special legal procedures that apply to international sites, perhaps in a footnote.</p> <p>Point 9 - This statement should say "Maintain and enhance the wooded..." to recognise the significant nature conservation value of these woodland areas and the aim to promote the creation, extension and better management of UK Priority Habitats including deciduous woodland, fens and reedbeds.</p>

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	<p>Point 10 - Access to and enjoyment of the natural environment must not jeopardise environmental capacity or protected landscapes, habitats, sites and species. The Preferred Options Habitats Regulations Assessment identifies the potential for increased recreational activity to have an impact on qualifying features of the Mersey Estuary SPA and Ramsar and recommended mitigation including alternative recreational space, enhanced access management and habitat management. Existing green infrastructure, such as Eastham Country Park and Dibbinsdale SSSI are already heavily used and cannot take more visitors without investment. Increasing pedestrian and cycle access to and along the coast would need to be accompanied by a clear commitment to mitigate or avoid any negative or cumulative impact. Point 10 should be reworded to add: "... where this is consistent with the capacity of the coastline to accommodate visitor impact".</p> <p>Point 11 - Should be supported by additional information about the likely local impact of long term climate change, for example in relation to coastal erosion, flood risk and sea level rise.</p>
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Comments on the Draft Vision Statement

ID	Summary of Responses Received
7	Support the vision to create a framework of green infrastructure. Green infrastructure has a multitude of functions including formal and informal sport and recreation opportunities e.g. cycling, walking, running routes or linking playing fields and other sports facilities to greenspace.
42	The Vision should come before the Policy, contain clear natural environment objectives and be expanded to add more locally specific detail. The reference to the coast and green infrastructure is welcome but there is no reference to protecting or enhancing, given the significance and sensitivity of some of these assets and should say "The potential of the coast and other green infrastructure as accessible and rich environmental assets will be being realised, including through the protection and enhancement of landscapes, habitats, sites and species".

Comments on the Reasoned Justification

ID	Summary of Responses Received
3	Welcome the recognition of the need to improve public transport flow in areas of congestion. Ensure local bus operators, as well as Merseytravel, are consulted on specific congestion/traffic flow considerations.
8	Area is supplied from Sutton Hall Water Treatment Works. Additional demand for water will exacerbate existing pressure issues. Developments will need to be assessed case-by-case, to determine their impact and identify any supporting infrastructure needs.

	<p>Area is served by Bromborough Wastewater Treatment Works, which has some headroom on flows, subject to loads and potential capacity from reduction in trade effluent. Connection dependent, local up-sizing works and wastewater pumping station up-sizing (or new pumping stations) could be required.</p>
10	<p>Understanding the components contributing to local character will be key. Additional characterisation work may be necessary to support implementation. Conservation Area Appraisals should be referred to and reference should be made to Understanding Place: Character and Context in Local Planning.</p>
11	<p>Paragraph 3.11 - The need to reduce the impact of HGV traffic on Eastham Village requires greater commitment to say something like 'all traffic over 7.5 tonnes to be excluded from the Eastham Village Conservation area (except for access)'.</p> <p>Paragraph 3.11 - 50% of the 30 hectares of land identified for industrial use should be devoted to forming a buffer zone between any development and the existing Green Belt or open space. Landscaping needs to be with mature trees and completed well in advance of any development. There should be no further tank farms (above ground) or heavy industry. No noise, potential emissions or traffic through Eastham Village should be generated by the development. The policy to develop a coastal footpath along the river frontage should be included and the medieval village site of Shodwell needs to be identified and protected.</p>
12	<p>Agree with the removal of the Unitary Development Plan (2000) and the Interim Housing Policy (2005) which have resulted in the restriction on development over the wider area of Wirral and the resultant decline in house building. The adoption of this new policy will reverse this decline by: 1) focusing on areas that attract higher incomes and skills reduces economic leakage and will pay for socio-economic policies; 2) focusing development on Areas 4, 5, 6 and 7, which are already significant economic assets, will increase GVA per head; 3) providing quality housing for entrepreneurs, investors and managers, who will start new businesses, will create employment; 4) quality residential areas attract investors; 5) increasing employment in local building trade and associated companies; 6) increasing housing stock in Areas 4, 5, 6 and 7 will use market forces to reduce prices to more affordable levels; and 7) development over a wider area will assist social inclusion by providing a percentage of affordable housing.</p> <p>Agree entirely with the reference to housing being mainly associated with infill sites within the curtilage of existing properties because: 1) sensitive infill schemes can provide some of the best and most imaginative housing developments; 2) better use of land in areas where people no longer want large gardens; 3) reduces need to take up greenfield and Green Belt sites and reduces urban sprawl; 4) generally do not increase demand on infrastructure; 5) small sites allow local builders to employ local people and self build projects; and 6) developments may sell more easily than large new sites in previously non-residential areas.</p> <p>However, to reduce local opposition the Council should:</p> <p>1) engage with applicants at an early stage;</p>



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	<p>2) produce a SPG for "Single plot and small scale infill residential development " covering such things as plot ratios, heights in relation to surroundings, retention of street scene features, separation distances, daylight, overlooking and parking issues etc., to promote sensible and sympathetic development which will not have an averse effect on the character and appearance of the local area and ensure that new infill development will look as though it had been planned as part of the original area; and</p> <p>3) produce an information brochure "New development near You" setting out the need for infill development, to make people aware that Wirral needs to create more jobs, opportunities and wealth and allay fears, distributed to surrounding neighbours at the time they are informed about the application.</p>
17	<p>Paragraph 3.11 - Welcome reference to Mersey Ports Master Plan but should be updated to say: "The Area also includes the dock estate associated with the entrance to the Manchester Ship Canal at Eastham, which benefits from port-related permitted development rights and provides storage, refinery and distribution activities with direct access to Junction 6 of the M53 (133 hectares). The Mersey Ports Master Plan sets out a long term investment strategy for enhancing and expanding port facilities in the locality through a scheme known as Port Wirral and identifies the potential to develop land for new and improved port related use, Over 65 hectares of land is currently in use or available within the Port Wirral area some 17 hectares or more being likely to be available for re-development within the plan period the potential to improve access to the dock and canal system through the provision of new lock gates from the QE II Dock; and the potential to increase waterborne and rail-based freight traffic all to deliver a new modern port and port-centric facility. It is noted that outdated port facilities at Ellesmere Port Docks are proposed to be relocated in phases to the Port Wirral site, enabling the redevelopment of that site. The need to reduce the impact of HGV traffic on Eastham Village is also recognised."</p> <p>Paragraph 3.13 - Should be reworded to say: "The whole of the coastline is of national and/or international importance for nature conservation, which means that adjacent new industrial and port-related development may require appropriate assessment and mitigation in construction, design and management."</p>
22	<p>Support the approach to out-of-centre retailing at Croft Retail and Leisure Park, which should be assessed against relevant national planning policy.</p>
27	<p>Non-designated historic designed garden landscapes are not recognised unless they happen to coincide with another designation or function. Sites in Port Sunlight are already designated but other sites for potential future investigation include Plymyard Manor; Spital Old Hall; Bankfield at Hooton Park and Bromborough Hall.</p>
32	<p>Paragraph 21.1 - add the word "village" after Eastham and Bromborough.</p> <p>Paragraph 21.8 - at Wirral International Business Park, existing purpose built premises should be used before permitting new ones, better design, a greener environment and more respect for historic sites should be insisted on.</p>

	<p>Paragraph 21.15 - Revise to name the roads, include Mill Road, Bromborough which is used as a through road to A41, add B5148, Bromborough Road to '...Bridle Road, Heygarth Road and Raeburn Avenue in Eastham' and 'Morland Avenue in Bromborough' as it leads through traffic directly to Raeburn Avenue.</p>
37	<p>Paragraph 3.5 - Balanced, sustainable communities created through mixed-use developments on older industrial sites can help to enhance population and economic growth, improve the alignment between homes and jobs, generate New Homes Bonus and enhanced spending on local goods and services and a more balanced mix of housing, which could provide family market housing with gardens and a better mix of tenure mix in locations such as Bromborough Pool, retaining existing and attracting new residents to the area.</p> <p>Paragraph 3.6 - vacant sites, poor quality and specialist premises, unsuitable for modern industrial purposes, can fuel out-commuting.</p> <p>Paragraph 3.8 - older industrial premises which are no longer fit for purpose can deliver attractive mixed-use developments to regenerate the economy, which can bring employment land to the market to meet the needs of modern businesses and replace run-down sites with high quality and visually attractive developments offering a mix of housing types and tenures within an attractive environment.</p>
38	<p>Paragraph 3.7 - Croft Retail and Leisure Park is an important established retail destination providing the main shopping facilities for local residents. Regeneration, investment and sustainable economic growth should not be discouraged where national policy is satisfied. Reference to a policy that could discourage and hinder sustainable economic development within a thriving retail destination should be removed.</p>
43	<p>The link with the Preferred Options Habitat Regulation Assessment and any important mitigation measures should be identified, national and international designations should listed and the special legal procedures referred to.</p> <p>Ancient and semi-natural woodlands and UK Biodiversity Action Plan priority habitats should also be specifically mentioned, to raise awareness and explain why these landscapes are valuable. Potential to act as wildlife corridors and/or stepping stones for the movement of species should be identified, to allow wildlife to adjust to development pressures and climatic changes. The relevant Landscape Character Areas should be identified, alongside their significant features, sensitivities and recommended management approach.</p> <p>Paragraph 3.14 should be expanded to address local climate change issues and state how this might impact on habitats, landscapes and communities and provision for adaptation. Support showing open space on the Map. Key natural environment designations should also be shown.</p>

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44	Settlement Area 4 is being consigned to an unsustainably low level of growth. Infill housing development will not deliver enough jobs, "maintain, enhance and safeguard" is not ambitious enough and will not meet the existing needs of the young, working age or elderly population.
45	

7 Settlement Area 5 - Mid-Wirral

7.1 Settlement Area 5 includes the mid-Wirral settlements to the immediate west of the M53 Motorway including Leasowe, Moreton, Upton, Greasby and Woodchurch:

Comments on the Draft Settlement Area Policy

ID	Summary of Responses Received
8	Point 8 - Welcome that flood risk is highlighted but recommend the phrase "minimise flood risk" is replaced with "reduce flood risk" to place greater emphasis on reducing the risk of flooding and to provide more clarity on what would be expected from developers.
12	All previously developed land should be effectively used to deliver sustainable economic growth. Alternative employment generating or mixed use developments should be considered on existing or former employment sites where higher value uses could enable employment uses to come forward or information is available to show that a site is unsuitable or unviable or no longer in demand. Employment sites can be suitable for new homes and can be used to provide the local community with access to a range of shops and services.
17	'Safeguard and enhance' should be explained and additional provision to serve top-up shopping needs should be provided for. Existing employment sites could be suitable for alternative employment generating uses and mixed developments. Employment and market trends, viability, suitability, demand for employment uses and the need for higher value uses should be taken into account.
18	The importance of established out-of-centre retail locations in meeting shopping requirements should be acknowledged. The text should say that Upton has a well established out-of-centre retail destination that sells a range of goods and caters for shopping demands of a significant catchment area, which makes a significant contribution to the local economy and generates local employment and that development proposals for retail uses must be balanced alongside wider economic factors.
19	The Policy should recognise the potential value of the many contrasting historic and modern designed parks and gardens in the Area, which may be of value in their own right and which may in future be added to a Local List prepared under PPS5.
22	Development in allocated centres is supported but the Policy should also set out the scale of development that will be appropriate in each centre.

