

**WIRRAL LOCAL PLAN - 2020-2035**

**SUSTAINABILITY APPRAISAL**

**REPORT OF CONSULTATION RESPONSES ON DRAFT SUSTAINABILITY APPRAISAL  
AND EQUALITIES IMPACT ASSESSMENT SCOPING REPORTS PREPARED BY AECOM  
ON BEHALF OF WIRRAL COUNCIL**

**(Consultation between 25th March and 8th May 2019)**

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP001	Local Resident	All you do is let builders build houses and flats on every scrap of land, with no thought of the consequences on the local residents, traffic madness etc etc. Seacombe and Moreton are in need of social and physical regeneration.	Not relevant to the Scoping Exercise
SCOP002	Local Resident	In terms of the Sustainability Appraisal, it MUST be that we abide by the NPPF document that states that we should safeguard and protect our productive agricultural land on the Wirral and ensure that we maintain our local food supplies and produce. To ensure this we must also abide by the council decision of 15th October 2018 which stated that agricultural land must be removed from the green belt and therefore from any proposed plans for the development of future housing.	Not a direct comment on the scoping process. The importance of agricultural land is outlined in the scoping report though.
SCOP003	Local Resident	The available information about Wirral Local Plan is too technical and too complicated and therefore is difficult to fathom for many or most people. WBC must change their whole approach to this matter in order to protect the Green Belt NOT to invade it. Find a way of encouraging Wirral Waters to increase their commitment and further utilise Brownfield Sites and other reasonable alternatives. Regarding consultation, public meetings are used more as an opportunity to inform the public of decisions already made, rather than discuss possibilities. Adverse comments from members of the public are simply ignored. There seems to be no acceptance of the thirteen 'Topics' listed in Appendix A of the S.A. Framework. WBC appears to be intent on sticking to this unpopular, unwanted and unnecessary course of action, building too many houses of the wrong type, in the wrong places. Please listen to the residents' needs and demands.	Relevant in terms of reasonable alternatives. There is a need to consider the extent to which Wirral Waters can contribute to the spatial strategy and to maximise brownfield regeneration. A non technical summary will be prepared to enable more effective consultation.
SCOP004 EQIA	Local Resident	Paragraphs 3.30 and 3.31 of the EQIA Scoping report highlight that there is a high level of affordable housing need in Wirral, and in particular that more smaller properties are needed, particularly 1 bed properties within the affordable housing stock. The report states 'the demand for 3 bed properties in Wirral has declined substantially' Paragraph 3.54 states that the older population in Wirral is expected to increase by 30% by 2030 and the 90+ age group is expected to increase by 103%. Paragraph 3.57 of the scoping report states that by 2032 the vast majority of households in Wirral with Children are expected to have 1 or 2 children. So the housing that Wirral actually needs is small affordable properties with particular focus on the housing needs of the elderly. The Council is proposing to release large areas of Green Belt for housing - the type of properties that developers will build on this land are likely to be larger, expensive detached houses when the report shows there is going to be a declining need for this type of accommodation. How many of the houses built on Green Belt will be the affordable 1 bed properties that Wirral actually needs?	Not a direct comment on the scoping process. No action necessary for the SA.
SCOP004	Local Resident	With regard to the Sustainability Appraisal Scoping Report, Paragraph 4.11 states three main flood risk locations on Wirral; Greasby is the second mentioned at highest risk of flooding due to fluvial and surface water/sewer). Paragraph 4.15 states: 'New development could have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.' So why are two of the Council's 'preferred sites' for release of Green Belt land for development in Greasby? paragraph 4.19 states: 'The objective should be to adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources...' Yet according to the leaked Council documents the council is intending to approve the release of two large areas of Green Belt in Greasby for several hundred homes to be built. This will inevitably increase the risk of flooding, particularly in Rigby Drive/Arrowe Road, an area which has already suffered several flooding incidents. Residents were told that the infrastructure was unable to cope with existing levels of development and that even microdevelopments such as people paving over their front gardens was exacerbating the problem. So how much worse will it get when a huge area of farmland is concreted over and hundreds of homes are built on it, not to mention the new road which is apparently planned from Irby to Arrowe Road and which will inevitably increase traffic. This all seems to fly in the face of the advice in para 4.19 that development should be directed AWAY from Greasby, being the area listed at second highest risk of flooding. Why then is the Council recommending more development in Greasby? Paragraph 15.7 states that the North Wirral WwTW at Meols has limited capacity to accept and treat any further wastewater from growth. Looking at the map provided this WwTW appears to relate to the Greasby area, again indicating that further development in this area is unmanageable and the existing infrastructure is unable to cope with further development. Paragraph 10.18 states that development should avoid the best and most versatile agricultural land. The greenbelt land at Rigby Drive/Arrowe Road which the Council is proposing to release for development is stated in the Summary of initial Green Belt assessment to be 66.1% best and most versatile agricultural land – one of the highest percentages of all the parcels of Greenbelt land that are being proposed for development. How can the Council justify building on this farmland?	Not a direct comment on the scoping process. No action necessary for the SA. Alternative strategies and sites will be considered in the SA. At this stage no firm decisions have been made as the approach to the Plan is being revisited.
SCOP005	Local Amenity Society	Remains deeply concerned that the Council has merely adopted and not countered the MHCLG's massively inflated and unrealistic housing "need" figures. The housing calculation work done by a resident for the local societies using the standard method, indicated a housing "need" a fraction of the number proposed. This is in line with the expected population and job creation with Wirral's population continuing to decline and age. The MHCLG's figures are wildly inaccurate and it is surely the Council's duty to correct them. Re the issue of "sustainability" there are fundamental issues that must be addressed:- 1. It can only be SUSTAINABLE if development occurs in the existing developed areas, i.e. development of brownfield sites. If these are not all fully used, then you are promoting a form of "slash and burn" development with old developed areas being abandoned and new "green fields" being desecrated. 2. For a country that can only produce some 50-60% of its food needs, it is obviously UNSUSTAINABLE to lose any land that is farmed or could be farmed to development. One cannot farm a housing estate, or golf resort. 3. The green fields are an active counter to CO2 and global warming. Housing estates create CO2 and have little ability to absorb CO2.	Not a direct comment on the scoping process. No action necessary for the SA. The importance of agricultural land of good quality is noted and this will be considered as part of the SA.
SCOP006	Local Amenity Society	General Comments In reference to the recently published WBC Action Plan submitted to Central Government which indicates that few documents informing the Local Plan are indeed current we firstly question whether the information provided to AECOM Infrastructure and Environment UK Limited to prepare the Sustainability Scoping Report is in itself current. That said, the scoping report is a comprehensive and impressive review of the Borough's assets of all kinds and in general terms the challenges faced. Housing is the only subject throughout the report in which specific projections of numbers are used. No employment numbers, no population growth numbers. Throughout the report there is considerable reference to Wirral Waters and Peel Holdings and the reader is encouraged by the overwhelming potential improvements on employment, environment and housing that could be brought to fruition. However, the reality is that many of the proposed projects are not yet deliverable and are unlikely to impact the emerging Local Plan. Given that the progression of the Wirral Community should be at the forefront of the controlling authority we strongly question why the potential at Wirral Waters is not being delivered at pace and would certainly encourage WBC to enter into further talks to bring forward and realise the opportunity to preserve our Greenbelt by formalizing the development of 13,000 Brownfield homes.	Relevant in terms of reasonable alternatives. There is a need to consider the extent to which Wirral Waters can contribute to the spatial strategy and to maximise brownfield regeneration. The information used to prepare the Scoping Report is as up-to-date as possible at this stage. However, scoping is a continuous process, so further updates to the baseline position will be made if necessary at appropriate junctures.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP006	Local Amenity Society	<p><b>Air Pollution</b> The report generally highlights issues relating to carbon emissions from traffic. The Barnston area too suffers from car emission from slow moving and queuing traffic in excess of one hour per day at the Barnston Road junctions at Whitfield Lane, Acre Lane, Whitehouse Lane, Thingwall Corner and notably Storeton Lane. Whilst we accept that development of new vehicles will reduce emissions over time we also argue that the increased development proposed in the Development Options review will result in a net increase in emissions from higher traffic numbers in the Barnston Area. Additionally, the proposed Development Options Review potentially increases home numbers by over 2000 in the Barnston area and to 14600 Wirral wide. There is a high probability that Natural Gas will provide the primary source of space heating for these homes and the report offers no reference to the negative impact on air quality that this will cause.</p> <p><b>Biodiversity</b> The report generally is just that, general. There should be a specific approach to the implication of development near to a designated site. Barnston Conservation Area is designated as positioned within a rural historic landscape. Potential development on site SPO62 both removes the historic landscape and the wildlife corridors important to the success of three sites of Biological Importance in Barnston Dale. This development cannot result in a biodiversity net gain.</p> <p><b>Climate change adaptation</b> It does not appear that Wirral's Water Cycle Study is current. The potential increase of over 2000 properties in the Barnston area will have a negative impact on the drainage provision in the area. The main sewer route is at and beyond capacity and lies adjacent to Prenton Brook. Sewer failures already cause serious pollution incidents to Prenton Brook and consequently water abstraction at Prenton. Major drainage infrastructure development between Higher Pensby and Birkenhead would be required for any potential large scale development. Such development will also increase surface water flooding in Prenton Brook and also at Brimstage, already designated as a category 3 flood zone.</p> <p><b>Climate Change Mitigation</b> We formally request that WBC provides evidence that the release of land from the Greenbelt in the Barnston area to build in excess of 2000 new homes will be served by sustainable travel means. We note that the figures from Wirral indicate that emissions per capita are notably lower than the England average, the report does not explain how this can be maintained with the addition of 14600 new homes across the Borough.</p>	Not directly relevant to the scoping process as comments are being made about specific sites and related impacts. As the SA progresses, the implications of different strategic approaches and sites will be compared.
SCOP006	Local Amenity Society	<p><b>Economy and Employment</b> The report points to the regeneration of the most deprived areas of the Wirral which has a history of lack of funding. The development of Birkenhead and Wirral Waters will likely increase investment in surrounding deprived areas and should be encouraged. As the economic growth is anticipated in these areas only the housing strategy should particularly relate to these areas. Significant commuting flows demonstrate the need for a Wirral, Liverpool City Region and Cheshire joint plan for housing and these authorities may include employment projections linked to their plans. The hoped for 'Growth' should be identified in all regional centres and there should be no assumption that Wirral will provide the housing for extensive commuting. Apart from Wirral Waters there is little evidence of concrete proposals for regeneration opportunities and the report again makes assumptions. We question whether the development of 2000 homes in the Barnston area will lead to increased employment in this rural area of Wirral and we suggest that the potential development will reduce tourism opportunities by removing open space, farmland, public footpaths and by having negative effects on biodiverse sites. Unfortunately, there are no guarantees for continued employment and the work force locally is transient. Post Brexit what is the likelihood of major employers like Vauxhalls and Unilever remaining in Wirral. This report makes many assumptions on the Economy and Employment without foundation.</p> <p><b>Health</b> The report emphasizes the importance of Green Infrastructure in providing improved health and well being opportunities for the residence of Wirral. This, of course, already exists in the natural environment of Greenbelt. Greenbelt provides open space, cleaner air, walking and provides health benefits for the whole of Wirral. Any reduction of Green space can only have a negative impact on health. However, manmade green infrastructure is also welcome as suggested by the Wirral Waters project.</p> <p><b>Heritage</b> Barnston Conservation Area is considered a heritage asset in Wirral and its setting in a rural, historic landscape including Town fields and Ancient and Post Medieval fieldscapes (Merseyside Historic Environment Record) is critical to its designation. Development on this landscape removes the importance of Conservation to this Conservation area and removes an important historic landscape from the residents of Wirral.</p>	Not directly relevant to the scoping process. Information from the Historic Environment Record will be added to the scoping report once available.
SCOP006	Local Amenity Society	<p><b>Housing</b> Evidence exists that Wirral's Brownfield register is not current or complete and therefore skews the suggestion of release of Greenbelt land for development to meet the housing need. We consider that the potential release of Greenbelt land in Barnston to provide 2000 homes without the consideration of the removal of open spaces, the increased pressures on local services, Schools, Surgeries, Public Transport and Roads etc is irresponsible. This report directly refers to a 13,000 new homes opportunity at Wirral Waters already given approval for development. This figure was not considered in the Development Options review and therefore cannot contribute to a sustainability report to the Local Plan. If the 13,000 figure is to be included then a Greenbelt release is unnecessary. WBC has recently disclosed that it is not prepared to revisit its own calculation of 12,000 new homes to be delivered by 2035 and does not find it necessary to explore any special circumstance which might influence this figure. A 20% buffer to this figure is to be applied. The Local Plan must be iterative; the 2014 household projection data is already five years out of date and the Government should be persuaded to utilize updated HP data and to require updating at least every three years. Evidence exists to disprove this figure and results indicate significantly lower numbers of homes are required using the same 2014 ONS figures. A local professor has concluded:- It is to be hoped that in evaluating local plans government inspectors will be permitted to consider robust, local, objective evidence and arguments and to reject, arbitrarily imposed, 'aspiration' based, objectively invalid local demographic housing targets. We challenge WBC to justify their calculations using independent sources. The "considerable challenge of rehabilitation from prior use" gives a clue as to why WBC, in informal consultation with developers have concentrated on greenfield and Green Belt sites which require no rehabilitation. Should the challenges in rehabilitation of Brown sites be compounded and passed on to future generations.</p> <p><b>Land and Soils</b> Sustainable Agricultural Units are important on Wirral and many have been lost for a variety of reasons over the past fifty years. Those that remain do so regardless of soil classification and generally adapt to make use of any sub grade land. Barnston remains as one of few historic farming villages on the Wirral, its surrounding land engaged in Agriculture for centuries. The release of Greenbelt land around the village for development removes quality farming land from Wirral and will lead to the closure of several sustainable Agricultural units. WBC are required to make every effort to bring forward all potential brownfield development sites which can be made available during the plan period before any consideration is made for Greenbelt release.</p>	Not directly relevant to the scoping process

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SCOP006	Local Amenity Society	<p>Landscape</p> <p>Paragraph 11.1 is an important benchmark :- ‘ The government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The general extent of Green Belts is established and can only be altered in exceptional circumstances through preparation of a Local Plan. It appears from the WBC intervention action plan that the current Wirral Greenbelt review is inadequate.</p> <p>It is essential that the Local Plan is thoroughly tested against national standards, both independently and by the public.</p> <p>It should be recognized that the ‘washing over’ of a number of the Borough’s smaller settlements is what gives Wirral some of its character by the preservation of such settlements. WBC needs to observe by actions which are demonstrable to the public.</p> <p>It is important to state that the Greenbelt parcels around Barnston that have been identified for further investigation strongly meet all the Greenbelt objectives. They provide open space, historic landscapes and separation between communities.</p> <p>Population and Communities</p> <p>Assumptions are made over population growth in Wirral which can be best described as static. The population is aging which reflects an increasingly shrinking economically active workforce. This scenario is likely to continue over the plan period and there are also indicators for a potential population decline if figures over the past twenty years are taken into consideration.</p> <p>At the January 2019 Schools Forum Meeting, Primary schools demographic update using WBC figures from Housing and the Primary Care trust shows long term falls in the Primary roll up to 2009 followed by small increases in the interim period. The forecast is that increases may continue until 2021. ONS figures for Wirral indicate a 9.8 % decrease in children aged 0-4 and 11.1% decrease in children aged 5-9 during the period 2018 -2038. Schools are being asked to prepare for roll number decline.</p> <p>All further indicators of potential population decline on Wirral.</p> <p>The importance of Green infrastructure is indicated and as previously stated this is already in existence and available to all Wirral residents in the form of Green Belt designation.</p>	Not directly relevant to the scoping process.
SCOP006	Local Amenity Society	<p>Transport</p> <p>The potential development of 2000 new homes in the Barnston area can only increase the dependency on cars. This, in turn, will significantly increase the problem of traffic numbers at the highlighted pinch points along Barnston road as well as pressurizing Pensby road creating considerable increases in traffic at Arrowe Park.</p> <p>The area is not served well by cycle routes and has poor rail connectivity.</p> <p>Rail infrastructure would require significant improvement to accessibility and parking and platform upgrade with additional consideration to electrification of the service.</p> <p>Some of this report is extremely optimistic.</p> <p>Water Resources</p> <p>Again, the Water Cycle Study for Wirral is not current.</p> <p>The proposal to develop 14600 new homes on Wirral will create insurmountable problems for United Utilities within the plan period in particular with regard to contamination free drainage which in many cases lies adjacent to natural water courses. The risk of contamination to already depleted ground water resource will be elevated considerably. Guarantee should be sought from United Utilities that any works associated with proposed development can be achieved within the local plan period and not given over to infinite resolve. In general utility companies are struggling with a century old infrastructure which is ineffective through lack of investment, leading to crisis.</p> <p>Water Quality</p> <p>See comments on Water Resources.</p> <p>NVZ designation on Wirral does not protect tributaries to the Mersey Basin and only partially protects the Drinking Water Protection Zone. It is likely that this designation will be extended to cover the whole of the Wirral in the near future and will further enhance the requirement for improved monitoring in vulnerable areas such as the Fender Valley. Increased development inevitably increases the risk of nitrate discharge into the environment.</p>	Any updated information will be incorporated into the scoping process.
SCOP007	Local Amenity Society	<p>ERRORS OF FACT AND OMISSIONS</p> <p>A) Chap 3.Biodiversity. Mersey Estuary SSSI is omitted from the text. The Mersey Estuary SSSI extends to SJ357838 (off Riverbank Road) where it meets the southern end of New Ferry shore SSSI. Consequently (3.11) Wirral Borough area has 12, not 11, SSSIs. While this is not critical, as the Mersey Estuary Ramsar site is cited in 3.8, and the Mersey Estuary SSSI is shown on Fig 3.2, it gives us a very poor idea of the consultants. Several documents they are supposed to have read e.g. Wirral Biodiversity Audit 2009 (3.6) refer to the twelve SSSIs in Wirral, figure that has not changed since 2000 when New Ferry and Mersey Narrows SSSIs are designated.</p> <p>B) 3.14 Priority Habitats.</p> <p>Open Mosaic Habitat on Previously Developed Land has been omitted altogether. While data is lacking on some previously- developed land, because of survey difficulties, there is no excuse for omitting the former railway goods yard at Bebington station, operated for the last 24 years as New Ferry Butterfly Park, or Penton Dell and Claypit, as both are described in their LWS citations as previously-developed land. This category and site should be added to the maps. This despite the fact that NFBP no longer qualifies as “brownfield” because nature has reclaimed the site, which has not had any industrial use for over 50 years. The Butterfly Park has been a Local Wildlife Site (Site of Biological Importance) since 1993, Prenton Dell since 2011.</p> <p>Ancient Woodland: the English Nature Ancient Woodland Inventory for Wirral is known to be incomplete. It never considered any woodlands less than 2ha is extent. The names it uses are unfamiliar to us and other local people, but appear to be all in the Dibbinsdale complex and Eastham Country Park. The inventory omits the LWS of Barnstondale, Upton Bridge Wood, Harrocks Wood, Prenton Dell, Stanley Wood – all of which are noted as containing ancient woodland indicators in their ground flora in the LWS citations. Map 3.3 therefore needs changing to note all these sites as ancient woodland, not just broad-leaved woodland.</p> <p>C) Local Wildlife Site citations 3.6. The paragraph should have included that new criteria for LWS, agreed across the whole Cheshire region, were adopted by WBC in 2017. These were agreed widely because wildlife does not observe administrative boundaries. Biological survey work is carried out each year by several expert volunteer groups, including ourselves but also CAWOS, Badger Group, BTO WeBS counts etc. The data are sent to Record, and the Wirral Local Wildlife Sites Partnership is charged with recommending changes to the schedule of LWS. At present, and for the next few years, all sites are being re-assessed against the new criteria. This takes time as survey work needs to be no more than 5 years old, and it is all being done by volunteers. Therefore the most recent data will need to be used in assessing the Local Plan.</p> <p>These errors and omissions undermine our confidence in Aecom on these biodiversity matters, where we have long-standing expertise.</p>	<p>Scoping report updated to reflect factual errors / omissions.</p> <p>Spatial data on LWS provided by WBC and mapped accordingly.</p> <p>Criteria for LWS selection does not form part of the policy context.</p> <p>Site specific survey data is not likely to be relevant to informing the selection of spatial strategy alternatives.</p>

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP007	Local nature conservation group	<p>COMMENTS ON SUSTAINABILITY ASSESSMENT OBJECTIVES</p> <p>1) Overall comment. The International Panel on Climate Change warns that we have little over a decade to change our ways, if we are to avoid catastrophic global climate change. The International Panel on Biodiversity and Ecosystem Services has this week issued a stark warning about loss of biodiversity and the likely effects. In the light of these, many of the objectives seem to be lacking in ambition. Current practice is unsustainable in many ways, and “The aim of the Sustainability Appraisal is to ensure that the Local Plan contributes to the achievement of sustainable development”. The Local Plan should aim for sustainability levels to act on these international warnings.</p> <p>2) Section 2.Air Quality: We support the first objective, but the second could be seen as an argument for new building in rural areas, to locate development away from areas of poor air quality. Rural development has many other sustainability problems, including loss of soils, loss of agricultural land and the lack of sustainable transport. The concentration should be on taking measures to improve air quality. The objective is probably aimed at localised areas of poor air quality, such as the A41 corridor, but does not read that way. Current levels of government regulation do not take into account the harm that nitrogen pollution is doing to threatened habitats such as heathland, species-rich grassland and ancient woodland, so more ambitious targets are needed for the future. Therefore the objective should be that all new development must rely on sustainable transport modes and not be primarily car-based, given that fossil-fuelled cars are likely to be with us for the duration of this plan.</p> <p>3) Section 3 Biodiversity. See all the errors and omissions above (our points A-C). The objective should follow the Mitigation Hierarchy as set out in NPPF 2018 and the 25-year Plan for the Environment, taking into account the IPBES report issued this week. The IPBES is recommending doubling the amount of land under protection for biodiversity. While Wirral can only do a small amount towards this, because of the physical constraints and existing urban development, we should play our part. So it should be reworded to read: All new development must achieve biodiversity net gain. Damage to biodiversity should be avoided, or if not possible minimised and mitigated on site. Where this is not possible and as a last resort, off-site compensation must be secured. Provision must be made for long-term management of biodiversity affected by development, including mitigation and compensation areas. This applies within and beyond designated sites of international, national and local significance, priority habitats and other natural capital assets such as ancient trees. In achieving net biodiversity gain, development should include habitat creation and the long-term enhancement of biodiversity assets, to achieve natural capital that is well-connected and resilient to climate change. Development that does not meet these criteria will be regarded as un-sustainable.</p>	<p>The SA Framework will be applied comprehensively, and so issues that might arise as a result of one objective would be considered / dealt with by others. The intention of the Air Quality objective is to avoid detrimental impacts on health due to air quality as well as reducing further issues and making improvements. Existing objective captures the key messages of the proposed updated objective and is not considered to need revising.</p>
SCOP007	Local nature conservation group	<p>4) Section 4 Climate Change Adaptation; Only flooding is considered, not any of the other matters to which we will have to adapt. So there should be consideration of the effects of proposed development on</p> <ul style="list-style-type: none"> <li>- food production, emphasising local food to minimise food miles.</li> <li>- biodiversity and all natural capital</li> <li>- pests, diseases and invasive species</li> <li>- soils – see section 10.</li> <li>- adaptation to temperature change e.g. provision for urban cooling</li> <li>- adaptation to increasingly frequent extreme weather events e.g. drought, storm, tidal surge.</li> </ul> <p>Objective should include: Proposed development should preserve good quality food-producing land (Grades 1-3), protect natural capital (section 3) and soils (section 10). Green infrastructure should be designed to aid climate change adaptation, mitigate climate change, and cope with extreme weather events, pests, diseases and invasive species.</p> <p>5) Section 5 Climate Change mitigation; The IPCC 2018 report states that we have little over a decade to avoid catastrophic climate change. This Local Plan therefore needs to focus on rapid reduction in greenhouse gases. Currently emissions from transport are not falling, and this source therefore needs special focus. Any greenfield development (whether Green Belt or not) will struggle to achieve net environmental gain unless it is high density, zero or very low carbon design e.g. BREEAM Excellent, and has significant areas of Green Infrastructure to absorb carbon. All future development needs to be designed to these principles if it is to be sustainable. We cannot continue as in the past decades in future. We propose that the objectives should be strengthened to say: All new development must achieve net environmental gain. It will need to be carbon-neutral in operation and as low-carbon as possible in construction. Transport must be most easily achieved by sustainable means. This applies particularly to greenfield development, because of the difficulty in making such developments sustainable in soil, transport, biodiversity and other environmental terms. Land should be protected which is suitable for renewable or low-carbon energy generation, or for carbon storage in suitably-managed soils.</p> <p>6) Section 6 Economy and Employment All economic growth should focus on achieving a “circular economy” with waste minimised and land used sustainably. The IPBES report emphasizes the need for “developed” countries to change the way we think about quality of life, away from consumption and towards reduction in waste, carbon and luxury goods. In Wirral, to aid this we support regeneration of deprived areas, and the urban areas in general. Add to objective: All economic growth should focus on achieving a “circular economy” and minimised carbon footprint. Reduction in retail space is to be expected, and re-use of redundant retail premises should be supported, including for housing. Existing car-dependent retail space should be reduced where possible.</p>	<p>4) Reference added to additional facets of climate change adaptation</p> <p>5) Requiring all new development to be carbon neutral may not be a proportionate objective for the SA but it has now been included as a more loosely worded aspirational objective.</p>

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SCOP007	Local nature conservation group	<p>7) Section 7 Health Note the influence of natural capital including Green Infrastructure on health, both mental and physical. The objective is acceptable, but should be strengthened to say that "All development must be designed to improve health and include appropriate measures to do so, such as Green Infrastructure."</p> <p>8) Section 8 Heritage. This is all about built assets. The objective should link to Sections 3, 10 and 11 and note the need to consider protection of assets such as ancient field patterns, trees, hedges and landscapes.</p> <p>9) Section 9 Housing: We support the emphasis on brownfield sites, though recognising that a small proportion of these have biodiversity value and the mitigation hierarchy will apply. The objective should include: Designation of land for development must respect the need urgently to mitigate climate change and biodiversity loss. Development must respect the physical constraints of Wirral, the presence of high natural capital assets, and local food production. All development will be expected to deliver net environmental gain and net biodiversity gain in order to be judged sustainable. This applies particularly to greenfield development, because of the difficulty in making such developments sustainable in soil, transport, biodiversity and other environmental terms. It will be necessary for central Government to justify the sustainability of the housing numbers it proposes, in view of Wirral's low population growth rate and high environmental and physical constraints.</p> <p>10) Section 10 Land and Soils. We are pleased that the need to safeguard soils has been recognised, as this has insufficient emphasis in the NPPF. Once built on, soils are effectively lost, as restoration after modern building is difficult. We need better protection for agricultural soils and for stores of soil carbon if we are to adapt to and mitigate climate change. The objective is laudable but weak, and would be better worded: Development must promote the efficient and sustainable use of natural resources of land including soil. It will only be judged sustainable where it avoids the best and most versatile agricultural land, makes efficient use of previously developed land and preserves stores of soil carbon. With a future need to produce more local food, the difference between Grades 3a and 3b will become unimportant, as we will need all reasonable quality land, therefore all Grade 3 should continue to be treated as "Best and Most Versatile".</p>	<p>7) Now updated to reference the health benefits of green infrastructure.</p> <p>8) reference to the importance of non-designated heritage assets now added.</p> <p>9) Existing objectives considered to capture these point already.</p> <p>10) Objective strengthened to include reference to soil carbon.</p>
SCOP007	Local nature conservation group	<p>11) Section 11 Landscape. We emphasize the importance of the eastern sandstone ridge in separating the Natural Character Areas, and therefore separating the ecology of Wirral. We note that the amounts of Green Belt release accepted by Sefton (6%) and Cheshire East (2.5%) are much less than the figures which are being talked about for Wirral, yet these boroughs do not have the physical and environmental constraints of Wirral. The objective is woolly in talking about "careful choices". To be sustainable, its last clause should be worded "mindful of the need to minimise Green Belt release where this involves greenfield development, because of the difficulty in making such developments sustainable in soil, transport, biodiversity and other environmental terms."</p> <p>12) Section 12 Population and Communities The Objective could be strengthened to read "Development will only be judged sustainable where it supports good access....etc</p> <p>13) Section 13 Transport Transport is the one section of Wirral's life where carbon emissions are not reducing. All areas need to reduce emission faster than at present if we are to meet the Paris Agreement targets and what is recommended by the IPCC. The objective should therefore include Ensure that the provision of infrastructure is managed and delivered to reduce carbon emissions, meet local population..... etc. The last clause should emphasize that development must be directed to where it can be accessed by public transport or sustainable transport modes.</p> <p>14) Section 14 Water Resources and Section 15 Water Quality, combined in one Objective Section 14 only considers drinking water supplies, and does not consider other impacts e.g. the need to avoid ecological damage to wetlands and other habitats. The objective should be strengthened to state: Development will only be judged sustainable where it ensures minimum pressure on water resources.....etc. This includes pressure on natural habitats as well as drinking water supplies. Our overall view is that the report is lacking in ambition for future sustainability, and if we are to both mitigate and adapt to climate change, then the sustainability of all future development needs to be increased significantly, starting now.</p>	Existing objectives considered to capture the key messages already.
SCOP008	CLH Pipelines	We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to <a href="http://www.linesearchbeforeudig.co.uk">www.linesearchbeforeudig.co.uk</a> , our free online enquiry service.	Not directly related to the scoping process.
SCOP009	Local Resident	In previous submissions on the Wirral Local Plan, I have emphasised the need to preserve as much farm land as possible. Can I now stress the importance of increasing agricultural production in the UK. This is to take account of the forecast rise in population (which is triggering the search for land suitable for development) and to compensate for the expected reduction in agricultural imports? In selecting land suitable for housing development, any inevitable encroachment on greenbelt land must give preference to preserving land which is or can be used for agricultural purposes.	Not directly related to the scoping process. The importance of agricultural land is acknowledged within the scoping report though.
SCOP010	Local Amenity Society	The comments will focus on the two sections of the Sustainability Appraisal concerned with Heritage and Housing. Purpose of the Appraisal As set out in your report the Appraisal "...is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. The aim is to ensure that the plan contributes to the achievement of sustainable development". We assume therefore that these "avoidance" and "mitigation" processes will be a thread running through the entire draft local plan.	No action to take

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP010	Local Amenity Society	<p>Heritage Context</p> <p>National</p> <p>8.1 Key messages from the National Planning Policy Framework (NPPF) include:</p> <ul style="list-style-type: none"> <li>• Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.</li> </ul> <p>Comment: The Council has a Heritage Strategy approved in 2010 and supposedly up for review at present. This strategy was heartily endorsed by Historic England as an example of good practice. However, it receives very little visibility in your planning and related documents. What do you think its role should be in relation to the Local Plan?</p> <ul style="list-style-type: none"> <li>• Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).</li> <li>• Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.</li> </ul> <p>Comment: Green Belt is an ‘irreplaceable resource’ and the question of its release is the biggest issue in the draft Local Plan and is not particularly” sympathetic “to local character and history given the nature of the Wirral peninsula. A sound strategy for “mitigating” the adverse effects of this is a prerequisite to producing a sustainable Local Plan.</p>	Policy context updated to include the Heritage Strategy 2010.
SCOP010	Local Amenity Society	<ul style="list-style-type: none"> <li>• Plans should set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.</li> </ul> <p>Comment: Lack of enforcement is a fundamental problem in this regard because the ‘conservation and enjoyment of the historic environment’ is now at risk through the incremental degradation of historic features of many of Wirral’s 26 conservation Areas and heritage assets. A strategy for delivering effective enforcement is another prerequisite for meeting this challenge.</p> <ul style="list-style-type: none"> <li>• When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.</li> </ul> <p>Comment: We are of the view that an important part of the Local Plan should be a grading of the area’s heritage assets to clearly show their importance to the general public.</p> <p>8.2 These messages are supported by the national Planning Practice Guidance (PPG)32 which itself includes the key message that local authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.</p> <p>Comment: This should be a key part of the Local Plan and the related Heritage Strategy.</p> <p>8.3 Historic Environment for England (2010) sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.</p> <p>Comment: Again, the Heritage Strategy in company with the Local Plan should be at the heart of this recognition.</p>	
SCOP010	Local Amenity Society	<p>Regional</p> <p>8.4 The Merseyside Historic Environment Record (HER) is maintained by the Merseyside Environmental Advisory Service and is one of a network of 85 HERs nationwide. The Merseyside HER records details on local archaeological sites and finds, historic buildings and historic landscapes across the five traditional Merseyside authorities (i.e. excluding Halton). HERs provide a significant resource for informing planning decisions, at both a spatial and development management scale.</p> <p>Comment: Are you content with the information in the HER? Is it up to date? Does it play a crucial role in the planning process as practised by the Council?</p> <p>Local</p> <p>8.5 The Merseyside Historic Characterisation Project – Wirral Report (2011) presents “broad brush” spatial data in relation to historic landscape character of Wirral. The project explores a broad spectrum of historic environment characteristics, including the period of origin and distribution of housing stock within the Borough, the type and distribution of historic field patterns and distribution and evolution of industrial and dockland activity in the Borough. This provides a “spatial historic environment framework” within which development decisions in the Borough at both a strategic and non-strategic scale can be made.</p> <p>Comment: Will this “spatial historic environment framework” be the template for the decisions needed on what land, if any, should be released from the green belt?</p>	Not directly related to the scoping process. The source of information (i.e. the HER) is considered to be useful in helping to set the baseline position and identifying the effects of the Plan.
SCOP010	Local Amenity Society	<p>Baseline</p> <p>Current baseline</p> <p>8.6 Wirral has a large number of historic assets including:</p> <ul style="list-style-type: none"> <li>• 26 conservation areas.</li> <li>• 8 scheduled monuments.</li> <li>• 4 registered parks and gardens.</li> </ul> <p>8.7 The Borough also contains a large number of listed buildings. The WBC website notes that “Wirral contains over 1,900 buildings and structures listed by Historic England”, with a review of HE’s list itself indicating that of this total 722 are listed buildings. 31 of these are Grade II* (buildings of special interest) and nine are Grade I (buildings of exceptional interest).</p> <p>8.8 The majority of the Borough’s 26 conservation areas has a management plan. Historic England defines conservation area management plans as “vehicles for reinforcing the positive character of a historic area as well as for avoiding, minimising and mitigating negative impacts identified as affecting the area. This may also outline opportunities to better reveal or enhance significance, possibly through the location or design of new development”. The following conservation areas do not currently have a management plan:</p> <ul style="list-style-type: none"> <li>• Clifton Park</li> <li>• Hamilton Square</li> <li>• Lower Bebington</li> <li>• Meols Drive</li> <li>• Mountwood</li> <li>• The Kings Gap</li> <li>• The Magazines</li> </ul> <p>Comment: As noted above 7 of the Wirral’s 26 Conservation Areas do not currently have a management plan. Again, how do you intend in the Local Plan to “mitigate” this problem? The fact that Hamilton Square is one of these areas is a major concern to us and we have been lobbying for the past two years to remedy this. We had an agreement with the Council and the Chamber to fund a commission to external consultants to address this nearly 18 months ago and as things stand, we do not even have an agreed brief.</p>	Not directly related to the scoping process

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP010	Local Amenity Society	<p>Comment: In addition, the Character Appraisals and Management Plans approved by the Wirral Council to date recommended that in 17 of the area's 26 Conservation Areas consideration should be given to the introduction of Article 4 Directions to remove permitted development rights in respect of a number of features currently enjoying those rights. The particular aspects which have a significant impact on the character of individual buildings, and which should be brought under control, were recommended as follows:</p> <ul style="list-style-type: none"> <li>* windows and doors / exterior joinery;</li> <li>* boundary features and structures;</li> <li>* roof coverings and roof features;</li> <li>* colour and surface treatment of elevations;</li> <li>* microgeneration installations.</li> </ul> <p>The conservation areas referred to were: Barnston; Birkenhead Park; Bidston Village; Bromborough Pool; Caldys; Eastham; Flaybrick; Frankby; Heswall Lower Village/Gayton; Oxtan; Rock Park; Saughall Massie; Thornton Hough; Thurstaston; Wellington Road; West Kirby</p> <p>On the broader question of conservation areas generally we have been active in publicising their existence and the need for a better understanding of those who live in them of their responsibility for doing the "right thing". Education and enforcement have to go hand in hand in addressing the issues of incremental degradation and thereby "mitigating" the adverse effects currently being exhibited in many of the areas, and especially in Hamilton Square, Clifton Park and Rock Park.</p>	Not directly related to the scoping process
SCOP010	Local Amenity Society	<p>8.9 There is a broad distribution of listed buildings pepper-potted throughout Wirral, though with a natural concentration at the Borough's more built-up eastern side. Substantial clusters of listed buildings are apparent at the historic Port Sunlight, Bromborough Pool and Rock Park areas of the Borough, as well as the Hamilton Square area of Birkenhead, with notable smaller clusters evident at the village of Thornton Hough to the south of the Borough, the New Brighton area of Wallasey in the north and village of Thurstaston in the Borough's west.</p> <p>8.10 Historic England maintains a nationwide Heritage at Risk register, updated on an annual basis. The 2018 HAR register records 14 features considered to be at risk within the Borough, including nine listed buildings (1 x Grade I; 2 x Grade II*; 6 x Grade II), two registered park and gardens, two conservation areas and one scheduled monument. Of these, two features – the Church of St Peter and St Paul in New Brighton, and the Church of St Mary in Liscard – are recorded as Priority A, meaning they are at "Immediate risk of further rapid deterioration or loss of fabric".</p> <p>Comment: In many ways the area at the greatest risk given its local, regional and national importance is Hamilton Square. Will the Local Plan prioritise these buildings and suggest a strategy for addressing these "adverse effects"?</p> <p>8.11 The 19th century 'model village' at Port Sunlight, built to house employees of the Sunlight Soap factory, is a particularly notable historic feature, as recognised by WBC's conservation area appraisal which notes the village's "unique place in the history of town planning". Nearly every building in the village is Grade II-listed.</p> <p>Comment: A major innovative aspect of recent work in the village has been the agreement to implement a Listed Building Consent Order to streamline the process for dealing with a concentration of listed buildings in one location. This would be equally applicable to Hamilton Square.</p> <p>8.12 Also of note is the area of opportunity at the former dockland area of Wirral Waters, which, if fully realised, has potential to be one of the largest urban regeneration projects in England, revitalising over 200ha of historic waterfront with outline permission granted for around 13,000 dwellings and 20 million square feet of mixed use floorspace.</p> <p>Comment: This is one location where the integration of the historic and the new could be particularly developed as a model of good practice and as an exemplar for the rest of the Wirral and elsewhere. As part of this we are working with several other partners to develop the story of Thomas Brassey (the great railway contractor) whose factory was located in the Wirral Waters area. We also recognise the large range of historic artefacts in the area which are remnants of its previous raison d'être as a dockland and port.</p>	Not directly related to the scoping process
SCOP010	Local Amenity Society	<p>Future baseline</p> <p>8.13 New development within the Borough has the potential to impact heritage assets and their settings through inappropriate design and layout. The Borough has a wide range of built heritage ranging from individual structures through to the entire Port Sunlight village, and the range of historic contexts presents potential for a variety of negative effects from inappropriate development.</p> <p>Comment: This is an important issue; and at the heart of it is the requirement in the planning process for a heritage statement to accompany any application in a conservation area. At present we have an agreement with the Council that no application in these areas will be registered if it doesn't have a statement. However, many of these statements are nothing more than a cut and paste from character appraisals and management plans. There is a need for some clear guidance on what constitutes an appropriate heritage statement, including what factors need to be considered for each generic type of application.</p> <p>8.14 Equally, however, new development will offer opportunities for enhancing the quality of the Borough's historic environment, either through regeneration of a specific asset or through improvements to an asset's setting and wider environment. Development can also offer opportunities to improve access to or better reveal the significance of a heritage asset. Most significantly in this regard, the Wirral Waters project will deliver very substantial regeneration across around 500 acres of post-industrial waterfront, much of which will be within the plan period. This could have potential to act as a catalyst for wider regeneration efforts within the Borough and beyond over the plan period.</p> <p>Comment: We are in agreement about the scale effect of Wirral Waters, but its ultimate success seems to be heavily bound up with the provision of substantial public sector grant to remediate land conditions and other factors. This cannot be achieved on a hand to mouth and scheme to scheme basis. It requires some long-term resource allocation and planning. The area is also fundamentally important in deciding about future housing provision and the impact on the need for release of green belt land. It would be particularly ironic if the matter of the phasing of Wirral Waters development programme fundamentally impacted on this process thereby resulting in the irreplaceable loss of green belt land because much of its development programme falls slightly outside the plan period to 2035.</p> <p>8.15 There are a relatively small number of historic assets at risk, though these could potentially deteriorate further without intervention or as a result of inappropriate development.</p> <p>8.16 Existing historic environment designations and the policies of the NPPF will continue to offer a degree of protection to heritage assets and their settings.</p>	Not directly related to the scoping process
SCOP010	Local Amenity Society	<p>Key issues and objectives</p> <p>8.17 The following key issues emerge from the context baseline review:</p> <ul style="list-style-type: none"> <li>• There is a rich variety and distribution of designated heritage assets present within the Borough, including 8 Scheduled Monuments, 26 Conservation Areas and at least 722 nationally listed buildings.</li> <li>• There are 14 designated heritage assets identified by Historic England as being at risk ranging from gardens to churches to entire conservation areas.</li> <li>• The Wirral Waters project offers significant opportunities to enhance the historic fabric of the Borough and enhance understanding and appreciation of Wirral's industrial heritage.</li> </ul> <p>8.18 In light of the key issues discussed above it is proposed that the SA framework should include the following objective:</p> <ul style="list-style-type: none"> <li>• Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.</li> </ul> <p>Comment: We go back again to the initial paragraph in this section "with a view to avoiding and mitigating adverse effects and maximising the positives". An important ingredient is the "enhancement of historic character through design, layout and setting of new development". Our view is that the issue of good design has been a real weakness in the development management process. The new NPPF has strengthened the ability of Councils to refuse developments on design grounds. But this cannot happen in a vacuum. The Council will need to develop a design policy as part of the Local Plan. This might need the commissioning of external consultants to develop a policy, especially with respect to the special areas and assets of heritage and conservation and the impact of developments in the various centres of the Wirral's urban settlements.</p>	Not directly related to the scoping process. No suggestions are made.



Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP010	Local Amenity Society	<p>Housing Context National</p> <p>9.1 Key messages from the NPPF include:</p> <ul style="list-style-type: none"> <li>• Support for strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.</li> <li>• To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'</li> </ul> <p>Comment: Inevitably there is controversy around the local housing need assessment. We understand the figure for the Wirral arising from this calculation is an average of 803 dwellings pa now to be supplemented by the penalty that Wirral will face for its past non-delivery of housing. Planning for this amount of housing will inevitably involve the release of green belt land. We understand the Council will not be making an "exceptional circumstances case" to "mitigate" this figure. We think there needs to be a clear explanation why the Council considers this figure to be unchangeable.</p> <ul style="list-style-type: none"> <li>• The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on site where possible.</li> <li>• Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.</li> </ul> <p>Comment: In relation to both points above, the irony in all of this, is that the Council has very limited control as a planning authority to determine how much and what type of housing is provided. The supply of housing is driven by market factors primarily and the supply of land is only one of the considerations, albeit an important one. We therefore have a situation where the future of a significant part of the green belt is really at the mercy of market decisions by private housebuilders and the pace at which they decide to build their dwellings.</p> <ul style="list-style-type: none"> <li>• In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.</li> </ul> <p>9.2 In February 2017 the government published the Housing White Paper entitled 'Fixing our broken housing market'. Key points in relation to housing delivery include the proposed new standardised methodology for calculating housing need and a drive to increase densities in the most sustainable locations, particularly near transport hubs such as train stations.</p>	General commentary on content. No suggestions made.
SCOP010	Local Amenity Society	<p>Regional</p> <p>9.3 The Liverpool City Region (LCR) Strategic Housing and Employment Land Market Assessment (SHELMA) was published in draft for consultation in 2017, and identifies housing need at a regional scale, apportioning this need between the constituent LCR authorities. The SHELMA identifies an objectively assessed housing need (OAHN) for Wirral of between 664 and 737 dpa. This document remains in draft and these OAHN figures should be viewed in that context.</p> <p>Local</p> <p>9.4 The Wirral SHMA and Housing Needs Study (2016) identifies housing need for Wirral, including affordable housing and other specialist housing types. The 2016 SHMA identifies a higher overall OAHN for the Borough of between 875 and 1,235 dwellings per annum (dpa).</p> <p>9.5 The Development Options Review (2018) proposes 90 strategic and non-strategic sites with capacity for up to 2,403 homes for allocation in the emerging Local Plan.</p>	No action to take
SCOP010	Local Amenity Society	<p>Baseline - Current baseline</p> <p>9.6 All OAHN calculations will likely be superseded by the Government's proposed standard methodology for calculating housing need, which produces an annual housing need figure of 803 dpa when calculated using the 2014 household projection data (as per current guidance). However, the more recent 2016 household projection data returns a significantly lower housing need figure, potentially as low as 490 dpa. It is noted that as at March 2019 the 2016 household projections should not be used to calculate housing need.</p> <p>Comment: Our understanding is that the OAHN calculation of 803 dwellings pa plus the further increase due to non-delivery (see para. 9.8 below) will be the minimum requirement and will have to be carried forward in the submission of the Local Plan for examination. If the Council decided not to meet this requirement the Plan will almost certainly be declared "unsound". Can the Council confirm categorically that this is the correct understanding of the position faced by the Council?</p> <p>9.7 In this context, the 2017/18 Wirral Annual Monitoring Report (AMR) indicates that the average annual rate of dwelling completion over the previous 5 years was 474 dpa. The high level of development constraint in Wirral is reflected by the high proportion of completed dwellings which were delivered on brownfield land, with 83% of 2017/18 completions, 84% of 2016/17 completions and 92% of 2015/16 completions being achieved on previously developed sites. Whilst this is positive in principle, it could suggest that housing supply from greenfield sites is being severely constrained by protective designations, particularly Green Belt.</p> <p>Comment: The last sentence is a truism. Of course, building on greenfield sites is limited by Green Belt protection but the primary issue in the Local Plan is the extent to which this protection should be withdrawn and the consequent impact on housebuilding and the character and environment of the Wirral. This is further exacerbated by the ability/willingness of the private housebuilders to utilise the sites released from protection and possibly thereby concentrate less on developing more difficult brownfield sites. We may enter a scenario where land is released from the Green Belt but is still not developed at a rate equivalent to the OAHN figure and the Council is penalised and required to release more Green Belt land to match the revised increased figure.</p> <p>9.8 The 2018 Housing Delivery Test (HDT) results record a total delivery over three years of 1,530 net new homes against a target of 2,093. This means the 2018 HDT measurement for Wirral is 73%.</p> <p>9.9 Figure 9.1 (below) illustrates data from the 2016 SHMA on the distribution of housing completions within Wirral between 2003/4 and 2014/15, revealing that Birkenhead is by far the area of highest housing delivery.</p> <p>9.10 The 2016 SHMA suggests a 40% policy target for affordable dwellings on new development, subject to viability testing. The 2017/18 AMR says that affordable housing policy in Wirral applies to developments of 11 or more units, with 10% affordable sought in areas of greatest need and 20% elsewhere. The AMR records total gross affordable housing completions of 83 dwellings in 2016/17 which was policy compliant at 22% of overall housing delivery.</p> <p>9.11 Figure 9.2 illustrates that home ownership in Wirral is higher than regional and national averages. The private rental sector is broadly comparable to the national average, but the social rented sector is notably lower than at both regional and national scale.</p> <p>9.12 Wirral has strong functional linkages to other areas within the Liverpool City Region and beyond. Housing market geography is therefore complex, and a number of evidence base studies prepared by the individual authorities have produced slight variances when identifying housing market areas (HMAs) in the region. However, the 2017 LCR SHELMA includes a review of previous work on regional housing and economic geographies and locates Wirral within a 'Central LCR' HMA, along with Knowsley, Liverpool, Sefton, and West Lancashire (see Figure 9.3 below). This group of authorities are identified as having "a self-containment of around 90%". Within this HMA, Wirral is identified as having particularly strong flows to and from Liverpool.</p>	General commentary on content. No suggestions made.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP010	Local Amenity Society	<p>Future baseline</p> <p>9.13 Significant policy and environmental constraints are likely to continue to heavily constrain housing land supply over time, particularly in terms of greenfield sites on the edges of settlements. A combination of very tightly drawn Green Belt boundaries and nationally and internationally significant biodiversity sites will naturally focus growth towards opportunities within the existing settlements, particularly in Birkenhead where the majority of housing completions are delivered. However, recent housing delivery rates suggest that there are simply not enough brownfield opportunities to meet housing need, and the gap between housing need and housing supply could increase over the plan period based on recent trends.</p> <p>9.14 One notable exception to this is the nationally significant redevelopment opportunity at Wirral Waters, where over 13,000 dwellings have outline consent as part of a transformational mixed-use scheme. The Wirral Waters site is therefore a very significant opportunity to dramatically boost housing supply in the Borough and realising its full potential over the plan period and beyond will likely be a key determinant in whether Wirral is able to meet its housing needs in full. However, the potential of the Wirral Waters scheme should be viewed in context. The November 2018 Planning Committee report on the Brownfield Land Annual Review notes that “as all matters are held in reserve, it has not been possible to identify a specific boundary for a minimum number of additional new housing units” indicating just how early the project is in its delivery and the challenges involved in accurately forecasting phasing of delivery of such a complex scheme.</p> <p>Comment: we are of the view that para. 9.14 above is an important element in making the case for “exceptional circumstances” to apply to the Wirral. The Wirral Waters scheme, as noted, is still at an early stage, and it would be prudent to review this at the point of the first 5 Year review period in terms of its ability to meet the numbers agreed in the outline planning permission. We understand that in the first 5 years there are still discussions taking place between the two arms of Peel Holdings over the requirements for continuing port use and the release of land for housing. It would be sensible to bear this in mind in allocating Green Belt land when there is a question mark over the ability of Peel to maximise their housing numbers in the first 5 years of the plan but the possibility of them achieving greater numbers in the subsequent 10 years.</p> <p>In fact, we are very surprised that the Council have not been advocating for a “special vehicle”, such as a Development Corporation, to embrace Wirral Waters, the Town Centre, Birkenhead Park, Hamilton Square and Woodside. This area could be regarded as of strategic importance to the whole of the Liverpool City Region and can only properly be enhanced by access to an assured forward funding profile and a partnership between the Liverpool City region, Wirral Council, Peel Holdings, the Wirral Growth Company, other private and community interests. Has such an approach been considered? Is it worth pursuing?</p>	Not directly related to the scoping process. No action to take.
SCOP010	Local Amenity Society	<p>Key issues and objectives</p> <p>9.15 The following key issues emerge from the context baseline review:</p> <ul style="list-style-type: none"> <li>• Wirral’s 2016 SHMA identifies an Objectively Assessed Housing Need (OAHN) for the Borough of between 875 dpa and 1,235 dpa.</li> <li>• The Government’s proposed standardised methodology produces a housing need figure of 803 dpa when using the 2014 household projection data, as per current guidance.</li> <li>• The 2016/2017 Annual Monitoring Report (AMR) records an average delivery over the preceding five years of 383 dpa meaning current rates of housing delivery will need to be significantly boosted to meet housing need.</li> <li>• The SHMA indicates that current levels of affordable housing delivery are below need, though delivery in 2016/17 was policy compliant at 22% of overall housing delivery. Viability issues may suppress capacity to seek affordable housing at a more ambitious scale.</li> <li>• The Wirral Waters regeneration offers a strategic long-term opportunity for substantial brownfield housing delivery and 13,000 units have outline permission already.</li> </ul> <p>Comment: See comment on para 9.14 above.</p> <p>9.16 In light of the key issues discussed above it is proposed that the SA framework should include the following objectives:</p> <ul style="list-style-type: none"> <li>• Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral’s residents, including older people, people with disabilities and families with children.</li> </ul>	General commentary on content. No suggestions made.
SCOP011	Landowner/Developer	<p>INTRODUCTION</p> <p>Our Client welcomes the opportunity to engage in this consultation process and to provide comments on the aforementioned documents. It is noted at this time that the consultation is only at the scoping stage; accordingly, it is understood that formal consultation on the Sustainability Appraisal itself will take place in parallel to the Regulation 18 stage of the Local Plan consultation process in the first quarter of 2020. As part of this representation, we have undertaken an assessment of our Client’s land interests to the west of Sandy Lane, in Irby, within the context of the key objectives identified within the SA Scoping Report. A location plan of our Client’s land interests is provided below: Figure 1: Site Location Plan: Land west of Sandy Lane, Irby [Map Attached]</p>	General commentary. No action required.
SCOP011	Landowner/Developer	<p>SUSTAINABILITY APPRAISAL (SCOPING REPORT)</p> <p>The following Section of our representation provides our comments in relation to the Sustainability Appraisal (“SA”) Scoping Report.</p> <p>Legislation</p> <p>The legislation which underpins the legal requirements of Strategic Environmental Assessments is the Strategic Environment Assessment of Plans and Programmes (“SEA”) Regulations 2004. This requires the formal environment assessment of plans and programmes which are likely to have significant effects on the environment. This is reiterated within the Planning and Compulsory Purchase Act (2004) which requires Local Planning Authorities (during the preparation of a Local Plan) to carry out a sustainability appraisal of each of the proposals and to ensure that its objectives contribute towards sustainable development.</p> <p>It is noted that paragraph 1.6 of the Scoping Report acknowledges the requirement for the SA to be undertaken in accordance with the specific procedural requirements identified within SEA Regulations. These require the provision of the scope and level of detail of the information to be included, and a report to be published for consultation alongside the draft plan which identifies, describes and evaluates the likely significant effects of implementing the plan and reasonable alternatives. This will take place in the first quarter of 2020 alongside as part of the Regulation 18 Local Plan consultation.</p> <p>The Scoping Report has been prepared primarily to ensure that there is engagement with key nationally designated authorities. This positive approach is supported by our Client.</p>	General commentary. No action required.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP011	Landowner/Developer	<p>Contents of Scoping Report</p> <p>Paragraphs 1.11 – 1.16 of the Scoping Report set out the topics/themes which will be assessed as part of the full SA. Whilst these are broadly acceptable, it is considered the themes should be amended to include the following topics listed below. Whilst they are already covered to some degree within the Scoping Report, it is considered that their inclusion will ensure that the scope of identified issues and objectives are comprehensive:</p> <ul style="list-style-type: none"> <li>➤ Cultural Heritage;</li> <li>➤ Community and Wellbeing; and</li> <li>➤ Accessibility.</li> </ul> <p>It is also noted that whilst waste has been excluded from the Scoping Report because it was undertaken at a sub-regional level in 2013; it should, for completeness, be considered as a topic within the SA.</p> <p>General Comments</p> <p>It is noted that the date of the Scoping Report is March 2019; however, the document refers to the 2018 version of the National Planning Policy Framework (NPPF). This should be updated to reflect the latest iteration of national planning policy published in February 2019, in addition to the Planning Practice Guidance.</p>	<p>Scoping is an iterative process. Important policy documents will be considered as the Plan progresses. It is considered that communities and wellbeing are addressed adequately through the proposed SA Framework. Likewise, accessibility is addressed in several objectives, most notably 'transport'. Waste has been scoped out of the process.</p>
SCOP011	Landowner/Developer	<p>SA Themes</p> <p>Section 2 - Air Quality</p> <p>It is noted that the Air Quality section is primarily based on the Council's Air Quality Annual Status Report (2018) and details the extent of monitoring undertaken. It also confirms that there has been a gradual reduction in nitrogen dioxide between 2013 and 2017, which is welcomed. However, it is noted that a number of monitoring sites have been reviewed and relocated (as of January 2018), and subsequently, the monitoring of nitrogen dioxide within these new locations will need to be monitored as the Local Plan progresses. Additionally, once proposed allocations are identified at the Regulation 18 stage (housing, employment, mixed-use etc.), monitoring within these locations will be essential to ensure that development would not give rise to harmful levels of nitrogen oxide and require the provision of an AQMA.</p> <p>Section 3 - Biodiversity</p> <p>The Scoping Report makes references to national, regional and local policy, but excludes reference to EU legislation relating to habitat management, biodiversity and birds directives. This context is important, particularly as reference is made to international and national designated sites.</p> <p>Reference should be made to the need for a Habitat Regulation Assessment ("HRA") Screening Opinion to be prepared and submitted as part of the Local Plan process.</p>	<p>Comments noted. No action required. EU Legislation is encapsulated by UK Regulations in most instances, and this is reflected in the inclusion of European protected sites in the baseline position.</p>
SCOP011	Landowner/Developer	<p>Section 4 - Climate Change Adaption</p> <p>This section focuses predominantly on flood-risk rather than any other aspects of climate change, and therefore it might be advisable to separate this into a flood-risk section as part of the wider SA.</p> <p>Section 5 – Climate Change Mitigation</p> <p>There are a number of key issues identified within the Scoping Report. It is our position that the SA should include the need to increase the proportion/supply of energy generated from renewable resources, and these types of uses should be supported and facilitated in order to help achieve a reduction in emissions.</p> <p>Section 6 – Economy and Employment</p> <p>This section deals with the need to develop new opportunities in key growth sections such as marine and maritime industries, the linkages to Liverpool and Chester and the role of SME's and start-up businesses. These objectives are supported by our Client.</p>	<p>Capturing flood risk within Climate Change Adaptation is AECOM's standard process as the chapter also provides opportunities to discuss other aspects of climate change. Flood risk is a major aspect but additional reference is now made to warming temperatures in the scoping report.</p>
SCOP011	Landowner/Developer	<p>Section 7 - Health</p> <p>This section fulfils the Health Impact Assessment scoping exercise. Whilst it is considered that it should be a separate screening approach, akin to the EqIA, it is deemed on balance to be acceptable, particularly given the inter-linked relationship between the documents.</p> <p>Section 8 - Heritage</p> <p>This section should include reference to "cultural wellbeing" in order to ensure that the scoping is comprehensive.</p> <p>Section 9 – Housing</p> <p>The Scoping Report sets out the national, regional and local context in relation to housing. In particular, it sets out the range of growth options which are proposed both at a regional (Liverpool City Region) and local level. This relates to the delivery of between 664 to 1,235 dwellings per annum (based on various household projections and evidence bases, namely Government projections, standard housing methodology and the Liverpool City Region SHELMA). Notwithstanding this, it is noted that the Scoping Report is largely reliant on the delivery of the Wirral Waters, and there are concerns over the deliverability of the site in terms of the numbers proposed (13,000 dwellings), and the over-reliance on a single site and housing market/type, to deliver the Borough's housing needs during the Plan period. It is our Client's consideration that a range of sites and land types are required in order to deliver the Borough's housing needs. This includes the release of Green Belt land. To this end, the content of the Scoping Report is largely supported by our Client.</p>	<p>The potential for Wirral Waters is discussed as part of the context. However, the extent to which this is relied upon as part of the Plan strategy is not a decision that is made through the scoping process. Such issues will need to be explored as the Plan progresses. This is an important issue with regards to the formulation of reasonable alternatives.</p>
SCOP011	Landowner/Developer	<p>Section 10 – Land and Soil</p> <p>The Scoping Report recognises that the amount of brownfield land in the Borough is a finite resource, and that it is likely that future development outwith the urban area has the potential to affect Best and Most Versatile Agricultural land. It is our Client's position that in order to meet future housing needs, Green Belt land release is required.</p> <p>Section 11 – Landscape</p> <p>The Local Plan (and Council's) main constraint is the extent of Green Belt within the Borough, which is addressed in this section. This should be addressed either within the housing section of the Scoping Report, or in a separate Green Belt section, because, as the Scoping Report acknowledges, it is a land-use rather than a landscape designation. Notwithstanding this, it is noted that the Scoping Report acknowledges the need for Green Belt release, albeit the need to make "careful choices". This approach is supported by our Client; any Green Belt release must be based solely on robust and up-to-date planning evidence, with all reasonable alternatives considered fairly. Failure to follow this approach will render the Local Plan unsound.</p> <p>Section 12 - Population and Communities</p> <p>The extent of the scoping with regard to population and communities is largely supported by our Client. However, the SA framework should also include the need to promote high levels of education and employment as identified within the Wirral Plan 2020 Vision as a key objective.</p>	<p>General comments. No action necessary. It is considered that the proposed SA Framework adequately deals with education and employment.</p>

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP011	Landowner/Developer	<p>Section 12 – Transport This section should refer to Transport and Accessibility as the baseline information relates to walking and cycling and sustainable modes of transport. This is interrelated and should cross refer to the objectives set out within Climate Change mitigation (Section 5).</p> <p>Section 13 – Water resources This section seeks to promote sustainable forms of development which minimise pressure on water resources and which enhance water quality in connection with the aims within the Water Framework Directive. This is supported by our Client.</p> <p>Section 14 – Water Quality This is generally supported by our Client. However, this should be cross-referenced and read in conjunction with the objectives set out in Section 4 (Climate Change mitigation).</p> <p>Next Steps The Scoping Report sets out the subsequent stages of the SA process and the extent of consultation. This is largely supported by our Client and is considered to be consistent with the SEA Regulations. Moving forward, the emerging Local Plan policies and allocations should be comprehensively assessed against the SA objectives and published for consultation.</p>	The SA Framework should be considered as a whole as well as looking at its individual component objectives. Therefore, cross references don't need to be made explicit.
SCOP011 EQIA	Landowner/Developer	<p>EQUALITY IMPACT ASSESSMENT SCOPING REPORT The Section provides our comments in relation to the aforementioned EqIA Scoping Report.</p> <p>Policy Context The EqIA makes reference to the Equality Act 2010 which protects people from discrimination in the workplace and in wider society. Reference should also be made to the Equality Act 2017, and in particular Chapter 15; this requires Local Planning Authorities to pay due regard to a number of equality considerations when preparing and before adopting planning policies and the need to carry out assessments to ascertain the policies potential impact on equality, and to demonstrate compliance with the Public Sector Equality Duty which we note is referenced in paragraph 2.2 of the EqIA Scoping Report.</p> <p>Baseline Position The baseline position provided within the Scoping Report offers high-level details of the protected characteristics groups identified within Paragraph 2.1 - age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Where it is identified that there is a deficiency in information i.e. gender reassignment, it suggests what work is being undertaken nationally in terms of capturing this level of detail in the 2021 census. This approach is supported by our Client.</p>	Reference to the Equality Act will be made, with any key messages being drawn out.
SCOP011	Landowner/Developer	<p>Key Issues and Objectives The key issues identified are supported by our Client and provide a summary of the main high-level findings identified within the Scoping Report. In terms of the objectives, we are largely supportive of these; however, we consider that in terms of the mix of homes, this should be amended to state: “to provide a mix of good quality, affordable and specialist housing which meets the needs of Wirral’s residents, including older people, people with disabilities (particularly those with accessibility issues) and families with children, in appropriate brownfield and greenfield sustainable locations” It is also our position that each policy should be assessed against the EqIA, particularly in relation to housing needs, distribution and mix of housing.</p>	We do not advocate the appraisal of every single individual policy. There is a need to consider the effects of a Plan in the round.
SCOP011	Landowner/Developer	<p>SUSTAINABILITY APPRAISAL We have set out below an initial Sustainability Appraisal of our Client’s land interests west of Sandy Lane, Irby based on the categories against which the Site will be assessed and how it aligns with the identified sustainability objectives.</p> <p>Background The Site lies to the west of Sandy Lane, Irby, and comprises 3 existing fields which are bounded by existing hedgerows. It extends to approximately 3.2 hectares and comprises greenfield land. The site is bounded by Greasby Brook and woodland to the north and west, Sandy Lane and Irby to the east, and open space, to the south. The Site is currently designated as Green Belt in the Wirral development plan. The Site has previously been promoted by our Client through each stage of the emerging Local Plan process and evidence base preparation; this includes its latest Strategic Housing Land Availability Assessment (SHLAA). The Site was previously assessed by the Council in its 2016 SHLAA which concluded that development of the Site is achievable, with minimal constraints to development, and would be capable of delivering up to 52 homes consistent with the density of the surrounding area.</p>	The SA process will be undertaken by AECOM, and therefore assessments made by third parties are not considered to be necessary. Nevertheless, useful information provided with regards to sites will be taken into account on a consistent basis for all sites.
SCOP011	Landowner/Developer	<p>Assessment against Sustainability Criteria We undertake our assessment of the Site against the Key Objectives identified within the SA Scoping Report below: Air Quality: The Site is not located within an Air Quality Management Area (as there are none located within the Wirral) and is of a scale and nature which would not adversely impact on Air Quality. The Site is located in a sustainable location and benefits from its proximity to a range of services and amenities (as discussed below in ‘transport’), which in turn would minimise the risk of air pollution arising from its development. Biodiversity: The Site is located to the east of Thurstaston Common SSSI which is identified as the largest and best remaining lowland heathland in Merseyside, as confirmed by Natural England. The condition of the Site is identified as “unfavourable – recovering” due to on-going management of encroaching scrub into areas of open heathland. It is also designated as Thurstaston Common Local Nature Reserve. This is not a constraint to development given that the Site does not support any habitats which are complementary, or which could contribute to the nature conservation status of the designated area and will not result in the loss of any habitat features of the SSSI. A landscape buffer could be included as part of the future design/layout of the Site to ensure that there would be no adverse impact on the SSSI. There are no known protected species or habitats on the Site. If any species are found, any impact can be mitigated through design. The Site is identified as having potential for bats; however, again, this could be suitably addressed through design and mitigation. Trees and hedgerows will be retained where possible. If any trees are lost, then replacement planting can be provided, on and off-site if required. Net gain will also be achieved through the long-term enhancement of the Site and the creation of a well-connected habitat.</p>	

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP011	Landowner/Developer	<p>Climate Change: Any future housing development of the Site will incorporate a range of features to aid sustainability, including building design, natural surveillance through the orientation of the buildings and plots and overlooking to provide inclusive design.</p> <p>Economy and Employment: The delivery of new homes on the Site would contribute to the economy of the local area both directly and indirectly through the following economic benefits:</p> <ul style="list-style-type: none"> <li>➤ Gross Value Added generated by residents of the proposed development;</li> <li>➤ Increased commercial expenditure (convenience, comparison, leisure goods and services) to help support and sustain the local community;</li> <li>➤ Direct Construction Jobs (on and off-site) over the lifetime of the build programme;</li> <li>➤ Indirect Jobs through the local supply chain via the purchase of goods and services; and</li> <li>➤ Annual Council Tax contributions.</li> </ul> <p>The Site is located in close proximity to a range of existing facilities and services within Irby. The delivery of new homes would help contribute towards the continued viability and vitality of these services and facilities.</p> <p>Health: The development of the Site would comprise dedicated on-site open space provision. The Site is located in an accessible location, and in close proximity to a range of services and facilities, including education, health, shops and commercial uses and recreational areas. Any future allocation or planning application on the Site will deliver financial contributions towards the improvement of healthcare facilities, where justified by evidence, and where any contribution would satisfy the tests set out in the CIL regulations (and the NPPF).</p> <p>Heritage: The nearest listed building is Hill Bark Farm, located approximately 0.6 km to the north of the Site, with Thurstaston Conservation Area located circa 500m to the south-west of the Site. The proposed development will not impact on the setting of the conservation area or listed buildings.</p>	
SCOP011	Landowner/Developer	<p>Housing: The delivery of the Site will contribute to the delivery of much needed new housing in the Borough, and within the local area. It will deliver both market and affordable housing in accordance with the findings outlined within the SHMA and a range of policy compliant house types and tenures, including, detached, semi-detached and terraced properties.</p> <p>Land and Soils: The Site is not identified as being of high agricultural land value or classification. Additionally, there are insufficient brownfield / previously developed sites within the County to accommodate and meet the Borough-wide housing needs. It is inevitable that this will require the loss of agricultural land to meet housing need, including land classified as Grade 1, 2, 3 and 3a.</p> <p>Landscape: The Site is largely contained by the Thurstaston Common SSSI to the north and west, with existing hedgerow and mature woodland and residential to the west and south (single dwelling). The Site is located within the Sandstone Hills Landscape Character Type and Thurstaston and Arrow Park Wooded Hills Landscape Character Area. The character of the Site is agricultural and benefits from visual enclosure from the surrounding woodland and adjacent residential properties. The visual impact of the Site is limited, in terms of the views both in and to the Site which are reduced primarily due to the woodland to the north and west, and to the east by residential properties.</p> <p>The Site is well contained, defined by existing hedgerow and enclosed by Irby to the west. This is a position that has been recognised by the Council with regard to their assessment of the Site and the role it contributes towards the Green Belt which concluded that the land is “enclosed between Sandy Lane and Thurstaston Common woodland and could have a more limited practical impact on the perceived separation between Irby and Caldby” and that it could, if needed, be proposed for release from the Green Belt.</p> <p>It is our Client’s position that the Site represents a logical extension to the settlement of Irby, and that the woodland to the west creates a strong defensible boundary which limits any potential for sprawl to the west. The existing hedgerow and dispersed residential (to the south), and Irby Road/dwellings to the east, serve to provide permanent and defensible boundaries. As such, whilst the development of the Site will result in the loss of Green Belt and greenfield land, this loss is acceptable in landscape terms. Detailed consideration will be given to the impact of any development on the Site in the context of the surrounding area, and to ensure that any potential impact on the landscape is mitigated through the design/layout process and the provision of appropriate landscaping.</p>	
SCOP011	Landowner/Developer	<p>Population and Communities: The development of the Site will provide a range of house types and tenures to help sustain the surrounding villages. This will achieve the objectives of housing through the provision of access to existing and planned infrastructure, and which will be designed in a manner which improves the perception of safety and addresses fears of crime.</p> <p>Transport: The Site benefits from its proximity to an existing bus stop located on Mill Hill Road (350m from the Site). This provides an hourly service to West Kirkby and Heswall. A further bus stop located near to the Site provides a regular service to Heswall and Liverpool.</p> <p>The Site also benefits from its cycle and pedestrian linkages and its proximity to a range of facilities, including a children’s nursery, recreational facilities, library, church, café, cricket club, primary school, public house, restaurants, social clubs and hairdressers, all located within 1km of the Site. The nearest primary school is located 0.7 miles from the Site, and the nearest secondary school is 1.2 miles from the Site; accordingly, it benefits from good access to education.</p> <p>The Site is located a mile to the south of Route 56 of the national cycle network, which connects to New Brighton, Wallasey, and Chester Zoo.</p> <p>The nearest railway station to the Site is West Kirkby; this is located three miles to the north-west of the site, and which provides a regular service (4 trains per hour) to Liverpool.</p> <p>Water Resources / Water Quality: The Site is located in flood zone 1 based on the Environment Agency’s flood mapping system. Prior to the submission of any planning application, detailed surveys would be undertaken to establish the flood-risk and drainage solutions for the Site. The site is not located on an area of known mineral resources; notwithstanding this, any future planning application would be accompanied by a Phase 1 Ground Investigations Report.</p>	
SCOP011	Landowner/Developer	<p>Based on the aforementioned assessment, we have demonstrated that the Site is compliant with the objectives set out in the SA Scoping Report. Accordingly, it is considered that the Site should be released from the Green Belt and identified as a housing allocation in the emerging Wirral Local Plan having regard to the following:</p> <ul style="list-style-type: none"> <li>➤ The Site is located immediately adjacent to a sustainable settlement, and thus is sustainably located;</li> <li>➤ It represents a natural and logical extension to the existing urban area of Irby, and would not conflict with the five purposes of Green Belt set out in paragraph 134 of the NPPF;</li> <li>➤ It would contribute positively to the delivery of much-needed open market and affordable housing provision;</li> <li>➤ It would contribute to the creation of a sustainable community, and is capable of accommodating a mix of new housing to meet local needs; and</li> <li>➤ There are no technical constraints which would preclude its development.</li> </ul>	

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP011	Landowner/Developer	<p>CONCLUSIONS</p> <p>This representation has provided our Client's comments in relation to the SA and EqIA Scoping Reports. Whilst we are largely supportive of the proposed scope contained within each document, we do nevertheless consider that amendments are required in order to ensure the robustness of each document and the soundness of the emerging Local Plan. A summary of these proposed amendments is provided below:</p> <p>Sustainability Appraisal</p> <ul style="list-style-type: none"> <li>➤ Reference is made to the 2018 version of the NPPF; this should be updated to reflect the latest iteration of the NPPF published in February 2019;</li> <li>➤ Reference should be made to EU legislation, particularly in relation to biodiversity;</li> <li>➤ Reference should be made to the need for a Habitat Regulation Assessment ("HRA") screening opinion to be prepared and submitted as part of the emerging Local Plan process;</li> <li>➤ To meet housing needs of the future, Green Belt land release is required;</li> <li>➤ The Local Plan (and Council's) main constraint is the extent of Green Belt within the Borough. This should be addressed either within the housing section of the Scoping Report, or in a separate Green Belt section, because it is a land-use rather than a landscape designation; and</li> <li>➤ The SA framework should also include the need to promote high levels of education and employment as identified within the Wirral Plan 2020 Vision as a key objective.</li> </ul> <p>Equality Impact Assessment</p> <ul style="list-style-type: none"> <li>➤ Reference should be made to the Equality Act 2017, and in particular Chapter 15, which requires Local Planning Authorities to pay due regard to a number of equality considerations when preparing and before adopting planning policies, the need to carry out assessments to ascertain the policies potential impact on equality, and to demonstrate compliance with the Public Sector Equality Duty as referenced in paragraph 2.2 of the EqIA Scoping Report; and</li> <li>➤ Each emerging policy should be assessed against the EqIA, particularly in relation to housing needs, distribution and mix of housing.</li> </ul> <p>Having assessed our Client's land interests to the west of Sandy Lane, Irby in the context of the SA Scoping Report, we have demonstrated that their Site is suitable for residential development. Accordingly, it should be considered by the Council for Green Belt release and a housing allocation in its emerging Local Plan.</p> <p>We welcome the opportunity to submit this representation to Wirral Council, and look forward to continuing to engage in the Local Plan process. We would be willing to discuss the content and findings of this representation with Officers in due course, and the development potential of our Client's land interests.</p>	NPPF review updated to 2019. EU Legislation has been embedded into UK Regulations, and so reference to the parent Directives is not considered necessary for all topics.
SCOP012	Local Conservation Group	<p>We understand delivering needed jobs, homes and other land uses is an important function of Wirral Borough Council and we hope to work well with the Local Plan Team in progressing a sound Local Plan to adoption to afford Wirral's beloved countryside up to date local planning policy protection.</p> <p>It is clear that to plan more sustainably, previously developed land in existing urban areas must be used as a priority, to avoid needless development of land in rural places. The Council must not exaggerate future housing requirements or risk failing the housing delivery test, meaning more greenfield loss. Building jobs and homes in urban areas on centrally located sites that are accessible by public transport, cycling and walking is much better in terms of carbon footprint. We need to plan more responsibly to ensure we do not exacerbate climate change and to support more deprived communities that need the investment. By leaving greenfields undeveloped, nature has a home, future generations have a means of sustaining food security through farming, and people can enjoy the health and well-being benefits afforded by quality greenspaces.</p>	General comments, not directly related to the scoping process. No action necessary.
SCOP013 EQIA	Other Local Authority	<p>Sustainability Appraisal (SA) and Equalities Impact Assessment (EqIA)</p> <ul style="list-style-type: none"> <li>• It would be helpful if the relationship between the SA, SEA and EqIA was clarified. The SA scoping report and Equalities Impact Assessment (EqIA) scoping report are separate documents, but according to the documents, they form part of an integrated appraisal. The Equalities Impact Assessment seems to be treated separately in some respects (for example with having a separate scoping report and separate objectives), but not in others (for example the EqIA referring to the SEA regulations and it being sent to the SEA consultation bodies in the same way as the SA). Paragraph 1.8 of the SA says that the SA should be read in conjunction with the EqIA, especially regarding the cross cutting themes and that the EqIA will inform the findings of the SA. This seems a bit complicated and confusing.</li> </ul>	Clarification provided in both documents to explain linkages.
SCOP013	Other Local Authority	<ul style="list-style-type: none"> <li>• The SA report doesn't mention the screening determination. Given that the screening opinion was consulted on in August 2005, does this need to be re-visited or updated, or is the information it is based on and the conclusion still correct?</li> <li>• Paragraph 1.6 states that SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes ('SEA') Regulations 2004. This is incorrect, as SEA and SA are different. SEA concentrates on environmental issues and is required for certain plans and programmes under the SEA Directive of 2001 and implementing regulations (SEA Regulations 2004). SA covers sustainability (environmental, social and economic issues) and is required for Local Plans under the Planning and Compulsory Purchase Act 2004. For plans that require both EA and SA a joint SEA/SA is normally carried out.</li> <li>• Paragraph 1.14 identifies that waste has been scoped out as a discrete SA theme and that the emerging Local Plan will not affect the adopted Joint Waste Local Plan. It is understandable that waste would not need to be a discrete theme if it is covered elsewhere, but levels of development proposed will impact on levels of waste generated, which in turn will impact on waste disposal requirements. This will need to be taken into account, and the need for a review of the Joint Waste Local Plan should be assessed.</li> <li>• Chapter 3 Biodiversity – this should refer to the Habitats Regulations Assessment, which will cover some of the issues raised. The key issues identify the designated sites, but not potential impacts. For example, recreational disturbance is a known issue that should be highlighted.</li> <li>• Chapter 4 Climate change adaptation - The objective relating to climate change adaptation refers to adapting to and managing flood risk, but should also refer to minimising the risk of flooding.</li> <li>• Chapter 9 Housing and Chapter 10 Land and soils – There is an overlap between the objectives for these two topics. The housing objective refers to the focus on maximising the potential from strategic brownfield opportunities and the land and soils objective supports development which makes effective use of previously developed land. It may not be necessary to include this in both objectives. Throughout the report there should be reference to either 'brownfield' or 'previously developed land'.</li> <li>• Chapter 11 Landscape - We would like to reiterate comments made at the previous stage of consultation on the Wirral Development Options in October last year and to query to reference to Green Belt in the context of the protection and enhancement of landscape. The purposes of Green Belt are set out in the NPPF and include: preventing neighbouring towns from merging into one another, safeguarding the countryside from encroachment and checking the unrestricted sprawl of large built up areas. If Green Belt is to be included within the SA framework objectives, reference to these purposes of the Green Belt should also be included, and the objective should be clear that the preservation of important gaps between settlements in the context of choices about Green Belt release, applies equally to settlements within Wirral and settlements within Cheshire West and Chester. We also question the use of the contribution towards the function of the Green Belt, against the Landscape topic as identified in the site assessment criteria in Appendix B. As stated above (and in national policy), Green Belt is not a tool to protect landscape, and the designation of land as Green Belt does not mean that it is a valued landscape in its own right.</li> <li>• Chapter 13 Transport – The baseline and issues refer to opportunities for sustainable transport, but this issue is not covered by the objective.</li> <li>• Chapter 14 Water resources – The objective refers to minimising pressures on water resources, water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality. It is not clear whether it is just the innovative features and techniques that should maintain and enhance water quality, or minimising pressure on water resources etc too? Water supply should be covered by the objective.</li> </ul>	All Local Plans are required to undergo SA and SEA. Therefore, screening is unnecessary. Chapters on biodiversity, housing, land and soils, landscape and transport updated accordingly, including moving Green Belt discussion to Land and Soils.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP013	Other Local Authority	<ul style="list-style-type: none"> <li>Appendix A – identifies objectives, but not sub-objectives or decision aiding questions. These would be helpful to inform the appraisal process. The objectives should concentrate on what is to be achieved (e.g. minimised air pollution), rather than how it is to be achieved (e.g. supporting the use of low emission technologies).</li> <li>Appendix B – identifies site assessment criteria. This provides a list of relevant criteria and assumptions but it is not clear how this will be used to assess sites. The population and communities section just lists primary school, Local Nature Reserve etc – how will this be used to assess sustainability of the site? Will it relate to distance from these sites?</li> </ul>	
SCOP013	Other Local Authority	<ul style="list-style-type: none"> <li>Will sub-objectives be used to assist with the appraisal of policies?</li> <li>The SA report could also identify potential indicators to use for monitoring purposes.</li> </ul>	
SCOP013 EQIA	Other Local Authority	<p>EqIA</p> <ul style="list-style-type: none"> <li>Paragraph 4.3 refers to the SEA Regulations requiring consultation with statutory consultation bodies and paragraph 4.4 refers to these statutory bodies. EqIA does not need to follow the SEA Regulations, as these relate specifically to Strategic Environmental Assessment (SEA). SA is often undertaken to incorporate SEA (and therefore meet the SEA regulations) and the EqIA can form part of the integrated appraisal process. However, the statutory environmental bodies for SEA are not necessarily the key bodies to consult on the scope of EqIA.</li> <li>The header at the top of each page says ‘Scoping Report for the Wirral Local Plan Sustainability Appraisal’ – shouldn’t this refer to the EqIA, rather than the SA?</li> </ul>	Comments noted.
SCOP014	Local Resident	<p>Thank you for the opportunity of commenting on the above. As you will realise it is almost impossible for a member of the public to meaningfully comment on this document and the related attachments due to its size and complexity. However, the social, economic and environmental implications of future planning policies are of considerable concern to many residents including myself.</p> <p>Thus far the Development Options Review has been met with widespread opposition, and in its present form would clearly not be sustainable simply because so many groups and individuals would challenge it, and many of the proposed potential development sites would appear in conflict with the needs and objectives set out in this Assessment Report. Having begun this consultation process the Council has now got to find a productive way of amending its draft options to take a fair and reasonable assessment of the comments, objections and proposals it has received. Any failure to do so would render the whole process impossible to manage, and future planning enforcement extremely difficult.</p> <p>Wirral residents should be able to understand and support planning polices and new developments should be able to have a positive and as far as possible welcome impact. Whilst building for the future we must recognise the fragility of Wirral's open countryside and as they have in the past Planning Policies should as far as possible have a positive environmental impact.</p> <p>This consultation exercise has resulted in Environmental Groups coming together in a positive and knowledgeable Alliance and this has created an opportunity for the Council to work in a Partnership with people who are dedicated to securing the well being of the Borough. In these difficult times when Council resources are limited this would seem to present a real opportunity and a positive way forward.</p>	General comments. A non technical summary will be prepared to enable effective consultation on the SA findings.
SCOP015	Local Resident	<p>The Sustainability report seeks to be all things to all men and does not in any way move things forward. Since this report was known to be being circulated to a wide audience including the public, a summary at the front would have been helpful. I am afraid my comments below move gradually to become more and more incredulous that we can be served up such blandishments. If this were the commercial world the report would I am sure be rejected.</p> <p>How can we have confidence in a report which has been critically examined for quality by someone who can't even spell his own title "Principle Consultant?" - amazing that not one of his colleagues picked this up! There is a general lack of any specific helpful recommendations or conclusions, the authors are clearly aware of the controversial nature of the study and this report ends up being all things to all men and nothing to anyone.</p> <p>Just a few examples of flumox on issues which which lie at the heart of the decision facing the Council are:-</p> <p>"In this context, the 2017/18 Wirral Annual Monitoring Report (AMR) indicates that the average annual rate of dwelling completion over the previous 5 years was 474 dpa. The high level of development constraint in Wirral is reflected by the high proportion of completed dwellings which were delivered on brownfield land, with 83% of 2017/18 completions, 84% of 2016/17 completions and 92% of 2015/16 completions being achieved on previously developed sites.42 Whilst this is positive in principle, it could suggest that housing supply from greenfield sites is being severely constrained by protective designations, particularly Green Belt. "</p> <p>Really it could suggest a lot of things and this is probably the least likely.</p> <p>"9.13 Significant policy and environmental constraints are likely to continue to heavily constrain housing land supply over time, particularly in terms of greenfield sites on the edges of settlements. A combination of very tightly drawn Green Belt boundaries and nationally and internationally significant biodiversity sites will naturally focus growth towards opportunities within the existing settlements, particularly in Birkenhead where the majority of housing completions are delivered. However, recent housing delivery rates suggest that there are simply not enough brownfield opportunities to meet housing need, and the gap between housing need and housing supply could increase over the plan period based on recent trends. "</p> <p>Another unsupported suggestion!</p> <p>9.16 In light of the key issues discussed above it is proposed that the SA framework should include the following objectives:</p> <ul style="list-style-type: none"> <li>Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral’s residents, including older people, people with disabilities and families with children.</li> </ul> <p>Motherhood and apple pie - how useful is that?</p>	The scoping report is not an assessment of the Plan, nor is it intended to make recommendations or conclusions on such matters. It is a summary of all the information and important issues relating to the Plan and Wirral. Issues such as the amount and location of development / growth will be addressed as the SA progresses. A non technical summary will be prepared.

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SCOP015	Local Resident	<p>"10.11 A substantial proportion of Wirral is urbanised and therefore not agricultural, though much of the open space between settlements in the north, west and south of the Borough is in productive agricultural use. Small areas of Grade 2 land are present throughout the non-urban areas, with notable instances around Meols in the north, and around Thornton Hough and Raby in the south. The majority of the remaining undeveloped land in the Borough is recorded as Grade 3, though very little of this has been surveyed in detail to sub-divide into 3a (i.e. BMV land) and 3b (i.e. lower quality land). Small areas of poorer quality land are present in isolated instances, including Grade 4 land between West Kirby and Moreton in the north, and Grade 5 land at the Borough's south west."</p> <p>This matter of the quality of agricultural land has been variously represented over time in many different reports and a large percentage has previously been classified as Grade 2. However if there can be any doubt one only has to see the large fields of corn and rape which are providing a glorious landscape e.g east of Pensby and Heswall. But surely this should have been assessed before calling for sale it would have been an easy matter to request only land which is of 3.2 and not BMV, this could have helped to avoid much unnecessary work and debate.</p> <p>"10.13 The Wirral Brownfield Land Register was most recently updated in December 2018. It identifies capacity for 900 new dwellings on previously developed site in the Borough which do not currently have planning permission, and capacity for a further 1,952 dwellings on sites with full or outline permission, or where permission is pending. "</p> <p>"Significant opportunities exist at brownfield sites within the Borough, and it is anticipated that these opportunities, particularly those with extant permission, will continue to come forward for development over the plan period. However, brownfield sites are a finite resource and there can be considerable challenges in bringing them forward, particularly in instances where sites require rehabilitation from prior uses such as heavy industry. "</p> <p>"10.17 The following key issues emerge from the context baseline review:</p> <ul style="list-style-type: none"> <li>• Land with potential to be 'best and most versatile' agricultural land is present across non-urban areas of the Borough including areas of Grade 2 and widespread areas of Grade 3, though this is largely not sub-divided into 3a and 3b. Development outside the existing urban areas is therefore likely to have potential to affect BMV land, though there could be potential to direct this away from areas of Grade 2.</li> <li>• There are opportunities to deliver some new development on brownfield sites within the Borough, though this is a finite resource and can be challenging to fully unlock. "</li> </ul> <p>All sites opportunities are finite. Challenges in clearing up brownfield sites need to be faced otherwise they will remain a blight on the landscape. Surely recognition of this and the fact that developers will always prefer greenfield sites is key and some recommendations for addressing this key issue would have been helpful.</p> <p>Weasel words "potential to " etc but clearly suggesting build on BMV land 2 and certainly 3a - not acceptable!!! Would DEFRA agree?</p>	<p>No suggestions made. We do not consider that the Scoping Report encourages development on best and most versatile land. To the contrary, there is an objective that seeks to avoid development on such valuable resources.</p>
SCOP015	Local Resident	<p>"The government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The general extent of Green Belts is established and can only be altered in exceptional circumstances through preparation or review of a Local Plan.</p> <p>Although much of Wirral's eastern third is urbanised in a largely contiguous built up area, much of the rest of the Borough is characterised by distinct settlements within a rural landscape, giving the gaps between these smaller settlements a key role in defining the Borough's landscape character.</p> <p>11.9 Currently, these gaps between settlements are protected by the Green Belt, which although a land use rather than a landscape designation, is an effective policy tool in maintaining characterful green spaces between the Borough's smaller towns and villages.</p> <p>11.10 Green Belt designation extends across 46.6% of the Borough, covering the overwhelming majority of nonurban land and 'washing over' a number of the Borough's smaller settlements. In the context of the Development Options Review identifying 48 parcels and sub-parcels for potential release from the Green Belt it is important to note that Green Belt parcels which are found to be performing Green Belt objectives weakly or not at all may be appropriate to test for release through the preparation or review of a Local Plan."</p> <p>Really - what a good idea - How much are we paying for this advice????</p> <p>Future baseline</p> <p>11.12 New development within the Borough has the potential to lead to incremental changes in landscape quality in and around the Borough, particularly if located on greenfield sites at the edges of settlements. This could include the loss of landscape features, visual impact on existing features and the potential for incremental coalescence between settlements, though this would likely require some Green Belt release. There is recent precedent within the wider region for this, with Sefton Borough Council releasing 6% of its Green Belt and Cheshire East releasing 2.5% of its Green Belt in 2017/18. The relatively scarce supply of housing land in the Borough could potentially necessitate consideration of the release of weakly performing Green Belt parcels as a means of unlocking additional land supply. This could have associated effects on the landscape character through the potential erosion of gaps between settlements.</p> <p>11.13 There could also be potential for new development to impact landscape quality in the vicinity of the road network, either via increased traffic flows impinging on tranquility or through works needed to add additional capacity to the road network.</p> <p>Suppose that potentially could be, might be true.....or not!</p>	<p>No specific suggestions made.</p>
SCOP015	Local Resident	<p>Key issues and objectives</p> <p>11.15 In light of the key issues discussed above it is proposed that the SA framework should include the following objectives:</p> <ul style="list-style-type: none"> <li>• Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps between settlements, mindful of the need to make careful choices about Green Belt release.</li> </ul> <p>Really another brilliant contribution - how much did you say???</p> <p>"Future baseline</p> <p>12.15 The slowing rate of overall population growth has been sustained since at least 2001 and growth between 2011 and 2016 averaged 0.16% per annum. There could be a risk that overall growth becomes negative over the plan period should this trend continue, though planned regeneration and development schemes within the Borough may help stimulate population growth via internal and external migration. "</p> <p>Surely this is the nub of the issue but it is let go at this point. If population growth stagnates or decreases then do we really need so many more houses - if they are built who will live in them and will not the whole area then be blighted? To address this a detailed examination of the economic future growth prospects and the implications for population would be required, is this going to happen?</p> <p>12.19 In light of these key issues it is proposed that the SA framework should include the following objectives:</p> <ul style="list-style-type: none"> <li>• Support good access to existing and planned community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.</li> <li>• Improve perceptions of safety and fear of crime and to help remove barriers to activities and reduce social</li> </ul> <p>Wow - how insightful!</p> <p>Apologies I am not typically so critical but this report has left me fearful of the standard of analysis which will go into the Local Plan. Poor background work will leave the decision making process not properly informed and outcomes will be subject only to political will.</p>	<p>The Scoping Report has been prepared using available information in a proportionate manner. Suggestions for additional information are welcomed; but in this case none have been made.</p>



Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP016	Local Resident	<p>COMMENTS ON THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL 'AIR QUALITY &amp; HEALTH' : DEATH BY PLANNING?</p> <p>1. Introduction The scoping Sustainability Appraisal report on air quality and health gives a very limited, misleading and complacent assessment of issues in these areas which should in practice have a significant impact on consideration of development options under the local plan. A detailed analysis of the health impact of house building on the Green Belt parcels identified for potential release in the Local Plan adjacent to the M53 is in preparation. Specifically it considers the GB parcels east (downwind) of the M53 from Storeton, south past Junction 4, to Raby Mere and those GB parcels near Junction 5 at Eastham. The serious negative effects of air pollution on any future residents and the current residents downwind of the M53 are examined. This note is to give the council early warning, for the record, of the negative health implications of building in these areas and an outline of the formal objections which will therefore be raised if these parcels are proposed for release.</p> <p>2. Scoping Report Context The Scoping Report published by Wirral Council discusses 'Air Quality' in a very limited way. It does however note the NPPF imperatives such as 'New and existing developments should be prevented from contributing to [residents], being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution.' Contrary to the complacent scoping report we will demonstrate from international and national studies and by analysing Wirral geographical health data, that building in the GB parcels identified will put residents at significant risk and cause real, unacceptable health deficits including reduced life expectancy. As traffic increases in coming years, the health impacts of pollutants such as PMs on Wirral will definitely increase significantly, even if the unrealistic government aspirations for replacing diesel vehicles are met. The scoping report mentions only one pollutant in detail, NO2, nitrogen dioxide. NO2 is allegedly monitored at 31 passive sites and levels are supposedly falling 'gradually'. Particulate matter, now recognised as extremely dangerous, is mentioned in passing. It is monitored at only one automatic site on Wirral at Tranmere. International air quality standards, which are continually tightening, and the views, for example of the World Health Organisation on health damage, are not explored. We will do so below. In fact the serious health impacts of air pollution on Wirral are not discussed in the 'Air Quality' section nor the 'Health' section of the scoping report. Given that air pollution is now considered to be 'the greatest environmental risk to public health' in the UK (1, 2) this is concerning. We will look at evidence from the literature causally linking PM and NO2 levels to premature mortality, lower life expectancy, COPD, lung cancer, asthma, diabetes, dementia, stroke, heart attack, development deficits in children's lungs and low birth weight. We will also present in summary, direct evidence of significant correlations between these diseases and PM levels across Wirral which are fully consistent with that extensive literature. [Maps Attached]</p>	Air quality chapter updated with additional evidence.
SCOP016	Local Resident	<p>3. National &amp; International Health Impact Evidence A good starting source for reviewing the evidence is reference 3: the joint report on Air Quality from DEFRA – Public Health England – Local Government Association in 2017. The report concentrates on PMs and NO2. PM10 includes all particles smaller in diameter than 10 microns. PM2.5 includes all particles smaller than 2.5 microns. PM10 therefore includes the PM2.5 and PM0.1 fractions. Nationally the ratio of PM2.5 to PM10 released into the air is 0.75. Concentration ratios vary depending on local conditions. The smaller particles are considered most dangerous since they can be inhaled deep into the lungs and even pass directly into the blood stream. PMs are known to be carriers for carcinogenic materials and are now classed as carcinogenic agents. The literature on health impacts of air pollution is now vast and still accelerating in scope. The health implications for the UK are well described in 'Health Matters: air pollution' published in 2018, by Public Health England (4). Locally we also have an excellent report by the Wirral Intelligence Service (1). WBC cannot claim that there is a dearth of information on these matters. The PHE report concludes that 'long term exposure to man-made air pollution in the UK has an annual effect equivalent to 28,000 to 36,000 deaths. Over 18 years a 1 microgram / m cubed reduction in fine PM air pollution could prevent 50,900 cases of CHD; 16,500 strokes; 9,300 cases of chronic asthma; 4,200 lung cancers.' This gives an indication of the human health value of reducing PM levels since the gains continue to zero levels (3). We will see that Wirral PM levels vary from ~10 to ~16 micrograms / m cubed. PHE notes that the cumulative disease burden to 2035 associated with PMs includes 348,878 CHD cases; 246,916 COPD cases; 273,767 diabetes cases; 173,886 low birth weight children; 133,356 asthma cases; 106,331 strokes; 44,290 lung cancers. Similar analysis for NO2 exposure yields: 573,363 cases of diabetes; 335,491 asthma cases; 102,545 low birth weight children; 86,617 cases of dementia (4).</p>	
SCOP016	Local Resident	<p>The international evidence of harm is overwhelming (8, 9). In many large epidemiological studies air pollution impact has been quantified while taking into account potential co-variables such as lifestyle (smoking, alcohol, exercise), income / education, and measures of socio-demographic deprivation (5). In many studies gradient effects have also been identified. That is, disease prevalence has been shown to fall away as a function of distance from pollution sources such as major roads (6, 7, 23). There have been very large, both cross-sectional and longitudinal health studies (6 provides a 78 page review of the health evidence). Such studies constitute a smoking gun and settle the issue of causation. PHE notes that the Environment Audit Committee of the HOC found evidence that the UK cost of these health impacts was likely to exceed £8 - £20 billion. Since the Clean Air Act in 1956 many sources of PMs have been eliminated but now levels have almost stabilised. The easy sources have been tackled (see Figure A). Traffic sources are resistant to reduction as number of vehicles and traffic miles continue to increase. The government claims that eliminating diesel and / or petrol cars will solve the air pollution problem (10). This is untrue. Their own data shows that ~80% of PMs do not come from car exhausts but from bitumen, rubber, organic and other waste matter released by vehicle tyres from road surfaces. 'Electric' cars and trucks will still cause high levels of PMs. Eliminating diesel cars will however reduce NOx by ~40% but published diesel vehicle reduction targets to 2040 in the UK and Europe are widely considered to be wildly optimistic (11). Official data for sales growth in Alternative Fuel Vehicles and conventional petrol / diesel vehicles suggests AFVs will be only ~8.3% of new car sales by 2030 versus the government's 'ambition' and 'illustrative', 30% to 70%. Note that Figure A also shows that since ~2005 PM pollution from industrial and commercial activities has sharply increased again. Recommended maximum allowable levels of the various pollutants continue to fall as health evidence emerges. The World Health Organisation published a review of 2,200 studies in 2013 (6) concluding that 'Annual PM concentrations are associated with all-cause mortality to a high degree of [statistical] confidence. There is no evidence of a safe level of exposure to PM or to a threshold below which no adverse health effects occur.' The WBC Air Quality report authors also acknowledge that 'Negative health impacts have been found well below current EU &amp; UK limits.'</p>	
SCOP016	Local Resident	<p>Local authorities such as WBC cannot simply say, as they do, we meet the EU or UK legal limits so no further action is needed. The WHO will steadily reduce PM limits in future years which are currently set at 10 micrograms / metre cubed average levels. In the 'Clean Growth Strategy 2018' (12) the government promises to [Diagram showing levels of particulate matter attached] 'reduce PM levels in order to halve the number of people living in locations where concentrations of PM are above 10 micrograms / meter cubed by 2025.' Much of the Wirral is above this limit currently and as vehicle numbers and miles travelled increase in the medium term PM levels will increase, not decrease (32). There was a small reduction in vehicle numbers growth during 'austerity' for a few years but growth has recovered. Traffic volume flow between J4 and J5 on the M53 is given in Figure B. From 2000 to 2016 traffic increased by 33.5% or 2.1% per annum on average. However before and after the 'economic shock' period, during which growth halted, traffic growth rate was ~2.9% per annum. We will show that building in the M53 eastern corridor GB parcels will expose many areas to PM levels well above 10 micrograms / m cubed and this will increase over time. By 2034 PMs near J4 could be at ~22 micrograms / m cubed, double the current WHO limit. [Diagram showing traffic volumes attached]. The government promises new powers for targeted local action. This should include not allowing building new housing in Green Belt areas and green spaces adjacent to identified PM and NO2 hotspots by major roads and motorways. There is extensive literature evidence that significant health deficits are found at distances from motorways of 500 ms and more depending on the air pollutant and the diseases considered (6,7). If local authorities ignore the clear health impact evidence in the scientific literature and allow unnecessary house building in high risk areas they will be guilty of a failure in their duty of care to residents. In the case of Wirral, for the sake of certainty, we now present local evidence that air pollution is ubiquitous and that the prevalence of several diseases is strongly correlated with local PM air pollution levels.</p>	