23	<p>The Vision Statement seeks to deliver settlements that will continue to serve as highly accessible residential areas and continue to provide significant employment opportunities. The Reasoned Justification indicates that sites designated for recreation and employment would need to be released to reach the higher level of new homes that the area could accommodate. Wirral Business Park in Upton is a Primarily Industrial Area in the UDP. UDP Policy EM9 prohibits retail or housing. New housing is currently restricted in this area. Greater flexibility is needed to maximise the potential for regeneration. The site is well-related to an established residential area and, given its size and the plentiful supply of employment land in the area, offers strong potential for a comprehensive, mixed-use redevelopment, capable of delivering higher quality, high density jobs alongside a mix of residential properties. The site is available, suitable in terms of proximity to services and facilities and can be delivered within 5 years. The Annual Monitoring Report 2011 shows a quantitative oversupply of employment land, amounting to approximately 19 years supply based on historical take-up rates of 10ha per annum. Employment land supply is dominated by Wirral International Business Park (WIBP) which is a priority location for commercial occupiers. Approximately 70,000 sqm of commercial floorspace is available with planning permission at WIBP. A further 10.9ha of publicly owned land is available with capacity to deliver a further 55,000sqm. There is already 93,000sqm available to rent, compared to the overall take-up of 71,000sqm between 2004 and 2010.</p>
26	<p>Welcome the reference to green issues in terms of open spaces, habitats, protected natural sites and sustainability. Maintaining the existing Green Belt and the physical separation of settlements must be retained into the future as stated.</p>
28	<p>Point 6 - add after Birket: "including Reeds Lane Nature area / Urban Greenspace", whichever designation now applies.</p> <p>Point 7 - probably needs separation of allotments (where provision must be increased) from greenspace issues because the latter should be retained and maintained (there is only limited scope for increase). There are only small stretches of carr / reedbed within North Wirral Country Park and along the Fender and Birket that could be called natural, as most are highly managed sites, like Leasowe Common and at Woodchurch.</p> <p>Points 8, 9, 10 - Whatever flood defence, road improvements, water supply and sewage treatment works are needed, due regard must be given to protecting and restoring natural features including where new cables are laid or pylons erected in connection with electricity supply from offshore windfarms and other sources.</p>
31	<p>Point 6 - Access must not jeopardise the environmental capacity of protected landscapes, habitats, sites and species. The Preferred Options Habitat Regulation Assessment identifies the potential for recreational activity and cumulative impacts to harm the North Wirral Foreshore pSPA/ pRamsar site through physical damage and disturbance to birds and recommends the provision of alternative recreational space, enhanced access management and habitat management and its role as part of the wider network of Natura 2000 sites and the words: "... where this is consistent with the capacity of the coastline to accommodate additional visitor impact" should be added.</p>

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	<p>Point 7 - Welcomed but there is no indication of how this might be achieved, for example through s106 contributions or seeking additional greenspace where it can usefully contribute to existing networks.</p> <p>Point 8 - The reasoned justification should be expanded to identify the likely local long term climate change, for example in relation to flood risk and sea level rise.</p>
34	Support development in allocated centres but the scale of development must be appropriate to the scale and function of the centre.

Comments on the Draft Vision Statement

ID	Summary of Responses Received
5	Support the vision to create a framework of green infrastructure. Green infrastructure has a multitude of functions including formal and informal sport and recreation opportunities e.g. cycling, walking, running routes or linking playing fields and other sports facilities to greenspace
32	The Vision should come before the Policy, contain clear natural environment objectives and more locally specific detail. The North Wirral coastline is not mentioned, despite its importance for recreation, amenity and conservation.

Comments on the Reasoned Justification

ID	Summary of Responses Received
4	<p>Paragraphs 3.5 and 3.8 contain specific references to potential development of playing fields/recreation sites. Any decision to allow development on greenfield sites including playing fields should be supported by an up to date and robust PPG17 compliant Open Space, Sport and Recreation Assessment and/or a Playing Pitch Strategy. Sport England is a statutory consultee on any development that affects a playing field and would lodge a statutory objection to any proposal to develop a playing field unless it is specifically identified as surplus to need in an up to date PPS that has followed the methodology set out in 'Towards a Level Playing Field'. Even if sites are currently disused paragraph 10 of PPG17 requires the Local Authority to carry out an assessment of what other open space function the site can perform. Disuse is not an indication of lack of demand but could be the result of deliberate abandonment in order to change the use. Again a PPG17 compliant assessment would identify sites that are genuinely surplus to requirement or should be brought back into use. An increase in housing also results in an increase in demand for sport. Any Playing Pitch Strategy should take into account proposed locations of new housing to assess the impact on demand and supply for pitches. Sport England also advise undertaking a corresponding Built Facilities Sports Strategy to assess the impact of new development on the demand and supply for sports facilities in the area. Sport England has a range of strategic planning tools to aid Local Authorities when assessing current and existing demand and supply for indoor and outdoor sports facilities www.sportengland.org/facilitiesandplanning</p>

6	<p>Area is supplied from Sutton Hall Water Treatment Works. There may be some local water supply network issues but development should be able to be accommodated with minor mains interventions. Developments will need to be assessed case-by-case to determine their impact and identify any supporting infrastructure needs.</p> <p>Area is served by the Waste Water Treatment Works at Birkenhead and at Meols. Birkenhead WWTW, in Settlement Area 2, has some headroom (dry weather flow) but is close to consented levels and will be impacted by Wirral Waters. Meols WWTW has limited headroom. Moreton pumping station is due to be upgraded/re-located over the next two years and further information will be required about potential development sites/scenarios. Connection dependent, local up-sizing works and wastewater pumping station up-sizing (or new pumping stations) could be required.</p>
7	<p>Paragraph 3.5 - very concerned about the higher housing numbers suggested, which would require building on greenfield land. This should be avoided as we have many people in Wirral and need our remaining open space for food production and recreation.</p> <p>Paragraph 3.15 - Support a new railway station between Moreton and Meols but must be well away from Meols Meadow SSSI, because of sensitivity to trespass, litter and disturbance.</p>
9	<p>Paragraph 3.8 - identifies employment areas that would appear to be located within Flood Zones 2 and 3. Any possible development/ allocation would be subject to the requirements to undertake a sequential test and will need to be supported by a Level 2 Strategic Flood Risk Assessment.</p>
11	<p>The lower housing figure could lead to a further loss of 1,900 people from this Area and would represent just 26 dwellings per annum (2012-27), which would not meet the housing needs of the Area, contrary to PPS3, paragraph 10; and the final bullet of PPS3, paragraph 37. The Area has a low proportion of previously developed land. The plan should recognise that urban expansion sites will be required outside the main urban areas, with Settlement Area and Green Belt boundaries redrawn to provide flexibility to meet identified needs.</p>
14	<p>The policy to be applied to out-of-centre retail facilities at Woodchurch Road (Asda) and Upton (Sainsburys and other non-food retailing) must accord with PPS4. The Settlement Area Policy should acknowledge that these centres play an important role meeting local needs and providing a range of employment opportunities.</p>
16	<p>Non-designated historic designed garden landscapes are not recognised unless they happen to coincide with another designation or function. The 1950s modernist water garden at Burton's Biscuit factory by the landscape designer Geoffrey Jellicoe is considered at risk but other sites for potential future investigation include Overchurch Hil; Upton Hall and Upton Manor/Bower House.</p>

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27	<p>The scope for additional housing appears to be over-estimated. The higher figures would not be compatible with retaining open green spaces, the existing Green Belt with separation of settlements, the provision of attractive (not too crowded) residential areas and protected habitats. Only the lower figures should be adopted with new housing only allowed on infill and demolition / brown sites.</p>
29	<p>Allotments should be dealt with separately as they will not be openly accessible to the public. The rest of the paragraph should include a commitment to protect and enhance areas of importance for nature conservation and biodiversity.</p> <p>Enhanced provision for public transport is welcomed but what is envisaged? Encouraging more people to use trains and buses? How can low fares and high frequencies be maintained at a time of financial constraint? The strategy must be realistic! Provision for walking and cycling is also welcomed but must be built with due regard for environmental protection and nature conservation including the retention of hedges, trees, road verges etc.</p> <p>The lower figure of less than 400 new homes should prevail, not expanding onto greenfield sites, retaining the present boundaries of the Green Belt and having due regard to the protection of open spaces. The strategy should seek to reduce the number of residential (and other) properties lying vacant.</p>
33	<p>Details of specific designations, their qualifying features and extent of designation and reference to special legal procedures for international sites should be included. Meols Meadows SSSI; other UK Priority Habitats including lowland heathland, deciduous woodland, coastal and flood plain grazing marsh alongside the aim to promote their creation, extension and better management; key protected species; Landscape Character Areas, with their significant features, sensitivities and recommended management approach; and the potential for climate change to impact on habitats, landscapes and communities and provision for adaptation should be included. "Hold the line" should be explained as "maintaining existing flood risk defences". Showing open space on the Map is supported. Key natural environment designations should also be shown.</p>
35 36	<p>Settlement Area 5 is being consigned to an unsustainably low level of growth. Infill housing development will not deliver enough jobs, "maintain, enhance and safeguard" is not ambitious enough and will not meet the existing needs of the young, working age or elderly population.</p>

8 Settlement Area 6 - Hoylake and West Kirby

8.1 Settlement Area 6 includes the northern west Wirral settlements of Hoylake and Meols, West Kirby, Newton and Caldy:

Comments on the Draft Settlement Area Policy

ID	Summary of Responses Received
6	<p>Point 3 - The decision to downgrade Hoylake from town centre to District was challenged at the first consultation by Hoylake Village Life as based on flimsy evidence from an extremely narrow information base. Hoylake has unique, distinctive and broadly balanced set of amenities and attractions as well as an international sporting reputation. It has a very strong sense of identity and deserves recognition as a town centre in the Core Strategy.</p> <p>Point 10 - Reference should be made to the congestion and delays caused to traffic crossing the railway line at Hoylake.</p> <p>Point 12 - There is an equal requirement to preserve the separation between Hoylake and West Kirby.</p>
8	Support the Policy, Point 5 in particular.
11	Point 8 - The wildlife value of Caldy Hill as lowland heathland and woodland and a Site of Biological Importance, smaller sites such as Newton Common and the wildlife value of the North Wirral Coastal Plain for roosting wading birds and wildfowl from the coast in winter should be added.
12	Item 10 should be changed to "Monitor and manage traffic flows to (a) maximise safety for pedestrians and cyclists and (b) maximise highway efficiency"
13	Welcome references to Conservation Areas and designated heritage assets and their setting and references to the coastal resorts.
15	<p>Point 2 and 3 - Disagree that West Kirby should get more focus than Hoylake, with the latter being downgraded to district status.</p> <p>Point 4 - Just maintaining Carr Lane is not sufficient. This employment area is pretty much at capacity and should be expanded to increase local employment. A link road out of the back of the estate would not only help with its expansion but also deal with the traffic problems mentioned in paragraph 3.14 in Hoylake town centre, by taking traffic associated with the industry/employment area away from Market Street.</p> <p>Point 6 - Disagree. On what basis is it felt that Greenbank Road should be the focus of local improvements?</p>