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SCOP016	Local Resident	<p>4. Wirral Evidence on Pollution Levels</p> <p>NO2 and PM measurements at many localities around the country have been used to calibrate government air pollution models by locality (13). These models take into account point (e.g. industrial) and line (road) sources of pollutants and topography. In the case of roads the key data are traffic flow volumes and traffic mix. The models also take into account prevailing wind directions and use well established spacial diffusion models to predict average concentration levels in one kilometre squares as defined on standard OS maps. This averaging means that pollution levels close to the source may be even higher because of gradient effects. Nevertheless the models give a reliable guide to pollution spread and general levels.</p> <p>The Wirral pollution maps are given in Figure 1 for nitrogen dioxide and particulate matter. The patterns are similar in that the highest pollution levels occur east of the M53 (14). This reflects degree of urbanisation and in particular Birkenhead but also major road distribution. The high pollution levels along the length of the A41 near the Mersey are clear as are the high levels adjacent to the M53 from Eastham to Moreton. In relation to the proposed local plan GB release parcels note the very high PM levels near M53 junction 5 (Eastham) and junction 4 (Clatterbridge). (Note: Junction 2 and the Moreton spur road is also a hotspot).</p> <p>It is therefore puzzling that the Scoping Report tells us (2.6) that :  ‘No hotspots are associated with the Boroughs motorway junctions, nor the toll point of the Kingsway Tunnel, suggesting that the presence of significant strategic road network infrastructure does not currently give rise to notable air quality concerns.’</p> <p>This is simply untrue. In fact the official air quality models show us pollution levels near the mentioned junctions as high as in the worst polluted areas of Birkenhead. An increase in traffic flows on roads feeding the junctions such as J4, resulting from large numbers of new houses on the GB parcels east of the M53 from Storeton south to Poulton Lancelyn would create a high air pollution nightmare. The roads are already congested at peak times twice a day and are generally very busy. J4 is also already a notorious traffic accident hotspot.</p>	
SCOP016	Local Resident	<p>5. Preliminary Wirral Evidence for Air Pollution Health Impacts</p> <p>Detailed analyses are currently underway exploring the links between the prevalence of several important disease classes across the Wirral and the levels of pollutants such as PMs and NOx . Disease data is available from several official sources at the level of political wards and constituencies. Pollutant exposure levels by ward are calculated from the models of Figure 1 by taking all the kilometre squares in a ward and the location of housing and calculating ward exposure averages. This procedure gives a score in the range of 1 to 5 for pollutant level. Disease prevalence is then plotted against pollution level and simple linear models fitted. In all cases significant correlations were found. These include:</p> <p>Wirral Life Expectancy by ward versus PM10 (Figure 2)  Wirral Mortality Rates (DSRs) versus PM10 (Figure 3)  [Diagrams showing Modelled Particulate Matter concentration in Wirral and Air Quality UK website]  Wirral Prevalence of Constrictive – Obstructive Pulmonary Disease versus PM10 (Figure 4). COPD Prevalence versus Indices of Multiple Deprivation (IMD) for closely similar PM10 level wards (Figure 4A)  Wirral Lung Cancer Mortality Rates versus PM10 (Figure 5). Lung cancer versus IMD for closely similar PM10 level wards (Figure 5 A)  Wirral Low Birth Weight Rates versus PM10 (Figure 6)</p> <p>Analyses are also underway for dementia, diabetes, asthma, Coronary Heart Disease and stroke prevalence. Preliminary work also shows clear correlations with PMs and NO2.</p>	
SCOP016	Local Resident	<p>We report the findings below for a selection of diseases. The ongoing analyses are currently addressing the issue of possible co-variables. Many published studies have already dealt with this issue and showed that even after lifestyle (smoking / alcohol / exercise) and so-called deprivation measures (income / service access) are included air pollution impacts are clearly significant (5, 6, 23). The intention here is to demonstrate this with Wirral health data. On the Wirral we can note immediately that smoking prevalence and intensity has been falling for many years yet diseases commonly associated with smoking in the public mind are rising. What is rising on Wirral are vehicle numbers and total miles travelled. We will also show later that constrictive obstructive lung disease (COPD) prevalence, while strongly correlated with PM level, is only weakly correlated with the Wirral ward level Index of Multiple Deprivation (IMD). The same is true for prevalence of low birth weight children.</p> <p>[Figure for smoking prevalence from fire safety checks]</p> <p>It appears that the official habit of simply blaming disease on bad ‘lifestyle choices’ among the poor underclass may be overstated, or indeed a case of ‘blaming the victim’. High air pollution levels for example generally correlate with poor urban housing locations. As more major international multi-factor studies emerge, blaming the victims is becoming harder. To a first approximation, in a country like Britain, we are all air pollution victims now. Similar analyses examining other variables are being prepared for the other disease classes and will be published as soon as possible.</p>	
SCOP016	Local Resident	<p>The intention of the detailed analyses will be to quantify the actual disease loading due to current variations of air pollution across the Wirral and to predict future loadings as traffic increases in general and in proposed areas of green belt development. Such increases impact both new residents in areas adjacent to the M53 but also current downwind residents. There is extensive evidence, accepted by government, and local authorities, that open fields, hedgerows and trees near motorways and major roads significantly reduce the levels of some air pollutants (15, 16). It is notable that WBC itself is promoting the growing of green hedges for this purpose to protect schools (17) and that the Scoping Report talks of pollution mitigation ‘through green infrastructure provision’ (2.10).</p> <p>On this ‘official’ logic it is surely wise to preserve not destroy, Wirral green spaces and existing green belt buffers near major roads and motorways.</p> <p>Removing these green ‘shelterbelts’ by building on them reduces the protection of nearby, current residents and exposes new housing residents to high pollution levels (as is the case in all the GB parcels being considered for release east of the M53).</p> <p>For now we will simply note some basic disease / air pollution correlations. Figure 2 shows Wirral life expectancy versus ward average PM10 levels. There is a clear correlation here with life expectancy at PM level 1 being around 87 years and PM level 4 around 75 years. This should not be surprising since Reference 1 tells us that : ‘reducing PM by 10 micrograms / m cubed would extend lifespan by three times more than eliminating passive smoking’.</p> <p>[Figure attached showing Wirral Life Expectancy by ward]</p> <p>The Air Quality Strategy for the UK in 2007 noted : ‘PM in the UK would be expected to reduce life expectancy averaged over the whole population by 7 – 8 months’. DEFRA tells us NO2 exposure alone ‘reduces UK life expectancy on average by ~5 months’. But of course excess deaths are concentrated in urban area sub-populations. People here are losing years of life.</p> <p>In the worst cases the WHO note an average life deficit of ~ 20 months related to PMs.</p>	

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SCOP016	Local Resident	<p>Figure 3 shows Mortality, age standardised death rates, for the Wirral versus PMs and a linear best fit model (h1). The correlation coefficient is quite high at 0.69. We can say that 48%, roughly half the variability in Wirral mortality rate, is accounted for by PM level differences (while noting there may be several interacting variables in play here. See below).  [Figure attached showing mortality rates in Wirral]</p> <p>Now we examine briefly, particular diseases. Figure 4 shows a best fit linear relationship between constrictive –obstructive pulmonary disease prevalence and PM10 level by Wirral ward (h3). The correlation coefficient is moderately high at 0.73. Taken literally this would imply that 53% of the variation in COPD prevalence is explained by PM variation.</p> <p>With this data we can make a rough check of the scale of impact on COPD of other possible ‘causative’ variables as we can identify several wards where PM levels are very similar (~3.2 to 3.3). The main official measure which purports to capture the level of deprivation in a population is the Index of Multiple Deprivation. This is a weighted sum of several inputs such as income, access to housing &amp; services, education, health and crime exposure. Health includes ‘lifestyle’ items such as smoking and alcohol prevalence. We might therefore expect IMD to correlate with disease measures such as COPD. IMD is usually adduced to explain various diseases under the short hand terms, ‘poverty’ and ‘lifestyle choices’.</p> <p>[Figure attached showing rates of Constrictive-obstructive Pulmonary Disease (COPD) in Wirral by Ward]</p> <p>In Figure 4 A we plot COPD versus IMD for wards with very similar PM levels. A linear fit gives a small positive relationship between COPD and IMD. The correlation coefficient is 0.11 so the slope is uncertain and IMD ‘explains’ very little COPD variation.  [Figure attached showing rates of Constrictive-obstructive Pulmonary Disease (COPD) in Wirral vs the Index of Multiple Deprivation]</p> <p>This is notable since other data suggests a strong relationship between smoking prevalence and IMD on Wirral. The intercept implies that even at zero IMD, COPD would be ~2% for this set of wards. All we can say at this stage is that COPD is strongly related to PM levels but that other variables may also be in play.</p>	
SCOP016	Local Resident	<p>Figure 5 plots lung cancer mortality rates (SMRs) versus PM10 levels across Wirral (h4). The scatter band is wide but a significant relationship emerges from a linear best fit. The correlation coefficient is moderate at 0.63. Taken at face value PM level accounts for ~40% of the variation in lung cancer. This is interesting since lung cancer is the canonical disease linked with smoking and high smoking prevalence these days correlates with low income. IMD should capture the low income effect and the direct ‘health’ deprivation / lifestyle effect. We noted earlier a sub-set of wards with very similar PM levels but a scatter of COPD levels. In Figure 5 A we plot lung cancer mortality versus IMD for these wards. There is a positive correlation and the correlation coefficient is again modest at 0.6.  [Figure attached showing Wirral lung cancer mortality rate]</p> <p>This implies that IMD ‘explains’ ~ 36% of the variation in lung cancer mortality in this data. We can tentatively conclude that PM air pollution and smoking variation contribute about the same amount to lung cancer mortality locally. Given the strenuous legal and social efforts to reduce smoking dependence over recent decades it seems air pollution deserves the same state and local authority attention. We noted that smoking prevalence and intensity is falling on Wirral and across the UK. However fossil fuel vehicle numbers and vehicle miles travelled are increasing and will continue to do so for decades. The proportion of disease like lung cancer due to air pollutants such as PMs will increase over time. Combating this will be very difficult for future governments in existing built up areas. However two actions would be both easy to implement and totally effective :</p> <ol style="list-style-type: none"> <li>1. Do not allow building of new housing, whether luxury or social homes, next to motorways and do not destroy green spaces and green belt protective zones.</li> <li>2. If a council chooses to allow such building it should be required by law to WARN prospective buyers and existing residents downwind of the health dangers involved.</li> </ol> <p>[Figure attached showing lung cancer mortality rates versus the Index of Multiple Deprivation]</p>	
SCOP016	Local Resident	<p>The government tells us they ‘aspire’ to build 300,000 new homes each year with many on green belt land. By following the above rules hundreds of thousands of families per annum can be protected from dangerous exposure to air pollutants. The real ‘need’ numbers are probably less than 160,000 houses per annum but there is still a huge accessible, potential saving in human distress, national disease burden and cost to the NHS.</p> <p>The diseases examined so far express themselves mainly in adults. In fact the coronary heart disease, strokes and dementia impacts of PMs largely strike older people. Living in a polluted area can increase dementia risk by up to 40% (23). But we should be equally concerned about the health impacts of air pollution on children and the developing foetus.</p> <p>There is very worrying evidence that living in high PM areas not only causes acute and chronic asthma but stunts lung development in children permanently (21). ‘Pronounced deficits’ in lung function have been found in 18 year olds who grew up within 500 ms of a motorway. Reference 21 notes</p> <p>‘the new study found reduced lung growth in [young] people who lived by motorways in otherwise open spaces with relatively clean air.’</p> <p>It should be noted that this major pioneering study took place in Southern California and only 3.9% of traffic there is diesel powered. In the UK the proportion is 45.9%. Even if the UK government clean air strategy succeeded it would not remove the problem (10, 11).</p> <p>California state law now prohibits new schools being sited within 500 ft of a highway.</p> <p>These lung stunting results have recently been confirmed in the UK around Greater London (22). Of even greater concern is the recent work showing directly that fine PMs can penetrate the placenta of pregnant women (19). Fine PMs are carriers for a range of carcinogenic compounds. What is certain is that the literature proves a strong correlation between low birth weight in babies and PM levels in the air (18). Low birth weight correlates significantly with later childhood problems including cognitive deficits (20). These results should be viewed with alarm by all current and prospective parents and cause UK central and local authority politicians to put immediate, severe constraints on nursery or school building near motorways and major roads.</p> <p>It is of some interest then to see if LBW is connected to air pollution on Wirral. Figure 6 plots low birth weight prevalence for Wirral wards versus PM levels (h5). The correlation is strong at 0.71. This implies that ~50% of LBW variation on Wirral is explained by PM levels. There is also a suggestion in the data that the negative effect of PM accelerates at higher PM levels. We may safely infer that the associated physical and cognitive deficits in children living near major roads and motorways, demonstrated conclusively in national and international pollution-health studies, also apply to Wirral.  [Figure attached showing Wirral Wards Low Birth Rates]</p>	

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SCOP016	Local Resident	<p>6. Wirral Local Plan : Planning Implications of the Health Deficit Evidence</p> <p>We have examined a summary of the national and international evidence for the many negative impacts on new and existing residents of building housing estates in the vicinity of motorways and major roads and the positive health value of preserving green buffer zones and green spaces in general. The problem is recognised by government to the extent that Highways England is experimenting with giant poly-tunnels to cover motorways (24).</p> <p>We also demonstrated by statistical analysis of Wirral health and air pollution data, very similar and significant negative health impacts for several disease classes. The evidence for impacts on vulnerable groups such as pregnant women, children and older people is particularly concerning.</p> <p>We also noted about two dozen Green Belt Parcels listed in the initial Local Plan for consideration for release from the green belt for major housing developments, lying adjacent to the M53 motorway. The parcels east of the M53 from Prenton and Storeton, through Brakenwood (junction 4) and Poulton to Raby Mere and the parcels adjacent to junction 5 at Eastham, are downwind from the motorway and particularly vulnerable to additional pollution impacts. The official government air quality models show levels implying serious health effects.</p> <p>All this evidence bears no relation to the Wirral Council Sustainability Assessment, Scoping Report in which all is apparently well on the Wirral. To be fair this simply reflects recent WBC documents on air quality (25). WBC sleeps on, apparently unperturbed by wider responses to this health crisis. Curiously this includes the new Air Quality Task Force, just set up for the Liverpool City Region Combined Authority of which Wirral is a part (26). Mayor Rotherham seems clear enough about the dangers :  ‘Poor air quality is a national public health crisis which is shortening the lives of people across our city region...’</p> <p>WBC should also note the European Court of Justice action which threatens to impose huge fines on six nations including the UK. The northwest is one danger area identified (27). We can also draw WBC attention to the latest NICE Guidance recommendations on local housing and facilities planning (28) in relation to the M53 green belt parcels:  ‘When Plan Making consider</p> <ul style="list-style-type: none"> <li>• Minimising the exposure of vulnerable groups to air pollution by not siting buildings (such as schools, nurseries and care homes) in areas where pollution levels will be high</li> <li>• Siting living accommodations away from roadsides</li> <li>• Avoiding the creation of street and building configurations that encourage pollution to build up where people spend time</li> <li>• Including landscape features such as trees and vegetation in open spaces or as ‘green’ walls...</li> <li>• Siting and designing new facilities and new estates to reduce the need for motorised travel.</li> </ul>	
SCOP016	Local Resident	<p>WBC should also consult the ‘Housing &amp; Economic Land Availability Assessment’ (29) on the issue of the ‘suitability of sites and broad locations for development’ and consider :</p> <ul style="list-style-type: none"> <li>• Physical limitations or problems such as access, ground conditions, flood risk, hazardous risks and pollution or contamination.</li> <li>• Environmental / amenity impacts experienced by would be occupiers and neighbouring areas.</li> <li>• Potential impacts including the effects upon landscape features, nature and heritage conservation.</li> </ul> <p>The extensive evidence presented above indicates the need for an independent, formal evaluation of the air quality health impact of the proposed housing developments on Wirral. The Institute of Air Quality Management &amp; Environmental Protection’ provides detailed instructions for LAs (30) on what should be taken into account including</p> <ul style="list-style-type: none"> <li>• The background and future baseline air quality</li> <li>• The presence of a heavily trafficked road, with emissions that could give rise to sufficiently high concentrations of pollutants that would cause unacceptably high exposure for users of the new development.</li> </ul> <p>The author is working on these issues. It is also clear that it is necessary to investigate the exposure of new residents of a development to existing pollution sources but also to assess the impact of the new development on existing residents. We have shown that housing east of the M53 would both expose new residents to unacceptable air pollution but also remove the green buffer zone currently giving some protection to existing residents downwind.</p> <p>The new NPPF / guidance (31) is also very clear:  ‘The planning system should contribute to and enhance the natural and local environment.’  This is to be achieved by:  ‘preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.’</p>	
SCOP016	Local Resident	<p>‘Opportunities to improve air quality or mitigate impacts should be identified such as...green infrastructure provision and enhancement. So far as is possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.’</p> <p>The Wirral Local Plan must consider professionally the health and environment impacts of building on the 50 sites earmarked for release from the Green Belt in the draft Local Plan.</p> <p>Specifically, on the evidence, building on the GB parcels we have identified east of the M53 will not provide opportunities to ‘improve air quality’ for new or existing residents nor ‘mitigate impacts’ nor ‘enhance green infrastructure’.</p> <p>Rather, it will definitely kill and disable people.</p> <p>We note from WBC Air Quality documents (25) that  ‘By being involved in conceptual stages of local planning policy and proposed development before formal planning applications are made, Environmental Health can help scrutinise initial plans...’  ‘We want all of our residents to have a good quality of life in clean and safe environments.’  ‘To use the planning system, in accordance with guidance, to effectively promote air quality.’</p>	

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SCOP016	Local Resident	<p>The latter statement is a 'key priority' for the coming year. The Wirral LPSA Scoping Report on Air Quality itself concludes with this 'key' council objective: 'Locate and design development so that current and future residents will not regularly be exposed to poor air quality.'</p> <p>The Wirral LPSA Scoping Report on Health also says at 7.2</p> <ul style="list-style-type: none"> <li>* Enable and support healthy lifestyles through provision of green infrastructure...</li> <li>* Help deliver access to high quality open spaces...</li> </ul> <p>And at 7.5</p> <p>'Health is a cross-cutting topic...This is particularly the case in relation to green infrastructure, which is a key aspect of all these themes thanks to its multi-functionality.'</p> <p>The proposed unnecessary destruction of ~5,000 acres of green belt in the initial Local Plan is somewhat difficult to reconcile with the above strategic objectives on health and air quality.</p> <p>The current creation of the final Local Plan provides a wonderful opportunity for WBC to deliver on all this positive rhetoric, comply with legal obligations, protect current and future Wirral residents and avoid judicial review and GLOs (under CPR 19.11) for causing actual bodily harm and potentially, corporate manslaughter charges. Let us hope that the above statements are true. Alas, the recent WBC Air Quality report concludes with</p> <p>'The principle challenges and barriers to achieving the above mentioned air quality priorities will be maximising the opportunities of the resources we have to maximise influence on air quality in the Borough.'</p>	
SCOP016	Local Resident	<p>Local Plan Context</p> <p>The Scoping Report section on Heritage begins by noting key messages from the NPPF</p> <p>'Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved 'in a manner appropriate to their significance'...great weight should be given to the assets conservation...'</p> <p>The Scoping Report concludes with the following WBC objective:</p> <p>'Protect, conserve and enhance heritage assets, including their setting and significance and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.'</p> <p>The scoping report rightly notes the 26 conservation areas, 8 scheduled monuments and 14 assets at risk on Wirral. However the majority of 'official' heritage assets are individual buildings from very recent centuries. The scoping report takes a purely bureaucratic approach and says nothing of Wirral's long history which goes back to the Mesolithic and Neolithic (16, 18). This approach gives a distorted view of our heritage and history and automatically precludes the possibility of new insights developing and of new discoveries being taken into account in time to prevent heritage destruction. This is not in accord with official guidances (see below).</p>	<p>A request has been made for Information from the Historic Environment Record. This will help to identify important 'non designated' features and other assets. With regards to the Battle of Brunanburh, the location has not yet been confirmed with confidence, with several sites still being mooted as potential candidates. Nevertheless, there appears to be a consensus that Bromborough in the Wirral is a strong contender. With this in mind, the potential for the site to be of significant historic value ought to be reflected in the scoping report. It will remain difficult to assess potential effects though because the site area remains unknown. Reference to non-designated assets now added.</p>
SCOP016	Local Resident	<p>The Brunanburh Report</p> <p>This report looks specifically at the heritage impact of the proposed Local Plan mass release of green belt land for housing development in the vicinity of the M53 in the area around Junction 4. (Figure A). The area of particular concern stretches from GB parcel SP31 (Storeton) south to SP44 (Poulton Hall). Roman farms are suspected at Storeton and Poulton and a Roman road believed to link Chester and Wallasey Pool (with a branch to the Roman quarry at Umberstones Covert) runs nearby, just to the west of the M53. Recently the foundations of a Roman building have been found at Poulton Lancelyn.</p> <p>It has been suspected for many decades that the invasion of England by King Anlaf of Dublin and his allies in 937 AD was here on Wirral and that the great Battle of Brunanburh centred on the area around Brakenwood – Clatterbridge (1, 4, 9) but covered a large area from Storeton and Higher Bebington in the north, south to Brimstage and along the Clatterbrook / Dibbin Valley eastwards to Poulton Hall. Significant skirmishes may also have occurred south of Bromborough Pool.</p> <p>Recent new analyses of the place name evidence in the chronicles and sagas add strong evidence for the battle and now major field finds at Poulton Lancelyn, outlined in this report, confirm it. A very large scatter of Viking age weapons has been found on green belt parcel SP42 and these likely define a discarded weapons collection site (a 'bera til stangar' site) and a recovery camp of the triumphant Merican King, Aethelstan, after the battle. It may also be the camp of the Mercian vanguard army before the battle which is described in Egil's Saga.</p>	
SCOP016	Local Resident	<p>Brunanburh was a huge battle, perhaps involving over 60,000 men, and marks the point in time when the realms of Mercia and Wessex became forged into one nation: England. Brunanburh has a national significance equal to the Battle of Hastings in British history according to many historians. The battle site of Hastings is protected and venerated. The site of Brunanburh demands equal treatment and there should be no question of further housing development there in the upcoming Local Plan.</p> <p>The site is an 'irreplaceable resource' in the words of the NPPF. I also note policy CH25 in 'UDP: Development Affecting Non-Scheduled Remains Policy' of the WBC.</p> <p>'In assessing development proposals liable to affect areas known or suspected to contain important un-scheduled archaeological remains, the Local Planning Authority will in particular consider...the potential importance of the site, in terms of rarity, condition and estimated age of the remains...'</p> <p>The national importance of Brunanburh cannot be overstated. 11.78 says 'Policy CH25 specifically provides, where the case for physical preservation in situ is overwhelming ...for planning permission to be refused...particularly ...where the setting of important remains would be severely compromised.'</p> <p>On the positive side, a site as important as Brunanburh offers considerable scope 'for high quality tourism' as recognised by WBC (17) and particularly so in the year when Wirral is LCR 'Borough of Culture'. (FIGURE A showing Green Belt Parcels Overlying the Brunanburh Battlefield)</p>	

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SCOP016	Local Resident	<p>The Battle of Brunanburh, Brimstage 'Fort' &amp; Poulton 'Castle'</p> <p>There appears to be compelling evidence now that the Wirral peninsula was the site of the great Battle of Brunanburh at which the Mercian and Wessex forces of King Aethelstan and his brother Edmund repulsed the Norse-Irish and Scottish alliance of King Anlaf, King Constantine and King Owen of Strathclyde. Norse settlers in Wales were also involved. That defeat secured the future of a united, nominally Anglo-Saxon, kingdom in England. The scale of the battle is made clear in the Anglo-Saxon Chronicle which tells us that by the day's end 'five kings, seven earls and countless of their hosts lay dead' upon the field. Some accounts claim 35,000 dead and that the Norse allies arrived in over 600 ships. The site of the battle on Wirral is logical since the northern half of the peninsula (and likely more) was occupied by Norse-Irish settlers and the south by the original Romano-British population and some Anglo-Saxon incomers. The Anglo-Saxons held the ancient city of Chester nearby (but with a considerable Norse trading presence). West Lancashire, Merseyside and North Wales also hosted many Norse settlements. However over forty sites have been proposed for the battle (as discussed in ref. 1). The nub of the problem is that through the 10th century a number of significant conflicts occurred involving the same protagonists: the family of Anlaf of Dublin (late of Northumbria) and his Scottish allies and the family of Aethelstan of Mercia. A number of 'revolts' and serious battles took place in Northumbria and Wirral against Mercian rule in the decades before and after Brunanburh in 937 AD (2). It may be that later commentators conflated several conflicts. For example in 934 AD the Anglo Saxon Chronicle tells of Aethelstan going north to invade Scotia with a huge army (15). By 935 he had subdued Constantine and 'five kings' came south to pay him homage yet, two years later, Constantine was in revolt and joined Anlaf's invasion. We will not refight the locations of Brunanburh here but looking at Egil's Saga (3), attributed to the warrior scald who fought on Aethelstan's side at Brunanburh, examining many local place names and new material discoveries, the evidence is now extremely strong : see Appendices 1 &amp; 3.</p> <p>The Wirral Norse-Irish settlers had their own local parliament at Thingwall in the west. Across the River Mersey was a second settlement of Norse farmers and a second Thing a few miles inland. Talacre on the Welsh Dee coast was also Norse. Invaders sailing straight across the Irish Sea from Dublin to Wirral would find a Norse speaking and presumably supportive population. There were also several places around the Dee and Mersey suitable for landing many ships and large armies: Wallasey Pool; the 'Viking' port at Dove Point; Dawpool and several small ports on the Dee; Tranmere inlet; Bromborough Pool and across the Mersey, Knott's Hole and Jericho Beach at the Dingle. There was space for the 615 ships of Anlaf's combined fleet which Symeon of Durham claims. One of the unresolved issues of Brunanburh is the location of 'Dingesmere', across which Anlaf fled by ship after the great battle according to the Anglo Saxon Chronicle. In Appendix 3 a solution will be offered based on the above material. This analysis, in the author's opinion, firmly nails down Brunanburh's location to the Wirral.</p>	
SCOP016	Local Resident	<p>It seems most likely as Professor Harding has claimed that the Brunanburh 'battlefield' covered an extended area from Storeton / Higher Bebington southwards through Brackenwood and Clatterbridge and on through Poulton Lancelyn. We can imagine Anlaf's troops marching south from Wallasey Pool and Tranmere, and perhaps west from Bromborough Pool, to converge near Storeton. Local tradition and field names centre the fighting below the slopes west and south of Storeton Woods (see Appendix 1) and at Brackenwood just to the east. But whence came the Anglo-Saxons? Where were they camped? The boundary of the Norse – Irish enclave and the Saxon lands is uncertain despite the existence of Raby, the supposed boundary settlement in Old Norse, a few miles south of Brakenwood. The boundary also probably shifted over time and may have been fairly informal during peaceful periods (4 ; Ingimund was allowed to settle in the Wirral by Queen Aethelfleda around 902 AD and Anlaf invaded in 937 AD). The density of Norse place names across Wirral tells a complex story. Almost certainly Bebington was Saxon in this period. There was a Saxon church there (although unusually, dedicated to St. Andrew) and there appears to have been an early Saxon (and Celtic?) church and convent at Bromborough but many Norse place names existed there (see Appendix 2). If we accept the 'simple' border story, Brimstage would also be firmly in the Norse enclave but clearly it is not simple.</p> <p>'Round Brunanburh' (Historical Map of battle site)</p> <p>The only account of the battle with geographical details occurs in Egil's Saga written down in the early 13th century. Egil gives information on the preparations for the battle including an apparent truce to negotiate the place and terms of conflict. Anlaf camps in a town north of the 'heath' battle site and sends men south to lay out the field with hazel rods. Aethelstan's forward men were camped to the south of Anlaf and south of the heath between a river and a large wood on raised ground. His men report to the Norsemen that the King would soon come from the town several hours ride to the south of the heath site. Was this perhaps Chester? Meanwhile the forces gathered. Was Anlaf's camp on the high, easily defended, ground at Storeton village, which had clear access north to Tranmere inlet and Wallasey Pool and excellent views southwards? (Several analysts have claimed that the eastern Roman road passed through Storeton and Prenton and on to Wallasey Pool where the remains of a 'Roman' (but probably medieval) bridge were discovered in the mid 19th century).</p>	
SCOP016	Local Resident	<p>Aethelstan's men awaited their king on land between a river and a large wood, south of the heath. Well west and south of Spittle Heath (Brackenwood) we have the Clatterbrook running into the Dibbin (perhaps the Vina of Egil; see Appendix 1). The wood is not helpful in placing the site: much of the area had woods and Storeton Hill and Poulton Lancelyn still do. But a wood on a raised site could be related to the high ground at Poulton Hall and Vineyard Farm (see below). When Aethelstan arrived it seems logical that he would encamp his main army near existing strong points. Historically attention has been focussed on Bromborough because of the name itself: Brunanburh, Bruna's stronghold. Bruna is an Old English personal name. But remember also the clear cluster of Norse place names at Bromborough. By Bromborough Pool courthouse there were ancient earthworks which were long assumed to be that stronghold. Did some of Anlaf's fleet land at the Pool and occupy old earthworks? A little to the south east of the current village, old OS and tithe maps marked three fields as 'wargraves' and associated them with the battle of Brunanburh. Was this a belated fight for the Pool? But the area of 'Bromborough' even in the 19th century, as marked on early OS maps, stretched far to the west of the current village. Also Anlaf was camped 'north' of the heath battle site and 'north' of Aethelstan's forward camp, not east of it, according to Egil.</p> <p>(Figure 1 Map Brimstage in 1872)</p> <p>A mile to the south west of the Pool is higher ground at Poulton Lancelyn surrounded on three sides by the deep valley of the Clatterbrook and Dibbin. At Poulton Hall the Lancelyn Greens have held the land since the Norman Conquest. An old family tradition says that a castle once stood there on the promontory ridge and indeed a 'castle' is marked on early OS maps. However no heavy duty masonry has ever been found there. This does not preclude a large earth and wooden stockade enclosure in Saxon times. Perhaps this was the eastern stronghold of Bruna? This place is indeed 'south' of Spittle Heath and Storeton woods.</p>	
SCOP016	Local Resident	<p>A mile west of the presumed battlefield centre at Brakenwood, a mile south southwest of Storeton and two and a half miles west of Bromborough village, lies the ancient village of Brimstage. It is well known for the medieval tower and hall which holds a grinning feline carving said to have inspired the Cheshire Cat. There are also the remains of a modest moat. However its origins may be far older and it may be our missing 'Saxon' western stronghold. The geography is striking. The main road performs an accurate semicircle (of about 700 ft diameter) to avoid a north facing, high bank of exposed sandstone which is largely natural (Figure 1).</p> <p>A deep stream flows along its base. The medieval tower and hall are on the eastern boundary of the circle. The author has long wondered about this landform. It is reminiscent of a low level, so called 'Marsh Fort', as opposed to the more familiar 'Hill Fort' of Iron Age date, several of which exist in northern Cheshire, and some of which were refortified by the Mercians. There is a further low level fort on the Dee coast at Burton (Burh – tun) to the west and castle earthworks at Shotwick.</p> <p>The Brimstage west, north and north – east boundary is defended by the 'natural' rock walls and stream. It occurred to the author that if an earth dam was built to the east of the village and the area flooded, our circle and more would be well protected from attack from the west, north and east. It was then noted that early tithe maps mark the rock platform boundary as 'Moat Road' (Figure 2).</p> <p>(Figure 2 map showing Brimstage Area Early 19th Century Tithe Map)</p>	

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SCOP016	Local Resident	<p>Locals know that in wet periods the ‘Moat Road’ still floods even without a dam. Perhaps the early settlers did create a wide protective moat here which could double as a fishing lake. Was this stream and large moat the ‘river’ by Athelstan’s camp spoken of by Egil? (Appendix 1). It is interesting that the narrow Brimstage stream runs eastwards in a very deep cutting to join the Clatterbrook and then the Dibbin. This cut would form a distinct boundary and a considerable barrier if defended from the south side. However at Brimstage the southern half of the circular bank field was apparently unprotected. Fortunately Lidar maps now exist for much of the Wirral including Brimstage. Figure 3 presents a blow up of this map. Several interesting landform features show up. Most notable is the broad linear earth bank which runs roughly east from the end of the rock bank boundary and disappears under current farm buildings. The bank and ditch are still prominent after several centuries of ploughing. This must once have been a formidable barrier, perhaps hosting a timber palisade. Also visible across the centre of the circular enclosure is a smaller bank and ditch which joins the road to the west to the same road east of the enclosure. A19th century footpath followed roughly the same line. At some time the road followed a straight path across the site before the fortified enclosure existed or after it was abandoned. Some colleagues in Wirral Archaeology suspect that there may have been a subsidiary Roman road here.</p> <p>A ‘major’ Roman road (from Deva to Wallasey Pool?) is known to pass through Clatterbridge a mile or so to the east and just west of the probable battle centre. From the centre of the enclosure a pair of parallel ditches ~17 ft apart runs to the south and across the southern boundary bank to end in the ditch. This suggests the ditches may be contemporary with the bank. We cannot be sure before excavation but here is a suggested sequence of events:</p> <p>Iron Age people fortify the natural enclosure and build a farmstead. The Romans subdue the area and build a road straight across the site. After the legions leave the Romano-British re-fortify the site. Later, the incoming Saxon (and Norse?) ‘invaders’ also used it as a stronghold, including perhaps King Aethelstan and his army in 937 AD. It is not however, identifiably mentioned in the sources such as Egil’s Saga. The Anglo-Saxon Chronicle speaks of the battle ‘Round Brunanburh’ which is also the name of the whole area. But Norse – Irish attacking from the north would find a formidable defensive position in front of them...if it was occupied at this time. All this is but reasonable conjecture.</p>	
SCOP016	Local Resident	<p>However the local historical place names also provide support in unexpected and internally consistent ways. We noted that Bruna is an Old English name but intriguingly there are other possibilities in OE and Old Norse. The name Brimstage appears in records from the 12th and 13th century onwards with the advent of the Domville family (5, 6). Brunstath court 1260; Brimstache 1275; Brunstach 1326; Brunstathe 1348. Other noted variants: Brunaburgh (cf Brunanburh); Brunanstaepa; Brunastaed (or stadr, ON for farmstead).</p> <p>Clearly we consistently have the apparent OE name Bruna at Brimstage. Brunstath could simply mean Bruna’s place, Bruna’s holding. Brunstach would be Bruna’s stack, post or pillar in OE. This could imply a standing marker stone of some kind. Curiously at the north end of the village, surmounted by the little school house, is a second high sandstone platform, natural in origin but clearly reshaped. A battered standing stone is set into the bedrock there. With a moat full of water this platform would edge that moat. It is a curious thing but ‘brunnr’ in ON is a stream. We could read the place name as the boundary stone by the stream: Brunnrstach or as Brunnrstath, the stream settlement. Also Brunaburgh could be read as Bruna’s river bank in OE and Brunanstaepa as Bruna’s river landing place. We should note also ON bryggja, a pier and ON bru, a causeway across marshy ground. In the latter case we could read bru-nand-burh since nand means in proximity to, near in ON, giving the Causeway Fort. It has to be said that these river names could also be applied to the Poulton Hall site and the earthworks at Bromborough Pool.</p>	
SCOP016	Local Resident	<p>The repeated theme of water is interesting. Early OS maps show several wells and springs in and around the village. Ironically the famous TV historian Michael Wood used the ‘brunn’, double n form to interpret the battlefield name as ‘the fort at the spring’. He then announced to the media that the battle site was near Robin Hood’s Well on the A1 at the village of Burghwallis (an old Roman fort site) near Doncaster (2). Nearby Barnsdale Hill would make a good burh site and one of the other 10th century battles could have occurred here. Wood is a long term advocate of a Yorkshire location for the great battle. He dismisses the Bromborough evidence as being ‘merely’ based on ‘the name’ although his own name interpretation applies equally well or better to Brimstage where there are several springs in the village. Wood has clearly never looked at the Wirral landscape nor it seems have protagonists of other sites. Even so there are many streams and springs on Wirral and many settlement sites. The name, if given to a whole area, would surely need to have had something more distinctive and unique about it?</p> <p>(Figure 3 showing Brimstage LIDAR Map)</p> <p>Well ‘brun’ in ON can also be a cliff or edge so that heidar – brun is the edge of a heath (see also Appendix 1). But a distinctive, natural, semi-circular cliff edge is exactly what we have at Brimstage (11). Brunstath would be the place (or farmstead) on the cliff. Brunstache would be the pillar cliff, or better, a cliff stack since a stack is a rock pillar (surrounded by water). The Wirral we must remember was Celtic before the Saxons and Norse came. We should not neglect the Celtic languages. In Irish one interpretation of ‘bru’ (from OI bruig) means brink, verge, bank of a river. Interestingly the plural form is brunna. However in Irish bru (plural bruna) is also a hall or hostel as in Bru na Boinne, the Mansions of the Boyne, the great semi-circular Bend of the Boyne which encloses ancient Newgrange. So we could read Brunnaburh as the fort on the brink, on the cliff edges, on the river (moat) bank. In English we still have brow as in the brow or edge of a hill. Synonyms include verge, brink and brim... The edge, brink, cliff, interpretation of Brunanburh can be applied to Brimstage and to the Poulton Hall site but not perhaps to Bromborough Pool.</p>	
SCOP016	Local Resident	<p>The problem with interpreting names in any language is the breadth of meanings which can become attached to a word or very similar words. We have seen several meanings attached to brun. Here is one more: a brun is an eyebrow. If we look at the lidar image of Brimstage it is indeed eyebrow shaped! Was brun a local nick name? But above we already noted, bru and brow meaning edge, brink. Here is another coincidence: we noted burh and burgh names in this context but there is also bughr in ON which remarkably, means curve. So brunbughr is an eyebrow curve. Perhaps though, we should stick to the several water related and cliff / edge words at this point.</p> <p>If the cliff enclosure at Brimstage was indeed fortified (and perhaps several times over the centuries) it would be doubly distinctive and could, in Saxon/Norse times, have become known as Brun(an)burh: the fort on the cliff edge or Cliff Fort. What about the ‘an’ element? If Bruna was a personal name brunan would be the genitive singular form in OE : Bruna’s Fort. We could have a conflation of Brunburh and Brunanburh over time. Brunanburh is certainly as easy to say. The known existence of several name variants with elements with several (often related) meanings in local languages would certainly promote this kind of conflation. Some early forms also include Brynstath and so on. Bryn is OW, a hill or mount, which could apply to our raised stone cliff. However we also note ON brynja which means armour, chain mail, protection. So we have an armoured or protected place...or, as we might say, a fort or burh.</p> <p>Such a strong fort would naturally dominate the area, including the nearest natural river port at modern Bromborough Pool, and also bestow its name widely on the local land. Some earthwork defences at the Pool might be expected. Similarly, the Poulton Hall site could have provided an eastern, defended outpost. In the early decades of the 10th century we also know that Aethelfleda, Lady of the Mercians, re-fortified some hill forts in west Cheshire in response to the Norse threat. She allowed Ingimund and his followers to settle in north Wirral in 902 AD but he grew greedy for more land. After he attacked Chester did she also re-fortify Brimstage and the Poulton Hall site? She re-fortified Chester itself in 907 and Eddisbury hill fort in west Cheshire in 914 and Runcorn in 915 AD (14).</p>	

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SCOP016	Local Resident	<p>The place name analysis of Appendix 1 shows how we can relate Poulton Lancelyn to place names which occur in the historical sources and sagas. Vineyard Farm is compatible with the 'Vinheidi' battle site name of Egil's Saga : 'Vina River Heath'. Vineyard becomes Vina gardr', the 'Vina River Enclosure (Castle)' (SP43). The Poulton Hall site and the adjacent farm are enclosed by the deep valleyed, Clatterbrook and Dibbin (SP44). That would make these streams equal to the Vina of Egil. But Vina could also be the name of the feeder streams of the northern Clatterbrook and Brimstage. As we show in Appendix 1 this is an excellent name to attach to a stream flowing through a battle field. OE clatra and ON klattrra, meaning 'a noisy commotion', a loud noise 'as of hard objects striking rapidly against each other'. We also note ON, klaka, a dispute. More name evidence is presented in Appendix 1.</p> <p>We also note less certainly, the place of the battle named in later Irish sources on the 'Plaines of Othlyn' (Annals of Clonmacnoise). 'Oth' has been read as 'od' meaning 'up to'. Linn in Gaelic and llyn in Welsh mean a pool, lake, stream or a 'deep place' in a river. So we have a plain 'up to' the boundary of a river for the battle field name. We noted earlier that 'heidar brun' meant the edge of a heath and Egil gave us Vinheidr for the battle name: the Vina river heath. Putting both names together gives us Vinheidarbrun: Vina heath boundary. This seems curiously close to the standard interpretation of the Plains of Othlyn. In Appendix 1 we discuss the word odr which means raging, berserk, which could give us the 'Plains of the River of Rage' (the Clatterbrook?). This all seems to relate readily to Egil's description of rivers and heaths. Now Poulton Lancelyn still has several meres and streams in deep cuttings. Half a mile south west of Poulton Hall we have the larger Raby Mere, a third of a mile long. This is the largest mere by far on Wirral. In early sources the area appears as Poltune: the settlement by the pool or lake. In conclusion I suggest the battle / camps area lay south of the Storeton / Higher Bebington line and north of Brimstage and the deep stream bed running from Brimstage to Clatterbridge. The southern boundary then followed the deep Clatterbrook / Dibbin Valley across to Poulton Hall on its high promontory in the east. This would put the geographical battle activity centre near Brakenwood (SP39) as Harding claimed.</p>	
SCOP016	Local Resident	<p>Egil's Saga may provide one last tentative indicator as to location. He tells of the flight of Earl Aelfgir from the first clash at Brunanburh between Anlaf's forces, under the turncoat earls, Adil &amp; Hring, opposing the forces of Aelfgir (and Egil) before the arrival of King Aethelstan. Hard pressed, Aelfgir losses his nerve and flees.</p> <p>'He rode to the southlands and of his travels tis to be told he rode night and day til he came westward to the Earl's Ness.'</p> <p>This was a fateful decision because Egil's forces rally and defeat Adil and Hring's men and begin a great slaughter of the Norse, pursuing them through the woods. Aelfgir, fleeing, comes near to the town where Aethelstan is waiting (Chester) but fears to meet the King and turns west to the 'Earl's Ness'. This would put the battle site north east of the 'Earl's Ness'. From the port at the Ness Aelfgir takes a ship to France from where he never returns to Britain. If we consult an OS map of Wirral and trace lines south westwards and south south westwards from Brakenwood / Poulton to the west coast we hit the villages of Neston, Little Neston and Ness. On the coast between Little Neston and Ness stands Denhall Quay. Denhall according to Harding, is ON Danir meaning Dane and hall is suggested to be ON waella, spring, by Harding. However, hallr, is a hill or big stone or flat rock in ON. This could well describe the rocky headland at Denhall. Ness itself of course is a nose or headland in ON. Denhall is said to be the only Danish settlement among the many Norse settlements on the Wirral. The east side of the Dee has hosted several small ports since Roman times including Parkgate, Denhall, Burton, &amp; Shotwick (on the old salt trail to Wales) further south. A deep channel once ran as far as Shotwick. Denhall Quay is most probably the Earl's Ness (see also Appendix 1).</p> <p>However, does the rest of the tale fit this area? Some have said the Earl's 'southlands' flight refers to southern England but why? Why fly southwards into the Mercian heartland? Why risk the King's wrath at Chester? Why could the southlands not just mean the lands to the south? Ness is on the usually presumed boundary of the Norse enclave. But also, Denhall is only five or so miles from Brakenwood / Poulton, a few hours ride under normal conditions. Maybe Aelfgir approached Chester before, hearing of the King's approaching army, changes his mind and turns west, adding several miles. But conditions were not normal. Aelfgir would not wish to encounter and be recognised by Mercian patrols. Also the battle is held to have taken place near the year's end, in mid October perhaps. If so the 'day long' battle would have ended near dusk and Aelfgir might have rode on, gratefully, through the night avoiding the Mercian army. Egil's Saga says specifically that Aethelstan and the main army arrive at Brunanburh at night fall, as does Anlaf, from his northern camp. The main battle occurs the next morning and again the Mercians and their allies are triumphant. Anlaf flees back to Dublin across Dingesmere and King Constantine to Scotland.</p>	
SCOP016	Local Resident	<p>One of the problems with the identification of the battle site on Wirral is John of Worcester's mention of Anlaf's forces coming to the Humber. There were several battles in the 10th century to confuse later chroniclers. However this issue may have been resolved over a century ago by Francis Tudsbury of Oriel College, Oxford (9). In the presumed second day of battle, Aethelstan makes his own stand in fields between the foot of Humbersdon, a high hill, and a river. Well, just northwest of the old Needwood Farm site at Brackenwood is Umberstone Covert, a wood covering the old Roman quarry site on a hill slope. The name similarity is obvious. But there was indeed once a large stone at the mouth of the Humber: the Humberstone. However the name and several variants of it occurred very early in other places, Herefordshire and Leicestershire for example. Humber or Umber is a fairly common river name. It probably derives from the Latin, Umbra: shadow, darkness. Also, adjacent Brackenwood is perhaps, the wood on the slope from ON brekka, a slope or hill. But note also brokon, brokun, clashing in ON: The Clashing Wood? To the west is the similarly named Clatterbrook we tentatively identified as part of the Vina river. The ground by the stream was probably marshy, guarding the left flank. It is still remembered perhaps, at Sitch Cottages at junction 4 of the M53. Sitch is from Sike in OE meaning slow flowing water. Siche is also an old surname attached to a person living by a marshy stream or damp gully. Alas, part of the main battle site may lie under junction 4.</p> <p>What about the area west of the northern Clatterbrook, east of Brimstage and south of Storeton? There is more level dry ground here for a fight and it includes the proposed Roman road line. Did Aethelstan's mounted troops also follow that line northwards? We speculated earlier that Anlaf had followed the same road line south from Wallasey Pool. He may have brought many horses on his levy longships (see below). The area would be better ground for cavalry than the (presumed) marshy land adjacent to the northern Clatterbrook. However I also note the name Iveston Farm just north of Brimstage village, date unknown. Do we have Iver(r)s tun? Tun is a farm. Iver, Ivar, etc, are derived from yr – herr, in ON, meaning yew (bow) warrior, or archer: the farm of the archers? Note that herr also means a host, an army. Did some of the Saxon host, or the Norse, camp here, near Bruna's Fort before the battle?</p> <p>In the Anglo-Saxon Chronicle, the epic poem, 'The Battle of Brunanburh', locates the battle as 'Round Brunanburh' suggesting an extended area of conflict as Harding has long maintained (4, 7). We also noted that Brimstage was long part of Bromborough parish. However it is curious that the sources do not stress any obvious strong points including our proposed 'burhs' at Brimstage and Poulton. Where these sites unoccupied and derelict at this time? Had the area been quiet for some time after Aethelfleda had repulsed Wirral's Ingimund attacks and refortified Chester in 907 AD? Certainly there was a considerable settled Norse, 'business' population at Chester by the time of Brunanburh according to Harding.</p> <p>Or did the two fully manned burhs merely provide a minor backdrop to the drama given the immense scale of the battle? This could be so if Anlaf and his allies really came with 615 warships, according to Symeon of Durham. Is this credible? Well we have the forces of three major warlord kings to consider along with lesser followers. Around 1050 King Sven Estridsson of Denmark had 720 ships at his command. In the 12th century the levy was nominally 900 ships strong (10). The biggest warships were called drekar, dragons. The biggest Norwegian ships carried a crew of ~100 men. The typical levy longship was a skeid, which means sword shaped. Such ships carried forty four men and two horses. The big ships carried thirty pairs of oars, sixty men at least (10). 615 skeids would hold 27,000 men and 1,230 horses. 615 drekar would hold 36,900 men. This does not include the men of local chiefs in Wirral, south Lancashire and north Wales who chose to join Anlaf. It is said that Aethelstan also came with a mighty host of men. Since he won the day let us assume a number at least the equal of Anlaf's army, say 40,000. However, William of Malmesbury, in 1127, claimed Aethelstan gathered a national levy army of 100,000 men! Perhaps then the various chronicles did not greatly exaggerate with 50,000 to 80,000 men in conflict 'Round Brunanburh'. It is possible as the Irish chronicles later report that 35,000 men were slain that day.</p>	
SCOP016	Local Resident	<p>After the Brunanburh battle, unified England (except, periodically, 'Anlaf's' rebellious Northumbria) became more peaceful and forts perhaps, less important. An early pre-conquest Saxon (Celtic?) church and convent existed at the village now called Bromborough, close to the River Mersey and Bromborough Pool. In 912 Aethelfleda, The Lady of Mercia (daughter of Alfred the Great) had also founded a small monastery at Bromborough. The Saxon church was ceded to St Werburgh's Abbey in 1152. Part remained visible until 1828. In the late 10th century the chronicler Aethelweard reports that Brunanburh was still called the 'Great Battle' by the people and that afterwards 'the fields of Britain were joined into one and there was peace everywhere and an abundance of all things'. Edward I (Longshanks) gave a charter granting a three day fair in June to the monks at Bromborough village in 1278. It became an important market town then. Peace, religion and trade moved the focus away from the fortified Brunanburh at Brimstage to the present Bromborough village site. Were the early, possibly key roles of the 'Cliff Fort' and 'Poulton Castle' forgotten, except in local traditions? Perhaps.</p> <p>After the Norman Conquest the incoming noble families presumably felt the need for some security. At Brimstage the high, impressive, defensive tower and moat were built in the 13th century and in the 14th, the stout, stone built hall, but the old cliff enclosure was never refortified by the Domvilles or later landowners. The Battle of Brunanburh was forgotten, except in local legend, despite its important role in the consolidation of the English Nation.</p>	



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SCOP016	Local Resident	<p>Introduction &amp; Summary Comments</p> <p>Housing is a key area of concern on Wirral both for residents struggling to obtain real 'affordable housing' and decent 'social housing' and those residents fearing that inappropriate, unnecessary development will negatively impact their quality of life and destroy the green belt. The issue of how many houses Wirral really needs to build over the Local Plan period is therefore extremely important and contentious. The scoping report on housing, if it represents the likely eventual LPSA outcome on housing, is therefore of great concern. The report is misleading, internally inconsistent, uses outdated data and is lacking in analysis of the sources adduced and the critical assumptions in those sources.</p> <p>For example, of particular concern is the summation of the SHMA (Lichfield) report of 2016 as identifying an OAHN of 875 to 1235 dwellings per annum. These numbers relate to 18 years not the 15 year local plan period. They should be 729 to 1029. In fact Lichfield examined over a dozen housing need scenarios and the lowest outcome was 157 dwellings per annum, the highest 1029 with several scenarios below 500. Many of the high scenarios were 'policy on'. That is they assumed local economic and job growth which now seems fantastical. In the following report we will show that the 'policy off', 'demographic' housing need projections, which should be compared with the government preferred standard method outcomes, assumed net migration levels never seen on Wirral. In fact there is a recognised, severe, problem with the ONS migration projection method at the local authority level which totally discredits the ONS population projections. We also show using ONS own published analyses that the household sizes underlying the 2014 'enforced' housing need projections are totally at odds with changes in household size since 2001 based on the official, national Labour Force Survey data on real English households.</p> <p>We deconstruct the population and HH size, 2014 based projections and prove their incompatibility with real Wirral historical data. We then seek out local, official data sources as a basis for reliable Wirral population projections. We use the HH formation rates implicit in the 2014 ONS HH projections and apply this new set of data in the Standard Method. Much lower future housing needs, compatible with recent local market building rates emerge.</p>	<p>The scoping report does not form the basis for which the Local Plan housing figures will be derived. The Scoping exercise is designed to set out a range of baseline information to help identify key issues that will need to be explored further in the SA. It should also be noted that the scoping report is only a snapshot in time, and will be updated as appropriate in the future.</p>
SCOP016	Local Resident	<p>In overall summary:</p> <p>The mandated government housing target for Wirral (base year 2018 and 2019) is 12,045 dwellings based on the obsolete ONS 2014 SNPP population and household size projections under the 'standard method'. This note summarises the effects of using variant household size and / or population projections based on recent official ONS studies and Wirral official, published data such as the 2011 census and voter registration records. The calculations still follow the 'standard method' procedure as required in 2019.</p> <p>The ONS 2016 based SNPPs used the most recent data from 2011 onwards as the basis for population projections and an ONS, more robust, projection method for HH formation. The 2016 projections go some way to taking into account the technical problems with earlier projections. This 2016 ONS analysis was rejected by the government because it showed a significantly slower growth in housing need across England compared with their purely politically defined target of 300,000 dwellings per annum. For Wirral the 2016 based SNPPs with the 'standard method' gave a 15 year target of ~7,300 dwellings based on 2018. Housing requirements to 2034 based on the ONS 2014 population projections for Wirral and the recent ONS analysis of trends in household formation rates and sizes, from base years 2008 to 2016, were analysed. We show that a robust interpretation of this data, as the ONS propose, strongly suggests a stabilising HH size and a Wirral 15 year housing need from the standard method (using the ONS 2014 based population projections) of ~4,300 dwellings. Applying the Housing Estimates HH formation trend obtained from the large sample data base of the English Labour Force Survey suggests an even lower housing need on Wirral. The government appear to have simply ignored this key, technically thorough, ONS analysis.</p>	
SCOP016	Local Resident	<p>We show by analysing the components of Wirral population growth (for 2014 and 2016 based data) that both natural (internal) population growth and net migration are not at all in accord with recent and past Wirral history. There are recognised, severe, problems with estimating net migration at the local authority level which we examine. For Wirral we show that the ONS automatic trend method exaggerated net migration by a large factor, masking the steady, long term, internal population decline. Substituting local migration data from various official sources including the 2011 census migration numbers, gives much lower population growth estimates. The various problems with out of date ONS data, official local population trend estimation and the distorting effect of reconciling migration flows across England, suggests a clear need, where possible, to use local official data to cross check the various ONS projections. A simple model linking voter registrations to total population has been developed using data since the 2011 census. We show that this is a robust procedure using government sampling accuracy studies. Applying the marginal HH formation rate as defined in the 2014 and 2016 based SNPPs (from 2019 on) plus the corrected population forecasts, gives an upper bound need of ~2,300 additional dwellings over the local plan period.</p> <p>The key conclusion from these various analyses is that the ONS 2014 based housing need estimate for Wirral is unrealistically high, by a factor of 5 X, compared with applying the 'standard method' with up to date ONS and local, published, population data and the latest ONS recommended, robust HH formation projections. The 2016 based housing need is also too high.</p>	
SCOP016	Local Resident	<p>Local 'Objectively Assessed Need' should not be grossly distorted by officially acknowledged, serious technical problems and government 'Aspirations' based national targets, simply for political purposes. OAHNs are intended to be simple 'policy off', demographic, objective, data based estimates.</p> <p>In the light of the above new housing need projections another dangerous assumption in the scoping report can be refuted. Section 9.7 claims that the high proportion of completed dwellings which were delivered on brown field land, some 83% in 2017/18 proves a 'development constraint' caused by a severe constraint on building on 'protected' green belt land. The scoping report also says at 9.13 '...recent housing delivery rates suggest that there is simply not enough brown field opportunities to meet housing demand.' This is nonsense if the 2014 / 2016 based need forecasts are too high and total demand is as low as the standard method (used with real Wirral / ONS recommended data) suggests. The 'real' problem is the lack of supply of low cost housing and the market responds to this by building on 'cheap' land. We can be sure that if developers can access virgin green belt land they will not be building low cost housing and will use the notorious economic 'viability test' to avoid building even a modest percentage on such land. The idea of a 'supply constraint' is a disease that has infected a government with severe problems of its own making in Greater London: a disease that appeals to developers who talk up a national epidemic. This is readily shown by considering the trends in Affordability Ratios. We look at this in Appendix 1. Figure A1 shows the trend in Wirral AR from 2006 to 2016. ARs have been falling significantly since 2006. Nationally over this same period, with the exception of London, the cumulative increases in regional household housing costs are significantly less than the cumulative increases in household income (Appendix 3). This is not an indication of supply constraint overall.</p>	