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	<p>Point 7 - The priority to enhance should include correctly dealing with the SSSI at Red Rocks that has been poorly managed to date, is recorded as unfavourable declining by Natural England and now lacks the Natter Jack Toads that used to breed there.</p> <p>Point 10 - Management of traffic should maximise highway safety not simply efficiency</p>
18	<p>Point 9 - Welcome that flood risk is highlighted but recommend the phrase minimise flood risk is replaced with reduce flood risk to place greater emphasis on reducing the risk of flooding and to provide more clarity on what would be expected from developers.</p>
19	<p>The Policy seems appropriate in general but there needs to more emphasis on how to address the housing demand within the locality. The emphasis on the maintenance and protection of Conservation Areas must be balanced by the need for new housing in the area and Conservation Areas should not be allowed to stagnate. New developments within Conservation Areas should be allowed subject to the usual parameters of the character and appearance being preserved or enhanced. The draft policy should reflect the opportunities available through infill plots which will help limit the need for housing on green field sites.</p>
21	<p>Point 2 - Need to ensure that West Kirby is not developed at a loss to Hoylake.</p> <p>Point 5 - Need to work with existing leisure and tourism facilities rather than develop new ones that would harm existing ones, for example by building on the existing golf course businesses rather than set up another. What are the costs/benefits of the Council's facilities, such as the Sailing School - is this run at a profit or loss?</p> <p>Point 6 - Is Greenbank Road in any more need than parts of Hoylake? Is the declining population reflected in the plans for housing in the area? Where is the strategy for the high percentage of older people? When was the last flooding of the Birket valley? Is this still a threat after the works to widen the river banks - although the vegetation does need clearing? Does the need for additional water treatment reflect the housing needs within the area, if the numbers are falling and the need for development is zero or negative?</p>
22	<p>The proposed change in classification of Hoylake from a Town to a District Centre could have a profoundly negative and potentially irreversible impact on the future regeneration of Hoylake, meaning that proposals for larger scale developments or for town centre uses, which would attract significantly more people to Hoylake, would be directed towards Birkenhead or West Kirby, Moreton, Heswall and Liscard, rather than Hoylake, reducing the level of potential private investment in Hoylake and increasing the competitiveness of other nearby centres, shrinking the centre of Hoylake, reducing the number of shops and opportunities for town centre uses. Reclassification would also allow for a diversification of uses, which could potentially allow shop units to be converted into flats or houses, with shop frontages replaced by domestic facades, greatly affecting the profile of Hoylake and its ability to attract visitors.</p>

25	All previously developed land should be effectively used to deliver sustainable economic growth. Alternative employment generating or mixed use developments should be considered on existing or former employment sites where higher value uses could enable employment uses to come forward or information is available to show that a site is unsuitable or unviable or no longer in demand. Employment sites can be suitable for new homes and can be used to provide the local community with access to a range of shops and services.
28	Point 5 - Should read: "Maintain and enhance the Victorian and Edwardian heritage..."
29	Point 8 - Strongly supported. It is especially important that the value of the wider views from locations such as Caldly Hill is recognised along with the wooded setting of Caldly itself.
30	Point 12 is especially important in terms of the character of the settlements around Hoylake and West Kirby.
34	The Policy should recognise the potential value of the many contrasting historic and modern designed parks and gardens in the Area, which may be of value in their own right and which may in future be added to a Local List prepared under PPS5.
35	'Safeguard and enhance' should be explained and additional provision to serve top-up shopping needs should be provided for. Existing employment sites could be suitable for alternative employment generating uses and mixed developments. Employment and market trends, viability, suitability, demand for employment uses and the need for higher value uses should taken into account.
36	Support the safeguarding and enhancement of West Kirby as the main convenience and comparison retail, office and service centre for the Area. West Kirby is a very accessible and centrally located town well placed to service the main retail needs of the community.
38	Development in allocated centres is supported but the Policy should also set out the scale of development that will be appropriate in each centre.
42	Welcome the reference to green issues in terms of open spaces, habitats, protected natural sites and sustainability. Maintaining the existing Green Belt and the physical separation of settlements such as Moreton and Meols/Hoylake must be retained into the future as stated.
44	Lowland heath must also be listed as well as woodland in Caldly, as it is for Heswall, as this habitat needs full protection and appropriate management.
45	Maintaining the national and international importance of the intertidal foreshore could be expanded to ensure that biodiversity is "protected, maintained, enhanced and reconnected".
46	Point 5 - Access must not jeopardise the environmental capacity of protected landscapes, habitats, sites and species. The Preferred Options Habitat Regulation Assessment identifies potential for recreational activity and waterside development to harm the North Wirral Foreshore pSPA/ pRamsar site through physical damage

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	<p>and direct disturbance and the Dee Estuary SPA/ SAC/ Ramsar site through direct disturbance and recreational activity and recommends the provision of alternative recreational space, enhanced access management and habitat management, which are part of a wider network of Natura 2000 sites. The words: "where this is consistent with the capacity of sensitive areas of the coastline to accommodate additional visitor impact" should be added.</p> <p>Point 7 - Welcome but the reasoned justification should identify why the coastline is of such importance and its particular sensitivities to development and recreational activity.</p> <p>Point 8 - Welcome but detail could be provided on the types of policy approach which might be applied.</p> <p>Point 9 - The justification should identify likely local long term climate change issues, for example in relation to flood risk and sea level rise.</p>
49	Support development in allocated centres but the scale of development must be appropriate to the scale and function of the centre.

Comments on the Draft Vision Statement

ID	Summary of Responses Received
6	Reference should also be made to the 'enhancement' of these areas and the need to ensure that all development plans follow or comply with the Wirral Heritage Strategy.
17	How does the Council's asset transfer of community centres fit in with a vision to support high quality facilities for leisure?
31	Mostly supported but there will be opportunities to enhance the distinct character, historic value and natural environment and the Vision Statement should be amended to read: "...the distinct character, historic value and natural environment associated with the settlements of Hoylake and West Kirby will have been sustained and enhanced..."
47	The Vision should come before the Policy, contain clear natural environment objective and more locally specific detail. The reference to promenades does not reflect the importance of this coastline for recreation, amenity and conservation.

Comments on the Reasoned Justification

ID	Summary of Responses Received
2	Paragraph 3.4 - There is a long-term empty property in Hoscotte Park. If it and other vacant properties were to be re-developed in some way e.g. converted to hotel, guest house, pulled down and rebuilt as flats, then various needs (low-cost or luxury housing, tourism) could be met without undue influence on other vacant sites. How many such sites are there in West Kirby?

	<p>Paragraph 3.7 - Is there nothing similar to "Hoylake Village Life" in West Kirby? Pity! The Marine Lake Sailing School has become a development opportunity because Council did not attend to its maintenance and changing user-need. These are lessons for Council to learn for the future. Council taxes have been wasted by these omissions.</p> <p>Paragraph 3.11 - These poorly vegetated, low-lying waterfronts around the coast are what provide the significant visual value of Paragraph 3.10 and must not be written-off because they are also the areas of nature conservation and/or earth science interest referred to in this paragraph. This eco-system is of recognised and stated importance (Government and NGO, home and international). Surface water attenuation and infiltration systems must be considered very carefully because these areas are flood zones currently occupied by wildlife, protecting areas occupied by homes and industry. These areas are natural sponges with which we tamper at human and economic peril.</p> <p>Paragraph 3.12 - The lack of fresh-water in-flow and foul-water out-flow must be taken into account when considering any form of redevelopment in the town. Perhaps the easiest solution is for developers and their end-users to meet the entire cost of providing extra water supply and sewerage mains and treatment systems. Frequently, water pressures are low, whilst being within statutory limits, in parts of West Kirby. In fact, for the duration of the Open Golf Competition in Hoylake, water pressure was much greater in West Kirby.</p> <p>Paragraph 3.13 - Bus management in West Kirby demands attention.</p>
6	<p>Paragraph 3.7 - Retain designation of Hoylake as a town centre. The final sentence should more accurately read: "Under the Localism Bill, DCLG has designated HVL vanguard status to prepare a neighbourhood plan on behalf of the town community."</p> <p>Paragraph 3.8 - The impact of the frequent closure of the railway crossing at Hoylake should be recognised.</p> <p>Paragraph 3.15 - Use of the word dedicated is misleading, as vehicles constantly park on the cycle route. Replace with designated, which is more accurate and appropriate.</p>
7	<p>The vision statement seeks to sustain "distinct character, historic value and natural environment within the settlements of Hoylake and West Kirby". These very laudable aims will never be achieved if proposals such as 'The Sail', or the so called 'Golf Resort' are ever allowed to come to fruition. Wirral is awash with golf courses: what a pity that any investment isn't channelled towards other much needed sport and recreational facilities that would benefit more of the community than just a few golf fanatics (Whatever happened to the promised 'peoples' leisure centre at New Brighton?). Any development proposals must have the tacit approval of the local community. Trying to force through unwanted developments, such as 'The Sail' project only antagonises the people who live in the area and fuels resentment and mistrust of their elected representatives and the process of democracy as a whole.</p>

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9	<p>Paragraph 3.5 - Any decision to allow development on greenfield sites including playing fields should be supported by an up to date and robust PPG17 compliant Open Space, Sport and Recreation Assessment and/or a Playing Pitch Strategy. Sport England is a statutory consultee on any development that affects a playing field and would lodge a statutory objection to any proposal to develop a playing field unless it is specifically identified as surplus to need in an up to date PPS that has followed the methodology set out in 'Towards a Level Playing Field'. Even if sites are currently disused paragraph 10 of PPG17 requires the Local Authority to carry out an assessment of what other open space function the site can perform. Disuse is not an indication of lack of demand but could be the result of deliberate abandonment in order to change the use. Again a PPG17 compliant assessment would identify sites that are genuinely surplus to requirement or should be brought back into use. An increase in housing also results in an increase in demand for sport. Any Playing Pitch Strategy should take into account proposed locations of new housing to assess the impact on demand and supply for pitches. Sport England also advise undertaking a corresponding Built Facilities Sports Strategy to assess the impact of new development on the demand and supply for sports facilities in the area. Sport England has a range of strategic planning tools to aid Local Authorities when assessing current and existing demand and supply for indoor and outdoor sports facilities www.sportengland.org/facilitiesandplanning</p>
10	<p>Water for the Area is supplied from borehole sources which may be stretched depending on demand and a review of water supply arrangements will be required. Additional (replacement boreholes) or provision of ring main system to improve distribution may be required. Some reinforcement of supply arrangements may be required with possible pressure issues around Hoylake. Developments will need to be assessed case-by-case to determine their impact and identify any supporting infrastructure needs.</p> <p>Area is served by Meols Waste Water Treatment Works, which has limited headroom on flows requiring further examination of loads. Connection dependent, local up-sizing works and wastewater pumping station up-sizing (or new pumping stations) could be required.</p>
11	<p>Paragraph 3.5 - very concerned about the higher housing numbers suggested, which would require building on greenfield land. This should be avoided as we have many people in Wirral and need our remaining open space, for food production and recreation.</p>
14	<p>Understanding the components contributing to local character will be key. Additional characterisation work may be necessary to support implementation. Conservation Area Appraisals should be referred to and reference should be made to Understanding Place: Character and Context in Local Planning.</p>
16	<p>Agree with the Council's assessment that whilst the main opportunities to provide new housing in this area are through infill plots, some development will be required on greenfield sites in order to meet the higher level of housing outlined in the draft Settlement Area Policy. There is a site east of Newton, south of Frankby Road</p>

	<p>which is available and developable. Release of this land from the Green Belt in the long term would enable housing targets to be reached in the form of a sustainable extension to West Kirby.</p>
20	<p>Paragraph 3.5 - Fully support the focus on infill plots providing new housing opportunities, which is crucial to maintaining the viability and vitality of the area. The use of infill plots is an acceptable and reasonable policy in this location. Housing need within the area has been ignored for too long.</p>
23	<p>The re-classification of Hoylake is difficult to understand. The centre has relatively few vacant shop units, the vacancy rate has reduced significantly in the last couple of years and is emerging as an attractive shopping destination for alternative and niche retail. A specialist sports shop, health food shop, pet shop, delicatessen, skateboard shop, gyms, therapy centres and several new gift shops have been attracted over recent months. Other new businesses are regularly being attracted. The cafe and restaurant scene is thriving, significantly broadening the leisure offer and the town is attracting big name brands including with Holiday Inn Express and the Marco Pierre White and Frankie Dettori Restaurant. Other new hotels have opened in recent years, or are due to open, including Number 15, Wirral Lodge, and the Royal Hilbre, in addition to the existing offer along Market Street which includes two thriving supermarkets, a busy and varied evening economy, a growing office sector, and the existing number of specialist shops and cultural uses. Roger Tym & Partners (2009) referred to evidence of on-going decline. Recent developments and incoming businesses demonstrate that Hoylake is not in decline and is becoming a far more attractive town centre, with more local facilities, more businesses, and a growing destination for shopping, leisure and tourism. The recent Wirral Visitor Survey showed that Hoylake (and New Brighton) had the longest visitor stay durations across the Wirral and that the reason that people are more likely to visit Hoylake is to go shopping. Based on UK average spending, available comparison retail floorspace and catchment population, Experian indicate that Hoylake's annual potential turnover is between £45-£60 million. In 2009, turnover was just £15 million. Hoylake has a range of special features which can attract more residents, more businesses, more visitors and ultimately more long-term investment including a stunning expanse of beach, beautiful views and sunsets, international-class sporting facilities and events (2011 European Sandyachting Championships; 2012 British Womens Open Golf Championship; 2013 British Boys Golf Championship; 2014 Mens Open Golf Championship), the character of a classic Victorian/ Edwardian resort, provision for outdoor pursuits, growing trends for UK breaks and special importance for biodiversity including SSSI and Ramsar designations. There are opportunities to develop the economy further at The Row, The Quadrant, Carr Lane Industrial Estate and the Promenade. Designation as a Neighbourhood Plan Frontrunner will further support the potential of the town to develop the opportunities and vision to attract more investment to build on recent trends and development and it is vital that Hoylake retains its status as a Town Centre.</p>
32	<p>The Reasoned Justification would be improved by a paragraph on the cultural heritage assets of the area, referring to the number, condition and quality of designated and local heritage assets and current knowledge, such as up-to-date Appraisals and/or Management Plans for the Conservation Areas.</p>

33	Non-designated historic designed garden landscapes are not recognised unless they happen to coincide with another designation or function. The Caldy villas may be of interest.
43	The scope for additional housing appears to be over-estimated. The higher figures would not be compatible with retaining open green spaces, the existing Green Belt with separation of settlements, the provision of attractive (not too crowded) residential areas and protected habitats. Only the lower figures should be adopted with new housing only allowed on infill and demolition / brown sites.
48	Specific designations, their qualifying features, extent of designation, special legal procedures for international sites; UK Priority Habitats including coastal sand dunes, lowland healthland, deciduous woodland, coastal and flood plain grazing marsh; Landscape Character Areas with their significant features, sensitivities and recommended management approach; potential for climate change to impact on habitats, landscapes and communities and provision for adaptation; reference to the Shoreline Management Plan, areas where coastline flood risk defences will be maintained or where there will be no active intervention to allow natural processes to continue and the potential for coastal squeeze should be included. Reference to the potential for Hilbre Islands to be designated as a new Marine Conservation Zone is welcomed. Support showing open space on the Map. Key national and international natural environment designations should also be shown.
50 51	Settlement Area 6 is being consigned to an unsustainably low level of growth. Infill housing development will not deliver enough jobs, "maintain, enhance and safeguard" is not ambitious enough and will not meet the existing needs of the young, working age or elderly population.

9 Settlement Area 7 - Heswall

9.1 Settlement Area 7 includes the west Wirral settlements of Irby, Thingwall, Pensby, Heswall and Gayton:

Comments on the Draft Settlement Area Policy

ID	Summary of Responses Received
5	Support this policy, Point 6 in particular.
9	Point 5 - Mentions the larger sites, but fails to record the importance to wildlife and people of small sites such as Heswall Beacons (Site of Biological Importance), Poll Hill, Puddydale.
10	Welcome references to Conservation Areas and designated heritage assets and their setting.
12	Point 5 - Heswall Beacons should be added to Heswall Dales, Thurstaston Common, Arrowe Country Park and Wirral Way. The Beacons is an important natural open space in Heswall which is surrounded by domestic properties and it

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	would be very possible for a developer to propose infilling the area with a new estate of houses. The Beacons needs to be preserved and protected from development in the same way, and for the same reasons, as Heswall Dales etc.
13	Restrictions on development in Thingwall should be lifted to provide local employment, support the economy and provide additional housing. Infill development would not infringe on any Green Belt.
14	Policy needs to ensure that development is directed to areas where existing waste water drainage capacity exists or can be readily and economically provided and that proposed development includes appropriate sustainable drainage facilities.
15	<p>Point 2 - Also safeguard / enhance the character of Heswall Centre and its soft landscaping and reduce street clutter and advertising. It is essential that the distinctive character of Heswall Centre, which is the key to its success, is maintained / improved.</p> <p>Policy 5 - Add Heswall Beacons to the list, as the landscape value and openness of this important recreational area should also restored and maintained. Also in add the term "restored" since for example Heswall Dales and the Beacons have been degraded by uncharacteristic vegetation.</p> <p>Policy 8 - And improve pedestrian safety and comfort in Heswall Centre, as traffic management should address pedestrian comfort as well as "highway efficiency".</p> <p>Add - Should maintain and improve public transport linkages in the Area, as it is important to improve linkages to Heswall Hills Station to facilitate use of the Wrexham / Bidston line. In the absence of a direct train link, the restoration of the "Rapidride" express bus to Liverpool would be beneficial.</p> <p>Add - Introduce Design and Density Guidelines for areas of Heswall, similar to those for Gayton.</p>
16	Point 7 - Welcome flood risk is highlighted but recommend the phrase "minimise flood risk" is replaced with "reduce flood risk", to place greater emphasis on reducing the risk of flooding and to provide more clarity on what would be expected from developers.
17	How have the centres at Irby and Thingwall been safeguarded with the loss of the GP Surgeries to The Warrens? How does this decision reflect the shortage of allotments identified? How do the Council's actions match this strategy?
19	All previously developed land should be effectively used to deliver sustainable economic growth. Alternative employment generating or mixed use developments should be considered on existing or former employment sites where higher value uses could enable employment uses to come forward or information is available to show that a site is unsuitable or unviable or no longer in demand. Employment sites can be suitable for new homes and can be used to provide the local community with access to a range of shops and services.

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22	Point 5 - The aspiration merely to maintain access is too limited. There are opportunities to improve the existing access arrangements, to make them more suitable for a range of users, improve their bio-diversity value, provide new routes and extend greenspace benefits.
23	Point 10 - Is especially important in terms of the character of the modest settlements in the wider vicinity of Heswall and is strongly endorsed.
27	The Policy should recognise the potential value of the many contrasting historic and modern designed parks and gardens in the Area, which may be of value in their own right and which may in future be added to a Local List prepared under PPS5.
28	'Safeguard and enhance' should be explained and additional provision to serve top-up shopping needs should be provided for. Existing employment sites could be suitable for alternative employment generating uses and mixed developments. Employment and market trends, viability, suitability, demand for employment uses and the need for higher value uses should taken into account.
29	Welcome the reference to green issues in terms of open spaces, habitats, protected natural sites and sustainability. Maintaining the existing Green Belt and the physical separation of settlements must be retained into the future as stated.
32	<p>Point 5 - Should be strengthened to include the importance of recreational routes. The Policy and supporting text should identify specific Landscape Character Areas; opportunities for the creation, extension and better management of UK Priority Habitats; targets for new habitat creation and how they will be met; the management of landscape features of importance to wild flora and fauna which are essential for the migration, dispersal and genetic exchange of wild species; how management will be improved by planning conditions or obligations; and provision for better access to and interpretation of nature conservation sites.</p> <p>Point 7 - Should be strengthened to resist development that would rely on additional flood defence works that could adversely affect the environment, protect naturally functioning floodplains and natural coastal defences, minimise culverting of watercourses.</p> <p>Point 9 - Should say how the Council will support greater use, with quantifiable targets to measure success.</p> <p>Point 10 - Should consider the wider environmental setting of settlements including the landscape, biodiversity and accessibility, opportunities to enhance the intrinsic, economic and recreational value of the countryside, long term defensible boundaries, the potential for loss of open space within settlements, impacts from infill and extensions and sensitivity of surrounding landscapes.</p>
35	Support development in allocated centres but the scale of development must be appropriate to the scale and function of the centre.

36	Support the safeguarding and enhancement of Heswall as the main convenience and comparison retail, office and service centre for the Area and Irby Village as the focus for neighbourhood level shops, services and community facilities.
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Comments on the Draft Vision Statement

ID	Summary of Responses Received
7	Support the vision to create a framework of green infrastructure. Green infrastructure has a multitude of functions including formal and informal sport and recreation opportunities e.g. cycling, walking, running routes or linking playing fields and other sports facilities to greenspace.
24	The Vision Statement for Heswall and the surrounding area is supported.
33	Support the Vision but it is too narrowly focused on sustainable transport. Sustainability should provide the core, supported by a definition with environmental outcomes, indicators and targets, including for transport, landscape and environmental management.

Comments on the Reasoned Justification

ID	Summary of Responses Received
4	Paragraph 3.11 states that the "Department of Transport Traffic Master Data highlights congestion at Thingwall Corner". The developer of the health centre at The Warrens claimed that it would have no affect on traffic flows. If that was the case, why has it now been deemed necessary to install a set of traffic lights just a few yards from Thingwall Corner, thus, adding to the congestion? Why wasn't the Traffic Master Data brought to the attention of the Planning Committee when the plans for The Warrens were being considered? This was Green Belt land and there was never any valid justification for it to have been lost to unnecessary development. If we cannot rely on our elected representatives to protect 'a tight Green Belt' policy, then why should we put any faith in the present proposal contained in the Vision Statement?
6	Paragraph 3.5 "Achieving the higher level would involve the provision of housing on greenfield sites and on sites designated as urban greenspace..." appears to contradict paragraph 3.8 which states "There is, however, a shortage of allotments, provision for children and young people and outdoor sports facilities..." Any decision to allow development on greenfield sites including playing fields should be supported by an up to date and robust PPG17 compliant Open Space, Sport and Recreation Assessment and/or a Playing Pitch Strategy. Sport England is a statutory consultee on any development that affects a playing field and would lodge a statutory objection to any proposal to develop a playing field unless it is specifically identified as surplus to need in an up-to-date assessment that has followed the methodology set out in 'Towards a Level Playing Field'. Even if sites are currently disused, paragraph 10 of PPG17 requires the Local Authority to carry out an assessment of what other open space function the site can perform. Disuse is not an indication of lack of demand but could be the result of deliberate abandonment in order to change the

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	<p>use. Again a PPG17 compliant assessment would identify sites that are genuinely surplus to requirement or should be brought back into use. An increase in housing also results in an increase in demand for sport. Any Playing Pitch Strategy should take into account proposed locations of new housing to assess the impact on demand and supply for pitches. Sport England also advise undertaking a corresponding Built Facilities Sports Strategy to assess the impact of new development on the demand and supply for sports facilities in the area. Sport England has a range of strategic planning tools to aid Local Authorities when assessing current and existing demand and supply for indoor and outdoor sports facilities.</p>
8	<p>Area is supplied from Sutton Hall Water Treatment Works. No current water supply capacity issues but localised up-sizing works may be required. Developments will need to be assessed case-by-case to determine their impact and identify any supporting infrastructure needs.</p> <p>Area is served by Waste Water Treatment Works at Birkenhead and at Meols. Birkenhead WWTW, in Settlement Area 2, has some headroom in capacity (dry weather flow) but is close to consented levels and will be impacted by Wirral Waters. Meols WWTW has limited headroom in capacity. Connection dependent, local up-sizing works and wastewater pumping station up-sizing (or new pumping stations) could be required.</p>
9	<p>Paragraph 3.5 - Very concerned about the higher housing numbers suggested, which would require building on greenfield land. This should be avoided as we have many people in Wirral and need our remaining open space for food production and recreation.</p> <p>Paragraph 3.8 - Records the need to maintain and improve Heswall Dales, which is welcome but not how this could be achieved.</p>
11	<p>Understanding the components contributing to local character will be key. Additional characterisation work may be necessary to support implementation. Conservation Area Appraisals should be referred to and reference should be made to Understanding Place: Character and Context in Local Planning.</p>
25	<p>The Reasoned Justification would be improved by a paragraph on the cultural heritage assets of the Area, to refer to the number, quality and condition of designated and local heritage assets and current knowledge such as up-to-date Appraisals and/or Management Plans for the Conservation Areas.</p>
30	<p>The scope for additional housing appears to be over-estimated. The higher figures would not be compatible with retaining open green spaces, the existing Green Belt with separation of settlements, the provision of attractive (not too crowded) residential areas and protected habitats. Only the lower figures should be adopted with new housing only allowed on infill and demolition / brown sites.</p>