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SCOP016	Local Resident	<p>The scoping report could be read to (wrongly) justify the release of large areas of the Wirral green belt and therefore must be corrected. The report does not comment on how much green belt must be released to end the mythical 'supply constraint'. We do so now in summary. The initial 50 site green belt release plan has a total area of ~4,900 acres. At the government stated NW region average building density of ~15 dwellings per acre (which the government is keen to increase) this could yield ~73,000 dwellings. But the worst case 2014 based 'standard method' government target is 12,045. So the green belt release area is 6 X the worst case requirement if only green belt was used. 12,045 houses would take up just 800 acres of green belt. But the WBC CE, has told local MPs that WBC has brown field sites for 6,090 dwellings in hand (letter to Margaret Greenwood MP; Appendix 4). If so in the worst case, only ~400 acres of green belt would be needed not 4,900 acres. This is just 8.1% of the proposed release area. Going further, analysing Robinson's numbers, if we substitute Peel's median bid of 6,450 and allow a 44% fraction of current empty houses recovery rate we obtain ~10,400 dwellings on brown field. The green belt requirement is then ~120 acres or 2.4% of the proposed green belt parcel release.</p> <p>However if the author's new standard method estimates of 2,300 or 4,300 dwellings over 15 years are confirmed NO green belt land is needed at all since WBC already has at least 6,090 brown field places in hand. Also we are told that the local market has been building at a rate of ~383 dwellings per annum in recent years or 5,745 over 15 years. Building capacity is clearly there. In addition as the scoping report notes in section 9.15</p> <p>'The Wirral Waters regeneration offers a strategic long term opportunity for substantial brown field housing delivery and 13,000 units have outline permission already.'</p> <p>The scoping report, having marched us up to the top of the hill in its 'analysis' of an urgent need for green belt building then marches us down again in the last, 9.16 section by emphasising '...a focus on maximising the potential from strategic brown field opportunities...'</p> <p>The report seems rather conflicted. Perhaps it is rather a question of exploiting limited attention span and assumptions about who is likely to read what. The erroneous comments on green belt requirements in the text will not be well received by Wirral residents.</p>	
SCOP016	Local Resident	<p>WIRRAL HOUSING REQUIREMENTS TO 2034 : APPLYING THE 'STANDARD METHOD' WITH 'ONS RECOMMENDED' &amp; LOCAL DATA EVIDENCE</p> <p>'Estimating the future need for housing is not an exact science. No single approach will provide a definite answer.'</p> <p>Planning Policy Guidance Introduction</p> <p>The government has decided that local authorities in England must use the 'standard method' for calculating (minimum) demographic housing requirements over local plan 15 year periods. The standard method has the virtue of transparency and in principle, consistency, and should, fed with the correct data provide reasonable demographic based starting points for housing requirements. In addition local authorities are now (in 2019) required to use the obsolete 2014 ONS district population projections and household formation rates. The later, 2016 ONS projections which better reflect recent changes in life expectancies and current and expected falls in immigration post Brexit, may not now be used. This is simply because the improved 2016 projections give lower housing need numbers than government policy 'aspirations'. The government is terminally confused between 'policy off' and policy on' projections (see section 5). The 'standard method' is supposed to provide an objective, demographic data based, 'policy off' starting point. The government claims the revised method meets the three key tests of being simple, realistic and based on publically available data (1). The method is indeed 'simple'. The concept of trend extrapolation is also sound but the procedure used is not 'realistic' in how it actually projects local authority level trends. It is still allowable to propose alternative housing requirement projections based on 'publically available' local evidence but if this leads to 'targets' lower than those currently mandated by government on the local authority, such projections must be fully evidenced and will be challenged in detail at local plan reviews.</p> <p>This paper will justify alternative projections for Wirral, based on several threads of analysis. The analyses follow the 'standard method' but substitute alternative 'publically available' data. In brief summary, this paper demonstrates the failure of the ONS migration projection system in general and by using real 'publically available' Wirral data and suggests evidenced alternatives for local population numbers to 2034. It also reviews the ONS analysis of how ONS forecasts of household formation rates have changed using data bases from 2008, 2011, 2012, 2014 and 2016. Their report compares these various projections with actual results from large scale survey samples of UK households in recent years. These 'Household Estimates' clearly show that the fall in household size is considerably exaggerated in all recent ONS household projections. This means that for any given population projection the final household numbers projected will be too high. We also demonstrate that the claimed 'official' method of projecting household formation rates has not in any case been applied to the Wirral projections. This ONS based sensitivity analysis is applied to the mandated Wirral 2014 population projections to demonstrate the resulting significant distortion in housing requirements. An attempt is made to correct the Wirral data problems and feed the corrected data into the 'standard method' to produce new projections. However given the various problems one would wish for a way to produce independent forecasts based on dependable local historical data. We will show that such data is available from the official Wirral registered voter rolls over time. These are used to statistically model real population growth for the Wirral and then applying the 'standard method' with the currently approved (and alternative) household formation rates to provide household projections to 2034. These various interventions unsurprisingly, produce a wide range of Wirral housing requirement estimates to 2034. Uncertainty is intrinsic to this endeavour. However the key result is that these estimates are all far lower than the government mandated 12,045 dwellings, local plan, minimum demographic 'target'. Using official local data since the census but retaining implied ONS HH formation rates and so on, suggests a need of less than a quarter of this level.</p> <p>[Figure attached showing 'Net Housing supply, Household Growth and Estimated Need (England)'] [Figure attached showing Historical Trends: Components of Net Change in Supply. (Thousands of dwellings per year, Great Britain England)]</p>	
SCOP016	Local Resident	<p>Some general comments are in order before the detailed analysis begins. The recent changes to the 'standard method' were imposed because using 2016 data gave a national housing target well below the government's POLICY determined target of 300,000 homes per annum. This is a purely political decision and has nothing to do with an 'Objectively Assessed Housing Need'.</p> <p>The OAN is, or should be, a number based on the best available demographic data and best practice use of established statistical theory. Even with the threat of sanctions against councils allegedly 'underperforming' against their part of this 300,000 arbitrary target, it is unclear that such levers will have any substantive effect on house building rates (see below). Councils build very few houses these days. Housing supply has more to do with market forces, sentiment and affordability (1). Figure 1A looking at the 'austerity' period is enlightening. The supply fell and then recovered to pre-crisis levels. Household growth rate varied over the period but shows no increase. For this decade household growth was consistently below the government set 'range of need'. Nor is this period exceptional. Figure 1B shows the historical trends in supply since the 1930s. Net supply other than in war or recession years has remained close to ~200,000 units per annum come hell or high water. Reference 1 notes that:</p> <p>'The delivery of more than 200,000 houses per year in England since 1939 has only happened [in some periods] as a result of major public sector house building programmes.'</p> <p>LAs have suffered major reductions in funding in recent years. Crude threats made to local authorities will not change this situation. Meaningful policy changes might. Reference1, citing recent research, also notes this:</p> <p>'While lack of supply is frequently assumed to be a national issue it is very much a London and south east problem... Weak demand is typically found in Wales, the north of England, Scotland,..New supply is not a panacea for these markets. Indeed it may even accelerate decline [in urban areas]...'</p> <p>These comments very much fit the Wirral situation as we will see.</p> <p>The promised control of net migration (reflected in the lower ONS 2016 population projections) should contain household growth need: declining internal natural growth and stabilised life expectancies will enhance this, as will the lower economic growth now expected for several years at least. Against this background, setting an annual policy target of 300,000 homes and assuming the market, developers and potential buyers will follow is astonishing hubris not supported by the evidence (1; see section 5). Sanctions on councils, giving developers free reign for example, to invade the local green belt, will achieve little if affordability and demand are limiting for economic and demographic reasons.</p>	

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SCOP016	Local Resident	<p>Mechanically the 'standard method' begins with a population projection which consists of internal, natural growth which should be predictable and internal UK and international migration flows which present problems on the national and (most certainly) the local authority level (2). We will attempt to deal with the migration problem by showing the scale and direction of error in all the Wirral ONS forecasts and by proposing an alternative local, evidence based, population projection.</p> <p>The second component of the 'standard method' requires forecasts of household formation rates or equivalently, household size. We can see this as a complex interaction between affordability, demand and supply. Household size has changed significantly over the decades and is still changing. It has a strong effect on household number forecasts and we will use a major ONS sensitivity report to explore this. A key result is that all ONS projections over the last decade have overestimated the falloff in household size in comparison with census data and large sample surveys of actual households. The effect of this on Wirral local plan housing needs is estimated.</p> <p>The third component of the 'standard method' is to apply an affordability 'uplift' to the previously calculated number of households. The implied Wirral affordability factor appears to be based on an out of date affordability ratio. We use recent official ONS, Wirral affordability ratios to predict future levels and apply these. The biasing effect is small compared with the exaggeration of local population growth and the exaggeration of the rate of fall of household size.</p> <p>A further technical problem is that a 'standard method' which may give reasonable, transparent, results at the national and regional level, becomes less reliable at the local authority level. For example using simple (and arbitrary) rules to project migration flows often leads to nonsense results at local level (see for example ref. 3 and the associated HOC Public Admin. Com. comments).</p> <p>'Users of migration statistics identified local area migration statistics as being particularly weak. This despite the ONS taking steps to improve migration statistics.'</p>	
SCOP016	Local Resident	<p>It is also acknowledged that there was a general problem between the 2001 and 2011 censuses in DCLG and ONS running population estimation. Later we will examine the historical evidence on Wirral migration flows and compare these with the recent ONS net migration projections. The large discrepancy between historic migration and the ONS automatic trend estimates dominate the Wirral population projections since internal growth projections are negative i.e. the internal population is in decline and has been for some decades. We look at other projections made for example, by Liverpool City Region analysts under other reasonable assumptions. From this analysis we derive alternative population projections which are uncertain but significantly lower than the ONS 2014 and 2016 projections. To avoid the migration problem we will also use Wirral electoral register data since the last census in 2011 to estimate recent population growth and test the reliability of the method using government census and government household survey sampling data. A simple linear model is fitted and trend uncertainty estimated. This model suggests very significantly lower population growth than the 2014 or 2016 ONS projections, more in line with the historical local migration and internal decline data. Even using the standard ONS 2014 based household formation rates and affordability factors still gives much lower 2034 Wirral housing requirements.</p> <p>Overall applying the 'standard method' with a range of data sets from the ONS and from local official historical sources gives a range of household growth projections and housing need requirements to 2034. The various estimates have used the 'standard method' with relaxed official population projections, or household size and affordability factors based on objective, alternative evidence and 'publically available' data, which is presented in full. These estimates are significantly lower than the government local plan minimum 'target' of 12,045 dwellings which is badly flawed for all the reasons explored in detail in this report. This appears to be a general problem across the UK at local authority level (4; Appendix 2). The current government 'standard method' fix is the planning policy equivalent of a leaky sticking plaster applied to a major arterial haemorrhage.</p>	
SCOP016	Local Resident	<p>2. The Impact of Historical &amp; Recent Trend Changes in Household Size on Housing Requirements Forecasts for England and the Wirral</p> <p>In this section we will examine the mandated 2014 ONS population, household size and household numbers projections to 2034 and comment on their properties. The 'standard method' requires that population growth over a local plan period is based on a continuous 10 year period from the current year to give an annual population increase which is then scaled to a 15 year period (2). We will show that this gives significant decreases in Wirral housing requirements as we progress through the plan period. Given the recognition that plans should be reviewed on a rolling basis anyway this rather dents the logic of using the initial year housing requirement calculation, particularly if this 'forces' a council into unnecessary actions e.g the objectively unjustified, upfront, release of large areas of green belt land.</p> <p>We will then examine in detail the ONS report 'Household Projections for England: comparison with other sources ; 2001 - 2018' published in September 2018 (5). Using the various household size forecasts from several base years and the Housing (size) Estimates from the regular government Labour Force Surveys we then argue that the current ONS household size projections for England and at local authority level are clearly biased in comparison with the recent decade of actual observations. It is also clear that at local authority level the official 2014 projections bear little relation to the alleged, mandatory, method for calculating household formation rates. One assumes that given the Wirral data problems, including migration flows, the formal method was abandoned to get, at first sight, 'reasonable' results. We will adapt and apply the actual household size projections as provided by the ONS. If the government's own agents do not apply sub-sets of the 'standard method' it seems irrational to insist that local authorities must blindly follow (unworkable) rules that lead to patently nonsense local results.</p> <p>Table 1 presents the 2014 based ONS SNPP projections for Wirral population, household numbers and household size which the local authority is constrained to use. Column 1 reports population numbers from 2014 to 2036; column 2 shows projected household size; column 3 projected household numbers. In the standard method we are required to consider continuous periods of 10 years from a defined, plan start, base year. Column 4 shows the 10 year growth in population for successive annual start points. The pattern is peculiar indeed. For some years, to 2017, 10 year growth increases significantly by 10%. From 2018 onwards cumulative population change falls away significantly. Using 2019 as start year, by plan year 5 forward growth is only 76% of start year. By plan year 10 forward growth is only 57% of start year. These are very significant changes in terms of considering planning targets and actions over time. Taking the 15 year period as presented gives a population growth of 6,300 not 9,450. Compounding this is the projected rapid fall in HH size.</p> <p>[Table attached showing 'Wirral ONS 2014 Based Population and HH Numbers'] [Figure attached showing Average household sizes, UK and England 1971 to 2017]</p>	
SCOP016	Local Resident	<p>Column 6 shows the 10 year cumulative household numbers growth for each plan start year. Column 7 shows the 15 year plan household numbers growth. The pattern is similar to that of population change. The cumulative plan housing numbers required fall away significantly over time. The housing minimum target currently imposed on the Wirral is 12,045 dwellings based on the 2014 ONS projections. Taking 2018 as start year we have a 10,630 start point and an implied affordability uplift of <math>12045 / 10630 = 1.133</math>. From the standard formula this is equivalent to an affordability ratio of 6.13. Consulting 'Housing Affordability in England &amp; Wales 2017' ONS, (6), this equates to the Wirral AR in ~2011, census year. Since ~2009 the AR trend has been clearly downwards. Logically this should be taken into account. This will be examined in detail in Appendix 1 but the effect is small compared with other problems. We have examined the mandated 2014 ONS SNPP data and its properties. Later we will look in detail at the population projection and its components in comparison with actual Wirral migration patterns. First we turn to the issue of household formation rates and household size trends which has a very great impact on housing need projections at the national and local authority levels whatever population trends are used. We will see a clear historical pattern of change and question whether the current 'approved' projection method is capturing reality. The key ONS source material for this examination is 'Household Projections for England in Comparison with other Sources' (5). This was published in September 2018 and represents the most up to date and thorough commentary on this issue. Figure 2 shows household size trends over the long term from 1971 to 2017.</p> <p>Despite short term variations on scales of a few years the pattern is one of a smooth, long term deceleration in the rate of fall of HH size. This must reflect steady long term demographic changes in the UK disturbed occasionally by temporary economic shocks. We see that already the simple ONS projections from 2001 / 08 data overestimated the fall off. Independent data from the government Labour Force Surveys provide direct sampling of household sizes on a large scale. The sample size is 40,000 households. This data shows a good match at the 2001 census and indicates a levelling off of HH size between 2001 and 2011. The ONS notes the good match to the 2014 based HH projections, however from 2012 the sampled actual data shows a sharp increase in HH size presumably in response to the economic crisis but also to the halt in the increase in UK life expectancy in the last decade. Note also the 2014 projection from 2012 on shows a rate of decline greater than the old 2001 / 8 projections.</p> <p>[Figure attached showing household estimates and household projections, England, 2001 to 2018]</p>	

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SCOP016	Local Resident	<p>This appears to be contrary to the objective sampled evidence. Consider now Figure 3. This presents ONS household projections issued in base years 2008, 2011, 2012, 2014, 2016 along with sampled LFS Household Estimates including back casts to 2001.</p> <p>We note a clear trend over time (projection base years) for the 2018 HH number estimates to fall. The ONS provide uncertainty bounds on the HE numbers and show the differences with all the projections are statistically significant. If the housing estimates from the LFS are representative, all the ONS projections since 2008 have failed to capture the long term, observed deceleration in household size change despite, or perhaps because of, complex modelling assumptions. This data shows a general demographic phenomenon happening across the country. Apparently it was a case of somebody not seeing the wood for the trees. They describe the forecast differences as 'small' but they have a real impact on housing requirement projections over a local plan period as we will see. The ONS analysis goes on to show the implications of applying the various projection rates to the base line 2011 census average, England HH size (Figure 4). Again we see that the ONS 2012 / 2014 based projections show a rate of decline in HH size close to that assumed in the 2008 based SNPP. Looking back to the history in Figure 2 and the comparisons with actual survey based Housing Estimates in Figure 3, it is difficult to see why this is acceptable, yet the government has mandated use of these 2014 based projections by local authorities. This is to ignore the clear ONS and LFS evidence.</p> <p>So what happens to household size and housing needs projections in the longer term if we apply the trends displayed in Figure 4 from the various SNPP base years? Table 2 shows the England trends in HH size calculated from Figure 4 data. It also shows the trends for Wirral, scaled by England and local HH size in 2011. Applying these trends from the 2011 census onwards provides a rough sense of the various HH size model changes. The standard method now uses 2001 and 2011 census data (two points!) to 'fit' an exponential projection model. The active projections only cover 2011 to 2021 after which HRRs are held constant. The ONS makes this comment:</p> <p>'As trends become less certain after 2021 and beyond the 10 yr [post 2011 census] point, HRRs are then held constant for the rest of the projection period.'</p> <p>[Figure attached showing 'Average household size from household projections and household estimates, England, 2001 to 2018']</p>	
SCOP016	Local Resident	<p>They see this as a robust procedure. It allegedly underlies the 2016 based national HH projections. The ONS robust conclusion on HHR trends is presented in Figure 6 : it reflects what actually happened. The earlier projections including the 2014 based used additional historical census points, meaning the trends reflect decades old data. We can see this in Figure 4 where the 2014 HH size trend equals the 2001 / 2008 trend. The 16 line is equivalent to the constant HRRs recorded in Figure 6.</p> <p>[Figure attached showing 'Wirral ONS HH Sizes Projections']  [Table attached showing 'HH Size Trends from various ONS Projections']</p> <p>Figure 5 shows HH size to 2038 if we take the ONS data of Figure 4, the stated projection procedure, and the trends of Table 2, at face value. Figure 5 also shows the HH sizes for the published ONS 2014 based and 2016 based household projections. The HH size decrease in Figure 4 for the 2014 projections matches the published 2014 based Wirral projections until 2021. After 2021 HH size continues to fall in the published projections we are mandated to use, contrary to the stated ONS procedure. The published 2016 based projections also give a falling HH size after 2021. Applying the Figure 4 trends from actual Wirral HH size at the census to 2021 and then holding them constant gives considerably higher HH sizes than the published 2014 based projections.</p> <p>The published 2016 based projections are better and overlap the Figure 4 based equivalent HH size projections from various base years until the 2030s. All size projections look too low compared with the measured Housing Estimate trend and the stated 2016 ONS robust procedure. From Table 1 for the published ONS 2014 based data we noted a 15 year increase in housing need of 10,630 based on a 2018 start year (before uplift). The equivalent published 2016 based figure was ~6,400. If we accept the evidence of Figures 4 and 5 both these housing requirements are too high. 6,400 before uplift should objectively be considered to be an upper bound on needs subject to further results derived below.</p> <p>[Figure attached showing 'Household representative rates, total household population, UK, 2001 to 2017']  [Figure attached showing 'Percentage difference household estimates and 2016-based household projections, regions of England, 2011-2017']</p>	
SCOP016	Local Resident	<p>We can check out the 2016 based projections a little further. Figure 7 displays percentage differences between the 2016 HH projections and the LFS Household Estimates over time for English regions. Two features are of interest. Firstly the 2016 projections would give higher HH numbers than sampled reality for the whole period 2001 – 2017 for London. The offset is constant until 2011 (the last census) and then increases: the forecasts are diverging further from reality after 2011. Secondly for our purposes in Wirral, the NW region statistics show a good match between the 2016 projections and Household Estimates from 2001 to 2011 but thereafter a significant offset. Even the 2016 base numbers are too high in some regions judged against measured reality on the ground. The government mandated ONS 2014 based projections are even further from current and probable future reality.</p> <p>The LFS Household Estimates show the fall in household size had ceased by ~2001 and HRRs and HH size remained constant on the ground. They reversed strongly after 2011. But is this reversal partly a short (or medium) term response to the economic / austerity crisis? Will Brexit precipitate the promised lower economic growth for several years and continue the effect? Also will the halt in the decades-long increase in life expectancy observed during the last decade, finally end or continue? Is that halt an austerity response or something else? (See section 3). After all our calculations Figure 2 and ONS reasoning, surely provide a simple answer: HRRs and household size have stabilised since at least 2001. To provide a more robust starting figure for the coming decade it seems sensible to assume a constant household size frozen at say the 2019 level. LAs should continue to monitor HH size during the local plan period and adjust forecasts as necessary. The next chance to do this formally, will come in the 2021 census, only two years away. What happens if we do this with the 2014 based data? Table 1 gives 2019 HHs as <math>323.2 / 2.212 = 146.13</math>. For 2029 we have <math>329.5 / 2.212 = 148.96</math>. The 15 yr growth is 4,245 dwellings. This is our new upper bound.</p> <p>However this assumes the government mandated ONS 2014 SNPP population numbers are reliable. We will now explore this assumption and show that it is false, primarily because of severe problems with the method for estimating net migration at the local authority level. Later we will suggest an alternative procedure based on objective, official, Wirral level data.</p>	

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SCOP016	Local Resident	<p>3. Wirral Population Projections: Problems with Migration Flow Estimation &amp; Life Expectancy / Fertility Assumptions used in the ONS 2014 Based Data Set</p> <p>'The significant uncertainty about the number of migrants in local areas creates significant difficulties for the planning and efficient delivery of public services and a whole range of other public policies.'</p> <p>HOC Public Admin. Committee July 2013</p> <p>Population projections at local level have two components. Firstly the internal 'natural growth' must be estimated based on births and deaths through time working through the changing age distribution. On the Wirral for some decades, the 'natural' internal growth has been negative: the core population is in decline. The prediction of 'natural' change should be a relatively easy, mechanical, calculation given reliable birth and death rates. However in the last decade the long, roughly linear increase in life expectancy and healthy life expectancy has halted and reversed in the UK. Figure LE shows the healthy life expectancy for England and Wirral from 2009 to 2016 (7). While English male life expectancy is approximately constant female LE has fallen. This is reflected on the Wirral but the fall in female HLE is even stronger. These HLE trends tell us to expect future falls in LE on Wirral. The other figures show the trend in basic LE at birth for males and females in England, the North West and the Wirral over the period 1995 to 2016. At national and local levels male LE has stabilised since ~2011 and female LE has begun to fall. At the England level the increase in LE from 1995 to ~2011 has been remarkably steady and apparently insensitive to economic variations. The fall off in LE appears to reflect some wider fundamental demographic shift. Future projections of LE in areas like Wirral need to reflect this shift.</p> <p>Fertility is also in decline as recorded in Figure FR taken from the Wirral Compendium of Statistics 2016 (8).The Wirral birth rate has fallen from 5,000 live births per annum in 1990 to ~3,400 in 2016. (14.9 to 11 births per 1000 population). Local birth rate is falling faster (-5.41% to 2037) than in the North West region (-4.2%) and in contrast to the increasing birth rate in England (+1.95%). The Wirral is not typical on fertility grounds nor net migration as we will see. The local ONS 2016 SNPPs may reflect these trends in life expectancy and fertility in that the projected Wirral internal 'natural growth is at least negative. It is difficult to judge to what degree the recent trends affecting 'natural' growth have been taken into account. ONS projections typically appear to lag real data trends as we noted for HH size. Also the natural growth estimates are unstable from ONS release to release. Between May and September 2018 the ONS Wirral population projections estimate of natural change increased from</p> <p>[Figure attached showing 'Trend in healthy life expectancy for males and females, Wirral and England, 2009-2016']</p> <p>[Figure attached showing '21 year trend in life expectancy at birth for males in England, North-West and Wirral between 1995 and 2016']</p> <p>-360 persons per annum to -260 persons per annum, despite the ongoing fall in fertility and life expectancy (see below). We will see the 2014 ONS projections are worse. There are more serious problems with migration. The problem with the official ONS method for calculating local authority level population migration flows from partial national and local data and appears to be well recognised (3). Somehow a complete, consistent matrix of internal UK in and out flows between all local authority areas must be generated.</p> <p>[Figure attached showing '21 year trend in life expectancy at birth for females in England, North-West and Wirral between 1995 and 2016']</p>	
SCOP016	Local Resident	<p>Somehow foreign immigrants must be tracked to local destinations and recorded as they leave the country or move. The immigration data is poor and the ONS models large and complex. Even if the flows are correct on a regional scale, on average, the 'automatic' results for local authorities can be nonsense. No attempt is apparently made to correct nonsense estimates from the models by checking and reconciling results at the local level. We cannot explore this issue in detail because the migration models are not accessible by the public. The Royal Statistical Society gave evidence to the HOC Public Admin. Committee (3) that :</p> <p>'There is a continued problem with the quality and quantity of migration data available at local level. For some local authority areas the Census has shown that the ONS population estimates have misrepresented the level of population growth, a problem caused by inaccurate internal and international migration estimates.'</p> <p>[Figure attached showing 'Population: Maternities, live and stillbirth rates, Wirral, 2004 to 2016']</p> <p>[Figure attached showing 'Projected births and percentage change, Wirral and England (2013 to 2037)']</p> <p>The Policy Advisory Service of the Local Government Association provides an excellent introduction to these problems in (4). Figure PAS gives a typical example of the distortions which often occur at local authority level. This LA is real but not identified. In this case the 'automatic' ONS system greatly underestimates net migration relative to recent measured data. The local pragmatic 'bespoke' scenarios, approximately retaining the ONS trends, are more sensible. Even so a 10 year fit to the actual data would give a slightly falling or constant migration level over a decade. Given the variation year to year this would be the only statistical estimate compatible with the real local data. In the Wirral case we will see the same statistically incoherent, ONS trend projection system greatly overestimates net migration.</p> <p>[Figure attached showing ' Net migration, history and three scenarios, District A, thousands of persons']</p>	
SCOP016	Local Resident	<p>The Wirral SHMA report of 2016 (9) looks at ONS migration statistics and the 'official' method for projecting migration. The data for Wirral 2001/2 to 2012/13 appears in Table A1.1 on page 262, right at the end of the document (Figure HMT). If we take the recent period from 2007/8 - 2012/13 the total net migration is given as + 79 persons or 13.2 p / yr. With no trend obvious. You can compare this with the independent migration scenario, the Lichfield consultants acknowledged, of 66 persons. If we take the longer period 2001/2 – 2012/13 the total net migration is -3713 or - 377.5 p / yr. However in Figure 6.4 the ONS net migration forecast over the 2014 – 2032 period is + ~450 p / yr every year (Figure HM). This may seem strange to the reader since it bears no relationship to the actual migration history. The Lichfield consultants themselves comment:</p> <p>'On the face of it the data of Figure 6.4 would appear to suggest that the 2012 SNPP [and later SNPPs] is suggesting a level of net migration to Wirral from 2014 onwards that is in sharp contrast to the level of migration that has been experienced on the ground over the past ten years and beyond.'</p> <p>Quite. The consultants then escape their dilemma by referring to the unintelligible (and inaccessible) ONS 'official' method of trend calculation which must simply be accepted. In fact it is said that our problem arises because Liverpool's population was also uplifted significantly at the 2011 census and the assumption was made that high migration to Wirral could be used to help 'offset' the problem. However the last data which should give definitive flow levels was the 2011 census. Table 3.1 in Wirral SHMA report 2016 and Table 8 in 'Defining Housing Market Area: Liverpool City Region' give the actual migration flows between Liverpool and Wirral (Figure CM).</p> <p>[Figure attached showing 'Wirral Migration Statistics 2001/02 – 2013/14']</p> <p>Liverpool to Wirral flow is 1078 persons and Wirral to Liverpool is 1322. So actually more people went to Liverpool than the reverse. The same is true for flows to Cheshire West and Chester and several other districts. (Note that the historic net international migration flows into Wirral were negative up to 2014 (Figure HMT). The ONS 2016 projections have a small, +41, inflow). This makes Lichfield's excuses for the current government migration projections rather fanciful. Does this matter? Well yes, because migration can dominate the housing need projections. Note also Figure LM which shows the intra regional flows for the Liverpool area 2009-2015. We can see very large outflows from Liverpool to other regions. Note also that at the census, which is based on actual measurement, there was a net outflow of 1,923 persons from the Wirral. Yet Figure HM above from the 2012 ONS SNPP (similar to the next 2014 update) shows a projected net inward migration of ~ +450 persons per annum! The later 2016 migration projections are worse as we will see.</p> <p>[Figure attached showing 'Historic and Projected Migration to/from Wirral']</p> <p>[Figure attached showing 'Origin/Destination Migration Data for Wirral']</p> <p>Note : It is interesting that other local authority analyst groups were less inhibited in using past ONS data sensibly. The Liverpool City Region SHELMA Report of July 2016 showed a Wirral total population change of 489 p /yr over 2012 – 2037 which implies +7,335 over 15 years, based on the official ONS data. However looking at the actual historical 10 yr Wirral net migration rate they get + 4,753 persons. Using the actual 14 year migration rate they get + 2,095 persons. Applying the Lichfield 2016 household formation factor this gives 2,443 to 5,542 dwellings over a 15 year period compared with the 2018/19 government mandated target of 12,045. These lower numbers are much closer to the current truth as we will see.</p>	

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SCOP016	Local Resident	<p>Let us look at the components of recent ONS population releases and compare them with the recent historical migration data. The May 2018 released (ONS 2016 based) population projections for Wirral (Tables 2 &amp; 5) gave us</p> <p>Natural population change -350 persons per annum  Net migration change +693 " " "  Overall change +343 " " "</p> <p>By September 2018 the population data had changed again (Table 5 SNPP for England 2016 based) for the period 2016 to 2026.  [Figure attached showing 'Net regional migration into Liverpool, 2009-2015']</p> <p>Natural change -260.1  Net migration +661.5  Overall change +415.3</p> <p>The data is not stable even over a few months. Recall at the census Wirral (and Liverpool City Region) net migration was negative (see Figures CM &amp; HM). Most of the above migration is attributed to internal UK flows. It is worth noting ONS Table 7.2 of 'England &amp; Wales Internal Migration by Local Authority 2015'. The migration rate given is equivalent to ~161 persons per annum, a long way from ~690.</p> <p>The latest 'version' of the 2014 based population data on the ONS site (Table 5) gives data by year from 2014 to 2039. The 'all net migration' figure varies from ~500 per annum in 2019 to ~600 in 2029 and ~800 in 2039, fairly similar to the 2016 versions above. However in this 2014 version internal 'natural growth' is positive, being ~100 from 2018 to 2026. From 2026, strangely it begins to fall sharply being, -100 in 2028 to -500 in 2039. This is weird behaviour. (This is why the 10 year cumulative population in Table 1 falls away so strongly after 2021). Wirral has not had positive natural growth for decades. If we calculate the 2014 based overall growth from 2019 to 2029 it is ~ 590 persons per annum (well above even the strange 2016 projections). This would imply a 15 yr need of 8,850 and <math>8,850 \times 1.133 = 10,027</math> after AR uplift. A check shows that this is the same data which provided the mandated government 2014 based housing needs for Wirral of 12,045 (see Table 1). It is unclear how these numbers were generated but they bear little resemblance to long term or recent Wirral population behaviour. Later we will confirm this using voter registration data. Nor do they conform to the claimed 'standard' method of generating HH formation rates. This involves extrapolation of the HH formation trends from two or more census points (2). From 2016 projections onwards only 2001 and 2011 points were included. Table 3A shows the year on year changes of population and HH size from the published 2014 SNPPs and their ratios which approximate the underlying marginal HH formation rates. From 2014 to 2019 the numbers are very high beginning at 5 and averaging 1.77. From then until 2027 they remain fairly steady with an average of ~1.13. Beyond they increase again. (The HH formation rates inferred for the 2016 based projections are more stable from 2018 to 2029 but go haywire beyond 2029: table 3B). This peculiar trend behaviour does not give confidence. Coupled with the strong deviations from observed, recent Wirral natural growth and migration history and the dissonance between observed and modelled HH size trends discussed in section 2, the 2014 ONS Wirral population and HH number projections must, objectively, be considered unreliable. This appears to be a wide spread and recognised problem at local authority level. Recent analysis by the MHC&amp;LG itself, published by the HOC Library, compares local authority derived needs with those produced by the 'new' standard method demonstrating huge and concerning variability (see Appendix 2).</p>																			
SCOP016	Local Resident	<p>Where does this leave us with regard to future local plan housing needs? In section 2 we argued that the robust ONS evidence showed a stabilised HH size for the foreseeable future. Coupled with the mandated ONS 2014 based population projections this choice led to a 15 year (demographic) housing need of ~4,300 dwellings. We have now demonstrated the unreliability of the 2014 based population projections for Wirral. Natural growth is forecast to be positive: a situation not seen in Wirral for some decades. Net migration is forecast to be large and positive: a situation at odds with the latest census and other data. We can conclude, objectively, that our ~4,300 needs figure is at best an upper bound on the real number. Suppose we apply the 2016 based SNPP population projections instead on the grounds that at least the natural change in Wirral population has the correct sign even if net migration is too large by a significant factor. Also let us assume that the recent ONS study of HH size change supports a negligible trend from 2018 onwards as we concluded in section 2. The ONS themselves apply such sensitivity analysis in comparing the 2014 and 2016 based projections and methods (10). What do these assumptions yield for Wirral needs in the standard calculation?</p> <table border="1" data-bbox="528 1066 1240 1144"> <thead> <tr> <th>Year</th> <th>Population</th> <th>HH size</th> <th>HH numbers</th> <th>HH growth</th> <th>15 year HH growth</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>323.2</td> <td>2.22</td> <td>145.56</td> <td>-</td> <td>-</td> </tr> <tr> <td>2029</td> <td>327.2</td> <td>2.22</td> <td>147.39</td> <td>+ 1.83</td> <td>+ 2.745</td> </tr> </tbody> </table> <p>Taken literally this yields 2,745 and 3,110 after uplift. However this mixed data set implies a sharp unconvincing, fall in marginal HH formation rate which happens with the ONS data also. We will revisit this later an alternative way.</p> <p>This is as far as it is possible to go using the published ONS data and projections. What is really required is a source of reliable local authority data from which population growth can be independently and formally estimated statistically. In section 4 we show that local registered voter records provide such a source.</p>	Year	Population	HH size	HH numbers	HH growth	15 year HH growth	2019	323.2	2.22	145.56	-	-	2029	327.2	2.22	147.39	+ 1.83	+ 2.745	
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SCOP016	Local Resident	<p>4. Wirral Population Projections Based on the Electoral Register Applied in the Standard Method Framework with Various HH Size Assumptions.</p> <p>There is one independent source of official 'population' data: the electoral register which records the number of adults (18+) on the Wirral through time at local and general elections. Some people will not bother to register or de-register on leaving the area or indeed vote, which will change the totals. Electoral registers will never be complete and will be subject to error (as is the census data). However to calculate changes all we need demonstrate is that the proportions involved remain substantially constant over time.</p> <p>[Table attached showing 'ONS 2014 BASED ESTIMATED WIRRAL HH FORMATION RATES']  [Table attached showing 'ONS 2016 BASED ESTIMATED WIRRAL HH FORMATION RATES']</p> <p>[Figure attached showing 'Recent Electoral Commission national studies into the accuracy and completeness of the electoral registers (2011-2014). All estimates are for the local government registers']</p> <p>The Electoral Commission undertakes national studies into electoral register accuracy and completeness from time to time (11). Figure ER shows accuracy and completeness measures from 2010 to 2014 which spans the 2011 census year. Note that their table ES2 gives ER completeness Dec 2010 (house survey): 85%; 2011 census: 84.9%; Feb / Mar 2014 (house survey): 84.7%. The various numbers seem to be consistent over time and there is no indication in the study of biasing. We assume this situation applies to Wirral for the several year period from the last, 2011, census to 2017. WBC and the ONS record registered voters at the times of local and general elections and there are a number of different records. As far as I can tell currently, the most consistent data source is the ONS UK Electoral Statistics annual series from which mid-year numbers can be derived.</p> <p>ONS population data and Wirral registered voter data for the period 2001 to 2017 have been examined. The ratios of the two series are less than one since the voter data relates only to people over 18 years in age, but also because not all voters trouble to register. The interesting question is, despite these factors, are ratios consistent over time? If they are, they provide an independent way of calculating population between censuses. This is desirable given the high, observed instability in the ONS local authority population 'projections' over time and their possible 'contamination' by policy 'adjustments' to the data. Despite the apparent falling population on the Wirral between the 2001 and 2011 censuses, the ratios of registered voters to population remained remarkably steady except during the ward boundary changes introduced in mid 2003. From the 2001 census to 2003 the voter / population ratio was constant at 0.792. It then fell slightly and quickly again became constant. Taking the period 2004 to 2010 we have:  2004 0.785; 2005 0.780; 2006 0.783; 2007 0.786; 2008 0.785; 2009 0.784; 2010 0.781</p>																			



Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP016	Local Resident	<p>5. Comments on Government 'OAN' Rules</p> <p>'Objectively Assessed Needs' should be just that: based on the best available, observed local and national data over the appropriate period, robust, conservative assumptions about data gaps and transparent, robust statistical procedures valid at the local authority level. The ONS 2014 and 2016 based local household projections on this basis, cannot be considered 'objective' in several ways. To be fair to the ONS their various recent technical and sensitivity reports, if consulted, point us in the right direction. One can only conclude that the ONS has been totally ignored by government. The recent consultation on 'Local Housing Need Assessment' (12) makes the position very clear.</p> <p>'The government has considered whether it needs to change its aspirations for housing supply in the light of the new [2016 based] household projections... It has decided it is not right to change its aspirations... Methodological changes are not a reason why the government should change these aspirations.'</p> <p>They do not understand that the changes are not 'methodological' as such but about removing obsolete, distorting data and responding to what is actually happening in the country. They are saying in other words: objective reasoning, the real data and good statistical practice will be ignored if they give numbers at odds with policy 'aspirations'. The government is abandoning rational decision making. The government is also terminally confused between 'policy off' and 'policy on' targets.</p> <p>'In the housing white paper the government was clear that reforms set out should lead to more homes being built. ...the intention is to consider adjusting the method to ensure that the starting point is consistent... with ensuring that 300,000 homes are built per year by the mid 2020s.'</p> <p>The Policy Advisory Service (4) makes these key points on OAHN and housing targets:</p> <p>'The NPPF and PPG use 'need' and 'demand' as synonyms. The PPG recommended method for calculating OAN, using trend-based projections uses the evidence of past demand and supply rather than aspiration. A plan that aimed to meet aspirations, rather than demand, would risk being undeliverable, contrary to [annex 2] of the NPPF.'</p> <p>The PAS takes a reality based approach, defining need as</p> <p>'The housing that households are willing and able to buy or rent, either from their own resources or with assistance from the state.'</p> <p>The mandated government defined 'need' is a policy based aspiration. It has nothing to do with 'objective assessment'. It has nothing to do with objectively measured data at the local level. It has nothing to do with applying the best logical and statistical 'methodology'. It is to be hoped that in evaluating local plans government housing inspectors will be permitted to consider robust, local, objective evidence and arguments and to reject, arbitrarily imposed, 'aspiration' based, objectively invalid, demographic housing targets.</p> <p>[Appendix 1 - Projecting Affordability Ratios – attached]</p> <p>[Appendix 2 - Comparison of the New 'Standard Method' and Local Housing Need Estimates – attached]</p> <p>[Appendix 3 - Affordability And Housing Supply – attached]</p> <p>[Appendix 4 - OPEN COMMENTS ON THE LETTER FROM ERIC ROBINSON TO MARGARET GREENWOOD MP (Dec. 2018) – attached]</p>	
SCOP016	Local Resident	<p>Under 13.15 you say</p> <p>'No significant or long standing congestion issues emerge in relation to the M53 though increasing traffic levels in the key A41 corridor are expected to result in issues over the plan period...'</p> <p>This is an untrue statement. I have already submitted a paper on air quality / health to which I refer you. The M53 junctions and the A41 represent significant and increasing health hazards due to increasing traffic flows and congestion and the associated pollutant levels. To take the A41 your SR air quality section notes on PMs and NOx</p> <p>'These [elevated emission] hotspots are at...and the A41/ Port Sunlight roundabout.'</p> <p>I enclose a copy of Figure 1 from my air quality paper. This shows official Wirral pollution level maps from Air UK. You can clearly see the A41 hotspot in PMs. However the same dangerous PM levels occur in the vicinity of M53 junction 4 and J5. These are often heavily congested. In fact just to the east along Brimstage Road at the Spital crossroads there is also heavy congestion particularly in the rush hour. Traffic tails back almost to Spital dam, into Lower Bebington village and down Poulton Road.</p> <p>I draw your attention to Figure 2 which shows the proposed GB parcels for release in the vicinity of M53 junction 4. Parcels SP42 - SP45 and SP36 - SP39 could hold ~2,000 new houses and ~3,000 new cars. This additional traffic will cause major congestion but also add to air pollution. Building in this M53 strip will also remove the protective green buffer zone from existing housing near the M53 and damage the health of thousands of current residents (see my health paper). The same comments apply to the proposed GB parcels adjacent to M53 J5. I also point to your Landscape section 11.13.</p> <p>'There could also be potential for new developments to impact landscape quality in the vicinity of the road network via increased traffic flows impinging on tranquility or through works needed to add additional capacity to the road network.'</p> <p>I suggest your Transport section is not compatible with the evidence in the Air Quality and Landscape sections and is misleading.</p>	The scoping report has had regard for the readily available evidence. AECOM has not had sight of the referenced study.
SCOP017	Local Resident	<p>I wish to protest at all the proposals in your Core Development Plan in so far as they impinge on the Green Belt. It is unacceptable that any Green Belt land is lost when there are still brownfield sites available.</p> <p>Your proposal developing to the east of Rigby Drive, Greasby is particularly inappropriate as it impinges on Greenhouse farm. The previous and current tenants have put their lives into the farm and it is a model for others to copy in the way it links with the local community. It is a very successful dairy farm yet manages to add to the image of a green wirral which we must not lose. Their eggs and raw milk are sold throughout wirral and they have featured on local radio and TV because of these developments. They champion links with local schools and would be a grave loss.</p> <p>Further, any development involving an extra road junction on Arrowse Road is unacceptable. That is one of the reasons the Cricket Club plans were rejected a few years ago. There are already frequent accidents and near misses at the junction with Caulfield drive.</p> <p>For much of the year the peak traffic coincides with low sun angles which dazzle drivers and although the speed limit is 30mph many drivers have not slowed down from the easterly direction.</p> <p>During periods of heavy rain there is often flooding at the bottom of Rigby Drive. Sacrificing pasture land for building development can only make this worse. Accepting that drainage for the new development will be put in place that does not improve the flood capacity along Arrowse Road, which will continue to overflow at manholes and drains.</p> <p>Altogether your project is flawed and needs a huge change of direction.</p>	Not directly related to the scoping process.



Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP018	Local Resident	<p>SCOPING REPORT FOR THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL</p> <p>This Report seeks to identify and make recommendations in relation to a number of areas for consideration in the preparation of a Local Plan. Below, using the nomenclature of the Report, I add a few comments in relation to some of those areas.</p> <p>1. Introduction I have no comment to add</p> <p>2. Air Quality I agree that air quality must be monitored into the future and as the Local Plan is developed the potential impact of increased traffic must be considered. This is particularly important in currently "clean air" areas where any increase in pollution is likely to have a significant detrimental effect. Areas used for recreation, including sports, walking, cycling and other leisure pursuits must be protected.</p> <p>3 Biodiversity (i). Biodiversity is an area of great importance. It is necessary to protect and enhance our natural, built and historic environment by helping to improve biodiversity across Wirral. This involves improving and protecting natural landscape, safe guarding wildlife habitats including "wildlife corridors" such, for example, as the Dee Estuary coast and land adjacent to it. (ii) There is no need for me to deal in detail with the U.K. Biodiversity Action Plan, the Wirral Biodiversity Action Plan or the Nationally and Internationally recognized designated sites. These are well known protected. Any encroachment may be unlawful and would be quite unjustified. At a time when the UK as a whole is becoming more conscious of the need to protect the environment any action that had the opposite effect would be irresponsible. (iii). The Report recognises the particular biodiversity significance of Wirral and the suggested objectives are entirely appropriate. Wirral should be viewed both locally and as a whole. It is all too easy to consider individual, sometimes small, areas and "chip away" without taking into account how damage to those areas affects the biodiversity of the whole.</p> <p>4. Flood risks The Report correctly identifies Wirral as an area potentially vulnerable to flooding with significant risk in North Wirral both along the coast and in the low lying areas where ingress from rising sea levels or increase in surface drainage are the greatest risks. Ignoring this in the short term greatly increases risks in the medium to long term and any Plan must reflect that.</p>	Comments noted. No action required.
SCOP018	Local Resident	<p>5. Climate Change The present increase in renewable energy capacity I'd welcome and it is encouraging to note that Wirral emissions are low in comparison with national figures. It is important to build on this and ensure that development does not threaten the progress that has already been made. We may soon approach the point where planting trees is more acceptable than planting buildings.</p> <p>6. Employment Wirral is currently predominately a "Dormitory" area with limited industry and employment save in the Leisure business. The Report correctly identifies that Wirral has a higher proportion of professional, quasi professional and small businesses with a lower proportion of what are described as "elementary" occupations than other comparable areas. This is reflected by the high numbers of working residents who travel to work outside Wirral. That trend is unlikely to change very much although the influx of tourists and those engaged in leisure pursuits is likely to encourage expansion in the leisure sector..</p> <p>7. Health The disparity between areas and the levels of deprivation are alarming. There is a need to reflect the consequences of that by better health care facilities and better education with improved access to both. It is accepted that National Government will have to play a part in seeking to remedy the disparity and assist in proper alignment of National services.</p> <p>8. Heritage Preservation of Wirral heritage is important both for current residents and those to come in the future. Some good work has been done in this area and it must continue to be a priority.</p> <p>9 Housing 10 Land and soils I have no comments to add.</p>	Comments noted. No action required.
SCOP018	Local Resident	<p>11. Landscape The significance of landscape seems a little underplayed in the Report. Simply because there are no Areas of Outstanding Natural Beauty does not mean that the varied and beautiful landscape of Wirral, which attracts visitors from around the Region and further afield, is not significant. Protection and enhancement is essential</p> <p>12. Population and Communities There is a need to ensure that communities are preserved. Development that simply infills areas between existing communities destroys their, sometimes very special, identities and risks changing the whole appearance of Wirral which has always comprised a number of different communities, some small and some larger. Wirral must not become one large urban conurbation. The creation of "infill villages" results in destruction of the communities between which they are created and should be avoided.</p> <p>13. Transport. There are areas where public transport is inadequate which contributes to the high usage of private transport and areas of significant congestion. Proper transport infrastructure is essential into the future.</p> <p>14. Water Resources. 15 Water Quality Save to point out that others have raised real concerns in relation to these matters I have no comment to make.</p>	A Landscape Appraisal is being undertaken to help guide the Plan-making process and will form part of the Local Plan Evidence Base.
SCOP019	Local Resident	File type not recognised [copy of text in an alternative format/or embedded in email requested but not received]	
SCOP020	Director of Public Health (Wirral Council)	<p>The following comments are provided within the context of the Council's statutory public health responsibilities and provide headline, rather than detailed, reflections to support the ongoing development of the Local Plan.</p> <p>1. Scoping Report for the Wirral Local Plan Sustainability Appraisal The Scoping Report is comprehensive in assessment of key issues for consideration. To ensure that the final report incorporates the existing and, in some instances evolving and emerging evidence, a broad range of partner stakeholders should be engaged to work alongside AECOM and planners to produce the final Sustainability Appraisal. This engagement may also assist with later public and stakeholder consultation. Health Impact Assessment (HIA), as part of the Sustainability Appraisal, should be utilised to optimise opportunities, presented by the Local Plan, to improve health and to identify mitigation measures which may need to be taken to ensure that adverse effects are lessened or eliminated entirely. There is rapidly developing policy on a number of key issues including climate change and air quality. Ensuring that the Sustainability Appraisal is connected to the existing Wirral Climate Change Strategy should feature as an important next step.</p>	We would welcome the opportunity to work alongside public health professionals to ascertain the impacts of the Plan and how mitigation and enhancement can be secured.