37	Settlement Area 7 is being consigned to an unsustainably low level of growth. Infill housing development will not deliver enough jobs, "maintain, enhance and safeguard" is not ambitious enough and will not meet the existing needs of the young, working age or elderly population.
38	

10 Settlement Area 8 - Rural Areas

10.1 Settlement Area 8 includes the predominantly rural areas of Wirral including Thurstaston, Storeton, Thornton Hough, Raby, Barnston, Brimstage, Saughall Massie, Frankby and Eastham Village:

Comments on the Draft Settlement Area Policy

ID	Summary of Responses Received
6	The Policy should allow for new employment uses at the Major Developed Site at Clatterbridge Hospital including uses associated with medical services and bio-sciences, research, education and manufacture or other uses which support healthcare, such as accommodation for families and carers of patients from outside the immediate catchment area.
7	Omitting a single plot of land adjacent to Burnbrae at Lever Causeway, Storeton from the Green Belt, to permit an approved development, would enhance the visual aspect, amenity and conservation of the area, as it is presently an eyesore.
9	Welcome references to Conservation Areas and designated heritage assets and their setting and references to other older residential areas.
11	Point 11 - Welcome that flood risk is highlighted but recommend the phrase "minimise flood risk" is replaced with "reduce flood risk", to place greater emphasis on reducing the risk of flooding and to provide more clarity on what would be expected from developers. Point 6 - Many of the natural and semi-natural features warranted for protection extend beyond the rural area into urban areas, which is often where protection and possible enhancement are required (reinforced by the Water Framework Directive) and this should be considered for every Settlement Area.
12	Where is the commitment to maintain the existing, long established Green Belt.
17	All previously developed land should be effectively used to deliver sustainable economic growth. Alternative employment generating or mixed use developments should be considered on existing or former employment sites where higher value uses could enable employment uses to come forward or information is available to show that a site is unsuitable or unviable or no longer in demand. Employment sites can be suitable for new homes and can be used to provide the local community with access to a range of shops and services.
20	The draft Policy captures the key assets, issues and aspirations for the Area and is supported.

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24	The Policy should recognise the potential value of the many contrasting historic and modern designed parks and gardens in the Area, which may be of value in their own right and which may in future be added to a Local List prepared under PPS5.
25	Point 4 - Please add: 'The Historic Environment record contains the undesignated local assets'. Please speed up the designation of Storeton, Raby and Brimstage villages as Conservation Areas.
28	The Rural Settlement Area is crossed by the high voltage overhead electricity transmission line between Birkenhead substation and Capenhurst substation in Cheshire. Rights are obtained from individual landowners to place equipment on their land. Existing overhead lines are retained in-situ because of the scale, bulk and cost of the transmission equipment required to operate at 400kV. The relocation of existing high voltage overhead lines are only supported where proposals directly facilitate a major development or infrastructure project of national importance identified by Central Government. Buildings should not be built directly beneath overhead lines for the amenity of potential occupiers of properties and to allow quick and easy access to carry out maintenance of equipment. Statutory safety clearances between overhead lines, ground levels and built structures must not be infringed.
29	Welcome the reference to green issues in terms of open spaces, habitats, protected natural sites and sustainability. Maintaining the existing Green Belt and the physical separation of settlements must be retained into the future as stated.
30	Agree with the importance of preserving the special character and natural features of Wirral's rural areas and support the need to maximise the use of agricultural land for food production but sustainable economic and housing growth should also be a priority within the key rural settlements of Raby, Thornton Hough, Brimstage, Storeton and Barnston to allow proportionate growth, not just limited infill, to ensure their future sustainability and economic contribution. Shropshire Council, which identifies rural hubs and clusters, is an example of best practice. A series of national reports have identified the impact of restrictive planning policies leading to a narrow economic base, low wages, declining services and above all unaffordable homes. The average house prices for Wirral's rural areas is £399,155 in Thornton Hough; £235,160 in Barnston; and £519,411 in Brimstage; which are unaffordable to younger generations and increasingly restricted to a wealthy few with a higher than average proportion of retired people. The Policy for Settlement Area 8 should be more flexible to allow for other unidentified sites, strategic urban extensions and windfall sites to ensure a flexible and deliverable strategy. The rural economy is not just about farms and land-based business. Allowance should be made for diversification including tourism and employment uses. Allowance for conversions of redundant and rundown derelict buildings is essential, even in Conservation Areas, for their continued maintenance and stewardship. The current strategy will result in pressure to develop amenity spaces, over-development and traffic congestion within the urban areas. It will also be more difficult to mitigate against climate change and promote sustainable design within the more densely built-up urban areas. Areas of environmental constraint do not significantly preclude development if local distinctiveness is maintained. Limited public funding is not a

	<p>justification for limiting growth in the rural areas, where development has the potential to be self-sustaining with local infrastructure provided through S106 agreements and/or CIL.</p>
31	<p>Maintaining the national and international importance of the intertidal foreshore could be expanded to ensure that biodiversity is "protected, maintained, enhanced and reconnected".</p>
32	<p>Point 1 - Should define measures to preserve openness and rural character, introduce a presumption for net benefit / no significant loss to the natural or semi-natural environment, include a set of outcomes, indicators and targets, take account of the intrinsic, economic and recreational value of the countryside, consider landscape, biodiversity and accessibility, opportunities to maximise the benefits to people and wildlife together and long term defensible boundaries.</p> <p>Point 2 - Fails to recognise the risk of unsustainable production upon landscapes, wildlife, habitats and geological features and the benefits of environmentally sensitive management and should include "... whilst respecting the capacity of the environment". Environmental capacity should be defined to minimise the risk of over development/ exploitation of the rural landscape and the semi-natural fringes around production land.</p> <p>Point 4 - Needs to identify measures to enhance character and appearance.</p> <p>Point 5 - Should be cross-referenced to identify specific Landscape Character Areas appropriate for enhancement or restoration; opportunities for the creation, extension and better management of UK Priority Habitats; the management of landscape features essential for the migration, dispersal and genetic exchange of wild species; and provision for better access and interpretation, with quantifiable targets to measure success.</p> <p>Point 6 - Should be expanded to cover protected and priority species, habitat creation, protection and enhancement of green corridors, river valleys, open space networks and other linking features in urban and rural areas following the principles of green infrastructure, a presumption for net benefit / no significant loss, climate change, mitigation and compensatory measures to offset harm and the level of compensation or benefits that will be expected.</p> <p>Point 7 - Should be expanded to minimise the impact on landscapes, wildlife, habitats and geological features.</p> <p>Point 8 - Should be strengthened to emphasise the importance of recreational routes.</p> <p>Point 9 - Should include targets for the best use of sustainable transport and how traffic management relates to effective landscape and environmental management.</p> <p>Point 10 - Needs to say how the Council will support greater use of the railway line, with indicators to measure success.</p>

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Point 11 - Needs to protect naturally functioning floodplains and natural coastal defences, resist developments that would rely on additional flood defence works and minimise culverting.

Comments on the Draft Vision Statement

ID	Summary of Responses Received
13	Should specifically include a strong, well defined, long established Green Belt to maintain the rural nature of Wirral and to focus development in the existing urban areas. This is especially important now the population is declining and the focus must increasingly shift to the regeneration of urban areas.
21	The Vision Statement is supported but fails to identify the element of enhancement identified in several of the bullet points in the Policy and should be amended to read: "...the distinctive landscape character, heritage value and environmental quality of the rural areas will have been maintained and enhanced, supported by..."
33	Support the Vision but it should also refer to "sustainable open land uses"; enhancement; and a definition of sustainability, with outcomes, indicators and targets for landscape and environmental management.

Comments on the Reasoned Justification

ID	Summary of Responses Received
3	Paragraph 3.7 - The hospital trusts are reducing employment at the Clatterbridge site. The Wirral University Teaching Hospital laboratories are in the process of moving to Bromborough and there are strong calls for the Oncology unit to be moved to Liverpool, coupled with several hospital ward relocations to Arrowe Park and further proposals to move even more medical facilities to Arrowe Park. Could this be part of an overall 'hand in glove' plan with the Council to free up land for housing development? After all, we have seen what happened to Green Belt land at The Warrens once the PTC and Council got together.
4	Paragraph 3.9 - The proposed Golf Resort at Hoylake has not yet been brought to any planning application and has the potential to seriously damage biodiversity, in contradiction to Priority 6. If it is ever to happen it needs planning to protect the fields used as roosts by wading birds for the internationally important sites round the coast. Interpretation and education about this biodiversity could be a more sustainable resource, supporting tourism in Wirral especially in winter, than yet another golf course. The reference to such a vague and possibly damaging scheme, which has got nowhere in the last few years, should be removed.
5	Paragraph 3.7 - The last sentence should be amended to read: "The Major Developed Site at Clatterbridge Hospital could attract new employment uses and the Council will support these uses. These could include uses associated with medical services and bio-sciences, but could also include research, education and manufacture, or other uses which support healthcare, such as accommodation for families and carers of patients from outside the immediate catchment area".

8	There are likely to be problems with water supply and wastewater connections with the majority of sites in the Green Belt.
10	Understanding the components contributing to local character will be key. Additional characterisation work may be necessary to support implementation. Conservation Area Appraisals should be referred to and reference should be made to Understanding Place: Character and Context in Local Planning.
14	What are the details for the Golf Resort, as the report (now very out of date) has been hidden from us. We can only presume there is no justification when the area is surrounded by existing Golf Clubs. Why does the Council persist with this rather than developing golf with the local clubs?
15	Land within Settlement Area 8 will be required for urban expansion to meet the housing needs set out in RSS and the SHMA because the Settlement Area boundaries have been too tightly drawn around the existing urban areas. The lower figure could lead to a loss in population of up to 200 people and would represent just 4 dwellings per annum (2012-27). This would not meet the housing needs of the Rural Area, the Settlement Area Vision Statements or the economic aims of the Core Strategy and would be contrary to paragraph 10 and paragraph 37 of PPS3. Settlement Area and Green Belt boundaries should redrawn to provide flexibility meet identified needs.
22	The reasoned justification would be improved by a paragraph on the cultural heritage assets of the Area, to refer to the number, condition and quality of designated and local heritage assets and current knowledge, such as up-to-date Appraisals and/or Management Plans for the Conservation Areas.
23	Non-designated historic designed garden landscapes are not recognised unless they happen to coincide with another designation or function. Thornton Manor Gardens is already designated but other sites for potential future investigation include Arrowe Park; Gayton Hall; Hillbark, Frankby; Poulton Hall; Raby Hall; Thurstaston Hall; Thornton Hall; Thornton House; Eastham Hall/House; Eastham Gardens & Woods; Westwood/The Grange; Frankby Cemetery; Royden Park; Brimstage Hall; Raby Court; Rocklands; New Hall Manor; Carlett Park; Hooton Park; Woodland House; Copley House and Irby Hall.
26	Paragraph 3.7 - Between the words '....small developments....' add in the words 'appropriately designed'.
34	It is unclear how the capacity of between 57 and 305 new homes has been calculated from sites within planning permission and previously developed sites without any conflicting designations. The SHLAA Update indicates that 448 new dwellings could be delivered. More could come forward over the next 15 years. Relying on Carlett Park, which is still in use and has not been sold, is premature. Planning consent and site clearance is still required. As sale proceeds are required to expand other facilities, a good sale price is required, which is unlikely in the current market.