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SCOP020 EQIA	Director of Public Health (Wirral Council)	<p>2. Equality Impact Assessment of the Wirral Local Plan Scoping Report</p> <p>It is welcome that that report recognises the importance of wider consultation. Consideration should be given to how groups included within the scope of the EqIA can be engaged to inform the development of the EqIA Framework. This should be reflected as a key issue and objective.</p> <p>Health Impact Assessment (HIA) should be utilised to ensure that equality issues and broader considerations optimise health and that potential negative impacts are mitigated and managed. HIA should be embedded into the EqIA Framework.</p> <p>Transport is identified as an important consideration for a number of groups. It also plays a major role in access to employment and active and sustainable travel. This is not however reflected specifically in the proposals for the EqIA Framework objectives.</p> <p>The EqIA Framework should be developed with a broad range of stakeholders, including but not limited, to Policy and Strategy Leads, Public Health, the Third Sector Infrastructure organisation –Community Action Wirral and other key partners e.g. Fire, Police and Health.</p> <p>Aside from the above points there are a number of typographical errors within the report. Furthermore a number of statements included, and on which key issues arise, do not refer to source reference. These should be reviewed to ensure the quality of the report.</p> <p>We welcome the opportunity to comment on this important Plan and would seek to provide ongoing contribution throughout the development of the final reports, rather than consultation, to ensure that it maximises the health of local people.</p>	Amendments to be made accordingly to the report. A meeting with stakeholders to help shape the framework might be beneficial
SCOP021	Local Resident	<p>Regarding the Sustainability Appraisal &amp; Equalities Impact Assessment, I am extremely worried by the proposition to develop large amounts of greenbelt land and functioning agricultural sites on Wirral.</p> <p>As a resident of Greasby, one of the assets I most value about where I live is my ability to shop locally, supporting the local economy and lowering the environmental impact of my shopping. The notion that the council would endorse effectively forcing a successful independent farmer from their land in order to build houses which could easily be placed in any number of different areas is very worrying. This is the exact opposite approach to what any local council interested in sustainable development of their area should be taking.</p> <p>The numerous environmental, social and logistical concerns with building on greenbelt will doubtless have been outlined to you already and seem too vast to ignore, so I instead implore you to consider the impact of proactively undermining a successful local business, which could not be viewed as anything other than shameful.</p> <p>Please stand up for Wirral residents and independent business-people, and deny planning approval,</p>	Not related to the scoping process.
SCOP022	Local Amenity Society	<p>We confine our comments to the 'Heritage', 'Lands and Soils' and 'Landscape' sections.</p> <p>Heritage</p> <p>The report's conclusions to this aspect are :-</p> <p>In light of the key issues discussed it is proposed that the SA framework should include the following objective:</p> <p>1) Protect, conserve and enhance heritage assets, including their setting and significance.</p> <p>2) Contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.</p> <p>We are delighted to see that that this section highlights the threats to Wirral's historic heritage and to the Conservation Areas, including Eastham, that make such a significant contribution to that heritage. We welcome the first of these two objectives. Unfortunately the second of these two objectives presupposes 'new development', this in itself is a threat to the 'heritage assets, their setting and their significance' that the first objective is seeking to 'protect, conserve and enhance.' In other words the second of these two objectives can be used to nullify the first.</p> <p>Given the track record of Wirral Council, then this becomes no more than a fig leaf to cover the Council's shortcomings in the field of Conservation. An example of this is the recent planning permission given for an ugly 21 property housing estate and a youth club on land in Eastham that is both within the Eastham Conservation Area and within the Green Belt. The aims and ambitions are laudable but these have not been sustained by past actions.</p> <p>What guarantee does this document provide that Conservation Areas - in their setting - are going to be protected from development in future? How do the stated objectives in this section sit with the proposed release of Green Belt land which as far as Eastham is concerned would destroy the Conservation Area, by removing the historic setting of the village? What steps will be taken to ensure that the first objective in this section is rigorously applied?</p>	It is appropriate to include objectives that recognise that development will occur. The purpose of the SA is then to assess the Plan (and different approaches to delivering the required housing and employment land) with regards to a wide range of factors (of which heritage is one).
SCOP022	Local Amenity Society	<p>Land and Soils</p> <p>The context for this aspect is defined by the National Policy (NPPF 48). The key message rightly identified in the report, states:-</p> <p>Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>1. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;</p> <p>2. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. As a result of this clear directive this section of the report concludes:-</p> <p>In light of the key issues discussed above it is proposed that the SA framework should include the following objective:</p> <p>Promote the efficient and sustainable use of natural resources, including supporting development which avoids the best and most versatile agricultural land and development which makes effective use of previously developed land.</p> <p>The majority of the Green Belt land in Eastham earmarked for possible release is either Grade II or Grade III agricultural land, in other words 'the best and most versatile agricultural land'. The recommended policy is to 'avoid the best and most versatile agricultural land'. This is in line with the National Policy.</p> <p>We endorse the objective but once again we draw to your attention the conflict of this admirable policy with the proposal to release Eastham's Green Belt land all of which is either Grade III or Grade II prime agricultural land. How is this conflict to be resolved?</p>	The SA Objective will highlight which sites and strategies are most likely to have negative effects with regards to the best and most versatile agricultural land. Given the sensitivity and importance of this resource in Wirral, a detailed agricultural economy land survey is being undertaken to help guide the Plan-making process.
SCOP022	Local Amenity Society	<p>Landscape</p> <p>The Appraisal rightly uses the context of the National Policies to frame its recommended policies but again we have to question the Council's lofty aspirations against its Green Belt release policy. The National context is:</p> <p>Strategic policies should set out an overall strategy making provision for conservation an enhancement of the natural, built and historic environment, including landscapes and green infrastructure.</p> <p>Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).</p> <p>Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils</p> <p>b. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and</p> <p>c. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. The Government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The general extent of Green Belts is established and can only be altered in exceptional circumstances through preparation or review of a Local Plan.</p>	Comments noted. It is suggested that an updated landscape character assessment / sensitivity assessment is prepared to support the Plan.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP022	Local Amenity Society	<p>The Appraisal's conclusion for this topic is:</p> <p>In light of the key issues discussed above it is proposed that the SA framework should include the following objectives: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps between settlements, mindful of the need to make careful choices about Green Belt release.</p> <p>So how exactly, in the Eastham context, does Wirral propose to implement the National Policy of:-</p> <p>1) "setting out an overall strategy making provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure".</p> <p>2) "ensuring that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting."</p> <p>These questions need to answered before any Green Belt release decisions are made.</p> <p>The SA then relies on the ten year old 'Wirral Landscape Character Assessment and Visual Appraisal'</p> <p>We are disappointed to note the emphasis placed on the artificial division of Wirral into two types of landscape by the arbitrary use of the sandstone ridge as a boundary whereas it should be seen as a natural uniting feature. The eastern section of Wirral is and remains a part of Wirral and has nothing whatsoever to do with Liverpool and the rest of Merseyside from which it is separated by a mile wide river – a far more natural boundary.</p>	
SCOP022	Local Amenity Society	<p>It is interesting to note that the Landscape report states:- "Wirral NCA is characterised by its rich pastoral landscape, natural coastal scenery, wooded sandstone ridges and the local distinctiveness of the peninsula's settlements and villages".</p> <p>This is exactly what that tongue of Green Belt that protects Eastham does. Eastham Village is distinctive, its roads are based on the medieval pattern, its whitewashed cottage and ancient church all a part of that distinctiveness, its links to Eastham Ferry, the rolling landscape behind Eastham House, the sandstone cliffs that line the Mersey (the only original river bank left), the sandstone outcrops in ancient Carlett Woods. The Eastham tongue of Green Belt is simply an extension of the Wirral NCA. Landscape does not easily conform to man-made artificial divisions and we therefore reject the concept that Eastham is to be somehow excluded from its Wirral roots. The Eastham Green Belt is noted as being 'an urban fringe' which is simply a convenient planner's term to suggest that it should be given different treatment from the rest of Wirral's Green Belt. This is completely unacceptable. Rather than being written off as an 'urban fringe' Eastham's Green Belt defends the rest of Wirral's Green Belt, keeping at bay the westward march of industry and importantly maintaining that essential separation from Ellesmere Port. It should be strongly defended by the Council as host to Wirral oldest village seen as such in the Domesday Book and one that has survived past threats by the staunch efforts of its citizens backed up by its councillors.</p>	
SCOP022	Local Amenity Society	<p>Conclusion</p> <p>To throw Eastham and its protecting Green Belt to the wolves as this section infers is not only at odds with other recommended policies in the Appraisal but is also completely contrary to Government policies for the Green Belt as set out in the 'National Context' quoted above. Not only does the Green Belt defend the 'urban fringe' but in so doing it also defends those green belt areas that are not on the 'fringe' but will become so if Eastham's green Belt is violated. We strongly object to the conclusions of this section of the Appraisal. They sit uncomfortably with the policies and recommendation in the other sections of the report which we have addressed.</p>	
SCOP023	Local Resident	<p>Point 10.14 in the Sustainability Appraisal says that, "The widespread areas of Grade 3 agricultural land outside the main urban areas of the Borough means that there is potential for future development to affect areas of BMV land" This would potentially give the green light to releasing farming land from the Green Belt and goes against paragraph 170 of the NPPF. Also, at a full council meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." This means that any land which is farmed should be removed from consideration of release from the Green Belt.</p>	The Scoping Report does not state that agricultural land 'should' be built upon. It identifies the potential for such loss as a key issue that needs to be addressed.
SCOP023 EQIA	Local Resident	<p>Equalities Impact Assessment</p> <p>Population</p> <p>The assessment shows how the population in the Wirral is ageing and slowing down. This provides further evidence that the Housing Assessment figure of 803pa is grossly overestimated. The evidence for this in the report is as follows:-</p> <p>3.6 As shown in Table 3.1, the population of Wirral increased at a lower rate between 2001 and 2011 in comparison to the North West of England and England averages.</p> <p>3.8 There is also a larger proportion of elderly residents aged 60+ within Wirral (25.7%) than in the North West (22.8%) and England (22.3%), as shown in Table 3.2.</p> <p>3.54 Population projections indicate that the older population in Wirral is expected to increase by 30% by 2030. Even larger increases are predicted for the 90+ age group which is predicted to increase by 103% by 2030</p> <p>3.31 The proportion of households requiring 3 or more bedrooms is significantly lower than the proportion of properties let with 3 or more bedrooms. This would suggest that more 'smaller' properties are needed, particularly 1-bed properties, within the affordable housing stock</p> <p>3.57 By 2032, the vast majority of households in Wirral with children in 2032 are expected to have 1 or 2 children. The proportion of households comprising larger families (with 3 or more children) is projected to equate to less than 13% of the total of households with children.</p> <p>Table 3.6 shows that there is not much movement of population into Wirral in comparison to the rest of the UK. 96% of residents born on the Wirral in comparison to 86.2 in the rest of England and 91.8 in the North West.</p>	General comments. No suggestions made.
SCOP023 EQIA	Local Resident	<p>Health</p> <p>3.14 Pregnant women can be more susceptible to experience negative effects associated with development and the built environment. For example, pregnant women can be more susceptible to poor air quality, which can have a negative impact on birth weight. 5.18 in the Sustainability Appraisal actually says that the increases in the built footprint of the Borough may lead to increases in overall emissions if efficiency measures do not keep pace. In theory you can say that you can make people use public transport/ more environmentally efficient ways to travel, but in reality this does not happen. The number of households with more than 1 car (especially in higher priced properties) will ensure that the air quality on the Wirral will deteriorate if housing in the numbers suggested is built.</p> <p>3.52 For the North West of England in 2015, the biggest population-level risk factor for early death was tobacco smoking, followed by dietary risks (e.g. not eating enough fruit and vegetables or eating too much salt), high blood pressure, high cholesterol and being overweight or obese. Cancer and cardiovascular disease are the biggest contributors of death within Wirral, so reducing the amount of green space (which has a direct correlation to wellbeing) and reducing the quality of air in the Borough will only further exacerbate this.</p> <p>3.56 Estimates suggest that the number of people in Wirral surviving a stroke and heart attack who are left with a longstanding health condition as a result will rise by a third by 2030, with significant implications for health and social care services. Medical evidence shows that exercise and a feeling of wellbeing can reduce this figure. Our green and open spaces are an important factor in helping tackle this upward trend. The actual summary of the Equalities Impact Assessment says that the provision for good quality family accommodation in sustainable locations should be balanced against the need for smaller housing to meet the needs of an ageing population with increasing numbers of single person households. Obviously, if more smaller units are built, there should be less pressure to build on the Green Belt.</p>	Comments noted

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SCOP023 SA+ EQIA	Local Resident	<p>Sustainable Assessment</p> <p>Air Quality</p> <p>2.12 states that there should be encouragement to use low emission technologies and sustainable modes of transport such as walking and cycling. However, in the sustainability report 3.54 it states that population predictions indicate that the older population in Wirral is expected to increase by 30% by 2030 and even larger increases are predicted for the 90+ age group. I would dearly love to see these people cycling everywhere. It's just not realistic to expect older people to walk and cycle and the report shows that the population will be, as a percentage much older in the future.</p> <p>5.18 actually says that the increases in the built footprint of the Borough may lead to increases in overall emissions if efficiency measures do not keep pace. In theory you can say that you can make people use public transport/ more environmentally efficient ways to travel, but in reality this does not happen. The number of households with more than 1 car (especially in higher priced properties) will ensure that the air quality on the Wirral will deteriorate if housing in the numbers suggested is built. Under point 3.14 in the Equalities Impact Assessment it is pointed out that pregnant women can be more susceptible to experience negative effects associated with development and the built environment. An example given in the report is that pregnant women can be more susceptible to poor air quality which can have a negative impact on birth weight.</p> <p>Biodiversity</p> <p>3.1 The actual designated sites of importance for biodiversity may be protected, but I am concerned that not enough is being done to highlight the wildlife corridors and the stepping stones that connect them. How have these been located and what has been provided for in the Local Plan to protect them?</p> <p>Economy and Employment</p> <p>The report points out that Wirral Waters is intended to eventually deliver 20,000 new jobs. It also says that the Land and Premises Study excludes mixed use opportunities at Wirral Waters which could have the potential to include some B class uses (6.17). Why has this been excluded from the Plan? However, when it comes to housing, the report is far more vague. More information should be obtained from Peel Holdings to include a realistic figure of housing which can be supplied over the life of the Plan.</p> <p>6.22 The LCR growth strategy identifies a number of strategic growth sectors for the region which includes visitor economy. If the Green Belt is built upon as planned, our green and open spaces will no longer be an attraction for visitors from outside the area.</p>	Comments noted
SCOP023	Local Resident	<p>Health</p> <p>7.9 table 7.1 shows that residents in Wirral have worse long term health outcomes than at regional and national levels. Building on our green spaces (such as SP030) which are used by residents for recreational activities, providing exercise and fresh air, will only widen this gap</p> <p>Housing</p> <p>Even WBC consultants drawing up this report have noted that the figures of 803 pa is too high. Contrary to what has been said, we are aware that if a robust case is presented by the Council for reduced figures, and the figures are scrutinised by the Planning Inspector, the housing needs number can be reduced in the Plan.</p> <p>Soil</p> <p>10.14 Says that, "The widespread areas of Grade 3 agricultural land outside the main urban areas of the Borough means that there is potential for future development to affect areas of BMV land" This would potentially give the green light to releasing farming land from the Green Belt and goes against paragraph 170 of the NPPF. Also, at a full council meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." This means that any land which is farmed should be removed from consideration of release from the Green Belt.</p>	The Scoping Report does not state that agricultural land 'should' be built upon. It identifies the potential for such loss as a key issue that needs to be addressed.
SCOP024	Local Resident	Protect our green belt	Not related to the scoping process.
SCOP025	Local Resident	Point 10.14 in the Sustainability Appraisal says that, "The widespread areas of Grade 3 agricultural land outside the main urban areas of the Borough means that there is potential for future development to affect areas of BMV land" This would potentially give the green light to releasing farming land from the Green Belt and goes against paragraph 170 of the NPPF. Also, at a full council meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." This means that any land which is farmed should be removed from consideration of release from the Green Belt.	The Scoping Report does not state that agricultural land 'should' be built upon. It identifies the potential for such loss as a key issue that needs to be addressed.
SCOP026	Local Resident	<p>Air Quality:</p> <ul style="list-style-type: none"> <li>Locate new housing and upgrade existing housing close to employment zones, concentrating new and refurbished housing in the NE of Wirral (Birkenhead, Wallasey, Rock Ferry, New Ferry). This will reduce the need for commuting and hence pollution attributable to transport requirements.</li> <li>The call for smaller, better quality homes with gardens can be met in such areas without recourse to release green belt land.</li> <li>Increase support for Peel Holdings' Wirral Waters Development.</li> <li>Reduce the number of Wirral's working Residents who commute off Peninsula by ensuring neighbouring Authorities provide more homes closer to their own employment areas - which also reduces the number of new houses required on Wirral.</li> <li>Ensure 'Brownfield' and 'Previously Developed' sites are 'greened up' during redevelopment with landscaping and electric bus and cycle routes, and new walking and jogging pathways.</li> <li>Do not locate housing alongside M53 or busy main roads/junctions. Many of the Green Belt Sites short-listed for 'Further Investigation' into potential for release are located in the 'green lung' buffer zones alongside the M53 and other busy locations. A technical report has been issued to the Council by a 'Wirral Green Space Alliance' member, which demonstrates that such developments are highly detrimental to the health of both new residents and those currently living beside the targeted green buffer zones which currently afford protection that will otherwise be lost.</li> <li>Replacement of diesel car numbers alone will not solve Wirral's air pollution problems. Reducing commute to work distances will.</li> </ul>	Comments noted, not they are not directly related to the scoping process.
SCOP026	Local Resident	<p>Biodiversity:</p> <ul style="list-style-type: none"> <li>The Council's (WBC's) short-list of Green Belt sites for potential release include many with significant, fragile, and irreplaceable biodiversity, endangered and protected species in ancient woodland, watercourses and foraging fields.</li> <li>The Government's increased emphasis on real and proven "biodiversity net gain" associated with any development has too often in the past been paid just 'lip service'; and there remains the high risk of this continuing to be the case in the pursuit of higher council tax payments and other receipts. Green Belt was designated to be 'permanent' and not manipulated for financial gain.</li> <li>Many Sites short listed by WBC have highly rated and "core biodiversity" status, but it appears the Council are ignoring the appraisals and recommendations of their own publicly funded specialist consultants. For example, in Irby alone: SP019B (East of Glenwood Drive), SP059E (Rear of Irby Hall) and SP060 (South of Thingwall Road).</li> </ul>	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	<p>Climate Change Adaptation:</p> <ul style="list-style-type: none"> <li>The Council's selection of Green Belt sites for potential release include those at risk of flooding and where there is little scope within the systems for drainage from development over and above the increased volume from wetter winters.</li> <li>This is particularly notable along the course of the Arrowe Brook.</li> </ul>	Comments noted, but they are not directly related to the scoping process.

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SCOP026	Local Resident	Climate Change Mitigation: As with 'Air quality', locating housing close to employment zones and bringing back into use the thousands of empty houses (at an increased rate of a new Programme) would reduce commuting and other travel distances, and make low-energy Bus Services more viable, frequent and attractive.	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	Economy and Employment: <ul style="list-style-type: none"> <li>The Sustainability Report correctly identifies the benefits of enhancing "the vitality of the Borough's town and local centres" by identifying "regeneration opportunities, particularly in the most deprived areas". Such areas provide the opportunity and affordability to include a range of smaller and medium size properties of different types suited to a wide range of people including those wishing to downsize, first-time buyers, those aspiring to better standards of housing, and those with physical, mental health and other conditions, where a mixed, balanced, vibrant, viable and caring community could flourish, close to improved public services and employment.</li> <li>Most of the green belt sites identified for major housing development are in rural areas with little or no opportunity for employment or economic development so it would be sheer folly to built houses on them.</li> </ul>	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	Health: There is a mis-match between the location of Wirral's main hospitals west of the M53 and the much higher incidence of ill-health and lower life-expectancy to the east of the M53, a situation which mitigates against access and involves much travel and inconvenience. This calls for some revision of Wirral's Health Service provision with regeneration of the north and east necessarily including improved local services with appropriate 'key worker' dwellings within easy reach. There are opportunities to situate a variety of 'key worker' homes close by and/or within Health Care estates.	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	Heritage: The Council admit to having done little to investigate and appraise heritage assets within Sites short-listed for release from Green Belt. Worse, work done by their Consultants is being ignored (in the rush to stave off possible 'Intervention'). In Irby alone, this means that a Scheduled Monument, Listed Buildings, a Roman Well, a rare example of medieval farming practice in its land formation, and remains of its original settlement as well as Ancient Woodland, vulnerable watercourses and 'best quality' open ponds are all at risk of damage and loss, unnecessarily, possibly unlawfully.	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	Housing: <ul style="list-style-type: none"> <li>Successive Secretaries of State and others have repeatedly told WBC that the 'base figure' for 'Housing Need' derived from the 'standard method' does not constitute a target", and that the Council should determine its own Assessment of 'Need' using actual local and national data, and to compare that number with the base figure and strongly argue the case and 'exceptional circumstances' (e.g. marked loss of Green Belt; neighbouring Councils to provide a proportion; etc) where a lower figure is sought. Whilst the Council refuses to take this line, two specialists within the WGS Alliance have prepared technical papers showing that actual housing need is very much lower than the WBC's out-of-date figures. Even the governments own latest prediction figures demonstrate that the figures currently being used by the Council are well in excess of what will be realistically needed.</li> <li>Once Green Belt has been released as a result of drastically overly inflated housing need figures, no developer is going to be interested in developing brownfield sites once a far more lucrative Green Belt alternative is available.</li> <li>The Council's own Consultants had concluded that the local housing need (for Irby, Pensby, etc.) is predominantly for the Elderly (mainly to downsize) and those groups needing supported living and not, as are proposed by the Council and the ruling Cabinet, larger houses located in Green Belt areas that would deliver higher council tax returns.</li> <li>Potential of 'Brownfield' and 'Previously Developed Land' must now be exhaustively explored and used to its maximum before other areas, particularly Green Belt. There is no apparent determination by WBC to maximise the considerable opportunities that exist, nor to encourage the full potential of 'Wirral Waters' and surrounding areas, nor to achieve better results in returning empty properties back into use, nor to increase housing capacity by applying the required higher standard densities; but instead there is an assumption and acceptance from the outset that Green Belt should be released for larger houses when there is no proven/justified need or significant demand for such.</li> <li>Opportunities for rationalisation of the Council's own properties locally (proposed by ITPAS and others) have been spurned and, contrary to the Appeal Court Ruling (Lindblom 2017) regarding not prejudging the housing market and thereby limiting 'Availability' in the Housing Supply, there appear to have been actions which did just that with the effect of minimising non-Green Belt site 'Availability' and 'Capacity', artificially bolstering a case for release of Green Belt.</li> <li>"Wirral Waters" must remain the cornerstone of the Council's strategy for the long-overdue regeneration of the most deprived areas of Wirral. Thus, it is unacceptable that WBC has been silent regarding this 'Lindblom Ruling', making it clear to councils, developers and others that proposals only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven 'deliverability' to be included in 5-year housing supplies. This supports Peel Holding's figure of 6,450 for its housing delivery during the Local Plan Period rather than the 1, 100 included by the Council.</li> </ul>	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	Land and Soils: WBC's selection of Green Belt sites for potential release include many designated as "High Quality Agricultural Land" ('Best and Most Versatile'), where development should be avoided and land maintained for future security of food production. The Council are planning to review the quality of soils, possibly leading to downgrading but the counter argument is that all productive farmland should be protected. Recent private testing up-held the quality of the soil.	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	Landscape: <ul style="list-style-type: none"> <li>Sites short-listed by the Council include those, like SP059E (Rear of Irby Hall), previously characterised as "the essence of Wirral", to be retained for the benefit of Residents and Visitors alike, contributing to the Local Tourism Economy.</li> <li>Several short-listed Sites conflict with the second "Purpose of Green Belt" which precludes 'infilling' developments that merge distinct towns (settlements or communities) and as well as the fifth, where 'permanence' is specifically designed "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". Worse, the Council has expanded sites to increase the extent of their 'enclosure' (by perimeter housing), classifying what is effectively inappropriate, massive urban sprawl and expansion into countryside as simply 'infilling within Settlements'. e.g. Site SP060 (South of Thingwall Road), which would see Irby, Thingwall and Pensby all merged. Worse still, it appears that, to achieve the status of 'highly enclosed', the Council has artificially expanded Sites to include protected woodland and even a covered reservoir that cannot be developed but which happen to be bounded by existing housing.</li> <li>Recently, planning for 35 house has been rejected by the Council's own planners on a small patch of land where Townshend Avenue meets Irby Road in Irby. Planning was rejected outright primarily on the grounds of urban sprawl, inappropriate development and harm to the Green Belt/openness of the area that could not be justified. This decision was upheld on appeal by the Planning Inspectorate. This decision should hold equally directly across the road where the Council is proposing the building of up to 846 houses on Site SP060 which would result in massive urban sprawl and merge the villages of Irby, Thingwall, and Pensby such that their unique and individual characters would be completely lost. The same planning rejection arguments also apply to Site SP059E(Rear of Irby Hall).</li> </ul>	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	Population and Communities: North and East Wirral are areas of greatest deprivation, highest crime rate and worst housing conditions. Not to concentrate on redeveloping these areas in the (admitted) pursuit of higher Council Tax Receipts from West Wirral, is to condemn the former areas and their communities to yet further decline. Whereas, to follow the albeit more difficult opportunities there are to improve life-chances and living conditions in the more deprived areas through sustainable, attractive and 'green' developments (spearheaded by 'Wirral Waters') would surely deliver lower crime, higher employment, better health, improved quality of life, and rejuvenated communities. Why isn't this emphasised?	Comments noted, but they are not directly related to the scoping process.

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SCOP026	Local Resident	<p>Transport:</p> <ul style="list-style-type: none"> <li>This objective has been covered in other sections above but improving public transport and increasing cycling and walking go hand in hand with an integrated development of well designed and appropriately located housing.</li> <li>Most of the proposed housing development on Green Belt land is in rural areas and will attract larger more expensive properties; not affordable housing. As a result, occupants of these houses will each require their own car for transportation, often at a rate of two or three cars per household. This will introduce a massive strain on the already very busy existing road infrastructure and result in grid lock at busy times, and undoubtedly more accidents caused by frustrated drivers.</li> </ul>	Comments noted, but they are not directly related to the scoping process.
SCOP026	Local Resident	<p>Water: Wirral's real 'housing need' is: a range of small and medium-sized, well-designed dwellings in the right places, with appropriately higher but standard densities to fulfil the Guidance requirement for 'the efficient use of land'. The efficient use of water would follow adopting such an approach.</p>	Comments noted, but they are not directly related to the scoping process.
SCOP027	Local Resident	<p>Wirral Local Plan: Sustainability Assessment (SA)</p> <p>In the sustainability documents, Wirral Council/Planning Dept states that public consultation is a key element of the SA process and seeks the public's views on scoping how the Local Plan is to be appraised in terms of the SA (para 16, Next Steps). That is good to know.</p> <p>The Council consulted on the Development Options Review (DOR). The options appear to utilise only part of the potential from Brownfield and from Peel Holding's work, aided by a parallel review of Greenbelt (GBT) and, therefore an inherently planned GBT release. The public disagreed.</p> <p>The Council made no analysis of the public comments but simply published them verbatim in three long appendices, each with 1000 or more replies. A manual search through appendix one with 1000 responses (individuals or organisations) revealed overwhelming disagreement with the Council's options and approach to release GBT. Comments from the public on the SA are likely to reflect wider comments to the DOR. There were just 22 responses which either favoured GBT release or were neutral in some way. Some nineteen of these are: clearly landowners or developers who wish land to be released, those organisations which argue more robustly to build or develop land, and responses about land for employment but these might be more industrial parcels of land anyway. There were three counted as inquiries rather than comments, giving 997 responses as genuine comments.</p> <p>This leaves 975 individuals who wrote to oppose the release of GBT. Thus 97.8% of genuine comments were opposed to GBT release. On a scan of the second appendix it is estimated that less than 1 in 20 responses supported GBT release. Those who support appear to be organisations.</p> <p>A more detailed examination of the first 200 responses showed the main issues for residents. Just three are in support – landowners or agents. One was neutral. That leaves 196 who oppose GBT release or some current developments.</p> <p>Responses cited more than one issue so the numbers below under-state the times the responses mentioned them. In other words, these are the collective issues for people from developing greenbelt. They are important enough to shape the DOR and the scope of the SA.</p> <ul style="list-style-type: none"> <li>The "village" would be harmed, urban sprawl, infill, issues of traffic and pressure on facilities (eg GP surgeries and schools) [37 responses].</li> <li>Develop brownfield sites first, pursue regeneration, and bring vacant properties into use [31 responses].</li> <li>Inflated housing target, Wirral not a housing pressure area, or no exceptional circumstances for GBT release [18 responses].</li> <li>General objection, bad for the environment and future generations, bad for the "green feel" of the area [19 responses].</li> <li>Specific site/village issues (flooding, sewers, habitat, farmland), and impact on wildlife [16 responses].</li> <li>A specific local point about current development (i) at Bromborough Civic Hall and loss of car park; (ii) housing near Fishers lane and loss of playing fields [67 responses].</li> </ul> <p>There were eight responses with other mixed issues but opposed to GBT release.</p> <p>In the Sustainability documents, there is an appendix A which lists a set of topics or issues by which to judge the SA of the Local Plan. Below, I have made comments to some topics and these are given in terms of policies which aim to support the SA Objectives.</p>	General comments.
SCOP027	Local Resident	<p>Air Quality</p> <p>SA objective – to ...minimise air pollution – as a general objective.</p> <p>Policy – to reduce the need to commute by car, and generation of vehicle pollution. Development and refurbishment of housing is best focussed in and near to the employment zones. These are mainly in east Wirral. Areas that need regeneration include: Birkenhead, Wallasey, Rock Ferry, New Ferry.</p> <p>Policy – to reduce the 30 - 40% figure of Wirral's working Residents who commute off the Peninsula. Work with neighbouring Authorities that they provide more homes closer to their own employment areas.</p> <p>Policy – to reduce the use of the car and increase the use of encourage electric bus and cycle. Develop 'Brownfield' and 'Previously Developed' sites are cleaned up and are made green through landscaping and electric bus and cycle routes. This is achievable in the Wirral Waters scheme and elsewhere as Peel Holding's development projects unfold.</p> <p>These policies do not mean loss of Green Belt.</p> <p>Policy – to limit the use of sites near busy "main" roads and junctions. Many of the Green Belt Sites short-listed for 'Further Investigation' into potential for release are located in the 'green lung' buffer zones alongside the M53 and other busy locations. In a technical report, a local Professor, demonstrates that such developments would have adverse health consequences for both new residents and those currently living beside the targeted green buffer zones which afford protection now.</p> <p>Also, residents are concerned about congestion and the impact on local community facilities from more development (see responses to the DOR consultation above).</p> <p>The Sustainability Report implies, wrongly, that reducing diesel car numbers alone will solve air pollution problems. It simply cannot, especially as the pace of change is slow and countered by increases in vehicle numbers and journey mileage, but more significantly by the fact that the most harmful, tiny particle emissions from vehicles actually arise from the road surface and tyres rather than exhausts.</p>	Comments welcomed. Suggestions will be taken into account in support of the SA Framework.
SCOP027	Local Resident	<p>Climate change adaption</p> <p>Policy – to minimise flood risks, and direct development away from areas of high flood risk. Ensure that the Council's selection of Green Belt sites for potential release does not include those at risk of flooding and where there is little scope within the systems for drainage from development over and above the increased volume from wetter winters. That this comment considers flood risks does not imply agreement to GBT release.</p> <p>Climate change mitigation</p> <p>SA objective, "... continue to reduce CO2 emissions,...by providing attractive opportunities to travel by sustainable means...". This accords with and supports the air quality objective.</p> <p>Policy - Develop local housing close to employment zones and bring back into use the 4000-odd empty properties in a re-energized programme.</p> <p>Policy – Develop plans for low-energy bus services more viable, frequent and attractive. Supports principles of more cycle and walk routes. Other cities benefit from a tram service. The Council has not made efforts to develop a co-ordinated transport policy for non-car use in the urban east where such a policy can work with the current good public transport. The non-car use can include: walk ways, cycle ways, trams, electric vehicles.</p>	Comments welcomed. Suggestions will be taken into account in support of the SA Framework.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP027	Local Resident	<p>Economy and employment</p> <p>The Sustainability Report correctly identifies the benefits of enhancing "the vitality of the Borough's town and local centres" by identifying "regeneration opportunities, particularly in the most deprived areas". Such areas provide the opportunity and affordability to include a range of smaller and medium size properties of different types suited to a wide range of people including those wishing to downsize, first-time buyers, those aspiring to more reasonable standards of housing, and those with physical, mental health and other conditions, where a mixed, balanced, vibrant, viable and caring community could flourish. These areas are close to good public services and employment.</p> <p>Policy - A test of SA objective is to maximise the benefits of work with the developer, Peel Holdings. Peel's Development Director, in a letter to Cllrs and the Planning Dept in January 2019, outlined many projects for housing and community action but criticised the Council for not working with them, or making more of the opportunities. In effect, the Council has failed to benefit from the input of a major developer in a region that requires regeneration.</p> <p>The Council has failed on this SA objective.</p>	Comments welcomed. Suggestions will be taken into account in support of the SA Framework.
SCOP027	Local Resident	<p>Health</p> <p>There is a higher incidence of ill-health and lower life-expectancy to the east of the M53.</p> <p>Policy – to reduce health inequalities. Council should work with the NHS organisations to improve access to Wirral's Health Services in the east with regeneration of the north and east necessarily including improved local services with appropriate 'key worker' dwellings within easy reach. There are opportunities to locate a variety of 'key worker' homes close by and/or within Health Care facilities.</p>	Comments welcomed. Suggestions will be taken into account in support of the SA Framework.
SCOP027	Local Resident	<p>Housing</p> <p>The SA objective places a focus on maximising the potential of brownfield opportunities.</p> <p>The NPPF is consistent and says "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." The NPPF goes on: "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; "</p> <p>Policy to meet the SA and NPPF objectives, - the Council should demonstrate; a fuller list of brownfield sites with the fullest potential for housing; and work in a collaborative manner with Peel Holdings to maximise the potential from Peel's various projects. Failure on either or both leads to a failure on this SA objective.</p> <p>In a letter to the Council and Planning Dept of January 2019, Peel Holdings lists a range of developments in Wirral Waters and the east. Summing up the dwellings planned comes to 5,585 units. In presentations to the public (Autumn 2018), the head of planning stated there were 2,634 units had planning permission, and there were 2,400 potential on brownfield sites. From MHCLG figures, some 4,955 dwellings were vacant in 2018. If just 10% of those were brought back into use, then the total of these sources comes to around 11,000 dwellings. This is an under-estimate because local groups consider that the 2,400 figure from brownfield sites is an under-estimate, and also that Peel's longer term plans include up to 13,000 dwellings..</p> <p>The letter of January 2019 also implies that the Council has more opportunity to work fully and collaboratively with Peel Holdings to regenerate docklands and Wirral Waters.</p> <p>And the Council has not provided proof that it has searched and maximised the full potential of brownfield opportunities. The potential of 'Brownfield' and PDL (Previously Developed Land) now more than previously has to be exhaustively explored and developed to its maximum before other areas, particularly Green Belt, can be considered. To date it would appear that the Council has not given the fullest determination to maximise the opportunities of available 'Brownfield' and PDL sites, nor to support and encourage the full potential of 'Wirral Waters' and the surrounding areas, nor to achieve better results in returning empty properties back into use, nor to increase the capacity of available housing deliverable through applying the required higher standard densities.</p>	Comments welcomed. Suggestions will be taken into account in support of the SA Framework. There is also a need to ensure that the reasonable alternatives robustly consider the issue of delivery at Wirral Waters (i.e. to what extent is this an alternative to green belt release).
SCOP027	Local Resident	<p>Use of brownfield first, regeneration and bringing empty properties into use – is a key point made by the public to the DOR consultation (see above).</p> <p>The Council appears to have contravened this SA objective by an assumption and acceptance from the outset that Green Belt should be released, and , in addition, for larger houses when there is absolutely no clear need or significant demand for such.</p> <p>Opportunities for rationalisation of the Council's own properties locally (proposed by local groups) have been spurned. Also, contrary to the Appeal Court Ruling (Lindblom 2017) regarding not prejudging the housing market and thereby limiting 'Availability' in the Housing Supply, there appear to have been actions which did just that with the effect of minimising non-Green Belt site 'Availability' and 'Capacity'. In effect, the Council has increased the case for release of Green Belt.</p> <p>'Wirral Waters' was and must remain the key element of the Council's strategy for the essential and long-overdue regeneration of the most deprived areas of Wirral. It is both surprising and concerning, therefore, that the Council has been silent regarding this 'Lindblom Ruling', which made it clear to councils, developers and others that developments only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven deliverability to be included with confidence in 5-year housing supplies. This alone could justify inclusion of Peel Holding's 6,450 figure for its housing delivery during the Local Plan Period rather than the 1,100 included by the Council.</p> <p>Currently, the Council has failed on this SA objective – in fact, it's development options do not even try to meet it.</p> <p>The SA objective refers to mix of housing types, tenures, older people, to meet needs...</p> <p>The Council has set a target of 12,045 over 15 years (803 pa). The MHCLG Secretary of State and others have informed the Council that the figure for 'Housing Need' derived from use of the MHCLG 'standard method' does not constitute a 'Target', and that it is for the Council to determine its own Assessment of Wirral's Housing Need using actual local and national data, and to compare that figure with the standard method base figure and strongly argue the local case especially where a lower figure is sought. Yet, the Council refuses to take this line.</p>	The SA does not set policy. There will be an assessment of different approaches to the Plan, some of which may involve lesser amounts of green belt release (or none at all if this is deemed reasonable).
SCOP027	Local Resident	<p>A fuller look at the standard method is important to get a more robust view on the "need". And the Council's figures are out-of-date.</p> <p>The MHCLG Standard Method specifies a ten year projection in household numbers as a starting point for the need. It expects Councils to use the latest statistics. From ONS statistics, the projection, 2018 – 28, for Wirral is 7,090 (709 pa) from the 2014 based projections, and is 4,360 (436 pa) from the latest 2016 based projections. A technical paper on the ONS projections (titled Sub-National Household Projections, SNHP, is available.</p> <p>The MHCLG interprets the lower 2016 based household projections as an inability of people to form households because of issues of affordability and availability. The household formation rates are lower in the 2016 based projections than the 2014 projections. Also, the population is projected to be lower from the latest 2016 population projections than those based on 2014. MHCLG proposes that the standard method uses "2014 data" without more clarification. However, the 2016 based population projections do not share this problem – just the formation rates of 2016 household projections.</p> <p>If use the 2014 household formation with the latest 2016 population projections, then we are meeting the MHCLG concern and using the latest population figures – in good science. .</p> <p>This gives a hybrid solution which applies the 2014 household formation rates to the 2016 based population projections. The result is an estimated 6,400 extra households in ten years or 640 pa. A second hybrid option is to apply the average household sizes from 2014 based projections to 2016 based population projections. The result is an estimated 6,090 extra households in ten years or 609 pa. A technical paper on this is available. All of these projections are less than the Council's 803 pa figure.</p> <p>A number of responses to the DOR consultation mentioned inflated housing targets.</p>	Comments noted, but they are not directly related to the scoping process.

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SCOP027	Local Resident	<p>Two further points.</p> <p>First, both the 2014 based and 2016 based household projections imply Wirral's population and households are ageing. During 2018-28, they project a rise of between 8,080 and 9,150 households of retirement age 65+, and at least 2,060 fewer of working age (no uplift applied). And the retirement population is projected to rise by 12,000 whereas those less than 65 are projected to drop by over 7,000. This agrees with the Council's Consultants who had concluded that the local housing need is predominantly for the Elderly (mainly to downsize) and those groups needing supported living and NOT, as seems to be proposed by the Council and the ruling Cabinet, larger houses in Green Belt which would deliver higher Council Tax Receipts.</p> <p>Second, Wirral's ranking, as part of the north west authorities and some others nearby, is low to middle in terms of rents, prices, trends and affordability ratios. Wirral is not a pressure area. Prices are more affordable in the east.</p> <p>The household projections and their shape by age supports the need for smaller and older households. And most of the land available for such dwellings is in the east (SHMA, para 4.50)</p> <p>In conclusion, there is a future supply of dwellings that, if maximised, would lead to meeting the SA objectives on housing, affordability and also on regeneration in east Wirral.</p>	Comments noted, but they are not directly related to the scoping process.
SCOP027	Local Resident	<p>Land and Soils</p> <p>SA objective is about "...supporting development which avoids the best and most versatile agricultural land, and which makes effective use of previously developed land..."</p> <p>The Council's selection of Green Belt sites for potential release include many within areas designated as 'High Quality Agricultural Land', alternatively termed 'Best and Most Versatile', where development should be avoided and the land maintained or enhanced for future security of food production. There is a suggestion that a planned review of the quality of soils may lead to downgrading but also the counter argument, that all productive farmland should be maintained, which should prevail. One recent private soil testing result apparently refuted such a suggested downgrading.</p> <p>Above comments to Housing SA are relevant to the failure to maximise the use of brownfield and PDL.</p>	Comments noted. An Agricultural Economy and Land Study has been commissioned and findings will be incorporated to future iterations of the SA Report.
SCOP027	Local Resident	<p>Landscape</p> <p>Policy – to protect and enhance the quality and character of Wirral's landscapes and townscapes...including the preservation of important open gaps between settlements".</p> <p>Sites short-listed by the Council include those, like SP059E (Rear of Irby Hall), which had been characterised as "the essence of Wirral", to be retained for the benefit of Residents and Visitors alike, being part of the attraction for both and contributing to the Local Tourism Economy.</p> <p>Council should work hard to protect separation between settlements in the more rural parts of Wirral - west and mid – Wirral. These areas are just as important settlements as those in the eastern part of Wirral. All have their own specific characters which variously include: conveniences of travel and work, visitor attractions, leisure areas, green space for residents to enjoy in the future and more.</p> <p>Several short-listed Sites conflict with the second 'Purpose of Green Belt' which precludes 'infilling' developments that merge distinct towns (settlements or communities) and as well as the fifth, where 'permanence' is specifically designed "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land".</p> <p>Larger parcels, SP017 and SP018, act as good green lungs and space between the very urbanised Morton and Meols/Hoylake settlements. Parcels, SP003 and SP004, provide the same within Saughall Massie.</p> <p>The Council has expanded sites to increase the extent of their 'enclosure' (by perimeter housing), classifying what is effectively inappropriate, massive urban sprawl and expansion into countryside as simply 'infilling within Settlements'. Also, it appears that, to achieve the status of 'highly enclosed', sites have been expanded to include protected woodland and even a covered reservoir that cannot be developed but which happen to be bounded by existing housing.</p>	Comments welcomed. Suggestions will be taken into account in support of the SA Framework.
SCOP027	Local Resident	<p>Population and Communities</p> <p>SA objective is about "improved access to community infrastructure ... and to improve perceptions about safety and the fear of crime..."</p> <p>Policy – to regenerate the areas with highest crime rates and worse perceptions around crime. This, like other objectives, leads to most effort being needed in the north and east of Wirral which are areas of greatest deprivation, highest crime rate and worst housing conditions. Not to concentrate on redeveloping these areas is to condemn the former areas and their communities to yet further decline. Whereas, to follow the albeit more difficult opportunities there are to improve life-chances and living conditions in the more deprived areas through sustainable, attractive and 'green' developments (spearheaded by 'Wirral Waters') has the potential to deliver lower crime, higher employment, better health, improved quality of life and rejuvenated communities. The Local Plan would fail on this and other objectives if a co-ordinated policy for these areas is not pursued.</p> <p>Transport</p> <p>SA objective is about...meeting local population and demographic change,...while reducing congestion, and providing infrastructure to connect new housing to the public realm...</p> <p>This topic overlays a number of other policies needed to support other SA objectives.</p> <p>Policy – to improve public transport for the increasingly elderly population, in the close urban areas, and utilise public transport to develop non-car use. While this can apply anywhere, it has particular relevance to the areas that need regeneration. As the regeneration projects get underway, the design of transport infrastructure can be optimised to reduce congestion, increased public health through use of means of non-car transport.</p> <p>The impact of development in smaller communities, harm to the "village", urban sprawl, infill, issues of traffic and pressure on facilities (eg GP surgeries and schools) were a key issue for the public in their responses to the DOR consultation (see above).</p> <p>Water</p> <p>The real 'housing need' on Wirral is for a range of small and medium sized, well designed dwellings in the right places, with appropriately higher but standard densities to fulfil the Guidance requirement for 'the efficient use of land'. The efficient use of water would follow adopting such an approach.</p>	Comments welcomed. Suggestions will be taken into account in support of the SA Framework.
SCOP028	Highways England	<p>Our response to the Consultation on the Scope of the Wirral Local Plan Sustainability Appraisal and Equalities Impact Assessment is written in the context of statutory responsibilities as set out in Highways England's Licence, and in the light of Government policy and regulation, including the:</p> <ul style="list-style-type: none"> <li>• National Planning Policy Framework (NPPF);</li> <li>• Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and</li> <li>• DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development ('the Circular').</li> </ul> <p>As a statutory consultee in the planning system, we have a regulatory duty to co-operate. Consequently, we are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses. However, we desire to be a proactive planning partner goes beyond this statutory role, but follows the spirit of the Licence which stipulates that Highways England should "Support local and national economic growth and regeneration". We encourage all parties promoting and preparing Plans that may have an impact on the Strategy Road Network (SRN) to engage with us as early as possible, to enable collaborative working and to deliver positive outcomes. Highways England is committed to working with local authorities and plan-making bodies prior to and between formal consultation periods to contribute to the thinking, and support the analysis of options and development of strong plans and proposals that take full account of highways issues.</p>	General comments.