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35	Settlement Area 8 is being consigned to an unsustainably low level of growth. Infill housing development will not deliver enough jobs, "maintain, enhance and safeguard" is not ambitious enough and will not meet the existing needs of the young, working age or elderly population.
36	

11 Other General Comments

11.1 A number of respondents submitted more general comments that applied to all of the Settlement Area Policies or to other elements of the content of the emerging Core Strategy:

ID	Summary of Responses Received
1	The Core Strategy should make provision for places of worship and faith schools. Provision has been included in the draft National Planning Policy Framework (NPPF) in paragraphs 126 and 127. Paragraph 126 states "to deliver the facilities and services the community needs, planning policies and decisions should plan positively for the provision and integration of community facilities (such as local shops, meeting places, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments". Paragraph 127 refers to schools "Local authorities should take a proactive, positive and collaborative approach to the development of schools by working with school promoters to identify and resolve key issues before applications are submitted. In determining planning applications for schools, local planning authorities should attach very significant weight to the desirability of establishing new schools and to enabling local people to do so". The provision of these local services is very important community cohesion and stability.
4 17	The data included in the reasoned justification to each of the Settlement Area Policies illustrates the total imbalance that will exist if the strategy so far promoted is allowed to be adopted. This strategy so geographically imbalanced, disproportionate and uncertain as to make it unsound and undeliverable. No settlement hierarchy is identified. The assumption is that the market will remain constrained across Areas 1, 3 to 8 and that the market will deliver new development in areas where they have showed no interest even in the boom times. The Council expects the majority of new homes will be delivered in what are almost uniquely the most unattractive market locations in the Borough, whilst remaining areas will be effectively become dormitory commuter settlements. There is no evidence that the Council's previously published aspiration of 40% affordable housing can and will be delivered.
5	Reference to individual Sites of Biological Interest (now Local Wildlife Areas), SSSIs and Urban Greenspace appears to be missing and should be included, to indicate that they will continue to be considered in any planning process.
13	Greater account needs to be taken of the impact of development on Level Crossings in terms of significant increases in the vehicular and/or pedestrian traffic, which can have impacts upon safety and service provision including train speeds, timetabling and future service improvements. This should be specifically addressed in Settlement Areas Policies to elevate the importance of Level Crossings within

	<p>the development management and planning process. The Council has a statutory duty to consult the rail undertaker under Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order 2010, where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. As a first principle, Network Rail would seek to close Level Crossings where possible. Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure and the developer should be required to fund any qualitative improvements required as a direct result of the development proposed. A policy has been included in the West Lancashire Local Plan to state that “Developments adjacent to, or affecting, rail lines (including resulting in a material increase or change of character of the traffic using a rail crossing of a railway) will only be permitted with the agreement of Network Rail” and has been submitted as part of the Staffordshire Moorlands Revised Submission Core Strategy and the pre-publication version of the Lancaster Local Plan. Where growth or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts on stations and routes are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades including improved signalling, passing loops, car parking, improved access arrangements or platform extensions, which should be sought from developer contributions where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network. PPG13 states that councils should, “take into account the potential for changing overall travel patterns, for instance by improving the sustainability of existing developments through a fully co-ordinated approach of development plan allocations and transport improvements” and that “where development can only take place with improvements to public transport services, a contribution from the developer (payable to the local authority) would be appropriate.” Standard charges and formulae may not be appropriate as the likely impact and level of improvements required will be specific to each station and each development. It is therefore essential that any Transport Assessment submitted in support of a planning application quantifies in detail the likely impacts on the rail network. The Core Strategy should therefore include a requirement for developer contributions to deliver improvements to the rail network; a requirement for Transport Assessments to take account of impacts on existing rail infrastructure to allow any necessary developer contributions to be calculated; and a commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. Improvements to rail transport contribute to the public good, support regeneration, increase the attractiveness of settlements and benefit communities and railway developments should not be expected to support other public projects.</p>
16	<p>The plan period should be extended. The Core Strategy will not be adopted until August 2013. PPS3 para 53 requires at least 15 years from adoption. The end date should be 2031. Subsequent DPDs should also plan for 15 years. RSS Policy L4 allows the annual housing requirement to be continued beyond 2021 until a review. This should be addressed before Examination.</p>

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18	The document should reflect the latest Wirral Visitor Research Study 2011 (copy provided).
19	<p>Development will need to take account of already unavoidable changes in the local climate. Policies should be mindful of the likely life of new built development going forward and make clear the necessity for new development to be resilient against and adapted to future climatic conditions including warmer wetter winters, warmer dryer summers, more storm disruption and flooding and drought conditions with heightened water stress. There is at present an implicit assumption that water constraints can be overcome with improvements to 'hard infrastructure' when there is a need to bring forward a different quality of development that places less demand on existing stressed infrastructure. Repeated reference to existing constraints present an opportunity to highlight the importance of sustainable design, resilient infrastructure design and developer contributions to improve local infrastructure. The role of green infrastructure in moderating urban temperatures and demands on drainage systems should be highlighted in addition to its function for leisure and biodiversity. To mitigate and adapt as intended, existing and proposed green and blue infrastructure will need development and maintenance. Hard infrastructure such as roads and lighting will also need to be adaptable to the potential changes in climate. More expensive or advanced technological fixes may be required, which could have significant cost and maintenance implications. The potential cost of responding to the likely increase in the frequency and severity of storms and flooding will also lead to ongoing and rising costs for which adequate financial and resource provision will be required.</p>
21	The Council should continue to have a flexible approach to uses in town centres.
22	The Core Strategy must include archaeology as a major consideration. Major projects must include an Archaeological Impact Assessment.
23	<p>There are many designed landscapes within Wirral but only four are on the English Heritage Register of Parks and Gardens. There is no specific reference to these sites but it is assumed that they would fall under "other designated heritage assets". UDP Policy CH26 only recognises two Register sites but the Spatial Options and Preferred Options Reports don't mention the sites at all. Parks and Gardens on the English Heritage Register are of national significance and are a material consideration in the planning process and should be recognised within local development documents without relying on other overlapping designations or functions to identify them.</p>
25	<p>The Settlement Area Policies appear to support potential development within areas of medium and high flood risk. Allocated sites must comply with the requirements of National Planning Policy (currently PPS25) and should be directed towards Flood Zone 1 in the first instance. Only where sites are not available in Flood Zone 1 should the allocation of sites in Flood Zone 2 be considered. Allocations in Flood Zone 3 should only be made if there are no reasonably available alternative sites in Flood Zone 2. Any site allocation in either Flood Zone 2 or 3 will need to be supported by evidence from a Level 2 Strategic Flood Risk Assessment. Under the Water Resources Act 1991 and Land Drainage Byelaws, sites on or adjacent to a Main River watercourse must have written consent for any proposed works or structures in, under, over or within 8 metres of the top of the bank/retaining wall of</p>

	<p>a 'Main River' watercourse. No trees or shrubs may be planted, nor fences, buildings, pipelines or any other structure erected within 8 metres of the top of any bank/retaining wall of the watercourse without prior consent.</p>
28	<p>There is a general lack of information in respect of waste and energy infrastructure. Some settlement areas propose continued expansion of housing and commercial or industrial land to meet identified housing and employment needs that will increase demands on the capacity of existing energy and waste infrastructure. It would be helpful to refer to the emerging Waste DPD as the policy framework and context for waste management infrastructure. Reference should be made to the need to incorporate sustainable design standards within new development, such as Code for Sustainable Home and BREEAM standards, given the importance of energy efficiency and the need for sustainable water management. Consideration of flood risk from all sources is welcome. The capacity of existing drainage infrastructure is limited across a number of settlement areas and the use of sustainable drainage systems is required</p>
30	<p>The Settlement Area policies fail to articulate the full range of natural environment issues signposted in Preferred Option 18 - Green Infrastructure. Statements in the Reasoned Justifications are insufficiently detailed to capture the diversity and significance of valued landscapes, habitats, sites and species. Evidence base documents should be clearly referenced.</p>
38	<p>To make the most of the bus services in the Wirral area there should be measures to: 1) ensure the right conditions for punctual bus services, such as bus priority measures to encourage people to use public transport whenever possible; 2) promote bus travel as a means to supporting reductions in congestion and release of carbon emissions to the environment; 3) promote bus services as the ideal means of access to essential services, jobs and training, and to social opportunities; and 4) consult with local bus operators on changes that could affect the efficiency of the running of bus services.</p> <p>To encourage a sustainable visitor economy through coach travel, which is greener than the car, taking up the space of two cars on the road and accommodating the same occupancy as 20+ cars, the Council should: 1) where relevant ensure adequate facilities are available for coaches, whether to accommodate travel to school or visitor journeys to attractions/ destinations; and 2) include facilities that enable safe and easy access of coach at designated drop off/ pick up points for passengers, with rest and refreshment facilities and nearby parking for drivers where relevant.</p> <p>Coach tourism is a growing sector for the Wirral visitor economy. Working with all relevant bodies including the attractions, Wirral Council should be working toward the CPT Coach Friendly Award, recently achieved by Liverpool City Council. Mersey Ferries is working toward the award for the Woodside Ferry Terminal.</p>
55	<p>Support is required from the Local Planning Authority, in the Local Plan and through development management, to protect and secure land for essential infrastructure for water supply and wastewater treatment to prevent the Core Strategy from being</p>

	<p>undeliverable and/or new development affecting the provision of other key services. Development should not be permitted unless the developer can demonstrate that adequate infrastructure capacity is available.</p>
56	<p>There must be a commitment to maintain the Green Belt, as is, to prevent the opportunity for development away from the core centres that the Council correctly wishes to reinvigorate.</p> <p>It is not clear why the Council still considering the need for additional properties given that the figures imply that within the next 20 years there will be a notable decline in population? The Council does not appear to have a strategy to manage this decline. There is no reference to the state of the second hand housing market, which is surely the best indicator of the “need” or otherwise for additional properties and no recognition of the availability of newly built properties in Liverpool, availability in CW&C and the plans for 2,000 new homes just over the border at Ledsham Road and the 300 at RoFTen at Hooton.</p> <p>There is no strategy to tackle the high incidence of “worklessness” amongst the young. There is clearly still a huge dependence on Liverpool to provide employment, underlining Wirral’s development as a dormitory for Liverpool. It is not clear that the strategies accept this - is it really desirable to change this?</p> <p>There is much reference to flooding but when was the last incidence of flooding, other than that caused by the water mains. Weeds and other growth blocking the drainage rivers need to be dealt with.</p> <p>There is nothing to address or influence the imbalance between the cost of new build and the additional costs and taxes (VAT) on the renovation of existing properties. What is the strategy to address the underused shops and flats, and the large numbers of vacant properties reported in some Settlement Areas?</p>

12 The Council's Response

12.1 The Council has responded to the comments received by amending the Settlement Area Policies and their associated vision statements included in the Proposed Submission Draft Core Strategy to:

- clarify that the priorities set out are intended to promote sustainable development within each of the Settlement Areas;
- express the intention to enhance as well as maintain relevant assets;
- make provision for the protection of un-designated heritage assets;
- include the intention to tackle concentrations of worklessness and low incomes within the text of the relevant policies;
- clarify requirements related to flood risk;
- clarify issues related to water supply and the capacity of waste water treatment works;
- provide for the promotion of sustainable transport;

- address the impact of pedestrian and vehicular traffic on railway crossings; and
- refer to other policies in the Core Strategy, where relevant.

12.2 In **Settlement Area 1** the main changes include:

- highlighting the need to address flood risk at Cross Lane Industrial Estate;
- including allotments and the need to strengthen provision of green infrastructure in the wording related to priorities for open space;
- reference to the "unfavourable recovering" condition of part of the inter-tidal foreshore; and
- reference to the potential need to upgrade water supply infrastructure after the first five years.

12.3 In **Settlement Area 2** the main changes include:

- references to ongoing investment in port infrastructure;
- references to the opportunity to establish strategic renewable energy infrastructure;
- including the dockland water areas alongside the enhancement of green infrastructure;
- providing for the protection of the adjoining natural environment;
- clarifying the range of activities anticipated at East Float and promote the better integration with and enhancement of the surrounding hinterlands;
- references to flood resilient design and the potential need for additional water supply and waste water treatment infrastructure; and
- references to linkages with the Strategic Freight Network.

12.4 In **Settlement Area 3** the main changes include:

- providing for the enhancement of the character of older residential areas;
- reference to strengthening the provision of green infrastructure;
- removing the reference to the evening economy in Oxton Village; and
- reference to the potential need to upgrade water supply infrastructure after the first five years.

12.5 In **Settlement Area 4** the main changes include:

- reference to the Lady Lever Art Gallery;
- clarifying the types of development anticipated at Wirral International Business Park;
- clarifying that increased access to the coast must be subject to the impact on nature conservation;
- reflecting the potential need for additional waste water treatment infrastructure at Bromborough Waste Water Treatment Works;
- references to increasing pedestrian and cycle access to the north; and
- reference to the flight paths from Liverpool John Lennon Airport.

12.6 In **Settlement Area 5** the main changes include:

- references to increasing access to North Wirral Coastal Park, subject to the policy for the Rural Areas;
- protecting facilities that meet needs arising from adjacent Areas;
- highlighting the need to address flood risk at Moreton and to maintain existing flood defences;
- reference to providing for improvements to local biodiversity and the "unfavourable" condition of Meols Meadows SSSI; and
- references to the impact of traffic on the level crossing at Leasowe Station.

12.7 In **Settlement Area 6** the main changes include:

- clarifying that provision for leisure and tourism must be subject to maintaining and enhancing national and international nature conservation, the character of the coastal resorts and priority habitats;
- clarifying the reason for the focus on Greenbank Road, West Kirby;
- references to the impact of traffic on rail crossings; and
- reference to the need to maintain the distinctiveness of Hoylake and West Kirby.

12.8 In **Settlement Area 7** the main changes include:

- reference to the national as well as international importance of the foreshore; and
- clarifying the focus for transport priorities within the policy text.

12.9 In **Settlement Area 8** the main changes include:

- reference to local nature reserves;
- references to the villages and tourism and employment in the Vision Statement;
- clarifying that agriculture, urban services and access to countryside recreation must be subject to the impact on local character, landscape, heritage and biodiversity;
- adding hedgerows to the list of habitats that should be maintained and enhanced;
- reference to the potential need for additional waste water treatment infrastructure at North Wirral Waste Water Treatment Works; and
- references to rural rail crossings.

12.10 The following matters are addressed elsewhere within the Proposed Submission Draft Core Strategy:

- matters related to the broad spatial strategy and levels of housing provision;
- the approach to alternative uses on employment sites;
- the need for additional design controls and character appraisals;
- the scale of retail development anticipated in individual centres;
- the position of Hoylake in the retail hierarchy;
- out-of-centre retail development;

- provision for highway safety, buses and coaches;
- the general approach to green infrastructure, biodiversity and priority habitats and the protection of sports facilities;
- the principal findings of the revised Shoreline Management Plan;
- amendments to reflect the changes to national policy for rural areas and Green Belts; and
- matters related to the requirement for appropriate assessments under the Habitat Regulations.

12.11 The following information has now been included within the Spatial Portrait accompanying the Proposed Submission Draft Core Strategy, alongside the majority of the background information previously provided to support the content of the draft Settlement Area Policies:

- additional background information on the expected impacts of climate change;
- the presence of non-designated garden landscapes;
- information on areas that are highly accessible by public transport and maps illustrating the latest information on high frequency public transport corridors;
- the location of current national and international nature conservation designations;
- references to where new housing development had previously been restrained;
- summary information on the provision of indoor recreation;
- additional detail related to water supply and the capacity of waste water treatment works within each Settlement Area; and
- reference to the emerging neighbourhood planning proposals for Greasby.

13 List of Contacts

A Power	Mr Brown
A2 Architects Ltd	Mr C M Brand
Abacus Organics	Mr C P Hales
Age Concern Wirral	Mr C R Hutchinson
Ainsley Gommon Architects	Mr C S Thomson
Airbus Operations Ltd	Mr C Simpson
Alinbrook Ltd	Mr C T Moore
Allerton Trust	Mr C W Dent BA Dip TP RIBA MRTPI
Alpha Homes	Mr C Wellstead
Alyn Nicholls & Associates	Mr Campbell
Anchor Trust	Mr Casement
Ancient Monuments Society	Mr Cushion
Anna May Couture	Mr D Allan
Arena Housing	Mr D Birkett
Arriva North West Limited	Mr D Clamp
Athertons	Mr D Cross
Avantgarde	Mr D Hollett
B Wagstaff	Mr D McKaigue
Bargain Booze	Mr D Nooman
Barnston Conservation Society	Mr D Taylor
Barnston Womens Institute	Mr Davies
Barton Willmore	Mr E Fewtrell
BE Group	Mr E J Norton
Beechwood & Ballantyne EMB Ltd	Mr F Burgana BA MCD MRTPI
Beechwood Community Association	Mr F Howell
Bell Developments Ltd	Mr F Hyde
Bellway Homes Ltd	Mr F J Bloore
Bett Limited	Mr G Bryan
Bidston Moss Steering Group	Mr G D Evans
Bidston Preservation Trust	Mr G Ellison
Bidston Residents Association	Mr G Jones
Bidston Village CAAC	Mr G McGaffney
Biffa Waste Services	Mr G Noble
Birkenhead Building & Roofing Supplies Ltd	Mr G S Nagra
Birkenhead Market Tenants Association	Mr Gorman
Birkenhead Town Centre Forum	Mr Grey
Birkenhead YMCA	Mr H Grimshaw
Black Macadam	Mr H S Cameron
Bloomfields Limited	Mr H Turnbull
Blue Sky Planning Limited	Mr Hale
Bluemantle Ltd	Mr Hogg
BNP Paribas Real Estate	Mr Hussenbux
Bovis Homes Limited	Mr I Coulthard
Brady Chartered Surveyors	Mr J A Wright BA (Hons) MRTPI
Braithwaite Associates	Mr J Baird

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Bremners Solicitors	Mr J Barrington
Bride Hall Holdings Ltd	Mr J Davies
Bridgewater Meeting Room Trust	Mr J M Corfe
Bridscape	Mr J Morris
Bristol-Myers Squibb Pharmaceuticals	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
Burton Property	Mr Lynchy
C A Planning	Mr M Curtis
C D Hughes	Mr M Dewhirst
Caldy CAAC	Mr M F Lewis
Campaign for Real Ale	Mr M G Laurenson
Carey Jones Architects	Mr M Kivlehan
Cass Associates	Mr M Rattenshaw
CB Richard Ellis	Mr M Studley
CDP Limited	Mr M Webster
CDS Housing	Mr Mahoney
Central Liscard Area Residents Association	Mr Martin
CgMs Consulting	Mr McCormick
Chart Plan (2004) Ltd	Mr Mighall
Cherish the Bride	Mr N Ferguson
Cheshire & Wirral Partnership NHS Trust	Mr N Poole
Cheshire Gardens Trust	Mr P Barton MCD BA (hons)
Cheshire RIGS Group	Mr P Berry
Cheshire Wildlife Trust	Mr P Burgess
China Plate Farm	Mr P Cutts
Chris Thomas Limited	Mr P Fitzgerald
Church Commissioners	Mr P Haywood
Claire House Children's Hospice	Mr P Jackson
Clatterbridge Centre for Oncology	Mr P McCann
Claughton Community Group	Mr P Pendleton
Cliff Walsingham & Company	Mr P Surrige
Clifton Park Residents Group	Mr P Swift
Clive Watkin Partnership	Mr Prandle
CLM Services	Mr Quaile
Colin Buchanan & Partners	Mr R Braithwaite
Colliers CRE	Mr R Hardman
Compendium Group (Riverside)	Mr R J Wood
Contour Homes	Mr R L Shelbourne
Corporate Property Solutions	Mr R Miles
Cosmopolitan Housing	Mr R Watson
Council for British Archaeology	Mr Reade
Country Land & Business Association	Mr Rowland

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Countryside Properties	Mr S Davies
Crosby Homes NW Ltd	Mr S Dyke
Crown Estate	Mr S Palin
Cunnane Town Planning	Mr Spencer
Cycling Project	Mr T Clark
D Bamber	Mr T Denton
D J Cooke & Company Ltd	Mr T Kirkham
D Morgan Plc	Mr T Roberts
D S & E J Webster	Mr T Rock
D2 Planning	Mr T Tarr
Dalton Warner Davies	Mr T Wolf
Daly International	Mr Van Ingen
Dawn Ralph	Mr W Cates
De Pol Associates	Mr W Conroy
Dee Estuary Conservation Group	Mr W Cushion
Denbighshire County Council	Mr W Eastwood
Denis Wilson Partnership	Mr W Mitchel
Denton Clark	Mr W O'Dowd
Design Planning Developments	Mr Watts
Development Planning & Design Services	Mr Wilkinson
Devonshire Park Residents Association	Mrs B Murthwaite
Dickinson Dees	Mrs Clarke
Dickman Associates Ltd	Mrs D M Bentley
Diocese of Chester	Mrs Duncan
Diocese of Shrewsbury	Mrs E M Hale
Disabled Motorists Federation	Mrs G Nicholas
Dixon Webb	Mrs G Wollers
Doyle Developments	Mrs J Andrews
DPP	Mrs J M Smith
Dr I Neilson	Mrs J McIlhatton
Dr K Singh	Mrs Johnson
Dr M A Turpin	Mrs K M Ives
Dr M Baker-Schommer	Mrs Lewis
Dr M Day	Mrs M Callaghan
Dr Macbeath	Mrs N L Ratcliff
Dr N M Jedynakiewicz	Mrs S Charlesworth
Dr R Dockrell	Mrs S Shaw
Drivers Jonas Deloitte	Mrs Testo
DTZ Piedad Consulting	Mrs V Doodson
E M Enterprises	Mrs Weston
Eastham Village Preservation Association	Ms A Gillett
EDAW Plc	Ms A Holcroft
Edmund Kirby	Ms C Radford
Eleanor Road Residents Association	Ms C Smyth
Emerson Group	Ms D Toony
Emery Planning Partnership	Ms Foster
Energy Projects Plus	Ms Gordon