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SCOP028 SA+EQIA	Highways England	<p>Equalities Impact Assessment</p> <p>In terms of the Equalities Impact Assessment, there are no matters upon which Highways England would look to comment.</p> <p>Scoping Report for the Wirral Local Plan Sustainability Appraisal</p> <p>Regarding the Scoping Report for the Wirral Local Plan Sustainability Appraisal, we would draw your attention to the borough's proposed plan for green belt release, discussed as part of Wirral's Development Options Review. This indicated a large area of current green belt land adjacent to the M53 motorway which may potentially be released for development. The Scoping Report makes only passing reference to this review, before continuing to state on that there are:</p> <p>"...no significant or long standing congestion issues emerging in relation to the M53..."</p> <p>Given the extent of the proposed green belt release which may be included in the future Local Plan, and following previous discussions between Highways England and Wirral Council, it is highly likely that there would be an impact to the SRN. We would therefore expect to have seen the proposed green belt release land referenced specifically in relation to the impact it is likely to have on the SRN, and state that there would likely be a need for improvements under Key Issues and Objections, paragraph 13.15.</p> <p>Prior to the full completion of Wirral Council's Local Plan, we would expect to see a full evidence base produced to determine the likely impact that it is likely to have on the SRN in the form of Transport Assessments. These assessments should also include any proposed mitigation that might be necessary to lessen the impacts generated by the implementation of the Local Plan.</p>	<p>There is a need for the SA to consider alternative approaches, and the previous proposals relating to the Plan will need to be revisited. The SA needs to assess the implications of such factors.</p>
SCOP029	Landowner/Developer	<p>Sustainability Appraisal Legislation</p> <p>The legislation which underpins the legal requirements of Strategic Environmental Assessments is the Strategic Environment Assessment of Plans and Programmes ("SEA") Regulations 2004, which requires the formal environment assessment of plans and programmes which are likely to have significant effects on the environment. This is reiterated within the Planning and Compulsory Purchase Act (2004) which requires Local Planning Authorities (during the preparation of a Local Plan) to carry out a sustainability appraisal of each of the proposals and to ensure that its objectives contribute towards sustainable development. Paragraph 1.6 of the Scoping Report acknowledges the requirement for the SA to be undertaken in accordance with the specific procedural requirements identified within SEA Regulations. These include the provision of the scope and level of detail of the information to be included, and a report to be published for consultation alongside the draft plan which identifies, describes and evaluates the likely significant effects of implementing the plan and reasonable alternatives. This is scheduled to take place in the first quarter of 2020 as part of the Regulation 18 Local Plan consultation. The Scoping Report has been prepared primarily to ensure that there is engagement with key nationally designated authorities. This approach is welcomed by our Client.</p> <p>Contents of Scoping Report</p> <p>Paragraphs 1.11 – 1.16 of the Scoping Report set out the topics/themes which will be assessed as part of the full SA. Whilst these are broadly acceptable, it is considered that some further expansion of a number of themes should take place to ensure that cultural heritage, community and wellbeing and accessibility are fully addressed. It is also our position that waste, whilst excluded from the Scoping Report because this work has been undertaken at a sub-regional level in 2013, should for completeness be considered as a topic within the SA.</p>	<p>It is considered that cultural heritage, community wellbeing and accessibility are already addressed by the proposed framework. Though waste management is clearly an important issue, we believe that the Plan has limited potential to generate significant effects.</p>
SCOP029	Landowner/Developer	<p>General Comments</p> <p>The Scoping Report is dated March 2019; however, the document refers to the 2018 version of the National Planning Policy Framework ("NPPF"). This should be updated to reflect the latest iteration of the NPPF published in February 2019 and Planning Practice Guidance.</p> <p>SA Themes</p> <p>Section 2 - Air Quality</p> <p>The Air Quality section is based on the Council's Air Quality Annual Status Report (2018) and details the extent of monitoring undertaken. It confirms a gradual reduction in nitrogen dioxide between 2013 and 2017. It also confirms that a number of monitoring sites were reviewed and relocated in January 2018, and the monitoring of nitrogen dioxide in these new locations should be monitored as the emerging Local Plan progresses. This is supported by our Client.</p> <p>Section 3 - Biodiversity</p> <p>The Scoping Report makes references to national, regional and local policy, however reference to EU legislation relating to habitat management, biodiversity and birds' directives is required. A Habitat Regulation Assessment ("HRA") Screening Opinion should also be prepared and submitted as part of the Local Plan process.</p> <p>Section 4 - Climate Change Adaptation</p> <p>Section 4 focuses predominantly on flood-risk rather than any other aspects of climate change. Whilst it is acknowledged that flood risk is an aspect of climate change, it may be advisable to address and amalgamate Section 4 (climate change adaptation), 13 (water resources) and 14 (water quality) into one section as part of the wider SA.</p> <p>Section 5 – Climate Change Mitigation</p> <p>There are a number of key issues identified within the Scoping Report. The SA should support the need to increase the proportion/supply of energy generated from renewable resources to help achieve a reduction in emissions.</p>	<p>NPPF review updated to 2019</p>
SCOP029	Landowner/Developer	<p>Section 6 – Economy and Employment</p> <p>This section deals with the need to develop new employment opportunities in key growth sections which include marine and maritime industries; the linkages to the Wirral to Liverpool and Chester; and the role of SMEs and start-up businesses. These objectives are fully supported by our Client.</p> <p>Section 7 - Health</p> <p>A separate Health Impact Assessment scoping exercise has not been undertaken, rather it has been assessed as part of the SA Scoping Report given the inter-linked relationship between the documents, this approach is deemed to be acceptable.</p> <p>Section 8 - Heritage</p> <p>This section should include reference to "cultural wellbeing" in order to ensure the SA Scoping Report is comprehensive.</p> <p>Section 9 – Housing</p> <p>The Scoping Report sets out the national, regional and local context in relation to housing. It sets out the range of growth options which are proposed at a regional (Liverpool City Region) and local level. This relates to the delivery of between 664 to 1,235 dwellings per annum (based on various household projections and evidence bases, including Government projections, standard housing methodology and Liverpool City Region SHELMA) and the extent of the housing requirements will be determined as the Local Plan progresses. To facilitate this, it is our Client's position that a range of sites and land types are required in order to deliver the Borough's housing needs. This includes Green Belt land release.</p> <p>Section 10 – Land and Soil</p> <p>The Scoping Report recognises that the extent of brownfield land available in the Borough is a finite resource. Whilst it acknowledges that future development outwith the urban area has the potential to affect Best and Most Versatile Agricultural land, it is our position that to meet future housing needs, greenfield and Green Belt land release is required.</p>	<p>Consideration and reference to cultural heritage now included within the Scoping Report.</p>

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SCOP029	Landowner/Developer	<p>Section 11 – Landscape This section of the Scoping Appraisal includes Green Belt matters. Whilst it is acknowledged within the Scoping Appraisal that Green Belt is a land-use rather than a landscape designation, it should be addressed either within the context of the housing section of the Scoping Report, or in a separate Green Belt section. This is to ensure that any Green Belt release is based on robust and up-to-date planning evidence, with all reasonable alternatives considered fairly to ensure the emerging Local Plan can be found sound.</p> <p>Section 12 - Population and Communities The extent of the scoping with regard to population and communities is largely supported by our Client. However, the SA framework should also include the need to promote high levels of education and employment as identified within the Wirral Plan 2020 Vision as a key objective.</p> <p>Section 12 – Transport This section should refer to Transport and Accessibility as the baseline information relates to walking and cycling and sustainable modes of transport. This is interrelated and should cross refer to the objectives set out within Climate Change mitigation (Section 5). Sections 13 and 14 – Water resources and Water Quality We refer to our earlier comments with regard to the amalgamation of Sections 4, 13 and 14 into one section dealing with flood risk and pressure on water resources to ensure this is addressed cohesively.</p>	<p>Green Belt now moved to Land and Soils.</p> <p>Flood risk is kept separate from water resources/quality as it can be challenging to draw a meaningful conclusion in the appraisal if an option/site/policy performs well in regard to flooding but poorly in regard to water quality.</p>
SCOP029 EQIA	Landowner/Developer	<p>Equality Impact Assessment Scoping Report (“EqIA”) Our comments in respect of the EqIA are limited to the need to make reference to the Equality Act Regulations 2017 and in particular Chapter 15; this requires Local Planning Authorities to pay due regard to a number of equality considerations when preparing and before adopting planning policies and the need to carry out assessments to ascertain the policies potential impact on equality, and to demonstrate compliance with the Public Sector Equality Duty which we note is referenced in paragraph 2.2 of the EqIA Scoping Report.</p>	<p>Suggested amendments to be made to the EqIA</p>
SCOP029	Landowner/Developer	<p>Site Specific Sustainability Appraisal Our Client has promoted their land interest at Birkenhead Road, Meols through the Local Plan process to date. To assist the Council in their assessment of the Site, we have set out below a Sustainability Appraisal of our Client’s land interests based on the categories against which the Site will be assessed and how it aligns with the identified sustainability objectives.</p> <p>The Site The Site is accessed from the A533 Birkenhead Road, which runs adjacent to the eastern boundary. The existing urban edge of Meols is located adjacent to the Site’s northern boundary and the wider settlement is located to the north. The Site is bounded to the north by the Wirral Railway line; to the east by agricultural use and residential development ; with residential properties to the south, and agricultural land to the west. The Site is predominately flat and extends to circa 45 hectares. It comprises a number of fields, of varying sizes, some of which are densely vegetated, and some in use for arable farming. There are also a number of buildings in situ, and ponds located to the north of the Site.</p>	<p>The SA process will be undertaken by AECOM, and therefore assessments made by third parties are not considered to be necessary. Nevertheless, useful information provided with regards to sites will be taken into account on a consistent basis for all sites.</p>
SCOP029	Landowner/Developer	<p>Assessment against Sustainability Criteria We undertake our assessment of the Site against the Key Objectives identified within the SA Scoping Report below: Air Quality: There are no identified Air Quality Management Areas located within the Borough, and as such, the Site is not located within an Air Quality Management Area. The Site is located in a sustainable location and benefits from its proximity to a range of services and amenities accessible via foot, cycle and vehicle (as discussed below in ‘transport’) within Meols, which in turn would minimise the risk of air pollution arising from its development. Biodiversity: The Site is not located within any designated ecological important sites, however, there are two European designated sites within 10 km of the site (Mersey Narrow &amp; North Wirral Foreshore and Dee Estuary), and three nationally designated sites within 2 km of the site. It is not designated as a local wildlife site, however, there are three sites within 1 km. Development can be accommodated on-site. Whilst the Site is partly identified as a Core Biodiversity Area for woodland habitat. Our Client has committed to delivering suitable ecological enhancement. This will be provided through enhancements to areas of retained trees and compensatory habitat planting. If any protected species or habitats are found on-site, any impact can and will be mitigated through design. This includes the area of land to the north east of the Site, which includes dense vegetation and will be retained and enhanced as part of any future landscape and ecology strategy for the Site. Net gains will be achieved through the long-term enhancement of the Site and the creation of a well connected habitat and on-site enhancement. Climate Change: The Site benefits from its proximity to public transport facilities . The nearest bus stop is located on Birkenhead Road, which provide regular services to Moreton, West Kirby, Chester, Birkenhead and Eastham and the nearest railway station (Meols) is located approximately 150m from the Site and provides a regular service to West Kirby, Birkenhead and Liverpool. Our Client is also committed to the delivery of a park and ride scheme on-site as part of the masterplan. The Site is therefore considered to be sustainably located given its proximity to public transport facilities, and Meols. Any future housing development of the Site will incorporate a range of features to aid sustainability, including building design, natural surveillance through the orientation of the buildings and plots and overlooking to provide inclusive design.</p>	
SCOP029	Landowner/Developer	<p>Economy and Employment: The delivery of new homes on the Site would contribute to the economy of the local area both directly and indirectly through the following economic benefits:</p> <ul style="list-style-type: none"> <li>➤ Gross Value Added generated by residents of the proposed development;</li> <li>➤ Increased commercial expenditure (convenience, comparison, leisure goods and services) to help support and sustain the local community;</li> <li>➤ Direct Construction Jobs (on and off-site) over the lifetime of the build programme;</li> <li>➤ Indirect Jobs through the local supply chain via the purchase of goods and services; and</li> <li>➤ Annual Council Tax contributions.</li> </ul> <p>The Site is located in close proximity to a range of existing facilities and services within Meols. The delivery of new homes would help contribute towards the continued viability and vitality of these services and facilities.</p> <p>Health: The development of the Site would comprise dedicated on-site open space provision. The Site is located in an accessible location, and in close proximity to a range of services and facilities, including education, health (300m from Hoylake and Meols Medical Centre), shops and commercial uses and recreational areas. Any future allocation or planning application on the Site will deliver financial contributions towards the improvement of healthcare facilities, where justified by evidence, and where any contribution would satisfy the tests set out in the CIL regulations (and the NPPF).</p> <p>Heritage: There are no listed buildings, conservation areas or scheduled monuments located within or immediately adjacent to the Site which would affect the heritage asset or its setting.</p> <p>Housing: The delivery of the Site will contribute to the delivery of much needed new housing in the Borough, and within the local area. It will deliver both market and affordable housing in accordance with the findings outlined within the SHMA and a range of policy compliant house types and tenures, including, detached, semi-detached and terraced properties.</p>	

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SCOP029	Landowner/Developer	<p>Land and Soils: The Site is not identified as being of high agricultural land value or classification and is subgrade 3a or 3b soil. Additionally, there are insufficient brownfield / previously developed sites within the County to accommodate and meet the Borough-wide housing needs. It is inevitable that this will require the loss of agricultural land to meet housing need, including land classified as Grade 1, 2, 3 and 3a.</p> <p>Landscape: The Site is located within the Birket Floodplain Farmland LCA which confirms that the LCA is in a poor condition. The redevelopment of the Site provides an opportunity for a landscape-led residential development, which will restore hedgerows by replanting any gaps; restore mixed woodland; and reduce tree loss, woodland belts and enhance the over appearance of the area. The Site is well contained by boundary tree vegetation to the north and north west. The existing built form adjacent to the eastern boundary along Rycroft Road and Birch Road, and existing woodland tree vegetation limits views into the site, with glimpsed views through broken hedgerows and tree vegetation within and outwith the site. The trees along the field boundaries, drainage ditch and Birket watercourse will provide additional physical and visual containment. Whilst the development of the Site will result in the loss of Green Belt and greenfield land, this loss is acceptable in landscape terms. The Site would provide development within clearly defined boundaries, using very prominent and permanent physical features. The proposed development, by virtue of its visual containment will not compromise the integrity of the surrounding landscape. Detailed consideration will be given to the impact of any development on the Site in the context of the surrounding area, and to ensure that any potential impact on the landscape is mitigated through the design/layout process and the provision of appropriate landscaping.</p> <p>Green Belt</p> <p>The allocation and development of the Site would lessen development pressure elsewhere and also on sites that are likely to be in more sensitive locations. Our Client's Site will have a low impact on the five purposes of the Green Belt, on the basis that the Site is wholly contained by strong and defensible boundaries which limits the contribution it makes to the openness of the Green Belt; will not result in coalescence; does not perform an important role in safeguarding the countryside from encroachment; will not affect the setting of the and special character of a historic town (as discussed in "heritage"); and that Green Belt land release is required alongside brownfield land to meet future housing needs.</p>	
SCOP029	Landowner/Developer	<p>Population and Communities: The development of the Site will provide a range of house types and tenures to help sustain the surrounding villages. This will achieve the objectives of housing through the provision of access to existing and planned infrastructure, and which will be designed in a manner which improves the perception of safety and addresses fears of crime.</p> <p>Transport: The Site benefits from its proximity to an existing bus stops located adjacent to the Site entrance on Birkenhead Road, which provides regular services to Moreton, West Kirby, Chester, Birkenhead and Eastham. The nearest railway station (Meols) is located approximately 150m from the Site and provides a regular service to West Kirby, Birkenhead and Liverpool. Our Client is also committed to the delivery of a park and ride scheme on-site as part of the masterplan. The Site also benefits from its cycle and pedestrian linkages and its proximity to a range of facilities, incl. Meols Station Approach Local Shopping Centre (300m), Hoylake and Meols Medical Centre and Pharmacy (300m); Post Office (300m), Great Meols Primary School (900m) and recreational area (500m). Further facilities including Kingsmead Secondary School and Dentist are located within 1.2km of the Site.</p> <p>Water Resources / Quality:</p> <p>The Site is located within a Flood Zone 3 which benefits from flood defences, which protect the area against a river flood with a 1% chance of occurrence each year or flooding from the sea with a 0.5% chance of occurrence. The Birket, a tributary of the River Mersey, runs along the southern boundary, with drainage ditches located throughout and a pond to the north west of the Site. A drainage strategy has been prepared as part of the promotion of the Site (and submitted to the Council) which confirms that surface water can be discharged into the Birket subject to the inclusion of the SUDS network. Additional drainage recommendations include the installation of a non-return valve from the outfalls to prevent water from flowing back into the site in the unlikely event that the Birket surcharges to an excessive level. On the basis of the above, it is concluded the scheme is acceptable in terms of flood risk and drainage.</p> <p>Based on the aforementioned assessment, we have demonstrated that the Site is compliant with the objectives set out in the SA Scoping Report. Accordingly, it is considered that the Site should be released from the Green Belt and identified as a housing allocation in the emerging Wirral Local Plan</p>	
SCOP030	Historic England	<p>Historic England recommends that a scoping report should:</p> <ul style="list-style-type: none"> <li>• Review the objectives of relevant policies, plans and programmes;</li> <li>• Establish the baseline for the historic environment, including any trends and targets and gaps in the existing information;</li> <li>• Identify sustainability issues and opportunities for the historic environment and heritage assets;</li> <li>• Develop sustainability appraisal objectives;</li> <li>• Identify indicators and targets;</li> <li>• Consider how alternatives will be assessed;</li> <li>• Provide sufficient information on the proposed methodology for the appraisal to assess whether effects upon the historic environment will be properly addressed.</li> </ul> <p>Historic England suggests that scoping reports are tailored to the type, purpose and level of plan under consideration. This accords with the NPPF, which requires that local plans are based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p>	General advice.
SCOP030	Historic England	<p>Context and baseline information</p> <p>The report should identify the built environment and its character and distinctiveness and refer to the historic environment. There is the potential for undesignated assets and archaeology, and these should be referred to within the baseline information. Within the section (page 33-35), it does not include any detail to inform the reader of the Borough's general historic environment including character and identity of the Wirral and only provides a list of assets. It is unclear why reference is made to the Wirral Waters scheme as this is not relevant (as it could be suggested that reference should be made to all other proposals as well), which is not the purpose of this section. Other inconsistencies include reference to conservation area management plans but to about appraisals for example. Could policy elements of the Borough's historic environment be best placed outside of this section?</p> <p>Baseline information should describe the current and future state of the historic environment, providing the basis for identifying sustainability issues, predicting and monitoring effects and alternative ways of dealing with them. It can use both quantitative and qualitative information and should be kept up to date. It is important that meaningful conclusions can be drawn from the baseline information; what it means for the Plan and how the historic environment is to be dealt with.</p> <p>The baseline information in the scoping report on the historic environment should include all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged. This not only involves undesignated (or local heritage assets) but the potential for unrecorded archaeology, and historic landscape character areas for example.</p>	General advice.

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SCOP030	Historic England	<p>The NPPF recognises the importance of undesignated heritage assets and therefore this should be included within the baseline data. The source of this information should be included within the scoping report; references made to them and recognise the opportunities for their enhancement and contribution to other aspects of the Plan area.</p> <p>The importance of local character and identity including the landscape and townscape of an area is an important consideration. The scoping report should recognise the importance of this and the source of this information should be included within the scoping report, with reference made to them in key issues and opportunities.</p> <p>Overall the scoping report is lacking in this information and needs to be expanded.</p> <p>Relevant Plans, Programmes and Policies</p> <p>In terms of the plans and policies identified, this needs to cover all those relevant at an international, national and local level that would have a direct bearing for the historic environment.</p> <p>There does not seem to be any information included on this within the document and it needs to be amended.</p> <p>Key issues and objectives</p> <p>Key issues and objectives should stem from the baseline information. It is unclear how the three issues in paragraph 8.17 are considered issues. In addition:</p> <ul style="list-style-type: none"> <li>• Bullet 1 – this lists the number of heritage assets – is this an issue?</li> <li>• Bullet 3 – it is not clear why the Wirral Water’s project is considered an historic environment issue for the Wirral Local Plan. The scoping report sets out the framework for the assessment of land allocations and policies in the local plan. It does not scope in specific planning proposals – it could be argued that if this is the case all planning permissions will need to be included at the scoping stage. It is suggested that this be removed and be included in the full document.</li> </ul>	<p>Undesignated assets now referenced in report and objectives</p> <p>Reference to Wirral Waters used to illustrate potential of strategic scale development to catalyse wider regeneration and repurposing of areas whose historic function has become redundant. Now removed on advice from HE.</p>
SCOP030	Historic England	<p>SEA Themes and Objectives</p> <p>It is important that the role the historic environment plays in sustainable development and the contribution it makes to delivering social, cultural, economic and environmental benefits is recognised. The historic environment underpins sustainable development and therefore, it may warrant including in other objectives including the need for specific reference to landscape character. Given the scoping report will assess policies, aims an objectives and not just sites, the proposed SA objective contained in Para 8.18 needs to be amended to ensure that it is specific to the historic environment and that character, design and layout etc. should be a separate objective or sub objective. It is suggested that it read:</p> <p>Conserve and enhance the historic environment, heritage assets and their setting</p> <p>Then there should be a series of sub objectives which cover other matters such as local character and distinctiveness, townscape, landscape etc.</p> <p>Site Allocations</p> <p>Historic England has produced an advice note – Site Allocations and the Historic Environment in Local Plans (<a href="http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a>) which may be of help in the production of your Local Plan and in assessing the impact of sites on the historic environment. This document is intended to offer advice to all those involved in the process, to help ensure that the historic environment plays a positive role in allocating sites for development. It offers advice on evidence gathering and site allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.</p>	<p>Significance of historic landscape and townscape character now referenced in report and objectives.</p> <p>Happy to include any relevant plans/programmes HE identifies as missing. None have been knowingly excluded. The suggested advice note will be of greatest value during the site assessment stage, not at SA scoping which is high level.</p> <p>The Key Issues summarises headline findings from the chapter.</p>
SCOP030	Historic England	<p>Appendix B does not make it clear how the assessment of sites will be undertaken. In assessing sites it is not just about location in relation to as stated in column B of the table. The setting of heritage assets is not determined by the distance of a site allocation from an asset but what the significance of that asset is, which requires an assessment. Our advice note provides further information on this. It is recommended that the SEA be expanded to include full detail on this. In addition to this, we have the following comments on Appendix B:</p> <ul style="list-style-type: none"> <li>-The relevant criterion under heritage includes reference to common land – this is not a heritage asset.</li> <li>-The suggested SA objective includes reference to design, local character etc. yet this does not appear in the site assessments?</li> <li>- Under assumptions reference is made to the need to consider ‘intersect’. What is this, how is it defined and how would it be used to meet the requirements of the NPPF and the relevant Acts?</li> <li>- What is a ‘constraint feature’ as mentioned in the assumptions column under heritage?</li> </ul> <p>- It is worth pointing out that under other assumptions e.g. economy and employment, a suggestion is made that a loss of employment land is presumed to be negative unless appropriate evidence can be provided. Why is this assumption not applied to the loss of a heritage asset, which would be harmful (Negative) unless the proposal can meet the tests in the NPPF?</p> <p>Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the local and county level to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the Local Plan, the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER (formerly SMR). They will be able to provide you with the Historic Environment Records for the area including any relevant studies, and ensure a joined-up and robust approach is undertaken.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, this would have an adverse effect upon the historic environment.</p>	<p>Comments welcomed and will be factored into the site assessment framework. A more qualitative approach will support any 'distance based' results that are provided. Where possible, advice on site impacts will be sought from experienced professionals. Information has been requested from the HER.</p>
SCOP031	Local Resident	<p>I would like to challenge Point 10.14 in the Sustainability Appraisal that says, “The widespread areas of Grade 3 agricultural land outside the main urban areas of the Borough means that there is potential for future development to affect areas of BMV land” This would potentially give the green light to releasing farming land from the Green Belt and goes against paragraph 170 of the NPPF. Also, at a full council meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." This means that any land which is farmed should be removed from consideration of release from the Green Belt.</p> <p>I would like this point to be addressed during the public consultation period and expect that common sense will prevail and local government will act in the interest of its Wirral constituents.</p>	<p>The Scoping Report does not advocate the loss of agricultural land. It identifies the presence of this resource and states that this is a key consideration within the SA process.</p>

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SCOP032	Local Amenity Society	<p>1.01 Regulations covering this Consultation only require it to be with specific statutory bodies (Environment Agency, Historic England and Natural England) but Wirral Council without explanation had chosen to publish "for public consultation more widely." As the documentation is highly technical and very lengthy, and as there has been no 'easy guide' or public meetings to give any explanation, and as the Consultation Period is during a busy time of holidays and Local Elections, we prepared and circulated a form of 'Easy Guide' for our Members and others to aid understanding and responding.</p> <p>1.02 Whilst the 'Easy Guide' has been well received, we suspect many people will have taken it more as an informative 'newsletter' and considered the matter either still too complex or to be addressed later in conjunction with the 'Draft Local Plan' (the more normal public stage). We would not wish any low level response now to be taken as either disinterest or acceptance of the Council's approach to the production of the Wirral Local Plan. On the contrary, from our many meetings and correspondence received, it is crystal clear that most people do not accept that the Council's approach is justified, and the Local Election results back this up, with the results so dramatically bucking the national trend.</p> <p>1.03 Many of our comments apply equally to the 17-page 'Equality Impact Assessment (EqIA) document but we direct our Response to the 71-page 'Scoping Report for the Wirral Local Plan Sustainability Appraisal'. That Document is closely related to the many issues raised by over 3,200 members of the general public and organisations in response to the 'Development Options Review Consultation' of last autumn (for which there has still been NIL published detailed appraisal or comment from the Council during the 6 months since that Deadline). That lack of official feedback is adversely affecting the on-going stages including this Consultation (as is the failure to respond to specific questions and queries).</p> <p>1.04 We are of the opinion: were Wirral Council to develop a Local Plan generally along lines suggested in the full Sustainability Report (albeit parts are deficient and/or complacent), its approach, direction and features - particularly concerning Green Belt protection, encouraging the full potential of 'Wirral Waters', and adopting the recently much toughened-up Government insistence of proof of exhaustive 'Brownfield First' consideration - Wirral's Local Plan would be fundamentally different and attract wide support. But unless the Council is convinced to change its approach now by the pressure of public demands and evidence submitted, much time, effort and expense will be abortive.</p> <p>1.05 However, sadly Wirral Council has shown itself to be lacking in several respects including as regards the preparation of its Local Plan, where it is believed that the Council is following a highly flawed approach (and has made procedural errors). Without political redirection now, this is unlikely to change as the Council is under extreme time pressure from Government if it is to avoid 'Intervention' (which nobody wants). If the current situation remains the case going forward (and pressure is being brought to bear both locally and nationally for change and for time to be allowed to enable change), this leads to the opinion that the methodology of the SA should be strengthened to ensure transparent and equitable handling of both supportive and unsupportive findings.</p>	The SA will present a robust and transparent assesment of the effects of the Plan. Importantly this will include a fresh look at reasonable alternatives with regards to the amount and location of growth.
SCOP032	Local Amenity Society	<p>1.06 Right from its approach to producing its much-belated Local Plan (which approach appears to be politically-based and more directed at achieving financial outcomes than developing and regenerating communities to provide what is actually needed and where) to the way it has treated the many informed submissions and expressed concerns of its Residents, the Council seems unprepared to listen and is set on fixed, largely predetermined outcomes without proper consideration of alternatives. This is no more clearly demonstrated than in its refusal to produce a 'Locally Assessed Housing Need' to set against the standard formula-based methodology figures (which it knows produces distorted base figures and especially so for Wirral), despite being encouraged (even directed) to do just this by both national and most local politicians as well as by national Guidance, and despite the evidence provided by experts and interest groups both in the general public and the Council's own consultancy firms.</p> <p>1.07 Our only reasonable hope is that the persons and appraisal processes employed to scrutinise details of the Council's Draft Local Plan will be exhaustively thorough and fair. To this end and because it appears that the Council's largely predetermined outcomes are 'unsustainable' in many respects, the depth and effectiveness of the Appraisal measures in the final Report should be unequivocal; and important factors should be given appropriate significance and weighting; and must include a proper scoring system that is simple and transparent, the workings of which are to be made available for independent examination in a measureable way. The Council must not be able to devalue, dismiss or ignore factors that are inconvenient or unsupportive of its Case or preferred outcomes.</p> <p>1.08 Consideration of 'Sustainability' and matters such as pollution, energy consumption, protection of the environment, and maximising the use of materials and land-take must be based upon latest data and include genuine consideration of 3rd-Party informed inputs. Data should be as local as possible and available - currently there is far too much out-of-date and irrelevant (to Wirral) data being used by the Council for its Plan to be considered 'safe'. It will not be good enough, for instance, to "minimise ... impacts to biodiversity", and protect habitats, green spaces, Green Belt, farmland, 'green corridors', and the like. Particularly in view of recent studies (including the 'UN Nature Report'), EU Directives, Court Rulings and tightening up of Government Guidance and Regulation around sustainability, the tests for 'biodiversity net gain', and 'exceptional circumstances', etc., must be made more prominent within the SA documentation and deliberately more difficult to achieve, knowing that this raises the bar for the Council and developers alike.</p>	The SA will present a robust and transparent assesment of the effects of the Plan. Importantly this will include a fresh look at reasonable alternatives with regards to the amount and location of growth.
SCOP032	Local Amenity Society	<p>1.09 The Consultation Report currently does not sufficiently reflect recent Nature, Healthcare and Climate Change Reports, nor Court Rulings, environmental toughening-up of Planning Guidance, various national and local statistics (especially on harmful effects to people and the environment, and Climate Change) nor, significantly, the Public's changed mood and heightened expectations/demands and reduced tolerance - the last area being starkly demonstrated by the recent Local Election results.</p> <p>1.10 The Council does not appear to be treating 'sustainability' as anything more than an irritation and a tick-box exercise that their QC has advised they must revisit (or at least be seen to revisit). For instance, its selection of '48 Green Belt Sites for Further Investigation' was not (by its own admission) appraised to any reasonable or appropriate degree against any of the Topics listed in the Consultation Report. All of these Sites would appear (and will separately be demonstrated) for the most part to conflict with official Guidance, national and even international findings, and certainly rated reports produced by informed community, environmental and wildlife groups/organisations and 3rd-Party demographers and statisticians, and must therefore be deemed 'unsustainable' in nature.</p> <p>1.11 Regrettably, such parties (groups, organisations and specialists) were not consulted nor have their inputs been assessed properly or appraisals of their work been completed or published for over six months, which threatens the validity of the whole Local Plan process, including this Consultation.</p> <p>1.12 How can it be considered 'sustainable' for the shortlisted Sites put 'at risk' of release from Green Belt to have an aggregate area exceeding ten times the average of all approved local plans during any of the last eight years (which includes many LAs with 'higher housing need'), and especially where even a high-level desk-top assessment/appraisal of 'sustainability', the Purposes of Green Belt and national Guidance (NPPF, etc.) should have ruled out most, if not all, of them?</p> <p>1.13 Though we give comments below on individual 'Topics', there is considerable overlap with some issues and Sites having 'sustainability' concerns across several Topics. e.g. the Council's controversial 'Hoylake Golf Resort' proposal has many 'sustainability' problems including 'Air-Quality' - encouraging visitors from far away by road and abroad by air travel; and pollution from a new road across Green Belt; 'Biodiversity' - threat to wildlife as farmland and watercourses are replaced with development and intensely treated golf courses; 'Climate Change- development of Resort in 'highest risk flood zone; 'Housing' - luxury, car-dependent houses - only needed for project viability - in the middle of Green Belt.</p>	Not directly related to the scoping process and no suggestions made.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP032	Local Amenity Society	<p>2.00 Topic - Air Quality:</p> <p>2.01 Emphasise further the need (for sustainability) to locate and upgrade housing close to employment zones. This means concentrating new and refurbished dwellings in the north and east of Wirral (Birkenhead, Wallasey, Rock Ferry, etc., which need regeneration). Stress the need to increase encouragement and support for Peel Holdings' exciting development plans at "Wirral Waters".</p> <p>2.02 Highlight the unsustainable nature of even more Wirral residents commuting off Peninsula. The current situation (circa 40% of Wirral's working residents commuting thus) does not represent a sustainable state of affairs and must be reduced as a percentage going forward. This should be stated in the SA Report. Further, this means the practice of neighbouring LAs satisfying some of their 'housing need' by net migration onto the Wirral should be reversed and the Council's half-hearted, 'going-through-the-motions' approaches to neighbouring LAs and meek acceptance of rebuttals to date is unacceptable and insufficient proof of compliance with NPPF requirements.</p> <p>2.03 Emphasise further the need to ensure 'Brownfield' and 'Previously Developed' sites are 'greened up' during redevelopment with landscaping and electric bus and cycle routes, and new walking and jogging pathways. State that the call for smaller, better quality homes with gardens (not just apartments) can be met in such areas and that it does not have to involve loss of Green Belt land.</p> <p>2.04 State that new housing should not be located alongside the M53 or busy main roads/junctions. Many of the 48 short-listed Green Belt Sites are located in the 'green lung' buffer zones alongside the M53 and other busy locations. A highly technical report has been issued to the Council by a 'Wirral Green Space Alliance' member, which demonstrates starkly that such developments would have disastrous health consequences for both new residents AND those currently living beside the targeted green buffer zones which currently afford protection.</p> <p>2.05 Remove the reckless complacency in the expressed but mistaken belief given in the Sustainability Report that reducing diesel car numbers alone will solve air pollution problems. It simply cannot, especially as the pace of change is not only very slow and countered by increases in vehicle numbers and journey mileage, but more significantly by the fact that much of the harmful, tiny particle emissions (PMs) from vehicles actually arises from the road surface and tyres, not just exhausts. Electric and hydrogen vehicles would therefore pollute in much the same manner and are not a complete solution.</p>	Comments taken into consideration. Reasonable alternatives to take account of the potential of Wirral Waters. Acknowledgement that air quality can be affected by increased car use, despite the move towards electric vehicles.
SCOP032	Local Amenity Society	<p>3.00 Topic - Biodiversity:</p> <p>3.1 The Council's shortlist of Green Belt sites for potential release includes many sites with significant, fragile and irreplaceable Biodiversity, endangered and protected species in ancient woodland, watercourses and foraging fields. More emphasis is required to avoid such Sites, otherwise proposals would be classed as 'unsustainable' development and unacceptable.</p> <p>3.2 The Government's increased emphasis on real and proven 'biodiversity net gain' associated with any development has too often in the past been paid just 'lip service'; and there remains the high risk of this continuing to be the case in the chase for higher Council Tax and other Receipts. Green Belt was designated to be 'permanent' and not manipulated. This requires greater stress.</p> <p>3.3 Also, stress that the Government's increased emphasis on real and proven 'biodiversity net gain' with ANY proposed development MUST be followed through; likewise, the Court Ruling on the recent EU Biodiversity Directive, which states that it is not enough to propose replacement biodiversity action but proof must be given firstly that everything has been done to avoid ANY damage/destruction before ANY replacement measures can be contemplated, and even then the burden of proof of effectiveness of proposals must be high. Stress that to do otherwise would NOT be sustainable.</p> <p>3.4 Many Sites shortlisted by WBC have highly rated and 'core biodiversity' status but (as with other Topics) the Council is ignoring the appraisals and recommendations of their own Consultants. e.g. in Irby alone: SP019B (East of Glenwood Drive), SP059E (Rear of Irby Hall) and SP060 (South of Thingwall Road) should all be excluded. Measures in the Report should lead to such exclusions.</p>	Comments noted, but not directly related to the scoping process.
SCOP032	Local Amenity Society	<p>4.00 Topic - Climate change adaption:</p> <p>4.1 This whole subject has of late come increasingly into the scientific, public and political realm and 'higher up the agenda' even since the Consultation Report was drafted. The Report must therefore be edited and made both more proscriptive and prescriptive in order to have the necessary level of effectiveness and avoid only 'lip service' being paid. Stress that to do otherwise would NOT be sustainable.</p> <p>4.2 The Council's selection of Green Belt sites for potential release include those at risk of flooding and where there is little scope within the systems for drainage from new development over and above the increased volume from already anticipated wetter winters.</p> <p>5.00 Topic - Climate change mitigation:</p> <p>5.01 As with 'Air quality', locating housing close to employment zones and bringing back into use many more of the thousands of empty houses (at an increased rate through establishing an effective new Programme) would reduce commuting and other travel distances, and make low-energy Bus Services more viable, frequent and attractive. Other cities benefit from a tram service: Wirral could, too.</p>	Comments noted, but not directly related to the scoping process.
SCOP032	Local Amenity Society	<p>6.00 Topic - Economy and employment:</p> <p>6.1 The Sustainability Report correctly identifies the benefits of enhancing "the vitality of the Borough's town and local centres" identifying "regeneration opportunities, particularly in the most deprived areas". This is so significant and makes sense of Wirral's considerable latent assets that the converse MUST also be made clear: i.e. that NOT to make the most of enhancing "the vitality of the Borough's town and local centres" by identifying "regeneration opportunities, particularly in the most deprived areas", and failing to do this BEFORE any other options are contemplated could NOT be considered 'sustainable'.</p> <p>6.2 Such areas, when 'greened up' as an integral part of redevelopment, would give the opportunity and affordability to provide a range of smaller and medium size properties of different types, suited to a wide range of people including those wishing to downsize (particularly older people), first-time buyers, those aspiring to better standards of housing, and those with physical, mental health and other conditions; and where mixed, balanced, vibrant, viable and caring communities could flourish, close to improved public services and employment - all as have been identified previously as the real 'housing need' by the Council's own Consultants - but which opinions run counter to the Council's current approach. The SA Report must therefore restate these points more definitively.</p> <p>6.3 It is clear from the statistical exercises performed by WGSAs own experts (demographers and statisticians) that the Growth assumptions for both population and the local economy underlying the Council's and the LCR's base figures (even before the 'standard method' was a factor) were grossly inflated and have significantly distorted the situation to be addressed by Local Plans. More up-to-date data on actual Growth (or the lack of it - certainly much lower than assumed/adopted even without the medium term depressing influence of 'Brexit'), clearly show the Council's base position to be an unsound foundation for its Local Plan. Consequently, the Council (and LCR) are having to revisit these critical areas of prediction. The SA Report must therefore state that the situation regarding Growth must take full account of actual, recent local data and include only identified opportunities for economic growth rather than the excessive use of aspirational wishes, for proposals to be deemed 'sustainable'.</p> <p>6.4 The link between economic growth and additional 'Housing Need', as it relates to the quite particular circumstances of Wirral, has also been exaggerated with the effect of inflating the actual 'Housing Need' total figures. Surely, part of any economic growth on Wirral would give the highly sustainable opportunity for some of the high number/percentage of those who currently commute off Peninsula to take up such jobs created on Wirral, closer to where they already live. This, coupled with the sustainable further reduction of inward migration, would reduce the link between economic growth and additional housing and could show (with other corrections) that actual housing delivery on Wirral over the past few years has been nearer to Target or even has achieved Target, meaning that the question of imposing a 'Buffer', brought forward into the first 5-year period, is called into question. Clearly, the 20% Buffer should not apply (and in any event the Council's gross, very basic error of ADDING a 20% Buffer TO the 'Housing Need' total figure must be banished from any thoughts or calculations).</p>	Not directly related to the scoping process. Comments relating to options will be taken into consideration in the next stages of the SA process.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP032	Local Amenity Society	<p>7.00 Topic - Health:</p> <p>7.01 There is a mis-match between the location of Wirral's main hospitals west of the M53 and the much higher incidence of ill-health and lower life-expectancy to the east of the M53, a situation which mitigates against access and involves much travel and inconvenience. This calls for some reconfiguration of Wirral's Health Services with regeneration of the north and east necessarily including improved local services with appropriate 'key worker' dwellings within easy reach. There are opportunities to situate a variety of 'key worker' homes close by and/or within Health Care estates.</p> <p>7.02 This mis-match must not be seen as an argument for moving population from areas requiring regeneration to 'green' areas nearer these Hospitals (which are in reality both beside Wirral's major arterial routes). Such a move would not only commit currently deprived areas to remain as such indefinitely but also put unsustainable pressure on already over-stretched Health Services and other Infrastructure. i.e. the worst of both worlds. Instead, some reconfiguration of Wirral's dispersed Health Services must be included as an integral part of the regeneration of north and east Wirral, provided by contributions from both developers and the Public Purse. The SA Report should remove developers' 'viability loopholes' if the ideal, affordable and sustainable situation is to be achieved.</p> <p>7.03 Any proposal which directs development to Green Belt, other 'green spaces' or alongside major traffic routes would lead directly to the worsening of public health, infant development, mortality rates and general wellbeing. Of this there can be no doubt and the SA Report should make this very clear. The Council has been informed and provided with scientific proof of this, and also been warned of the risk to itself and its finances as a consequence of avoidable future court proceedings for direct liability and complicity. On the other hand, to direct development "particularly in the most deprived areas", to improve the housing there and to 'green up' those areas would have positive outcomes for Health. Stress that to do otherwise would NOT be sustainable.</p>	Not directly related to the scoping process.
SCOP032	Local Amenity Society	<p>8.0 Topic - Heritage</p> <p>8.01 It is clear (as the Council have admitted in earlier documentation) that little was done in the process to shortlist 48 Green Belt Sites for possible release for development to properly investigate and appraise heritage assets contained within them. This was inexcusable as even a high-level desktop study, combined with reviewing (rather than ignoring) the work done and conclusions reached by their own Consultants, would have quickly and clearly shown that many of the Sites had heritage assets which should exclude or severely constrain them. In Irby alone, this has meant that a Scheduled Monument, Listed Buildings, a Roman Well, a rare example of medieval farming practice in its land formation, and remains of its original settlement as well as Ancient Woodland, vulnerable watercourses and 'best quality' open ponds are ALL at risk of damage and loss, unnecessarily, possibly unlawfully.</p> <p>8.02 This cannot be dismissed as the opinion of 'extremists' as such views are held and have been expressed by the 'National Trust', local historians and archaeologists, community, environmental and amenity Groups right across Wirral (including within WGSA), as well as by those who live alongside such Sites and have the depth of local knowledge which the Council has failed to consult or deploy.</p> <p>8.03 As with 'Biodiversity' above, it is not enough (morally or legally) to propose 'mitigation' but instead proof must be given firstly and in advance that everything has been done to avoid ANY damage/destruction before ANY compensatory measures could be contemplated, and even then the burden of proof of effectiveness of proposals must be high. The SA Report should stress heightened importance to this and that to do otherwise would NOT be sustainable.</p>	Comments noted, but not directly related to the scoping process as such.
SCOP032	Local Amenity Society	<p>9.00 Topic - Housing</p> <p>9.01 There must be more stress in the Report that the potential of 'Brownfield' and 'Previously Developed Land' MUST be exhaustively explored (not minimised) and used to its maximum before other areas, notably Green Belt, are considered. The burden of proof of exhaustive exploration should be high. Further, it needs stressing that (i) releasing Green Belt for housing is 'unsustainable' per se; (ii) 'exceptional circumstances' MUST be shown before any Green Belt can be released (noting: Local Plan production cannot be an 'exceptional circumstance'); (iii) appropriate and robust actions must be shown to have been taken to ensure neighbouring local authorities take on board fully the proportion of Wirral's 'Housing Need' for which they could and should cater; and (iv) the Council must produce clear evidence of what it has done to maximise every source of non-Green Belt capacity for development before its policies, let alone a 'Draft Local Plan', could be considered as 'sustainable' to any extent.</p> <p>9.02 It is self-evident and a main conclusion of numerous environmental reports (including the very recent publication - the 'UN Nature Report' - which also states) that natural and farmed land is "not just lovely to look at but necessary for human wellbeing". However, Wirral Council has seen fit to change its views as expressed in 2014 and embarked upon a course of action which actively works against sustainable development of the numbers, types and locations of new homes that are actually required on Wirral, minimising the various sources of non-Green Belt capacity (as is being demonstrated elsewhere), and even employed dubious devices to circumvent the reasonable exclusion of sites even where suggested by their own consultants (as is also being demonstrated separately).</p> <p>9.03 There is no apparent determination by WBC to maximise the considerable opportunities that exist, nor to encourage the full potential of 'Wirral Waters' and surrounding areas, nor to achieve better results in returning empty properties back into use, nor to increase housing capacity by applying the required higher standard densities; but instead there is assumption and acceptance (from the outset) and actions being taken that actually promote release of Green Belt for larger houses, when there is absolutely no proven need or significant demand for such. The Consultation Report time and again refers to the significance and capacity of 'Wirral Waters' to deliver directly and as a catalyst the bulk of development and regeneration that Wirral needs. The SA Report should stress this even further and commit the Council to transparently explaining and justifying its actions.</p>	Comments noted, but not directly related to the scoping process as such.
SCOP032	Local Amenity Society	<p>9.4 Worse, possibly through the fear of 'Intervention' and/or political pressure (for the admitted seeking of increased financial gains), Wirral is not producing a 'locally assessed housing need' (employing actual and up-to-date local and national data) to argue for the lower resultant figures against those derived "as a starting point" through use of the 'standard method', despite repeated invitation to do so by 'Homes England', the MHCLG and successive Secretaries of State who in addition have stressed and repeated that Wirral is NOT an area of high(er) housing pressure. So, please do not let it be treated as such.</p> <p>9.05 To emphasise this further, successive Secretaries of State and others have repeatedly told WBC that the 'base figure' for 'Housing Need' derived from the 'standard method' does NOT constitute a 'Target', and that the Council should determine its own Assessment of 'Need' using actual local and national data, and to compare that number with the base figure and strongly argue the case and 'exceptional circumstances' (e.g. marked loss of Green Belt; neighbouring Councils to provide a proportion; etc) where a lower figure is sought. Whilst the Council refuses to take this line, two specialists within the WGS Alliance have prepared technical papers showing that actual 'housing need' is very much lower than WBC's inflated and out-of-date figures. The SA Report could and should make it clear that to be 'sustainable' and 'sound' a Local Plan must be informed by a thorough 'Locally Assessed Housing Need' exercise based upon up-to-date actual, predominantly local (where available), data and not merely passive adoption of 'standard method' outputs.</p> <p>9.06 The Council's own Consultants had concluded that the local housing need (for Irby, Pensby, etc.) is predominantly for the Elderly (mainly to downsize) and those groups needing supported living and NOT, as is proposed by the Council and the ruling Cabinet, larger houses in Green Belt which would deliver higher Council Tax Receipts.</p>	Comments noted, but not directly related to the scoping process as such.
SCOP032	Local Amenity Society	<p>9.07 The potential of 'Brownfield' and 'Previously Developed Land' must now be exhaustively explored and used to its maximum before other areas, particularly Green Belt, can be considered for release or development. However, there is no apparent determination by WBC to maximise the considerable opportunities that exist (quite the contrary), nor to encourage the full potential of 'Wirral Waters' and surrounding areas, nor to achieve better results through an energetic new initiative to return empty properties back into use, nor to increase housing capacity by applying the NPPF-required higher standard densities. Instead there has been an assumption and acceptance from the outset that Green Belt should be released for larger houses when there is absolutely no need or significant demand.</p> <p>9.08 Specific opportunities for rationalisation of the Council's own properties and operations locally (proposed by ITPAS's professionals and others) have been spurned and, contrary to the Appeal Court Ruling (Lindblom 2017) regarding not prejudging the housing market and thereby limiting 'Availability' in the Housing Supply, there appear to have been actions which did just that with the effect of minimising non-Green Belt site 'Availability' and 'Capacity', and artificially bolstering a case for release of Green Belt land. The SA Report should include reference to this Court Ruling and other relevant ones.</p> <p>9.09 'Wirral Waters' must remain the cornerstone of the Council's strategy for the long-overdue regeneration of the most deprived areas of Wirral. Thus, it is unacceptable that WBC has been silent regarding this 'Lindblom Ruling', which makes it clear to councils, developers and others that proposals only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven 'deliverability' to be included in 5-year housing supplies. This supports Peel Holding's figure of 6,450 for its housing delivery during the Local Plan Period rather than the 1,100 included by the Council. The SA Report should add to the repeated significance attributed to Wirral Waters by saying that all reasonable support must be given to this Project and to surrounding regeneration, taking advantages of Court Rulings which enable them to include outlined schemes that are "reasonably possible" but not certain.</p>	Comments noted though not all directly related to the scoping process. With regards to Wirral Waters, it will be important to explore the different approaches that could be taken when testing reasonable alternatives.

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SCOP032	Local Amenity Society	<p>10.00 Topic - Land and soils:</p> <p>10.01 There are numerous environmental reports right up to the very recent 'UN Nature Report' (and TV programmes) that all stress the importance of preserving and indeed enhancing (and not covering in concrete) the remaining farmland and open landscape, including Green Belt which was specifically designed and designated to be 'permanent' and 'open'. The SA Report should place even higher stress on this than it already does, with insistence on quantitative measures and not just qualitative, rather dismissive comments. Releasing farmland and Green Belt land is 'unsustainable' per se and the Report should stress that. All farmland is required for food production and/or new woodland, and (we are advised) Wirral Councillors last year voted that no farmland should be released for development. This commitment should be carried through and included within the SA Report.</p> <p>10.02 Shockingly, the Green Belt Sites shortlisted by the Council include many designated as 'High Quality Agricultural Land' ('Best and Most Versatile'). Though there is some suggestion that current designations should be reviewed in order to reduce the extent of Grade 3a and above land, recent independent soil testing has upheld the current ratings and thus the need for exclusion of many Sites.</p>	Comments noted and will be factored in to the next stages of the SA.
SCOP032	Local Amenity Society	<p>11.00 Topic - Landscape:</p> <p>11.01 Sites short-listed by the Council include those, like SP059E (Rear of Irby Hall), previously characterised by the Council as "the essence of Wirral", to be retained for the benefit of Residents and Visitors alike, contributing considerably to the Local Tourism Economy.</p> <p>11.02 Several short-listed Sites conflict with the second 'Purpose of Green Belt', which precludes 'infilling' that would merge distinct towns (settlements or communities); and all Sites conflict with the fifth 'Purpose', where 'permanence' is specifically designed "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". This has been raised in earlier sections but the SA Report should make it clear that Sites which fail to pass the test of the 'Purposes of Green Belt' cannot be developed sustainably per se and must be excluded from consideration. It is not as if there are no alternatives to the 48 shortlisted Sites, there are more acceptable sites available were the need to release ANY Green Belt land proven.</p> <p>11.03 Worse, the Council has expanded sites to increase the extent of their 'enclosure' (by perimeter housing), classifying what is effectively inappropriate, massive urban sprawl and expansion into countryside as simply 'infilling within Settlements' ('Settlement' not being a term used anywhere in the NPPF, including the Glossary). Incredibly, it appears that, to achieve the status of 'highly enclosed', sites have been expanded to include 'unavailable' portions, land excluded from their Consultants' previous appraisals, protected woodland and even a covered reservoir that cannot be developed but which just happen to be bounded by existing housing. Where 'infill' is effectively 'urban sprawl' or intrusion into what is in reality 'open countryside', such as Site SP060 (South of Thingwall Road - which would see Irby, Thingwall and Pensby all merged), or merges distinct communities (in cases up to a mile apart), the SA Report should state that such instances will NOT be considered as 'sustainable'.</p>	Comments noted, but not directly related to the scoping process.
SCOP032	Local Amenity Society	<p>12.00 Topic - Population and communities:</p> <p>12.01 North and east Wirral are areas of greatest deprivation, highest crime rate and worst housing conditions. Not to concentrate on redeveloping these areas is to condemn them and their communities to yet further decline and no timescale for regeneration. Whereas, to follow the albeit more difficult opportunities there are aplenty to improve life-chances and living conditions in the more deprived areas through sustainable, attractive and 'green' developments (spearheaded by 'Wirral Waters') would deliver lower crime, higher employment, better health, improved quality of life and rejuvenated communities - all normal objectives of a proper Local Plan. Whilst this very argument is supported by the Consultation SA Report, the Council is clearly NOT following this course. In fact, it is seen to be actively opposing it in favour of a highly unsustainable alternative. In such a situation, it is beholden upon the Report's authors to make this (their own) case all the more strongly and unequivocally in the certain knowledge that that is what is demanded by the people of Wirral.</p> <p>13.00 Topic - Transport:</p> <p>13.1 This Topic has been covered in other sections above but improving public transport and increasing cycling and walking go hand in hand with an integrated development of well designed and appropriately located housing, predominantly in the north and east of Wirral.</p> <p>13.2 To locate housing in dispersed Green Belt areas, mainly in the west of Wirral, would overstretch the meagre public transport services that exist, make improving such services up to an acceptable and sustainable level prohibitively expensive, and most likely increase car-dependency and usage, aggregate journey mileage, fuel consumption and air and ground pollution, leading directly and inevitably to a series of negative outcomes, including adverse health effects, whilst perpetuating poor conditions particularly in north and east Wirral. Why would this be done knowingly and presumably with little concern over accountability? The SA Report must seek to avoid this in case the new Council (following the result of the recent Local Election) fails to honour the individual and collective undertakings universally made in the Councillors' election literature and statements.</p>	Comments noted, but not directly related to the scoping process as such.
SCOP032	Local Amenity Society	<p>14.00 Topic - Water: (includes Topic 15)</p> <p>14.01 Wirral's real 'housing need' is predominantly for a range of small and medium-sized, well-designed dwellings in the right places, with appropriately higher but standard densities to fulfil the NPPF requirement for 'the efficient use of land'. The efficient use of water would follow adopting such an approach. Sadly, the Council pours cold water on such ideas.</p> <p>15.00 General Note:</p> <p>3.1 Please bring the Sustainability Appraisal Report up-to-date and more in tune with current expert thinking and evidence - now actively and increasingly being supported by the general public - about all aspects of Development, Protection of the Environment and Natural World, and Climate Change: the effects, scale of problems, feasible remedies, necessary actions, responsibilities, opportunities and urgency.</p>	The scoping report presents a proportionate summary of key environmental, social and economic factors within the Plan area.
SCOP033	Local Amenity Society	<p>1. The SA and EqIA are welcomed, and clearly, it is important in each case to choose on a robust methodology.</p> <p>2. We agree that the social, economic and environmental implications of the emerging Local Plan must be thoroughly appraised in line with statutory requirements for the promotion of sustainable development.</p> <p>3. From our work with a large number of residents groups across Wirral we are acutely aware of how important people consider the natural environment near to where they live, and for farm-fields in the Green Belt to be protected. The media informs us almost every day of robust, science-based research evidencing climate change impacts, such as crop failure, large scale flooding and the wholesale loss of biodiversity. WGSA acknowledges that climate change is real. Urgent change to the way we plan future development is required. WGSA agrees that promoting a Local Plan that is truly sustainable, to prioritise low carbon solutions is necessary. The fact is everyone shares the same environment. Key issues include prioritising urban regeneration, whilst avoiding needless countryside encroachment and urban sprawl that so negatively impacts our countryside and planning for a more resilient future.</p> <p>4. There is recognition that the Council is bound by the National Planning Policy Framework, 2019 version, which sets out a presumption in favour of sustainable development. The statutory status of the development plan (Local Plan) is the starting point for decision making. Therefore we observe that the Local Plan is crucially important for future planning decisions. We want enough needed new homes to be planned, in the right places, for the right reasons. This is why WGSA submitted such a comprehensive response to the Wirral Local Plan Development Options Review. We will continue to engage in a positive way to help the Council in its duty to plan sustainable over the next 25 years and beyond.</p> <p>5. Similarly the Assessment ought to address the requirements of Strategic Environmental Assessment and Health Impact Assessment. Pressure on public funding means that in the future social and health spending will reduce, particularly impacting less well-off households, and the ageing population. Therefore, WGSA supports the Council in its endeavour to produce a Local Plan that balances social, economic and environmental factors so that the quality of our natural and built environment can be maintained and in doing so people may continue to enjoy the health and well-being benefits associated with spending time outdoors, particularly in quality natural environments.</p> <p>6. We applaud that there are no AQMAs in the Borough. Also, that the recent trends indicate key pollutant levels are decreasing. However the Council must ensure the air quality impacts of any new development is negative.</p>	General comments and support.