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- English Churches
- Entec UK Ltd
- Envirolink Northwest
- Environmental Resources Management
- Equfund (IPS) Ltd
- Family Housing Association
- FFT Planning
- Fisher German
- Forestry Commission
- Forster and Company
- Fort Perch Rock
- Forthview Limited
- Forum Housing
- Frankby CAAC
- Friends of Arno and Oxton Fields
- Friends of Arrowe Country Park
- Friends of Ashton Park
- Friends of Bidston Hill
- Friends of Birkenhead Park
- Friends of Central Park
- Friends of Coronation Gardens
- Friends of Dibbinsdale
- Friends of Eastham Country Park
- Friends of Flaybrick
- Friends of Gilroy Nature Conservation Society
- Friends of Grange Community Park
- Friends of Harrison Park
- Friends of Heswall Open Spaces
- Friends of Heswall Shore
- Friends of Higher Bebington Park
- Friends of Hilbre Nature Reserve
- Friends of Hoylake & Meols Gardens & Open Spaces
- Friends of Hoylake & Meols in Bloom
- Friends of Leasowe Lighthouse
- Friends of Meols Park
- Friends of Ness Gardens
- Friends of North Wirral Coastal Park
- Friends of Rock Park
- Friends of Royden Park
- Friends of Storeton Woods
- Friends of Tam O'Shanter Urban Farm Trust
- Ms H Butler
- Ms H M Jones
- Ms J Benfield
- Ms J M Stafford
- Ms K Robinson
- Ms K Truman
- Ms L Rutter
- Ms L Woodhead
- Ms M Bintley
- Ms M Bowman
- Ms M Johnson
- Ms P F Elcock
- Ms S Colquhoun
- Ms S J Wall
- Ms S Magee
- Ms S Noyce
- Ms T Irving
- Ms V A Ferris
- Ms V P James
- Muir Associates
- Multiple Sclerosis Society
- Myles Parry Estates
- N Power Renewables
- Nathaniel Litchfield & Partners
- National Farmers Union
- National Federation of Gypsy Liason Groups
- National Trust
- National Wind Power Limited
- New Brighton BRAVO
- New Brighton Community Association
- New Brighton Community Partnership
- New Brighton Environmentalists
- New Brighton Football Club
- New Ferry & Rock Ferry Conservation Society
- New Ferry Regeneration Action Group
- NJL Consulting
- Norland
- Norman Street Residents and Tenants Association
- North Birkenhead Neighbourhood Forum
- North Country Homes Group Limited
- North West Association of Sea Angling Clubs

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Friends of Vale Park
 Friends of Victoria Gardens
 Friends of Warwick Park

Friends of Wirral Country Park
 Fuller Peiser
 FWT
 Garden History Society
 Garry Usherwood Associates
 Gary Strother Builders
 Gauchwin Group
 General Aviation Awareness Council
 Georgian Group
 Gerald Eve
 Gilling Dod Architects
 Gilmore Developments Limited
 GL Hearn
 Gladman Developments
 Goodwin Planning Services
 Gough Planning Services
 Greasby Outdoor Activity & Leisure
 Grosscurth & Co
 GroundSure Limited
 Guardian Retirement Housing

GVA Grimley
 Halcrow Consulting Business Group
 Halcyon Properties
 Hallam Land Management Ltd

Halliwells LLP, Planning Section
 Harlor Homes
 Haston Reynolds Partnership
 Hawarden Airport (Airbus)
 Health & Safety Executive
 Henry Boot Developments Limited
 Heswall & District Business Association
 Heswall Jehovah's Witnesses
 Heswall Society
 Hickling Gray Associates
 Higham & Co.
 Highways Agency
 HM Coastguard
 Hooton Park Trust
 Hornby Homes
 Hourigan Connolly
 Housing 21

North West Strategic Health Authority
 North Western Baptist Association
 North Western Confederation of Passenger Transport
 Northern Trust
 NTL
 Overchurch Residents Association
 Oxtou Society
 P H Property Holdings Limited
 Paddock Johnson Partnership
 Paisleys Emporium Ltd
 Palms Fine Foods
 Pareto Retail Ltd
 Partnership for Racial Equality
 Party Paraphernalia
 Patrick Farfan Associates Ltd
 Paul Butler Associates
 Peacock & Smith
 Peel Holdings Limited
 Peel Ports
 Persimmon Homes
 Peter Brett Associates
 Phil Major Waste Disposal Limited
 Phoenix House Residential Rehabilitation
 PHP Developments Ltd
 Pierhead Housing
 Pine Court Housing
 Planning and Environmental Services Ltd
 Planning Bureau Limited
 Planning Potential Ltd
 Port Sunlight Village Society
 Poulton & District Residents Association
 Precious Moments
 Premier Brands UK Limited
 Prime Maintenance & Development
 Pulford Road Residents Association
 R G Drake
 Ramblers Association (Wirral Group)
 Redrow Homes
 RES Northern Europe
 Rev Father Ostaszewski
 RGB
 Robinson & Neal
 Robinson Architects
 Rock Ferry Community Partnership

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HOW Planning LLP
Hoylake CAAC

Hoylake Civic Society
Hoylake Village Life
Hylgar Properties
Indigo Planning Limited
Inglewood Properties
Inshore Fisheries and Conservation Authority
Irby, Thurstaston & Pensby Amenity Society
Irish Community Care Merseyside
Irvin Consultants
J Barnard
J Bowen
J Smith
J10 Planning
JASP Planning Consultancy Ltd
JMP Consulting
Job Centre Plus
John Millar (UK) Ltd
Jones Lang LaSalle
JWPC Limited
Kemp & Kemp
Kersh Commercial
King Sturge
Kings Lane Supporters Association

Knight Frank LLP
L Masterman
Lairdside Communities Trust

Lambert Smith Hampton
Lamont
Land Planning Group
Land Projects UK Associates
Landmark Information Group Ltd
Lattitude
Lawn Tennis Association
Leasowe Community Centre
Leasowe Community Homes
Lees & Partners
Leith Planning Limited
Leverhulme Estates
Liscard and Egremont Partnership
Liverpool Housing Trust
M Graham
MacIntosh Communications Limited

Rock Park Conservation Area
Rock Park Estate Management Committee
Rodney Housing Association
Roger Tym & Partners
Roman Catholic Church
Royal Estates
Royal Liverpool Golf Club
Royal National Lifeboat Institution
RPS Planning Transport & Environment
RSPB
Rural Development Service
Safety Layne (Investments) Limited
Salisbury Developments
Salvation Army
Sanderson Weatherall LLP
Saughall Massie CAAC
Savills (L & P) Limited
Seacombe Community Partnership
Seddon Homes Limited
Seven Waves Radio
Shireconsulting
Signet Planning
SLR Consulting Limited
Smith & Sons Property Consultants
Society for the Protection of Ancient Buildings
Sommerville Primary School
Spawforth Planning Consultants
St James Area Regeneration Action Team
St. Mary's Catholic College
Stanton Estate Residents Association
Steer Davies Gleave
Steven Abbott Associates
Stewart Ross Associates
Storey Sons & Parker
Street Design Partnership
Strutt & Parker
Suburban Studios
Sure Start (Birkenhead Central)
Sustrans
Taylor Wimpey UK Limited
Taylor Woodrow Developments
Taylor Young
Terrence O Rourke
Tetlow King Planning

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Malcolm E Lloyd
 Malcolm Scott Consultants Ltd
 Manor Egremont Mast Action Group
 Manor Kingdom Central
 Marine Lake Training Ltd
 Maritime Housing Association
 Mason Owen Property Consultants
 Matthews & Goodman
 McCormick Architecture
 McDyre & Co.
 Mersey Estuary Conservation Group
 Mersey Estuary Development Co-ordinator
 Mersey Forest Offices
 Mersey Waste Holdings Limited
 Merseyside & West Cheshire Ramblers
 Merseyside & West Lancs Bat Group
 Merseyside Archeological Service
 Merseyside Civic Society
 Merseyside Cycling Campaign
 Merseyside Environmental Trust
 Merseyside Police
 Methodist Church Property Division
 Metropolitan Resources Limited
 Michael Cunningham Architects
 Miller Town Planning
 Mineral Products Association
 Miss J Marguerie
 Miss S Poole
 Mitsubishi Electrical Europe B.V.

 Mono Consultants Ltd
 Morecrofts Solicitors
 Morris Homes (North) Limited
 Mouchel Parkman
 Mr R Neale
 Mr & Mrs A & Y Salisbury
 Mr & Mrs A Pasterfield
 Mr & Mrs Anderson
 Mr & Mrs Arnold
 Mr & Mrs B & R Walsh
 Mr & Mrs D Gleave
 Mr & Mrs Dunne

 Mr & Mrs E & B Bushell
 Mr & Mrs Edwards
 Mr & Mrs G Archibald
 Mr & Mrs J & C Thomas

 The Co-operative
 The Front Room
 Theatres Trust
 Thermal Ceramics UK Ltd
 Thomas Estates Limited
 Thornton Hough Community Trust
 Tower Action Group
 Townswomen Wirral 101-25
 Tranmere Alliance
 Tranmere Parks
 Tranmere Together
 Transition Town West Kirby
 Turley Associates
 Tweedale
 Twentieth Century Society
 Unichema Chemicals
 Unilever Research Port Sunlight
 Unilever UK Home and Personal Care
 Unilever UK Property
 Union Street Day Resource Centre
 V David
 VCA Wirral
 VCAW Bebington
 VCAW Heswall
 VCAW Wallasey
 Venture Housing Association
 Villa Medical Centre
 Wallasey Civic Society
 Wallasey Village Community
 Partnership
 Welcome Home Developments
 Wellington Road CAAC
 West Cheshire Cleaning Services
 West Kirby Village CAAC
 Westwood Road Residents Association
 White Young Green
 WIRED
 Wirral & Cheshire Badger Group
 Wirral Association for Disability
 Wirral Autistic Society
 Wirral Barn Owl Trust
 Wirral Black & Racial Minority
 Partnership
 Wirral Business Forum
 Wirral Chamber of Commerce
 Wirral Change
 Wirral CVS

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Mr & Mrs J & H Wesencraft
Mr & Mrs Jacques
Mr & Mrs L & B Bell
Mr & Mrs L & S Hurst

Mr & Mrs M & A Hudson
Mr & Mrs M & N Davies
Mr & Mrs M Cook
Mr & Mrs N & M G Dyson
Mr & Mrs Neeson
Mr & Mrs PM & UR Weston
Mr & Mrs Povoas
Mr & Mrs S & B Irving
Mr & Mrs T Sullivan
Mr & Mrs Woods

Mr A Kennaugh
Mr A Love
Mr A Nuttall
Mr A P McArdle
Mr A Royle
Mr Ashman

Mr B Legan Dip TP DMS
Mr Badenoch

Wirral Disabled Peoples Partnership
Wirral Environmental Network
Wirral Fire Safety Command
Wirral Footpaths and Open Spaces Society
Wirral Friends of the Earth
Wirral Green Belt Council
Wirral Green Party
Wirral Jehovah's Witnesses
Wirral Local Strategic Partnership
Wirral Methodist Housing Association
Wirral Metropolitan College
Wirral Multicultural Organisation
Wirral Partnership Homes
Wirral Planning Advice & Appeals Service
Wirral Society
Wirral Transport Users Association
Wirral Urban Farm Association
Wirral Victim Support
Wirral Wildlife
Woodchurch Neighbourhood Management
Woodland Trust

14 List of Specific Consultation Bodies

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

15 List of Respondents

Allerton Trust
Asda Stores Limited
Barclays Bank
Bellway Homes
Birkenhead School
Bromborough Society
Cheshire Gardens Trust
Cheshire Wildlife Trust (Wirral Group)
Confederation of Passenger Transport
Dibbin Estates
Dwr Cymru Welsh Water
Eastham Archives Group
Emerson Group
English Heritage
Environment Agency
Foden Investments
Grosvenor Liverpool Fund
Heswall Society
Hoyle Village Life
Leverhulme Estates
Liscard & Egremont Partnership
Mason & Partners
MEAS
Miss S Poole
Mr & Mrs G Moore
Mr & Mrs Rock
Mr C Moore

Mr H Irving

Mr I Campbell
Mr J Hutchinson
Mr J Priest
Mr N Cowley
Mr N Fergusson
Mr P Barton
Mr S R Davies
Mr T Harney
Mr T Roberts
Mrs M Campbell
Ms X Brooke
National Grid
National Trust
Natural England
Network Rail
Oxton Society
Peel Land and Property
Sainsburys
Seaview Meadows
Sport England
United Utilities
USS Ltd
Vyner Estate
Wirral Destination Marketing Manager
Wirral Society
Wirral Sustainability Liaison Officer
Wirral University Teaching Hospital NHS
Foundation Trust
Wirral Wildlife