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SCOP033	Local Amenity Society	<p>7. In the future, there needs to be a net environmental gain from the Local Plan in line with the NPPF, and 25 Year Environment Plan (2018). We think that the Sustainability Appraisal Appendix B identifies all the biodiversity relevant designations but suggest advice is sought from Cheshire Wildlife Trust, and other independent environmental organisations, which provide specialist technical advice. Locally the Wirral Biodiversity Action Plan (2003) and the Wirral Biodiversity Audit (2009) provides a biodiversity evidence base for the Local Plan, which is referred to in the SA.</p> <p>8. We agree that Climate Change Adaptation and Mitigation are good SA objectives. The NPPF, and the Climate Change Act 2008 requires climate change adaptations are planned. All Local Plan allocations and planning applications must have effective policy in place to enable effective scrutiny of relevant issues.</p> <p>9. We accept enough needed jobs should be planned for the labour market to help rebalance the ageing demographic of the area. However, previously the Local Plan consultations have had bloated development requirements for Local Plan economy and Employment policies. Realism must be applied to growth aspirations at the national, regional and local level.</p> <p>10. Good health and well-being is so important to everyone. The Local Plan must enable a high quality of life for the people of Wirral and safeguarding, and enhancing the natural environment is key to this objective.</p> <p>11. Our cultural and social identity is underpinned by our history. It is important that references to our past are protected and enhanced in the future. Heritage assets help to understand where we have come from, maintain local character and local distinctiveness and adds to sense of place. Having criteria for the Local Plan policies is important to ensure heritage is properly valued in the future.</p> <p>12. We accept enough needed new homes should be planned, particularly those that are 'truly' affordable. That said, we are opposed to the Government's standard method for calculating the housing requirement, as it is considerably flawed. It pushes housing to already over-heating, highest value areas, focused on developer profit, and consequently it stops housing investment being directed into areas that most need it, and it fails to tackle house price affordability in any meaningful way. However, a local Professor's Report on Wirral's housing calculation showed that when using the Government's standard method the housing target figure for Wirral should be much reduced.</p> <p>13. We are concerned that if the 'Housing Delivery Test' is failed, the Local Plan is deemed out of date, and this leads to further green fields being allowed for development. As the Council can't build houses, only process applications in a timely fashion, and as developers only have a limited capacity, the housing target must be realistic and achievable. Ultimately, it is the public that suffers when housing is over-planned and when Council's fail to then deliver, as further land in the countryside allowed for development. Consequently, we recommend that not a single dwelling too many is planned.</p>	General comments and support.
SCOP033	Local Amenity Society	<p>14. The Government also requires Local Planning Authorities to rely on inflated Office of National Statistic (ONS) 2014 based population growth projections, against its own best practice of using up to date data. ONS 2016 based household projections, which show much lower actual growth rates, result in substantial reductions to the housing figures for all of the Liverpool City region. Successive Secretaries of State have told Wirral Council it should plan for a lower housing number. Recently, Kit Malthouse, Housing Minister in a recent spat with Andy Burnham, Mayor of Greater Manchester, said Council's in 'exceptional circumstances' can depart from the standard method. We recommend given the significant amount of brownfield in Wirral, and the harm to Green Belt purpose that the Council has the 'exceptional case' to depart from the standard method. In conclusion, the need to develop land in the Green Belt is non-existent.</p> <p>15. The Council should be clear that it is not promoting higher housing numbers than is required.</p> <p>If the Planning Inspectorate does not accept the alternative method, contrary to repeated Government calls to Wirral Council to do so, then it will be clear that the Government is in fact forcing high housing targets onto Wirral Borough Council. In doing so the Government would be imposing a high housing target, harming the Green Belt, breaking promises about protecting it. Moreover, Wirral Council should apply the recently published Office of National Statistic 2016 based household projection which shows much lower actual growth rate shows further reductions in the housing figures for the Liverpool City region equal to 3,177 dwellings per annum. This is a more realistic starting point for the Wirral Development and equates to 436 dwelling per annum housing requirement. Adding 12% uplift for affordability gives an overall total of 488 dwelling per annum requirement.</p> <p>16. The Regional SHELMA is being updated due to flaws, and reliance on unreasonably high economic growth assumptions. Such growth assumptions must not bloat the housing requirement.</p> <p>17. Maximising the potential from strategic brownfield land opportunities, is essential and a requirement in the NPPF, 2019. We recommend the Council imposes an effective brownfield target for development in the Local Plan.</p> <p>18. There is an identified absence of exceptional circumstances to release Green Belt. We showed in our previous response that the release of Green Belt is not be required. If jobs and houses were planned according to latest data, using a bone fide housing calculation method, and by using all available and suitable brownfield land the need to build on our countryside would be removed. So far the Local Plan process has failed to be based on robust evidence and the Council has misled the public on the scale of Green Belt release required, which is strongly opposed by us.</p>	Comments noted, but not directly related to the scoping process as such.
SCOP033	Local Amenity Society	<p>19. We want the Local Plan to protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps between settlements, mindful of the need to maintain Green Belt so land is kept permanently open.</p> <p>20. When developers come forward with schemes, we agree that they must support good access to existing and planned community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.</p> <p>21. We agree that the Local Plan should be based on more sustainable principles, such as integrated transport infrastructure, with improved networks for walking and cycling such as enhancing our public rights of way that enable people enjoy outdoor recreation.</p> <p>22. We understand that water quality is a priority when preparing the Local Plan.</p> <p>23. In terms of the Equality Impact Assessment of the Wirral Local Plan Scoping Report, we note the key issues emerge from the context and baseline review. In light of the key issues identified in the EqIA framework, WGSa supports the Council in preparing a Local Plan that responds adequately to the five topics of: Populations and Communities; Housing; Transport; Economy and Employment; and Health</p>	General comments and support
SCOP033	Local Amenity Society	<p>24. We firmly believe that by steering future development to previously developed land in existing urban areas, particularly Birkenhead and north-east that the population of Wirral, particularly those who are most vulnerable will be best served. The loss of our valued greenspace would only serve to undermine our local communities bringing jobs and housing forward in the wrong places, increasing commuting distances and further reliance on private cars, to the detriment of Wirral's environmental health and public health.</p> <p>25. Below I set out two Appendices. Appendix 1 considers the SA Framework Appendix A and B covering thirteen topics, relating to SA Objectives, and criteria and assumptions; and Appendix 2 considers the five topics identified by the EqIA Scoping Report.</p> <p>26. If you have any further questions, please do not hesitate to contact me.</p> <p>27. We would welcome a meeting about the progression of the Local Plan, to best support the Council to protect Wirral's greenspace when planning for sustainable development. We are currently compiling evidence to show the availability of suitable brownfield is greater than currently shown on the Brownfield Register. It would like to engage positively with local planning officers on this topic. It is hoped that if the Brownfield Register is updated, and is consequently more comprehensive, it will remove the need to consider the allocation of green field sites in the future.</p>	General comments.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP033	Local Amenity Society	<p>Air Quality- SA Objective -</p> <ul style="list-style-type: none"> <li>• Seek to build on current air quality achievements by minimising air pollution more generally, such as through supporting or enabling the use of low emission technologies and encouraging sustainable modes of transport such as walking and cycling.</li> <li>• Locate and design development so that current and future residents will not regularly be exposed to poor air quality.</li> </ul> <p>Relevant Criteria Air Quality Management Area (AQMA)</p> <p>Comment: We recommend the Council does continue to closely monitor air quality in the Borough and avoids air pollution, by mandating the use of low emission technologies (electric charging points) and sustainable modes of transport (walking and cycling). Locate and design development so that current and future residents will not require car-dependency or be regularly be exposed to poor air quality.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033	Local Amenity Society	<p>Biodiversity- SA Objective -</p> <ul style="list-style-type: none"> <li>• Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of international, national or local significance.</li> <li>• Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.</li> </ul> <p>Relevant Criteria International designations: 3 Ramsar sites: 4 Special Protection Areas (SPAs): 2 Special Areas of Conservation (SACs): National designations 11 Sites of Special Scientific Interest (SSSIs) 0 Marine Conservation Zones 0 National Nature Reserves 10 designated Ancient Woodlands Range of Biodiversity Action Plan Priority Areas Local designations 69 Local Wildlife Sites (LWS), referred to in Wirral as Sites of Biological Importance</p> <p>Comment: In our view, this SA objective relies on maximising the future development contribution from brownfield sites, such as the large previously developed site owned by Peel at Wirral Waters. We recommend a locally imposed brownfield target in the Local Plan. We are compiling evidence to show the availability of suitable brownfield is more than shown on the Brownfield Register. We want to share our information and engage positively with local planning officers. If the Brownfield Register is updated to be more comprehensive, it may remove the need to even consider the allocation of green field sites in the future. The Council ought to include Local Plan policy on biodiversity, and supplementary guidance to developers on the standards are expected when developing a brownfield site, and a greenfield site, the latter being much higher to combat harm to the environment.</p>	The biodiversity objective makes no reference to brownfield land. Brownfield land can also hold biodiversity value, and impacts will be determined accordingly.
SCOP033	Local Amenity Society	<p>Climate Change Adaptation - SA Objective -</p> <p>Adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.</p> <p>Relevant Criteria Fluvial flood zone Surface water flood risk Other flood risk (groundwater)</p> <p>Comment: The question of whether a development can be accommodated at a proposed location must be able to be assessed. Any additional infrastructure requirement arising must be properly mitigated through Sustainable Urban Drainage Solutions. Problems for areas further down the river catchment must not be caused. The hydrological impact of land uses such as golf courses and housing should be properly considered, as the water demand, and discharge can be excessive.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033	Local Amenity Society	<p>Climate Change Mitigation - SA Objective -</p> <p>Continue to drive down CO2 emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.</p> <p>Relevant Criteria Appendix B states "Spatial data unlikely to be available". This is not the case, GHG emissions must be considered.</p> <p>Comment: We agree that CO2 emissions must be cut drastically and new development should comply with appropriate energy efficient standards, which the Local Plan could impose. For example, developers should seek to calculate the overall Greenhouse gas (GHG) emissions from their proposals, irrespective of land use. The GHG should be considered against the whole of Council's Carbon budget. In this way the negative GHG impact can be fully understood.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP033	Local Amenity Society	<p>Economy and Employment -</p> <p>SA Objective -</p> <ul style="list-style-type: none"> <li>• Ensure that education and skills provision meets the needs of Wirral’s existing and future labour market and improves life chances for all, including by enabling older people and people with physical and mental health conditions to stay in employment.</li> <li>• Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the Borough’s town and local centres including through the identification of further regeneration opportunities, particularly in the most deprived areas. This could include support for the social enterprise, voluntary and community sectors.</li> </ul> <p>Relevant Criteria</p> <p>Existing strategic employment areas</p> <p>Committed strategic employment areas</p> <p>There is a presumption that employment sites that are located within close proximity to existing strategic areas can benefit from established services. There is also a presumption that sites with good access to strategic transport routes and hubs ought to be marked as particular opportunities. A loss of employment land is presumed to be negative unless there is evidence that the site is poor quality / not attractive for modern business.</p> <p>Comment:</p> <p>Unrealistic economic growth assumptions should not be relies upon. Over-development, not only impacts negatively on existing property markets, but harms our countryside.</p> <p>The countryside of Wirral provides Gross Value Added for the area. The agricultural sector, related food and drink and visitor economy relies on land being retained for farming, food processing and activity associated with rural areas.</p> <p>The natural habitat of Wirral, attracts visitors including bird watchers and those who explore the picturesque countryside and coastline.</p>	Comments noted and will be factored in to the next stages of the SA. (i.e. in relation to the economic value of enviromental assets)
SCOP033	Local Amenity Society	<p>Health -</p> <p>SA Objective -</p> <p>To improve the physical and mental health and wellbeing of Wirral residents and reduce health inequalities across the Borough and between local communities</p> <p>Relevant Criteria</p> <ul style="list-style-type: none"> <li>• GP Surgery and</li> <li>• Other healthcare facilities</li> </ul> <p>Comment:</p> <p>We agree that the Council must ensure that adequate developer contributions are agreed as new development is planned to ensure there are adequate places available at local doctors, dentists and other healthcare services</p>	Comments noted.
SCOP033	Local Amenity Society	<p>Heritage -</p> <p>SA Objective -</p> <ul style="list-style-type: none"> <li>• Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.</li> </ul> <p>Relevant Criteria</p> <ul style="list-style-type: none"> <li>• Registered park or garden</li> <li>• Scheduled monument</li> <li>• Listed building</li> <li>• Common land</li> <li>• Conservation area</li> <li>• Locally listed buildings</li> </ul> <p>Comment</p> <p>We agree that the Local Plan policies should adequately protect, conserve and enhance heritage assets. We think that the SA has identified many of the heritage assets that could be impacted in Wirral. There are some omissions, such as, in Irby a Scheduled Monument, Listed Building and Roman Well.</p> <p>It is important to ensure any neighbouring land that may form part of an important part of the setting of heritage assets are also protected and enhanced as new development comes forward.</p>	Designated assets in both the discussion and the maps are drawn from data provided by the Council. No designated asset has been knowingly excluded. If there are any exclusions this reflects the data provided to AECOM or the nationally available open source data.
SCOP033	Local Amenity Society	<p>Housing -</p> <p>SA Objective -</p> <ul style="list-style-type: none"> <li>• Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral’s residents, including older people, people with disabilities and families with children</li> </ul> <p>Relevant Criteria</p> <p>AECOM states: Spatial data unlikely to be available. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes.</p> <p>Housing objectives could potentially be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at larger sites)</p> <p>Comment</p> <p>We accept enough needed new homes should be planned, particularly those that are ‘truly’ affordable.</p> <p>Above we refer to the Government’s flawed standard method, and reliance on inflated ONS 2014 based population growth projections.</p> <p>Wirral Council must only plan ‘enough’ new housing, and not for excessive numbers.</p> <p>The Regional SHELMA is being updated due to flaws.</p> <p>Maximising the potential from strategic brownfield land oppourtunities is essential.</p> <p>We question AECOM’s comments on comparing large and small sites.</p> <p>Smaller sites are an important component of the housing land supply, and the NPPF 2019 expects at least 10% to come from this source.</p>	<p>AECOM's highlighted comment on small sites is consistent with WGSA's. The intended message is that small sites are an important source of supply and that it is important to avoid a presumption that large sites perform more strongly against the housing objective just by virtue of delivering greater quanta of growth.</p> <p>Comments on the evidence base are not relevant to the SA in that the SA does not influence the preparation of regional evidence base work.</p>

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP033	Local Amenity Society	<p>Land and Soils - SA Objective -</p> <ul style="list-style-type: none"> <li>Promote the efficient and sustainable use of natural resources, including supporting development which avoids the best and most versatile agricultural land and development which makes effective use of previously developed land</li> </ul> <p>Relevant Criteria</p> <ul style="list-style-type: none"> <li>Agricultural land quality</li> <li>Contaminated land</li> <li>Mineral safeguarding areas</li> </ul> <p>Comment</p> <p>The SA should refer to a commitment made by the Council in 2018 not to develop on farmland. This was supported by us and is in line with the NPPF, which discourages the loss of high grade farmland (grades 1 to 3a) for development. Grade 1 should be entirely prohibited from development, as it is a national asset.</p> <p>We agree contaminated land should be recorded. More than this, the Council ought to do much more to remediate contaminated land. Such as, action plans to overcome contamination should be prepared to facilitate the reuse of land in the future. During the Local Plan period there must be a prospect of constrained sites being unlocked.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033	Local Amenity Society	<p>Landscape - SA Objective -</p> <ul style="list-style-type: none"> <li>Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps between settlements, mindful of the need to make careful choices about Green Belt release.</li> </ul> <p>Relevant Criteria</p> <ul style="list-style-type: none"> <li>National character areas</li> <li>Local character areas</li> <li>Green Belt</li> <li>Local landscape designations / areas of known sensitivity</li> </ul> <p>Comment</p> <p>We agree that the Local Plan must protect and enhance the character, quality and diversity of the Borough's landscapes. The release of open Green Belt is not required if jobs and houses were planned according to latest data, using a bone fide housing calculation method, and using all available, suitable brownfield land. The Local Plan process to date has served to mislead on the scale of Green Belt release required, and WGSA remains strongly opposed to this.</p> <p>Furthermore, some of the 48 shortlisted sites, were identified in the Council's Characterisation Report as being part of the essence of Wirral. There is an obvious conflict. Sites of distinct local character representing 'the essence of Wirral' ought to be protected from development, indeed enhanced in the future.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033	Local Amenity Society	<p>Population and communities - SA Objective -</p> <ul style="list-style-type: none"> <li>Support good access to existing and planned community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community Improve perceptions of safety and fear of crime and to help remove barriers to activities and reduce social isolation.</li> </ul> <p>Relevant Criteria</p> <ul style="list-style-type: none"> <li>Primary Schools</li> <li>Secondary School</li> <li>Designated open green space/open space</li> <li>Index of Multiple Deprivation</li> <li>Local Nature Reserves</li> </ul> <p>Comment</p> <p>Developers must agree to providing adequate infrastructure associated with the scheme they promote.</p> <p>Developers ought not to be allowed to use viability reasons for reneging on their contributions.</p> <p>We have seen this happen and the new Local Plan should strictly control contributions expected from developers</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033	Local Amenity Society	<p>Transport - SA Objective -</p> <ul style="list-style-type: none"> <li>Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change whilst helping to reduce congestion and travel times. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to the public realm, including key services.</li> </ul> <p>Relevant Criteria</p> <p>Bus Stops Train stations Cycle routes Other transport features</p> <p>Comment</p> <p>Sustainable development requires non-reliance on the private car for daily services such as school, and local shopping. The distance of development from amenities should be strictly controlled. This can help prevent urban sprawl.</p> <p>People will not use public transport, cycle or walk if it is too onerous or services too infrequent.</p> <p>Developers should contribute to the provision of public transport where deficient.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP033	Local Amenity Society	<p>Water - SA Objective -</p> <ul style="list-style-type: none"> <li>Promote sustainable forms of development which minimises pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive</li> </ul> <p>Relevant Criteria Groundwater Source Protection Zones (SPZ) Comment On the contrary, we believe the presence of a groundwater source protection zone or aquifer could be a major constraint for most types of development. It is an issue requiring adequate attention.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033	Local Amenity Society	We are pleased to see inclusion of Public Rights of Way, PROW. The network of footpaths has an impact on how people enjoy their environment and should be protected and enhanced wherever possible.	Comments noted.
SCOP033 EQIA	Local Amenity Society	<p>Appendix 2 – 5 topics of the Equality Impact Assessment (EqIA) of the Wirral Local Plan Scoping Report We note the key issues emerging given the context and baseline review. WGSA make the following comments on the EqIA framework:</p> <p>Population and communities - Objective -</p> <ul style="list-style-type: none"> <li>To support good access to existing and planned community infrastructure for new and existing residents, mindful of the potential for community needs to change over time.</li> <li>To improve perceptions of safety and fear of crime to help remove barriers to activities and reduce social isolation.</li> </ul> <p>Comment We support good urban design that will reduce crime and the fear of crime, especially for vulnerable groups. We acknowledge housing affordability is a key issue in Wirral. It is important that the housing needs of families with children are met, along with the requirement for smaller houses. We object to the false premise that building houses on the Green Belt would have the effect of lowering house prices. There is no evidence to show this has happened elsewhere. This is because developers only seek to build more expensive and larger family/executive homes for profit reasons, rather than affordable ones.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033 EQIA	Local Amenity Society	<p>Housing - Objective - To provide a mix of good quality, affordable and specialist housing that meets the needs of Wirral's residents, particularly older people, people with disabilities (particularly those with accessibility issues) and families with children. Comment We want enough homes to be planned, and observe the anticipated 30% increase in people aged 65 and over by 2030. The increase in the number of elderly people will require appropriate housing in existing urban places with good community facilities and bus services. Regeneration of urban places would better support older people by keeping them well connected to their community, rather than pushing them out to the fringes or rural parts of our towns and settlements, where they are at a distance from shops and vital services, therefore more isolated and vulnerable.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033 EQIA	Local Amenity Society	<p>Transport - Objective -</p> <ul style="list-style-type: none"> <li>Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to the public realm, including key services.</li> </ul> <p>Comment No development that is over-reliant on cars should be supported by the Local Plan. This is why previously developed sites are much more suitable for development of jobs and housing, as they are more accessible due to central locations, and are already supported by public services</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033 EQIA	Local Amenity Society	<p>Economy and Employment - Objective -</p> <ul style="list-style-type: none"> <li>Support a diverse and resilient economy that provides opportunities for all and promotes regeneration. This could include support for the social enterprise, voluntary and community sectors.</li> <li>Provide employment opportunities in the most deprived areas, particularly to disadvantaged groups.</li> <li>Enable older people and people with physical and mental health conditions and disabilities to stay in employment</li> <li>Ensure that education and skills provision meets the needs of Wirral's existing and future labour market and improves life chances for all</li> </ul> <p>Comment There are areas of entrenched deprivation within the Borough, particularly in Birkenhead in the north east, creating a complex and nuanced range of community needs. Furthermore, across Wirral the proportion of 16-18 year olds not in Education, Employment or Training (NEET) remains higher than regional and national averages. We believe it is very important to direct investment for new training, jobs and housing at existing urban areas, especially Birkenhead and the north-east. Poor health can be tackled by improving the fortunes of people in Wirral, particularly so in areas of deprivation.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP033 EQIA	Local Amenity Society	<p>Health - Objective - Improve the physical and mental health and well-being of Wirral residents and reduce health inequalities across the Borough and between local communities. Comment Ensuring permanent access to Wirral's quality natural space is so important for health and well-being, with 20% of residents have a long-term health problem or disability. We believe it is right for the Local Plan to retain as many opportunities for people to benefit from natural green space and the countryside. There is so much evidence showing the health (including physical and mental health) benefits of spending time in quality natural environments. This is why we feel so strongly against the unnecessary loss of green fields. We believe the Local Plan must guard against the development of green spaces.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP034	Local Resident	<p>Like several others, I am only able to respond to this Consultation through the production and circulation by ITPAS/WGSA of 'An Explanation and Easy Guide to Responding' to the nearly one hundred pages of technical, jargon-filled text and diagrams of the Consultation Documents. The Council, having chosen for an unexplained reason to include the public in this Consultation, should have made the public more aware of its existence, provided essential explanation and held open meetings as it did for the 'Development Options' Consultation of last autumn for which I and all other contributors still await official feedback after more than six months.</p> <p>From reading the 'Easy Guide', it would seem that there is much in the Sustainability Report to applaud and agree with but the main problem with the Report is that the Council is running directly counter to most of its suggestions and sustainability tests, and I am concerned that the Council may seek to dismiss, degrade or ignore reasonable assessments based upon the Document as it stands. I, therefore, would like to see many of the provisions and deciding factors being 'beefed up' considerably and made more measurable and less open to preferential consideration.</p> <p>I am fortunate enough to live close by wonderful Green Belt with views across productive farmland and many attractive footpaths. Irby is a very pleasant and bustling small, semi-rural village, quite separate and distinct from its neighbouring communities of Pensby, Barnston, Heswall, etc., which also have their own distinctive characters. These communities must not be joined together in a huge urban sprawl, miles across. It would be totally unsustainable and a great shame.</p> <p>Having said this, it is not a case of NIMBY nor a wish to stop others enjoying pleasant surroundings to their homes but it could not be sustainable to destroy the assets of some areas whilst leaving others, notably Birkenhead, Wallasey and derelict Dockland, in desperate need of the regeneration called for and highlighted in the Consultation Report. That would be a totally unsustainable approach but sadly that seems to be what the Council is set on doing. To avoid this, the main Report should be far more robust and clearer in its statements as to what would be deemed 'unsustainable' and unacceptable development.</p>	The SA will present a robust and transparent (and independent) assesment of the effects of the Plan. Importantly this will include a fresh look at reasonable alternatives with regards to the amount and location of growth.
SCOP034	Local Resident	<p>Having seen what can become of derelict Dockland and surrounding areas in other parts of the UK and abroad, it is clear to me (as it obviously is to most other people) that the Council should be concentrating its efforts, new dwellings and community-building by identifying and developing "regeneration opportunities, particularly in the most deprived areas". As the Report says, "Wirral Waters must remain the cornerstone of the Council's strategy for ... regeneration" and the delivery of the range of new dwellings which will be needed in the future.</p> <p>To quote further, "Such areas provide the opportunity and affordability to include a range of smaller and medium size properties of different types suited to a wide range of people including those wishing to downsize, first-time buyers, those aspiring to better standards of housing, and those with physical, mental health and other conditions, where mixed, balanced, vibrant, viable and caring communities could flourish, close to improved public services and employment." This would be sustainable development and satisfy actual need.</p> <p>The Council's Consultants have not identified the need in Green Belt areas for significant numbers of medium and large dwellings. The market and demand simply does not exist, and what does exist is catered for by small infill schemes, conversions and modest redevelopments within existing communities. I was also at a public meeting where the Head of Planning confirmed that affordable housing would not be viable on Green Belt sites. Taken together, without a highly unsustainable artificial inward migration, the Council's apparent determination to have widespread development on Green Belt sites seems completely unrealistic and the concern raised to be totally unjustified and a waste of time and Taxpayers' money.</p>	This suggestion is a common theme, and should form part of the discussions in relation to reasonable alternatives for the spatial strategy.
SCOP034	Local Resident	<p>The prospect of the population of Wirral escalating by over 20,000 over the next 15 years is also nonsense, and flies in the face of the lack of any sustained growth in either population or the local economy. Indeed, the drive for sustainability on Wirral would see inward migration continue to decline (naturally and by policy), preferably by surrounding Authorities housing a higher percentage of their own working populations.</p> <p>I have been convinced that the opportunities within the wealth of available Brownfield and other non-Green Belt sites within Wirral are much more than are required to satisfy any demand, except that of greedy developers and others seeking easy money or a soft option. Developing Green Belt sites whilst failing to maximise available Brownfield ones is against national Planning Policy and Guidance, the specific Purposes of Green Belt formation, and the expressed wishes of the local Electorate, and is in no way sustainable.</p> <p>I have witnessed first-hand the considerable work and body of proof and informed opinion produced by ITPAS, WGSA, the 20+ Groups and individuals within that Alliance, and by other organisations (e.g. The National Trust). This immense effort is intended to aid the process towards a reasonable Local Plan but I have been appalled to see it all utterly disregarded by the Council, whilst at the same time being highly praised and valued by communities across Wirral and the Electorate who have clearly demanded change to a more sustainable approach.</p> <p>In case the Council is still minded for whatever misguided reason to continue on its flawed path, the Sustainability Scoping Report must be made clearer and more onerous and include more stringent, measurable and transparent tests of Sustainability.</p> <p>Wouldn't it be great and highly 'sustainable' to see such groups, who represent their communities, being consulted by their Council and working together to produce a proper Local Plan.</p>	The SA will present a robust and transparent (and independent) assesment of the effects of the Plan. Importantly this will include a fresh look at reasonable alternatives with regards to the amount and location of growth. Appraisal reports will include non technical summaries to aid in consultation moving forward.
SCOP035	Local Resident	<p>I am writing to object to the recent proposal of Wirral Council, to build on Wirral's greenbelt land. Of particular concern to me and to my family, are the proposals to build hundreds of houses and a road in Greasby, on the land east of Rigby Drive (SP010A), the site of Greenhouse Farm and Appleby's.</p> <p>Apart from the fact that it's heartbreaking to think what it would be like if all of this disappeared, and all we were able to see was rows and rows of houses, it's clear that this development would mean the end of a wonderful farm, and a valuable local business.</p> <p>As part of our efforts as a family to live in a greener way, and support local businesses, we are proud to buy our milk and eggs from Appleby's. This way, we reduce the carbon footprint of these products, and ensure that we buy this food from a farm where the animals are looked after and free range.</p> <p>Appleby's do not only provide a valuable service to our local community, they are also a part of it, and we can't imagine life without the farm and its surrounding fields.</p> <p>We often walk our dog along the edge of the Rigby Drive estate, and around to the edges of Arrowe Park, where it is peaceful and rural. The wildlife is there in abundance, and the ancient woodlands of the copse are wonderful to behold. Who knows what archaeology lies under the fields of Greenhouse Farm? And what wild creatures and plants would be lost if it all turned to houses? I often stop at the field gate by the Infant School, just to take in the view. My son commented how brilliant it is that - from his playground at school - he can see the very cows that produce the milk we drink.</p> <p>Then there is the question of infrastructure. If so many houses are built on this land, and the land north of Greasby (SP001), what will the increase in traffic do to the area? Where will the children who live in these new developments go to school? Where will the new residents be able to register to see a doctor or dentist? How will they travel to work? Our local services are already stretched as it is, so how would they cope with such an increase to Greasby's population?</p> <p>Please do not build on these sites - or indeed any of the Wirral's greenbelt land. We are a small peninsular, and - if our precious greenbelt was gone - everyone's quality of life would be diminished. I appreciate the need for more housing, but when brownfield sites are unused, developers are hoarding land, and many properties which already exist are sitting empty, it seems absurd and utterly wrong to build on our greenbelt. Once it is gone, we will never get it back. I want my son and his friends to grow up in a world where wild places are easy to find and still there to explore, not in an endless, choked, urban sprawl. Save our greenbelt.</p>	Not related to the scoping process.
SCOP036	Local Resident	<p>There are some good aspects to the Report but the emphases and proscriptions go nowhere near far enough, especially as it is clear that the Council's proposals run counter to many of the pointers in the Report. It must be made more difficult for the Council to ignore guidance.</p> <p>There needs to be much more emphasis on building only as many new homes as really necessary and of the right type (smaller), and all close by existing employment and infrastructure (roads, bus routes, utility services and drainage, schools, health centres, etc.). This would promote sustainability.</p> <p>The brief to Wirral Council in the Sustainability Report should be clear and stark: it must include drastically reducing the use of and dependency upon cars and bringing journey frequency and travel distances down considerably in order to reduce pollution, and certainly not to build homes alongside the M53 and other busy, highly polluting roads and busy junctions, as this would increase pollution and remove the protection of the 'green buffer' zones. Please say this clearly.</p>	The SA will present a robust and transparent (and independent) assesment of the effects of the Plan. Importantly this will include a fresh look at reasonable alternatives with regards to the amount and location of growth.

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SCOP036	Local Resident	<p>Too many people already commute off Wirral to places of employment - other local authorities should cater better for their own workpeople in terms of providing their homes, and Wirral Council should not meekly take "NO" for an answer, which they appear to be doing. With neighbouring authorities building homes for their own workpeople, this would have the twin beneficial effects of (i) reducing travel journeys and pollution, and (ii) needing fewer houses on Wirral and reducing any need to release Green Belt land.</p> <p>Recent TV programmes on climate change show even more clearly that we need to keep all our farmland for future food security and planting trees (to capture carbon), and to protect vulnerable wildlife.</p> <p>The current Council seem to think building on Green Belt will not harm them electorally and that their proposals would raise a lot of much needed Council Tax - this is cynical and plainly wrong; and highly unsustainable. In fact, the whole approach is the antithesis of sustainable development. It's really important for the wellbeing of people and the local economy that the beautiful and healthy walks and views across Wirral's open countryside are not destroyed but left for future generations to enjoy. Please bring this report up-to-date and more in tune with the latest expert thinking - now actively and increasingly being supported by the general public - about all aspects of climate change: the effects, scale of problems, feasible remedies, necessary actions and the urgency. Please don't fall short.</p>	Comments noted, but they are not directly related to the scoping process.
SCOP037	Local Resident	<p>Given goodwill and straightforward endeavour, the 'Scoping Report for the Wirral Local Plan Sustainability Appraisal' could with some strengthening be an acceptable basis for Sustainability Appraisal. However, sadly Wirral Council has shown itself lacking in several respects including as regards the preparation of its Local Plan, which leads to the opinion that the methodology should ensure the transparent and equitable handling of supportive and unsupportive findings.</p> <p>Right from its approach to producing its much-belated Local Plan (which approach appears to be politically-based and more directed at achieving financial outcomes than developing and regenerating communities to provide what is actually needed and where) to the way it has treated the hard work and expressed concerns of its Residents (witnessed first-hand), the Council seems set on fixed, predetermined outcomes without proper consideration of alternatives. This is no more clearly demonstrated than in its refusal to produce a 'Locally Assessed Housing Need' to set against the standard formula-based methodology, despite being encouraged (even directed) to do just this by both national and most local politicians as well as by national Guidance, and despite the evidence provided by experts and interest groups both in the general public and the Council's own consultancy firms.</p> <p>Our only reasonable hope is that the persons and appraisal processes employed to scrutinise details of the Council's Draft Local Plan will be exhaustively thorough and fair. To this end and because it appears that the Council's largely predetermined outcomes are 'unsustainable' in many respects, the depth and effectiveness of the Appraisal measures in the final Report should be unequivocal; and important factors should be given appropriate significance and weighting; and must include a proper scoring system that is simple and transparent, the workings of which are to be made available for independent examination in a measurable way. The Council must not be able to devalue, dismiss or ignore factors that are inconvenient or unsupportive of its Case/preferred outcomes.</p>	The SA will present a robust and transparent (and independent) assessment of the effects of the Plan. Importantly this will include a fresh look at reasonable alternatives with regards to the amount and location of growth.
SCOP037	Local Resident	<p>Consideration of 'Sustainability' and matters such as pollution, energy consumption, protection of the environment, and maximising the use of materials and land-take must be based upon latest data (as local as possible and available) and include genuine consideration of 3rd-Party informed inputs. It will not be good enough, for instance, to "minimise ... impacts to biodiversity", and protect habitats, green spaces, Green Belt, farmland, 'green corridors', and the like. Particularly in view of recent EU Directives, Court Rulings and tightening up of Government Guidance and Regulation around sustainability, the tests for 'biodiversity net gain', and 'exceptional circumstances', etc., must be more prominent within the SA documentation, and deliberately more difficult to achieve, knowing that this raises the bar for the Council and developers alike.</p> <p>The Consultation Report currently does not sufficiently reflect recent movements in Court Rulings, Planning Guidance, national and local statistics (especially on harmful effects to people and the environment, and Climate Change) or, significantly, the Public's changed mood and heightened expectations/demands and reduced tolerance.</p>	The SA Framework seeks to achieve biodiversity net gain. If the proposals within the Local Plan do not achieve such goals, then negative effects will be highlighted, with suggestion for improvement. The Council will need to respond as they consider appropriate.
SCOP037	Local Resident	<p>The Council does not appear to be treating 'sustainability' as anything more than an irritation and a tick-box exercise that their QC has advised they must revisit (or at least be seen to revisit). For instance, its selection of '48 Green Belt Sites for Further Investigation' was not (by its own admission) appraised to any reasonable or appropriate degree against any of the 13 Topics listed in the Consultation Report. All of these Sites would appear (and will separately be demonstrated) for the most part to conflict with official Guidance, national and even international findings, and certainly rated reports produced by informed community, environmental and wildlife groups/organisations and 3rd-Party demographers and statisticians, and must therefore be deemed 'unsustainable' in nature.</p> <p>Regrettably, such parties (groups, organisations and specialists) were not consulted nor have their inputs been assessed properly or appraisals of their work been completed or published for over six months, which threatens the validity of the whole Local Plan process, including this Consultation.</p> <p>How can it be considered 'sustainable' for the shortlisted Sites put 'at risk' of release from Green Belt to have an aggregate area exceeding ten times the average of all approved local plans during any of the last eight years, and especially where even a high-level desk-top assessment/appraisal of 'sustainability', the Purposes of Green Belt and national Guidance should have ruled out most, if not all, of them?</p>	The SA will be undertaken independently by consultants with vast experience in this field. There is a clear intention for the SA to drive the process, which is a positive step.
SCOP037	Local Resident	<p>Air quality: Considering building houses beside a motorway and remotely (in Green Belt) away from centres of employment and established infrastructure, would lead inevitably but avoidably to increased pollution, energy consumption, instances of serious health problems to new and existing protected residents, and loss of 'green' and 'wildlife corridors' as well as the well-being benefits of open green space. Please stress that this would NOT be sustainable.</p> <p>Biodiversity: The Council's shortlist of 48 Green Belt sites for potential release include many with significant, fragile and irreplaceable Biodiversity, endangered and protected species in ancient woodland, watercourses, habitats and foraging fields. Stress that this, too, would NOT be sustainable.</p> <p>Also, stress that the Government's increased emphasis on real and proven 'biodiversity net gain' with ANY proposed development MUST be followed through; likewise, the Court Ruling on the recent EU Biodiversity Directive, which states that it is not enough to propose replacement biodiversity action but proof must be given firstly that everything has been done to avoid ANY damage/destruction before ANY replacement measures can be contemplated, and even then the burden of proof of effectiveness of proposals must be high. Stress that to do otherwise would NOT be sustainable.</p> <p>Climate Change: This whole subject has come increasingly into the scientific, public and political realm and 'higher up the agenda' of late and even since the Consultation Report was drafted. The Report must therefore (and otherwise) be edited and made both more proscriptive and prescriptive in order to have the necessary level of effectiveness and avoid only 'lip service' being paid. Stress that to do otherwise would NOT be sustainable.</p>	Comments noted, but they are not directly related to the scoping process.
SCOP037	Local Resident	<p>Economy and employment: The Sustainability Report correctly identifies the benefits of enhancing "the vitality of the Borough's town and local centres" by identifying "regeneration opportunities, particularly in the most deprived areas". This is so significant and also makes appropriate sense of Wirral's considerable latent assets that the converse MUST also be made clear: i.e. that NOT to make the most of enhancing "the vitality of the Borough's town and local centres" by identifying "regeneration opportunities, particularly in the most deprived areas" and doing this BEFORE any other options are contemplated could NOT possibly be considered sustainable.</p> <p>Such areas, when 'greened up' as an integral part of redevelopment, would provide the opportunity and affordability to include a range of smaller and medium size properties of different types suited to a wide range of people including those wishing to downsize, first-time buyers, those aspiring to better standards of housing, and those with physical, mental health and other conditions; and where mixed, balanced, vibrant, viable and caring communities could flourish, close to improved public services and employment - all as have been identified as the real 'housing need' by the Council's own Consultants.</p> <p>Health: Any proposal that directs development to Green Belt, other 'green spaces' or alongside major traffic routes would lead directly to the worsening of public health, infant development, mortality rates and general wellbeing. Of this there can be no doubt and the Report should make this clear. The Council has been informed of the scientific proof of this and warned of the risk to itself of avoidable future court proceedings for direct liability and complicity. On the other hand, to direct development "particularly in the most deprived areas", to improve the housing there and to 'green up' those areas would have positive outcomes for Health. Stress that to do otherwise would NOT be sustainable.</p>	Comments noted, but they are not directly related to the scoping process.

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SCOP037	Local Resident	<p>Heritage: It is clear (as the Council have admitted) that little was done in the process to shortlist 48 Green Belt Sites for possible release for development to investigate and appraise heritage assets contained within them. This was inexcusable as even a high-level desktop study, combined with reviewing (rather than ignoring) the work done and conclusions reached by their own Consultants, would have quickly and clearly shown that many of the Sites had heritage assets which should exclude or severely constrain them. In Irby alone, this has meant that a Scheduled Monument, Listed Buildings, a Roman Well, a rare example of medieval farming practice in its land formation, and remains of its original settlement as well as Ancient Woodland, vulnerable watercourses and 'best quality' open ponds are ALL at risk of damage and loss, unnecessarily, possibly unlawfully.</p> <p>This cannot be dismissed as the opinion of 'extremists' as such views are held and have been expressed by the 'National Trust', local historians and archaeologists, community, environmental and amenity Groups right across Wirral, as well as those who live alongside such Sites and have the depth of local knowledge which the Council has failed to consult or deploy.</p> <p>As with 'Biodiversity' above, it is not enough (morally or legally) to propose 'mitigation' but proof must be given firstly and in advance that everything has been done to avoid ANY damage/destruction before ANY compensatory measures could be contemplated, and even then the burden of proof of effectiveness of proposals must be high. Stress heightened importance to this and that to do otherwise would NOT be sustainable.</p>	Comments noted, but they are not directly related to the scoping process.
SCOP037	Local Resident	<p>Housing: There must be more stress in the Report that the potential of 'Brownfield' and 'Previously Developed Land' MUST be exhaustively explored (not minimised) and used to its maximum before other areas, notably Green Belt, is considered. The burden of proof of exhaustive exploration should be high. Further, it needs stressing that (i) releasing Green Belt for housing is 'unsustainable' per se; (ii) 'exceptional circumstances' MUST be shown before any Green Belt can be released (noting: Local Plan production cannot be an 'exceptional circumstance'); (iii) appropriate and robust actions have been taken to ensure neighbouring local authorities take on board fully the proportion of Wirral's 'Housing Need' for which they could and should cater; and (iv) the Council must produce clear evidence of what it has done to maximise every source of non-Green Belt capacity for development before its policies, let alone a 'Draft Local Plan', could be considered as 'sustainable' to any extent.</p> <p>Whilst self-evident and a main conclusion of numerous environmental reports (including today's publication - the 'UN Nature Report' - which also states) that natural and farmed land is "not just lovely to look at but necessary for human wellbeing", Wirral Council has seen fit to change its views as expressed in 2014 and embarked upon a course of action which actively works against sustainable development of the numbers, types and locations of new homes that are actually required on Wirral, minimising the various sources of non-Green Belt capacity (as is being demonstrated elsewhere), and even employed dubious devices to circumvent the reasonable exclusion of sites even where suggested by their own consultants (as is also being demonstrated separately).</p> <p>There is no apparent determination by WBC to maximise the considerable opportunities that exist, nor to encourage the full potential of 'Wirral Waters' and surrounding areas, nor to achieve better results in returning empty properties back into use, nor to increase housing capacity by applying the required higher standard densities; but instead there is assumption and acceptance from the outset and actions being taken that promote release of Green Belt for larger houses, when there is absolutely no need or significant demand for such. The Consultation Report time and again refers to the significance and capacity of 'Wirral Waters' to deliver directly and as a catalyst the bulk of development and regeneration which Wirral needs. Please stress this further and make the Council justify its actions.</p> <p>Worse, possibly through the fear of 'Intervention' and/or political pressure for the admitted seeking of increased financial gains, Wirral is not producing a 'locally assessed housing need' (employing actual and up-to-date local and national data) to argue for the lower resultant figures against those derived "as a starting point" through use of the 'standard method', despite repeated invitation to do so by 'Homes England', the MHCLG and successive Secretaries of State who in addition have stressed and repeated that Wirral is NOT an area of high(er) housing pressure. So, don't treat it as such.</p>	Comments noted, but they are not directly related to the scoping process. It is not appropriate for the scoping report to make suggestions on the policy approach that should be taken. However, these matters will be explored as the process moves forward.
SCOP037	Local Resident	<p>Land and soils: There are numerous environmental reports right up to today's 'UN Nature Report' (and TV programmes) that all stress the importance of preserving and indeed enhancing (and not covering in concrete) the remaining farmland and open landscape, including Green Belt which was specifically designed and designated to be 'permanent'. The Consultation Report should place even higher stress on this than it already does, with insistence on quantitative measures and not just qualitative dismissive comments. Releasing farmland and Green Belt land is 'unsustainable' per se and the Report should stress that. All farmland is required for food production and new woodland. Shockingly, the Green Belt Sites shortlisted by the Council include many designated as 'High Quality Agricultural Land' ('Best and Most Versatile'). Though there is some suggestion that current designations should be reviewed in order to reduce the extent of Grade 3a and above land, recent independent soil testing has upheld the current rating and thus the need for exclusion of many Sites.</p>	Comments noted, but they are not directly related to the scoping process.
SCOP037	Local Resident	<p>Landscape: Sites short-listed by the Council include those, like SP059E (Rear of Irby Hall), previously characterised by the Council as "the essence of Wirral", to be retained for the benefit of Residents and Visitors alike, contributing considerably to the Local Tourism Economy. Several short-listed Sites conflict with the second 'Purpose of Green Belt', which precludes 'infilling' that would merge distinct towns (settlements or communities); and all Sites conflict with the fifth 'Purpose', where 'permanence' is specifically designed "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". This has been raised in earlier sections.</p> <p>Worse, the Council has expanded sites to increase the extent of their 'enclosure' (by perimeter housing), classifying what is effectively inappropriate, massive urban sprawl and expansion into countryside as simply 'infilling within Settlements'. Incredibly, it appears that, to achieve the status of 'highly enclosed', sites have been expanded to include 'unavailable' portions, land excluded from their Consultants' previous appraisals, protected woodland and even a covered reservoir that cannot be developed but which just happen to be bounded by existing housing. Where 'infill' is effectively urban sprawl, or intrusion into what is in reality 'open countryside', or merges distinct communities (in cases up to a mile apart), the Report should state that such instances will be deemed 'not sustainable'.</p>	The Council have commissioned a landscape study, which is now underway.
SCOP037	Local Resident	<p>Population and communities: North and east Wirral are areas of greatest deprivation, highest crime rate and worst housing conditions. Not to concentrate on redeveloping these areas is to condemn them and their communities to yet further decline. Whereas, to follow the albeit more difficult opportunities there are aplenty to improve life-chances and living conditions in the more deprived areas through sustainable, attractive and 'green' developments (spearheaded by 'Wirral Waters') would deliver lower crime, higher employment, better health, improved quality of life and rejuvenated communities - all normal objectives of a proper Local Plan. Whilst this very argument is supported by the Consultation Report, the Council is clearly NOT following this course. In fact, it is seen to be actively opposing it in favour of a highly unsustainable alternative. In such a situation, it is beholden upon the Report's authors to make this (their own) case all the more strongly and unequivocally.</p> <p>Transport: This Topic has been covered in other sections above but improving public transport and increasing cycling and walking go hand in hand with an integrated development of well designed and appropriately located housing, predominantly in the north and east of Wirral.</p> <p>To locate housing in dispersed Green Belt areas, mainly in the west of Wirral, would overstretch the meagre public transport services that exist, make improving such services up to an acceptable and sustainable level prohibitively expensive, and most likely increase car-dependency and usage, aggregate journey mileage, fuel consumption and air and ground pollution, leading inevitably to only a series of negative results, including adverse health effects, whilst perpetuating poor conditions in north and east Wirral. Why would this be done knowingly and presumably with little concern over accountability? The Report must seek to avoid this in case the new Council (following the result of the recent Local Election) fails to honour the individual and collective undertakings universally made in the Councillors' election literature and statements.</p>	Comments noted, but they are not directly related to the scoping process.
SCOP037	Local Resident	<p>Water: Wirral's real 'housing need': a range of small and medium-sized, well-designed dwellings in the right places, with appropriately higher but standard densities to fulfil the NPPF requirement for 'the efficient use of land'. The efficient use of water would follow adopting such an approach. Sadly, the Council pours cold water on such ideas.</p> <p>Please bring the Sustainability Report up-to-date and more in tune with current expert thinking and evidence - now actively and increasingly being supported by the general public - about all aspects of Climate Change: the effects, scale of problems, feasible remedies, necessary actions and urgency.</p>	Climate change issues are addressed throughout the Scoping Report.
SCOP038	Local Resident	<p>In terms of the Sustainability Appraisal, it MUST be that we abide by the NPPF document that states that we should safeguard and protect our productive agricultural land on the Wirral and ensure that we maintain our local food supplies and produce. To ensure this we must also abide by the council decision of 15th October 2018 which stated that agricultural land must be removed from the green belt and therefore from any proposed plans for the development of future housing.</p>	Agricultural land will form an important factor in the appraisal of the Plan (and reasonable alternatives).



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SCOP039	Landowner/Developer	<p>1.1 This report provides representations relating to the consultation on the Sustainability Appraisal Scoping Report of the Wirral Local Plan.</p> <p>1.2 We have previously submitted evidence outlining why the site at Greenheys Nursery should be considered for release from the green belt. The 0.7ha site has the potential to deliver up to 18 homes. Set against this content, this report highlights key issues that need to be considered when developing the Sustainability Appraisal and new Draft Local Plan for the Wirral.</p> <p>1. Economy &amp; Employment Section of the Scoping Report</p> <p>1.1 Section six of the Scoping Report looks at the Wirral economy and we welcome the fact that one of the issues it identifies for the Sustainability Appraisal Framework (SAF) is to:  “Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the Borough’s town and local centres including through the identification of further regeneration opportunities...”</p> <p>1.2 The Scoping Report quite rightly highlights the need to increase employment in the District, and it compares the Wirral’s recent economic performance with that of the North West and England. However, what it does not do is look at how the Wirral performs relative to the wider Liverpool City Region. For example, between 2015 and 2017, employment on the Wirral grew by only 1.0% - from 105,000 to 106,000. Over the same timeframe, job numbers in the City Region increased by 20,000 (3.2%) to reach 639,000, with Liverpool accounting for half this increase. The Wirral’s share of total employment in the City Region also declined from 2015-17, falling from 17.0% to 16.6%.</p>	General comments.
SCOP039	Landowner/Developer	<p>1.3 The Scoping Report also highlights how there are significant commuting flows to and from the Wirral, most notably with Cheshire and Liverpool. This is based on data from the 2011 Census and more detailed analysis of this data shows that the Wirral experiences a net outflow of around 27,000 commuters. Unsurprisingly, Cheshire West &amp; Chester and Liverpool are the most common destinations. This outflow is unlikely to be reversed in the long-term, however it seems reasonable to argue that the District needs to see significantly more jobs created over the 10-20 years in order to it be considered as the “strong, diverse and resilient economy” noted in the Scoping Report.</p> <p>1.4 For the District to achieve genuinely sustainable economic growth, the Wirral needs to see faster jobs growth and increase the number of people who live and work in the District. The Sustainability Appraisal and new Draft Local Plan need to outline how this will be achieved.</p> <p>When looking at how to increase the number of people who live and work in an area, the role of housing will be an important factor – not just in providing new homes for people wanting to move to the area, but in creating local economic benefits. For example, if residential dwellings were developed on the site at Greenheys Nursery, new job opportunities would be created in the construction sector, while residents in the new homes will be spending money in the local area and supporting permanent employment. Additional Council Tax would also be generated.</p>	General comments.
SCOP039	Landowner/Developer	<p>Local Economic Benefits Generated by the Construction Phase</p> <p>1.5 If the land at Greenheys Nursery is developed for new residential dwellings, this will generate significant benefits for the local economy:</p> <ul style="list-style-type: none"> <li>• The site has the potential to deliver up to 18 homes. Construction costs are estimated at £2.5million over the build programme, which is expected to be no more than 12 months. The construction costs have been estimated using the BCIS Online tool<sup>2</sup> and are exclusive of external works, contingencies, supporting infrastructure, fees, VAT, finance charges etc.</li> <li>• To estimate construction employment supported during the building phase, the total construction cost has been divided by the average turnover per construction employee in the North West of £122,500, based on figures derived from the 2018 edition of Business Population Estimates produced by the Office for National Statistics. This means that over the 12 month build programme, around 20 construction jobs on-site could be supported.</li> <li>• It is widely recognised that housebuilding has knock-on effects for other sectors, which leads to increased demand for building materials and equipment at the construction phase, as well as domestic furniture and carpets etc. following completion. This generates and sustains employment in other sectors. The July 2018 ‘Economic Footprint of House Building in England and Wales’ report by the Home Builders Federation found that for every 1 job in housing construction, the scale of employment supported is equivalent to between 2.4 and 3.1 direct, indirect and induced jobs per new dwelling built. Taking an average of these figures, a multiplier of 2.75 has been used – i.e. for every 1 job in house building, a further 1.75 jobs are supported in the wider economy. Therefore, as well as the 20 on-site jobs supported per annum during the build phase, the scheme could support a further 36 additional jobs in the wider economy.</li> <li>• In total, around 56 temporary jobs could be supported during the build phase.</li> <li>• Another way of looking at the economic impact of the construction phase is to calculate the contribution a development makes to wealth creation, as measured by the increase in the value of goods and services generated within an area. This can be done by looking at the increase in gross value added (GVA)<sup>3</sup>, a common proxy for economic output. Drawing on data published by the Office for National Statistics (ONS), based on the number of jobs supported during the build phase, developing the land at Greenheys Nursery for new residential dwellings could generate an additional £3.0million of GVA for the regional economy during the construction period.</li> </ul>	Comments noted, but not directly related to the scoping process as such.
SCOP039	Landowner/Developer	<p>Household Spend and Supporting Permanent Employment</p> <p>2.7 In addition to the impact of the construction phase, developing the site at Greenheys Nursery for residential dwellings will bring long-term benefits to the economy in the form of increased household spend. Figures produced by the ONS<sup>4</sup> at a regional level can be used to provide an estimate of what this spend could be worth on an annual basis. For the North West, average household spend on items such as food &amp; drink, household goods, leisure etc. is estimated by the ONS to be around £280 per week.</p> <p>2.8 Not all of the household spend will be retained in the local area (Wirral district). Analysis in the Wirral Retail &amp; Leisure Study, published in March 2016 by Lichfields, indicates that approximately 90% of convenience spend is retained on the Wirral, while around 60% of comparison spend is retained in the District. Taking this into account, weekly spend retained on the Wirral is estimated at £205. Over the course of a typical year, the 99 homes that could be developed on the land at Greenheys Nursery could generate around £0.2million of additional spend in the local economy, which could support 2 full-time equivalent (FTE) jobs.</p> <p>Additional Council Tax Revenue</p> <p>2.9 Assuming the new dwellings at Greenheys Nursery fall within Band D5, once fully occupied the site is estimated to generate over £33,000 on an annual basis in additional Council Tax payments, or around £0.3million over 10 years at 2019/20 rates.</p>	Comments noted, but no suggestions made in relation to the objectives themselves.
SCOP039	Landowner/Developer	<p>3. Housing Section of the Scoping Report</p> <p>3.1 Section nine of the Scoping Report deals with housing and it concludes that the SAF needs to:  “Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral’s residents, including older people, people with disabilities and families with children.”</p> <p>3.2 We support the objective above and the Scoping Report also helpfully outlines the current evidence on housing requirements in the District. This shows a range of figures:</p> <ul style="list-style-type: none"> <li>• Wirral’s SHMA, published in 2016 identifies an Objectively Assessed Housing Need (OAHN) of between 875 dwellings per annum (dpa) and 1,235 dpa.</li> <li>• The Government’s proposed standard methodology produces a housing need figure of 803 dpa.</li> <li>• The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) was published in draft for consultation in 2017, and identifies housing need at a regional scale, apportioning this need between the constituent LCR authorities. The SHELMA identifies an OAHN for the Wirral of between 664 and 737 dpa.</li> </ul>	General comments.

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SCOP039	Landowner/Developer	<p>3.3 Regarding the housing requirement figures outlined above, data published by the Ministry of Housing, Communities &amp; Local Government (MHCLG) show that the rate of housing delivery on the Wirral has been consistently below the required level over the last decade. The latest figures for 2017/18 indicate that there were 704 net additions to the dwellings stock in the District. As shown in Figure 3.1, this represents the highest number since 2007/08, however it is still well below the SHMA and standard methodology housing requirement estimates. It is also lower than the higher end estimate of 737 outlined in the Liverpool City Region SHELMA. [Table attached showing Net Additional Dwellings on the Wirral, 2008-18]</p> <p>3.4 Boosting the supply of housing is therefore a critical consideration for the SAF and the new Draft Local Plan of the Wirral if it is to achieve long-term sustainable development. Developing residential dwellings on the land at Greenheys Nursery can help in achieving this aim, by providing new homes that can attract people to the area. In particular, attracting economically active people to the District is an important consideration when looking at future labour supply. The Wirral has seen a significant increase in the number of people aged 65 and over in the last decade – experiencing a rise of 17.9% (10,000) within this cohort between 2007 and 2017. The number of people aged 0-15 and 16-64 in the District declined over the same period.</p> <p>3.5 The trend of an ageing population is expected to continue, raising the importance of the Wirral seeing new homes built that are attractive to people of working age. This younger population can help boost labour market supply as older members of the workforce reach retirement age and become economically inactive. Sites such as Greenheys Nursery can play an important role in increasing housing supply on the Wirral.</p>	general comments.
SCOP039	Landowner/Developer	<p>4. Conclusions</p> <p>4.1 Whilst we welcome the objectives relating to the economy &amp; employment and housing in the Scoping Report, the analysis presented in this report raises a number of important points from an economic perspective when responding to the consultation on the Sustainability Appraisal Scoping Report of the Wirral Local Plan.</p> <p>4.2 In terms of the economy &amp; employment, the Sustainability Appraisal needs to consider how the Wirral performs relative to the Liverpool City Region and look at how the District can make a greater contribution to this larger area to which it is so closely linked. The Wirral's labour market has grown at a slower rate than the City Region's in recent years, and it continues to see a net outflow of commuters – larger to Liverpool and Cheshire West &amp; Chester. The commuting outflow is unlikely to be reversed in the long-term, however it seems reasonable to argue that the District needs to see significantly more jobs created over the 10-20 years in order to be considered as the “strong, diverse and resilient economy” noted in the Scoping Report.</p> <p>4.3 For the District to achieve genuinely sustainable economic growth, the Wirral needs to see faster jobs growth and increase the number of people who live and work in the District. The Sustainability Appraisal and new Draft Local Plan need to outline how this will be achieved. The role of housing will be an important factor in this respect and it can generate long-term local economic benefits. For example, if residential dwellings were developed on the site at Greenheys Nursery, it is estimated that the following economic benefits would be generated:</p> <ul style="list-style-type: none"> <li>• In total, around 56 temporary jobs could be supported per annum during the build phase.</li> <li>• An additional £3.0million of GVA (a proxy for economic output) for the regional economy during the construction period.</li> <li>• Around £0.2million of additional spend in the local economy, which could support two full-time equivalent (FTE) jobs.</li> <li>• An estimated £33,000 on an annual basis in additional Council Tax payments, or around £0.3million over 10 years at 2019/20 rates.</li> </ul> <p>4.4 In terms of housing, the rate of housing delivery on the Wirral has been consistently below the required level over the last decade, regardless of which housing target the District is measured against. Boosting the supply of housing is therefore a critical consideration for the SAF and new Draft Local Plan if the Wirral is to achieve long-term sustainable development. In particular, attracting economically active people to the District is an important consideration when looking at future labour supply. The Wirral has seen a significant increase in the number of people aged 65 and over the last decade and the trend of an ageing population is expected to continue, raising the importance of the Wirral seeing new homes built that are attractive to people of working age. This younger population can help boost labour market supply as older members of the workforce reach retirement age and become economically inactive. Sites such as Greenheys Nursery can play an important role in increasing housing supply on the Wirral.</p>	Economy and employment objectives amended to include reference to supporting a growing economy in addition to the existing text.
SCOP039	Landowner/Developer	<p>1. INTRODUCTION</p> <p>1.1 We have been instructed to prepare a response to the consultation that Wirral Council formally began on the 25th March which runs until the 8th May. This consultation outlines the scope of the Wirral Local Plan Sustainability Appraisal and Equalities Impact Assessment, which has been prepared by AECOM on the Council's behalf.</p> <p>1.2 Although a major part of the SA process, a scoping report isn't legally required to be conducted or opened up to consultation other than beyond the key bodies of Natural England, Historic England and the Environment Agency. However, we welcome Wirral Council's approach and trust our comments will be fully considered as part of the SA process going forward. Indeed, it is noted that the results of this consultation are to help steer the Sustainability Appraisal to be legally conducted as part of the Local Development Plan process as required by Section 19 of the Planning and Compulsory Purchase Act 2004.</p> <p>1.3 The emerging Wirral Local Plan will form the spatial strategy outlining the locations for new housing and economic growth to the end of the plan period in 2035. We also note that the final Sustainability Appraisal will be released in tandem with the Draft Local Plan, will be open for further consultation and that the overall process is an iterative one that will evolve over time. However, it is critical that the Scoping Assessment for the SA demonstrates that all relevant baseline information is being considered at this early stage in order to ensure that as part of preparing the Local Plan, all relevant and reasonable considerations are at the forefront of the Council's decision making process. Indeed, the SA should ultimately contribute towards and influence the decision making process.</p> <p>1.4 Whilst a SA requires the inclusion of a Strategic Environmental Assessment to ensure environmental effects are given full consideration, this must also sit alongside with equally important economic and social considerations and impacts. Indeed, a Sustainability Appraisal is primarily tasked with assessing the delivery of 'Sustainable Development' and the associated impacts of doing so, together with assessing 'reasonable alternatives'. Sustainable Development within England is defined by National Planning Policy but very few of the considerations set out within the NPPF are laid out in this Scoping Report for the Sustainability Assessment.</p>	General comments.
SCOP039	Landowner/Developer	<p>1.5 The consultation document considers the baseline position for a range of individual topics to help form the scoping requirements for the Sustainability Appraisal. There are 14 chapters which have been determined as the key themes most relevant to the development of the emerging Local Plan by AECOM. These include: Air Quality; Biodiversity; Climate Change Adaptation; Climate Change Mitigation; Economy and Employment; (To be discussed in the economic statement) Health; Heritage; Housing; Land and Soils; Landscape; Population and Communities; Transport; Water Resources; and Water Quality.</p> <p>1.6 As noted above, the scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The above list is very much focused on environmental considerations that make up 8/9 of the topics and associated objectives.</p> <p>1.7 Our principal recommendation is that the Scoping Assessment and subsequent objectives are set out under the following three objectives as defined by paragraph 8 of the NPPF.</p> <p>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p> <p>c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	Disagree - The key themes outlined are considered to provide a comprehensive understanding of the sustainability issues facing the plan area. These included economic, social and environmental factors.

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SCOP039	Landowner/Developer	<p>2. SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT</p> <p>2.1 The preparation of all Local Plans within the UK must comply with EU Law and Acts relevant to the associated countries within the UK. In short, EU law calls for SEA's to be carried out and UK Acts, policies and guidance require a SA to be carried out. Ultimately, it is considered best practice to incorporate requirements of the SEA Directive into a Sustainability Appraisal which must ensure that the potential environmental effects are given full consideration alongside social and economic issues. Indeed, the SA incorporates the requirements of SEA.</p> <p>The SEA European Directive</p> <p>2.2 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005) and the NPPG also provides further guidance on the matter.</p> <p>2.3 The aim of the Directive is to 'to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.'</p> <p>2.4 This Directive applies to a plan or programme related solely to England (or part of England) and any other part of the United Kingdom. The Directive therefore applies to the preparation of the emerging Wirral Local Plan and applies specific requirements that must be complied with and incorporated as an integral part of the sustainability appraisal process.</p> <p>Strategic Environmental Assessment Regulations requirements checklist</p> <p>2.5 Regulation 12 – Preparation of an environmental report that 'identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>2.6 This report should include the relevant information referred to in schedule 2 of the directive as required taking in to account 'current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3))'.</p>	General coments.
SCOP039	Landowner/Developer	<p>2.7 When deciding on the scope and detail of the information which should be included as part of the environmental report the consultation bodies being Natural England, Historic England and Environment Agency should be consulted. This is at the earliest stage of the preparation process and includes the following requirements:</p> <ul style="list-style-type: none"> <li>• It should form an outline of the contents;</li> <li>• main objectives of the plan and its relationship with other plans or programmes;</li> <li>• It should provide a baseline state of the environment which is as existing before the implementation of the plan;</li> <li>• It should include the environmental characteristics of the areas likely to be significantly affected by the plan over its period;</li> <li>• It must outline any existing environmental problems which are relevant to the plan including areas of particular environmental importance pursuant to Directives 2009/147/EC and 92/43/EEC (Habitats Directive);</li> <li>• It should include environmental protection objectives established at international, national or community level which are relevant to the plan and the way those objectives have been taken in to consideration throughout the preparation of the plan;</li> <li>• The following issues should be looked at as an overall effect on the environment: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors;</li> <li>• Measures should outlined which will be envisaged to prevent, reduce or offset any significant adverse effects on the environment from implementing the plan;</li> <li>• It should provide an outline the reasoning for selecting the alternatives that were dealt with outlining how the assessments were undertaken;</li> <li>• It should look at how it is going to monitor the impacts in accordance with regulation 17 of the Directive; and</li> <li>• It should provide a non-technical summary of the information provided under all of the above headings and topics.</li> </ul> <p>2.8 The above process is very much focused on identifying the key environmental considerations within an area and it is a process that must be carried out. Indeed, we consider the AECOM document prepared is very much focused on the above process. However, it is critical to note at this stage that the European Directive does not define 'Sustainable Development' in the context of preparing a Local Plan under UK legislation. Indeed, it is for each member state to define 'Sustainable Development' in this regard and it is the SA's role to consider the implications of Sustainable Development policies in the round. Simply adhering to SEA legislation and the EU Directive is therefore not enough in itself to assess the impacts of a Local Plan and its associated policies.</p>	General comments of the process.
SCOP039	Landowner/Developer	<p>Planning Acts, National Policies and UK Guidance</p> <p>Planning Acts</p> <p>2.9 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. The 2008 Planning Act amended the requirement to undertake a Sustainability Appraisal for Development Plan Documents (DPDs) but did not remove the requirement to produce a Strategic Environmental Assessment. Moreover, Section 19(5) of the Planning and Compulsory Purchase Act 2004 (as amended) maintains that:</p> <p>'The local planning authority must also –</p> <p>(a) Carry out an appraisal of the sustainability of the proposals in each development plan document;</p> <p>(b) Prepare a report of the findings of the appraisal.'</p> <p>2.10 Section 19(A) was introduced to the 2004 Act as part of the 2008 Act/amendments and stipulates that:</p> <p>'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.'</p> <p>2.11 This ensures that environmental impacts are still at the forefront of the overall process. However, it is still critical to note that Section 39(2) of the 2004 Act (as amended) states that 'the person or body must exercise the function with the objective of contributing to the achievement of sustainable development.' Furthermore, Section 39(3) confirms that for the purposes of achieving sub-section 2, 'the person or body must have regard to national policies and advice contained in guidance issued by the Secretary of State...'</p>	General comments

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SCOP039	Landowner/Developer	<p>National Policy and Guidance</p> <p>2.12 National planning policy guidance confirms the following: ‘A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.’</p> <p>2.13 Sustainable development is defined in the NPPF (2019) and is the principle by which the SA should be prepared against. Paragraph 8 of the NPPF states: ‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’</p>	General comments
SCOP039	Landowner/Developer	<p>2.14 Critically, any SA process has to be judged against reasonable alternatives to ensure that the Local Plan is the most appropriate to achieve sustainable development. The whole process should identify ways the Local Plan can contribute to improvements in economic, social and environmental conditions as well as mitigating any potential adverse effects that the plan may cause. This will ensure that the plan is the most appropriate against the reasonable alternatives and can be used to test the evidence underpinning the plan and is important in demonstrating how the tests of soundness have been met.</p> <p>2.15 The NPPG goes on to set out a 5 step process for the preparation of a SA as follows:</p> <ul style="list-style-type: none"> <li>• Stage A – Setting the context and objectives, establishing baselines and deciding on the scope: <ol style="list-style-type: none"> <li>1) Identification of other relevant policies, plans and sustainability objectives</li> <li>2) Pooling baseline information</li> <li>3) Identification of sustainability issues and problems</li> <li>4) Develop a sustainability appraisal framework</li> <li>5) Consultation of the relevant bodies</li> </ol> </li> <li>• Stage B – Developing and refining alternatives and assessing effects: <ol style="list-style-type: none"> <li>1) Test local plan objectives against sustainability appraisal framework</li> <li>2) Develop Local Plan options including reasonable alternatives</li> <li>3) Evaluate likely effects of Local Plan and alternatives</li> <li>4) Consider ways of mitigating adverse effects and maximising beneficial effects</li> <li>5) Propose measures to monitor significant effects of implementing the Local Plan</li> </ol> </li> <li>• Stage C – Prepare Sustainability Appraisal report</li> <li>• Stage D – Seek representations on sustainability appraisal report from consultation bodies and the public</li> <li>• Stage E – Post adoption reporting and monitoring</li> </ul> <p>2.16 The Scoping Stage (stage 1) is relevant to the current consultation document. It should identify the level of detail and the relevance of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and sustainability objectives.</p>	General comments.
SCOP039	Landowner/Developer	<p>3. SCOPING REPORT FOR THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL</p> <p>Defining the Purpose and Scope of the Scoping Report</p> <p>3.2 Section 2 of this report has outlined the requirements of a scoping report for a Local Plan Sustainability Appraisal whilst also outlining the process as a whole. This helps to provide clarity behind what the Council has completed as a part of this consultation.</p> <p>3.3 Based on the title of the Council’s document, the current consultation process is seemingly associated with Stage 1 of the Sustainability Appraisal development process. As recommended by the NPPG this stage/Scoping Report should therefore include the following information:</p> <ol style="list-style-type: none"> <li>1. Identification of other relevant policies, plans and sustainability objectives</li> <li>2. Pooling baseline information</li> <li>3. Identification of sustainability issues and problems</li> <li>4. Develop a sustainability appraisal framework</li> <li>5. Consultation of the relevant bodies</li> </ol> <p>3.4 However, within the introduction of the Scoping Report, it is not made clear that this is the process that is being undertaken. The background details provided to the Sustainability Appraisal process is minimal. It should clearly define and outline what information is required at each stage and its relationship with the SEA process.</p> <p>3.5 When assessing the information that should be provided as part of stage 1 it is evident that there are 2 sections missing from this scoping report, these being point 3 and 4 in paragraph 3.2. This report has not successfully identified the sustainability issues and problems which should be carried on for further investigation and the way in which the sustainability issues are connected with one another.</p> <p>3.6 Instead of providing this detail the scoping report is far more focussed on the requirements of the SEA Regulations which, as previously explained, form a part of the SA however they focus only on the environmental assessment. The scoping appraisal incorporates the requirements for a SEA scoping report, we feel therefore clarification should be provided as part of the introduction as to the purpose of this scoping report produced for the Wirral Local Plan.</p>	Disagree - The SA Scoping Report includes an introduction which explains the SA process, what the scoping report considers and why and the approach to the scoping report. The sustainability issues identified within the Scoping Report are underpinned by analysis of a comprehensive range of data sources.
SCOP039	Landowner/Developer	<p>3.7 The economic and social principles have not been considered in enough detail to be suitable as a scoping appraisal for a SA. We therefore consider that this document has been titled incorrectly and although it would assist with the development of a SA through the SEA regulations it doesn’t itself form scoping for a sustainability appraisal.</p> <p>3.8 Notably Paragraph 1.7 of the Scoping Report states that it is concerned with item 1 of paragraph 1.6, which states: ‘SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004. Two key procedural requirements of the SEA regulations are that:</p> <p>6) When deciding on ‘the scope and level of detail of the information’ which must be included within the key output report – namely the report published for consultation alongside the draft plan – there is a consultation with certain nationally designated authorities, namely the Environment Agency, Historic England and Natural England.’</p> <p>3.9 This seems indicates that the Council’s SA Scoping Report was prepared for the purpose of scoping a SEA. However, it is not abundantly clear at this point in the document. Moreover, we note that paragraphs 16.1 and 16.2 of the Scoping Report confirms that this document does relate to Stage A of the SA Scoping Report stage as set out in NPPG and that the next stage will look at reasonable alternatives under NPPG Stage B. The Scoping report goes on further to discuss 14 separate chapter topics, all of which would be expected within a SEA scoping report as outlined by the SEA Regulation requirement checklist.</p>	Disagree - The objectives are comprehensive and cover both SA and SEA and consider a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors.

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SCOP039	Landowner/Developer	<p>3.10 Ultimately, the purpose of the report should be clarified both within the title of the report but also in the introductory text. We consider that the document should either be renamed ‘Scoping Report for the Wirral Local Plan Strategic Environmental Assessment’ or it should be restructured to address the requirements set out at the beginning of this section as defined by the NPPG.</p> <p>3.11 With regard to the latter option, we consider the following should be included as an absolute minimum:</p> <ul style="list-style-type: none"> <li>• More detailed background on the purpose of the SA and its involvement in the Local Plan process</li> <li>• Outline the role of sustainable development in the process including definition and national policy position and in the context of Wirral highlighting the key issues and difficulties the Council have faced in terms of delivering sustainable development to date;</li> <li>• Discuss the synergies between environmental, economic and social topics and how they lead to sustainable development at the national and local level.</li> <li>• Clearly set out a sustainability framework based on the three principal arms of Sustainable Development (i.e. economic, social and environmental considerations) rather than the 14 separate topics currently set out in Appendix A.</li> </ul> <p>3.12 We also consider that it would be prudent to set out key considerations that will impact on the assessment of ‘reasonable alternatives’ for the Local Plan. Whilst the NPPG assigns this task to Stage B of the process, Wirral in particular is faced with some critical decisions going forward in terms of ensuring economic regeneration, the delivery of sufficient homes and helping to mitigate climate change.</p> <p>3.13 We consider this approach should include growth strategies such as low – high economic development and similar with new housing figures. Links need to be made between these two strategies, how they connect with each other and also how they may impact the environment either positively or negatively. – Although this isn’t required until stage 2 of the process it will help determine the effects of the Local Plan from an early stage thus potentially providing more opportunities for avoidance/ mitigation</p> <p>3.14 Indeed, it must be noted that Wirral has not had a Local Plan in place for a considerable period of time (since 2001). This will have ultimately placed additional burden on surrounding Local Planning Authority areas simply due to the fact that Wirral will not have meet all of its own development needs. Such inaction could have conceivably led to higher out migration patterns, longer commuting patterns and therefore an increase in the use of the private car. By proxy, this could have led to the development of land in surrounding areas that was not as suitable for meeting needs. Such trends could continue if Wirral does not act now and it is telling that at remains one of very few Local Planning Authorities that is still being monitored by the Secretary of State in terms of its Local Plan production.</p>	<p>Comments relating to reasonable alternatives are noted and will be explored in greater detail at the next stages of the SA and plan-making process. It is not considered necessary (nor is it a requirement) to provide a more detailed explanation of what SA / SEA is.</p>
SCOP039	Landowner/Developer	<p>4. KEY TOPICS AND SUSTAINABILITY OBJECTIVES</p> <p>4.1 At present, the Council’s proposed Sustainability Framework and Objectives are set out in Appendix A of the Scoping Report and follow the associated Chapters of the report (as we have set out in Section 1).</p> <p>4.2 With regard to the Sustainability Objectives, 2 are set for Air Quality, 2 for Bio-diversity, 1 for Climate Change Adaption, 1 for Climate Change Mitigation, 1 for Heritage, 1 for Land and Soils, 1 for Landscape, and 1 for Water. As such, 10 objectives are set in relation to environmental considerations. The remaining are 2 objectives for the Economy and Employment, 1 objective in relation to Health, 1 for Housing, 2 for Population and Communities and 1 for Transport. As such, only 7 sustainability objectives are spread across economic and social objectives.</p> <p>4.3 As previously noted, we consider the SA Scoping Report should be tailored and structured in accordance with the three arms of Sustainable Development as defined by paragraph 8 of the NPPF (i.e. economic, social and environmental considerations). Moreover, these considerations should then influence the Sustainability Framework and Objectives.</p> <p>4.4 Even if our principal suggestion is not endorsed by the Local Planning Authority, at the very least, we consider that the Council’s list of SA objectives should be more evenly balanced so there is a more equitable distribution across the three arms of Sustainable Development. This could be achieved by compiling some of the environmental impacts into fewer objectives or increasing the number of objectives under economic and social considerations. For instance, a more encompassing environmental objective could be ‘To promote the sustainable and prudent use of natural resources including Air Quality, Land and Soil and Protected Landscapes by minimising the use and impacts on such resources’. Such an approach would be justified on the basis that the Council’s own scoping report confirms the following:  There are no Air Quality management Areas within Wirral and recent trends indicate key pollutant levels are decreasing (suggesting this is not a major issue for the Borough)  Most land is within Agricultural Grades 3 or below within the Borough and there is very little minerals related activity (suggesting Wirral is not renowned for major food or mineral production)  No AONBs or National Parks are located within Wirral (suggesting the landscape and open countryside is not regarded as the most valuable or scenic).</p> <p>4.5 The above approach could also arguable be applied to Bio-diversity and Water Resources. However, we note that the baseline position in Wirral in this regard is more sensitive and therefore, we can also see the value of separate objectives for these issues.</p>	<p>Disagree - It is considered that the SA Framework considers a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors. It should also be remembered that the legislation is founded in the SEA process, which focuses more strongly on environmental factors. The reasonable alternatives will consider a range of growth and distribution options, including assumptions about the contribution that is made by Wirral Waters.</p>
SCOP039	Landowner/Developer	<p>Environmental</p> <p>4.7 As part of this scoping appraisal a lot of focus has been provided on the current and potential environmental constraints, this is evident by the number of chapters which have an environmental focus and the few that revolve the social and economic impacts. The importance of the environment on sustainable development cannot be underestimated however this scoping appraisal forms more of an appraisal for a SEA rather than SA.</p> <p>4.8 Within this appraisal there is some contradiction around the location for new development. The environmental chapters are clear in promoting the re-use of previously developed land which, as evident in the housing chapters, is mostly located in the eastern parts of the Wirral, specifically Birkenhead. It is these areas that have also been identified as having significant flooding issues, the example of a large proportion of Wirral Waters being located in flood zone 3 is a prime example.</p> <p>4.9 Furthermore, the location of Ramsar sites along the River Mersey and the highlighted importance of green infrastructure in these areas seem to suggest that development of these areas are more appropriate to other uses rather than housing or industry.</p> <p>4.10 Air quality has been depicted as being a more problematic issue in eastern parts of the Wirral which again signals the need to reduce traffic congestion to these areas and locating new development here will have significant impact on people’s health and the connectivity to recreational opportunities.</p> <p>4.11 Paragraph 4.3 of the climate change adaptation chapter specifically mentions the need to roll back development in coastal areas to avoid damage from flooding or coastal erosion. This has been set out in the Flood and Water Management Act (2010) and should provide a strategic consideration for new development which would therefore exclude large sections of previously developed land in the eastern side of the Wirral. Expectedly the flood risk decreases as you move further inland which provides more opportunities for new development.</p> <p>4.12 The land and soils chapter show a desire to re-use previously developed land for development purposes however, it has already been made clear that the housing allocation for the Wirral cannot be supplied through brownfield sites alone and although touched upon briefly in 10.14 the potential to release land which is not Best and Most Versatile should be considered in more detail.</p>	<p>Disagree - It is considered that the SA Framework considers a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors. It should also be remembered that the legislation is founded in the SEA process, which focuses more strongly on environmental factors. The reasonable alternatives will consider a range of growth and distribution options, including assumptions about the contribution that is made by Wirral Waters.</p>

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SCOP039	Landowner/Developer	<p>Economic and Social</p> <p>4.13 Economic stability and prosperity and social well-being is inevitably closely tied particularly in an area such as the Wirral. As such, we could see merit in these two arms being grouped together.</p> <p>4.14 Under the social arm of Sustainable Development, we would expect to see objectives tied to the following:</p> <ul style="list-style-type: none"> <li>i. The delivery of high standards of education and the mitigation against unsustainable class room sizes.</li> <li>ii. The improvement of physical and mental health and well-being including the delivery of necessary health care infrastructure, community facilities and opportunities to tackle loneliness</li> <li>iii. The promotion of development and policies that tackle deprivation and support social mobility including access to increased levels of education, housing, healthcare and employment opportunities.</li> <li>iv. Delivery of enough affordable housing and homes suitable for first time buyers in a range of locations across the Borough to meet the needs of individual communities.</li> <li>v. Delivery of enough specialist care related homes in a range of locations to meet the needs of an aging population.</li> <li>vi. Reduce crime rates and the fear of crime through well planned developments and regeneration policies.</li> </ul> <p>4.15 One key topic that appears to be missing within the Sustainability Framework relates to 'Social Mobility' which is a key issue in Wirral where social divides in terms of wealth and opportunities are very apparent. There are evidently areas within Wirral where poor levels of investment, employment, education and housing quality come together to generate high areas of deprivation.</p> <p>4.16 Conversely, there are areas of high wealth, shrink wrapped by Green Belt where development opportunities are been curtailed for a prolonged period (due to the lack of an up to date local plan), which have undoubtedly contributed to rising house prices, rents and loss of employment land, which will have inevitably curtailed social mobility in past years.</p>	Disagree - It is considered that the SA Framework considers a suitable and balanced range of factors. SA objectives have been included relating to education and skills, mental health and well being, economic inequality, affordable housing, specialist housing, crime. SA economic objectives relate to inequality in relation to education and skills and the provision of economic opportunity for all.
SCOP039	Landowner/Developer	<p>4.17 With regard to Housing, we would expect to see outputs and objectives for the delivery of housing development contributing to economic and social objectives (including health and well-being). At the very least, the housing objective must ensure the timely delivery of the minimum number of homes as well as an appropriate mix and distribution to meet the needs of a range of groups within the Borough. At present, the objective focuses on mix when the amount and distribution of housing delivered will clearly have an impact on economic, social and environmental considerations.</p> <p>4.18 As noted above, under the social heading, a specific objective should relate to 'Support the timely delivery of sufficient affordable housing to meet the needs across the Borough for those unable to access the standard housing market.' Another housing linked objective could also relate to the delivery of aspirational housing to promote social mobility, retain or see an increase wealth, expenditure and tax revenues; new homes that could accommodate first time buyers, growing families etc.</p> <p>4.19 Due to the rising demographic of an elderly population, it would also be prudent to have a social objective that specifically looked to 'Support the timely delivery of specialist residential care accommodation through the delivery of care homes, extra care development and housing schemes that would accommodate those looking to downsize or obtain an alternative type of property to meet their specific needs'.</p> <p>4.20 The benefit of including more distinct objectives associated with the different types and form of housing would assist in the SA considering a wider range of social and economic objectives when looking at alternative potential sites. Indeed, we note that in Appendix B of the Scoping Report, the following is stated in relation to housing 'Spatial data unlikely to be available. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could potentially be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at large sites).'</p> <p>4.21 Whilst we do not disagree with the above statement, it is probably fair to say that many larger sites will have the ability to deliver a wider range of homes including affordable accommodation, elderly accommodation, etc. Alternatively, some sites might be more suitable in terms of attracting first time buyers and others will be better suited for meet the needs of a growing elderly population or for executive homes. Scoring a site against different housing / SA objectives should assist in helping to deliver a broad mix of sites that would ultimately assist in meeting the wide-ranging housing needs within the Borough.</p>	Partly agree - The SA objective with regard to housing has been amended "Support timely delivery <i>sufficient homes of an</i> appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral's residents, including older people, people with disabilities and families with children".
SCOP039	Landowner/Developer	<p>4.22 One of the key issues facing Wirral over the past decade has related to the 'timely delivery of new homes'. To date, much emphasis has been placed on the capacity and deliverability of Wirral Waters. Whilst this scheme will deliver many benefits, its lack of delivery (coupled with the distinct lack of any plan led alternative solutions for housing delivery) will have contributed to negative social and economic impacts within Wirral and possibly further afield. Moreover, Wirral Waters alone will not meet many of the distinct housing needs within the Borough and must only be regarded as part of the solution.</p> <p>4.23 Indeed, large problems with the redevelopment of previously developed sites is the viability and deliverability of the scheme especially in areas which do not retain high market values which is a problem for some eastern parts of the Wirral as explained in the population chapter. The slow development of Wirral Waters is a good example of the difficulties in providing a valuable return on development in areas such as Birkenhead. This will impact the ability to achieve the housing targets as laid out by the 2014 OAHN which will require 803 dpa as confirmed by the Secretary of State's letter to Wirral Council dated 28th January 2019.</p> <p>4.24 The number of completions over the previous 5 years is just over half this rate as there has been a focus on the redevelopment of brownfield land where between 83 and 92% of all new developments have been located. Chapter 67 of the NPPF states planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It is of great importance that economic viability of the previously developed sites is analysed and considered as part of any future allocations or strategic policies and further investigation of market rates need to be incorporated in to the sustainability appraisal. Furthermore, in line with para 11 the relevant policies to housing will be considered out of date if housing delivery is less than 75% of the housing requirement over the previous three years. Based on the current supply which has focussed the majority of developments on to brownfield land then Wirral would not be able to keep up with their housing requirement putting their planning policies in to jeopardy. Therefore, there needs to be a major consideration as part of the SA as to how housing delivery can be speed up to ensure the presumption in favour of sustainable development.</p> <p>4.25 Consistently through the scoping report there is a focus on the Wirral Waters scheme which has been proposed for Birkenhead docks. Understandably, this is an important part of the Wirral Emerging Plan because of its redevelopment potential however, there is consistently differing information being released from the scheme and it is widely understood that it is not going to be completed by the end of the Local Plan period. The focus of the SA therefore needs to assess the potential of the Wirral as a whole. There is very little strategic guidance provided in the SA appraisal as all future baselines focus on the 'potential' of Wirral Waters. This has the impact of losing sight of the potential of other areas in the Wirral to provide sustainable development for new housing and employment allocations along with significant environmental improvements. It is expected that Wirral Waters will only be able to provide between 2900 and 6450 homes under the local plan period with completion anticipated to be beyond 2040.</p>	The next steps of the SA will involve the consideration of reasonable alternatives for delivering the homes that are needed to achieve sustainable growth. This will include consideration of the role that Wirral Waters has to play.

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SCOP039	Landowner/Developer	<p>4.26 It is standard practice for the SA to assist in the comparison of all reasonable alternative site options being considered by the Local Planning Authority in order to identify the most sustainable options for inclusion in the Local Plan. Approximately 50 Green Belt sites have been put forward for release as part of the development options review, these have not been discussed in the scoping appraisal and yet they are the likely alternative for new housing development in the Borough. A scoring matrix will need to be created and used to help define which of these sites are sustainable for release, this is something that has been partially provided under previous consultations and this will need to form a large part of the SA. The scoring matrix should look to prioritise partial brownfield land along with poor Agricultural scrubland over land that is considered to be best and most versatile. Special consideration also needs to be made for small/ medium sized sites, which should form at least 10% of the housing requirement according to paragraph 68(a) of the NPPF.</p> <p>4.27 The focus on the Wirral Waters scheme has led to there being little strategic guidance of where new housing development should be located elsewhere in the Borough and besides sections in the transport chapter there is very little discussion as to how sustainability will be determined for new housing and employment allocations. Further work on the wider economic impact of Wirral Waters and other strategic sites needs to be provided and linked to employment and education opportunities. Further economic analysis has been provided in our economic statement.</p> <p>4.28 The SA should assess all of the topic chapters to provide suitable strategic guidance as to where new housing should be located. This scoping report fails to do this, it is only within the transport chapter where there is a strategic analysis of new growth opportunities where it indicates that growth potential could be located within the M53 and A41 corridor along with the Merseyrail Chester/ Ellesmere Port line. There needs to be further assessment on this principle and the assessment needs to cover the whole of the Wirral.</p> <p>4.29 The potential for new development of housing on greenfield areas is not principally discussed in the Housing chapter and only becomes a topic for discussion when assessing the best and most versatile land in the borough. Moreover, there needs to be a greater assessment of where development will be considered sustainable besides on PDL which is constrained.</p>	<p>The purpose of the scoping stage is not to assess potential locations for growth nor to provide suitable strategies for growth. These factors will be explored at the next stages of SA alongside and in tandem with the Plan-making process itself)</p>
SCOP039	Landowner/Developer	<p>4.30 The SA should incorporate issues surrounding education as a separate chapter as this has large implications for social and economic factors in the area. We also consider that deprivation should also be considered separately. All of these principles have been pooled under populations however there needs to be a further analysis of each topic separately.</p> <p>4.31 Under the economic arm, we consider the Council's Sustainability Objectives are too narrow and many of the above comments could also apply. In addition, we would expect to see objective that support the following principles:</p> <ul style="list-style-type: none"> <li>i. The delivery of a sufficient number of homes to support planned or forecast jobs growth and objectively assessed needs to help support the construction industry and the wider economy;</li> <li>ii. The delivery of sufficient land and support of development that for town centre uses including retail, leisure, offices and other related uses;</li> <li>iii. The delivery of sufficient land to meet general industry, warehousing and other industries to support economic growth and social mobility;</li> <li>iv. The support of policies and delivery of land that would support the rural economy including agriculture, outdoor recreational economy, housing for villages, and uses that would make a village more sustainable or contribute to sustainable rural diversification.</li> </ul> <p>4.32 The intuition and rational for splitting up the different types of economic development considerations is that each have very different locational requirements. As such, the above split would assist in ensuring that a suitable range and mix of employment land is identified.</p>	<p>Diagree - The SA objective seek to support a strong, diverse, resilient and growing economy that provides opportunities for all.</p>
SCOP039	Landowner/Developer	<p>5. CONCLUSIONS</p> <p>5.1 The consultation response has been commenting on the Scoping for the Sustainability Appraisal produced by Aecom on behalf of Wirral Council.</p> <p>5.2 The scoping report does not fulfil the requirements for a Sustainability Appraisal (SA) required as part of a Local Plan submission under UK Law, policy and guidance. Instead, it is more geared towards a scoping report for a Strategic Environmental Assessment (SEA) appraisal, which forms a part of the SA process but should not be confused with the requirements of a SA as dictated by national planning policy and guidance.</p> <p>5.3 Indeed, the SA should inform and guide the principles and definition of what constitutes Sustainable Development, as defined within the UK and England. In order to do this, direct reference must be made to the NPPF and NPPG. Clarity needs to be provided as to the purpose of the Sustainability Appraisal as this report has not successfully identified the sustainability issues, nor has it established any synergies between environmental, economic and social topics which make up the purpose of sustainable development as outlined in the NPPF.</p> <p>5.4 The SA needs to be conducted to incorporate all three arms of sustainable development being; environmental, social and economic. There is currently an imbalance between these topics with a particular focus on the environment and minimal discussion on the economic and social objectives and the ramifications in terms of assessing reasonable alternative development scenarios. Whilst the consideration of reasonable alternatives will form part of the next stage of the SA, it is considered prudent to provide an indication as to what these alternatives might be at the earliest opportunity.</p> <p>5.5 We therefore consider the following focus recommendations are taken in to account as part of the SA:</p> <ul style="list-style-type: none"> <li>• Remove contradictions in the environmental objectives whilst providing synergies with both economic and social objectives;</li> <li>• Provide assessment of economic and social topics to including education, mental health and wellbeing, affordable housing and specialist care homes, crime and social mobility which itself is one of the key issues in the Wirral;</li> <li>• Focus on the viability and deliverability of new housing and employment land across the Borough following the consistent undersupply over the previous years;</li> <li>• Provide housing and sustainable assessments on the whole of the Wirral and reduce the focus on Wirral Waters which will only supply a small proportion of the sustainable objectives; and</li> <li>• Provide reasonable alternatives and assess them against the sustainability criteria through the preparation of a sustainability matrix.</li> </ul> <p>5.6 A greater focus on the 3 principles of sustainable development to include a wider range of topics will assist in providing a more robust scoping report which will form a major part of the SA and Local Plan development process.</p>	<p>It is considered that the SA Framework considers a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors. It should also be remembered that the legislation is founded in the SEA process, which focuses more strongly on environmental factors. The reasonable alternatives will consider a range of growth and distribution options, including assumptions about the contribution that is made by Wirral Waters.</p>
SCOP040	Landowner/Developer	<p>1. INTRODUCTION</p> <p>1.1 Response to the consultation that Wirral Council formally began on the 25th March which runs until the 8th May. This consultation outlines the scope of the Wirral Local Plan Sustainability Appraisal and Equalities Impact Assessment, which has been prepared by AECOM on the Council's behalf.</p> <p>1.2 Although a major part of the SA process, a scoping report isn't legally required to be conducted or opened up to consultation other than beyond the key bodies of Natural England, Historic England and the Environment Agency. However, we welcome Wirral Council's approach and trust our comments will be fully considered as part of the SA process going forward. Indeed, it is noted that the results of this consultation are to help steer the Sustainability Appraisal to be legally conducted as part of the Local Development Plan process as required by Section 19 of the Planning and Compulsory Purchase Act 2004.</p> <p>1.3 The emerging Wirral Local Plan will form the spatial strategy outlining the locations for new housing and economic growth to the end of the plan period in 2035. We also note that the final Sustainability Appraisal will be released in tandem with the Draft Local Plan, will be open for further consultation and that the overall process is an iterative one that will evolve overtime. However, it is critical that the Scoping Assessment for the SA demonstrates that all relevant baseline information is being considered at this early stage in order to ensure that as part of preparing the Local Plan, all relevant and reasonable considerations are at the forefront of the Council's decision making process. Indeed, the SA should ultimately contribute towards and influence the decision making process.</p> <p>1.4 Whilst a SA requires the inclusion of a Strategic Environmental Assessment to ensure environmental effects are given full consideration, this must also sit alongside with equally important economic and social considerations and impacts. Indeed, a Sustainability Appraisal is primarily tasked with assessing the delivery of 'Sustainable Development' and the associated impacts of doing so, together with assessing 'reasonable alternatives'. Sustainable Development within England is defined by National Planning Policy but very few of the considerations set out within the NPPF are laid out in this Scoping Report for the Sustainability Assessment.</p>	<p>The scoping report is not only geared towards an SEA process and this is clear from the introductory chapter. Some of the factors listed below go beyond the requirements of the scoping stage and will be addressed as the SA process progresses.</p>

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SCOP040	Landowner/Developer	<p>1.5 The consultation document considers the baseline position for a range of individual topics to help form the scoping requirements for the Sustainability Appraisal. There are 14 chapters which have been determined as the key themes most relevant to the development of the emerging Local Plan by AECOM. These include: Air Quality; Biodiversity; Climate Change Adaptation; Climate Change Mitigation; Economy and Employment; (To be discussed in the economic statement) Health; Heritage; Housing; Land and Soils; Landscape; Population and Communities; Transport; Water Resources; and Water Quality.</p> <p>1.6 As noted above, the scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The above list is very much focused on environmental considerations that make up 8/9 of the topics and associated objectives.</p> <p>1.7 Our principal recommendation is that the Scoping Assessment and subsequent objectives are set out under the following three objectives as defined by paragraph 8 of the NPPF. an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	
SCOP040	Landowner/Developer	<p>2. SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT</p> <p>2.1 The preparation of all Local Plans within the UK must comply with EU Law and Acts relevant to the associated countries within the UK. In short, EU law calls for SEA’s to be carried out and UK Acts, policies and guidance require a SA to be carried out. Ultimately, it is considered best practice to incorporate requirements of the SEA Directive into a Sustainability Appraisal which must ensure that the potential environmental effects are given full consideration alongside social and economic issues. Indeed, the SA incorporates the requirements of SEA. The SEA European Directive</p> <p>2.2 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication ‘A Practical Guide to the Strategic Environmental Assessment Directive’ (ODPM 2005) and the NPPG also provides further guidance on the matter.</p> <p>2.3 The aim of the Directive is to ‘to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.’</p> <p>2.4 This Directive applies to a plan or programme related solely to England (or part of England) and any other part of the United Kingdom. The Directive therefore applies to the preparation of the emerging Wirral Local Plan and applies specific requirements that must be complied with and incorporated as an integral part of the sustainability appraisal process. Strategic Environmental Assessment Regulations requirements checklist</p> <p>2.5 Regulation 12 – Preparation of an environmental report that ‘identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>2.6 This report should include the relevant information referred to in schedule 2 of the directive as required taking in to account ‘current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3))’.</p>	
SCOP040	Landowner/Developer	<p>2.7 When deciding on the scope and detail of the information which should be included as part of the environmental report the consultation bodies being Natural England, Historic England and Environment Agency should be consulted. This is at the earliest stage of the preparation process and includes the following requirements:</p> <ul style="list-style-type: none"> <li>• It should form an outline of the contents;</li> <li>• main objectives of the plan and its relationship with other plans or programmes;</li> <li>• It should provide a baseline state of the environment which is as existing before the implementation of the plan;</li> <li>• It should include the environmental characteristics of the areas likely to be significantly affected by the plan over its period;</li> <li>• It must outline any existing environmental problems which are relevant to the plan including areas of particular environmental importance pursuant to Directives 2009/147/EC and 92/43/EEC (Habitats Directive);</li> <li>• It should include environmental protection objectives established at international, national or community level which are relevant to the plan and the way those objectives have been taken in to consideration throughout the preparation of the plan;</li> <li>• The following issues should be looked at as an overall effect on the environment: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors;</li> <li>• Measures should outlined which will be envisaged to prevent, reduce or offset any significant adverse effects on the environment from implementing the plan;</li> <li>• It should provide an outline the reasoning for selecting the alternatives that were dealt with outlining how the assessments were undertaken;</li> <li>• It should look at how it is going to monitor the impacts in accordance with regulation 17 of the Directive; and</li> <li>• It should provide a non-technical summary of the information provided under all of the above headings and topics.</li> </ul> <p>2.8 The above process is very much focused on identifying the key environmental considerations within an area and it is a process that must be carried out. Indeed, we consider the AECOM document prepared is very much focused on the above process. However, it is critical to note at this stage that the European Directive does not define ‘Sustainable Development’ in the context of preparing a Local Plan under UK legislation. Indeed, it is for each member state to define ‘Sustainable Development’ in this regard and it is the SA’s role to consider the implications of Sustainable Development policies in the round. Simply adhering to SEA legislation and the EU Directive is therefore not enough in itself to assess the impacts of a Local Plan and its associated policies.</p>	



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SCOP040	Landowner/Developer	<p>Planning Acts, National Policies and UK Guidance</p> <p>Planning Acts</p> <p>2.9 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. The 2008 Planning Act amended the requirement to undertake a Sustainability Appraisal for Development Plan Documents (DPDs) but did not remove the requirement to produce a Strategic Environmental Assessment. Moreover, Section 19(5) of the Planning and Compulsory Purchase Act 2004 (as amended) maintains that:</p> <p>‘The local planning authority must also –</p> <p>(a) Carry out an appraisal of the sustainability of the proposals in each development plan document;</p> <p>(b) Prepare a report of the findings of the appraisal.’</p> <p>2.10 Section 19(A) was introduced to the 2004 Act as part of the 2008 Act/amendments and stipulates that:</p> <p>‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.’</p> <p>2.11 This ensures that environmental impacts are still at the forefront of the overall process. However, it is still critical to note that Section 39(2) of the 2004 Act (as amended) states that ‘the person or body must exercise the function with the objective of contributing to the achievement of sustainable development.’ Furthermore, Section 39(3) confirms that for the purposes of achieving sub-section 2, ‘the person or body must have regard to national policies and advice contained in guidance issued by the Secretary of State...’</p>	
SCOP040	Landowner/Developer	<p>National Policy and Guidance</p> <p>2.12 National planning policy guidance confirms the following:</p> <p>‘A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.’</p> <p>2.13 Sustainable development is defined in the NPPF (2019) and is the principle by which the SA should be prepared against. Paragraph 8 of the NPPF states:</p> <p>‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’</p>	
SCOP040	Landowner/Developer	<p>2.14 Critically, any SA process has to be judged against reasonable alternatives to ensure that the Local Plan is the most appropriate to achieve sustainable development. The whole process should identify ways the Local Plan can contribute to improvements in economic, social and environmental conditions as well as mitigating any potential adverse effects that the plan may cause. This will ensure that the plan is the most appropriate against the reasonable alternatives and can be used to test the evidence underpinning the plan and is important in demonstrating how the tests of soundness have been met.</p> <p>2.15 The NPPG goes on to set out a 5 step process for the preparation of a SA as follows:</p> <ul style="list-style-type: none"> <li>• Stage A – Setting the context and objectives, establishing baselines and deciding on the scope: <ol style="list-style-type: none"> <li>1) Identification of other relevant policies, plans and sustainability objectives</li> <li>2) Pooling baseline information</li> <li>3) Identification of sustainability issues and problems</li> <li>4) Develop a sustainability appraisal framework</li> <li>5) Consultation of the relevant bodies</li> </ol> </li> <li>• Stage B – Developing and refining alternatives and assessing effects: <ol style="list-style-type: none"> <li>1) Test local plan objectives against sustainability appraisal framework</li> <li>2) Develop Local Plan options including reasonable alternatives</li> <li>3) Evaluate likely effects of Local Plan and alternatives</li> <li>4) Consider ways of mitigating adverse effects and maximising beneficial effects</li> <li>5) Propose measures to monitor significant effects of implementing the Local Plan</li> </ol> </li> <li>• Stage C – Prepare Sustainability Appraisal report</li> <li>• Stage D – Seek representations on sustainability appraisal report from consultation bodies and the public</li> <li>• Stage E – Post adoption reporting and monitoring</li> </ul> <p>2.16 The Scoping Stage (stage 1) is relevant to the current consultation document. It should identify the level of detail and the relevance of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and sustainability objectives.</p>	

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SCOP040	Developer	<p>3. SCOPING REPORT FOR THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL</p> <p>Defining the Purpose and Scope of the Scoping Report</p> <p>3.2 Section 2 of this report has outlined the requirements of a scoping report for a Local Plan Sustainability Appraisal whilst also outlining the process as a whole. This helps to provide clarity behind what the Council has completed as a part of this consultation.</p> <p>3.3 Based on the title of the Council's document, the current consultation process is seemingly associated with Stage 1 of the Sustainability Appraisal development process. As recommended by the NPPG this stage/Scoping Report should therefore include the following information:</p> <ol style="list-style-type: none"> <li>1. Identification of other relevant policies, plans and sustainability objectives</li> <li>2. Pooling baseline information</li> <li>3. Identification of sustainability issues and problems</li> <li>4. Develop a sustainability appraisal framework</li> <li>5. Consultation of the relevant bodies</li> </ol> <p>3.4 However, within the introduction of the Scoping Report, it is not made clear that this is the process that is being undertaken. The background details provided to the Sustainability Appraisal process is minimal. It should clearly define and outline what information is required at each stage and its relationship with the SEA process.</p> <p>3.5 When assessing the information that should be provided as part of stage 1 it is evident that there are 2 sections missing from this scoping report, these being point 3 and 4 in paragraph 3.2. This report has not successfully identified the sustainability issues and problems which should be carried on for further investigation and the way in which the sustainability issues are connected with one another.</p> <p>3.6 Instead of providing this detail the scoping report is far more focussed on the requirements of the SEA Regulations which, as previously explained, form a part of the SA however they focus only on the environmental assessment. The scoping appraisal incorporates the requirements for a SEA scoping report, we feel therefore clarification should be provided as part of the introduction as to the purpose of this scoping report produced for the Wirral Local Plan.</p>	
SCOP040	Landowner/Developer	<p>3.7 The economic and social principles have not been considered in enough detail to be suitable as a scoping appraisal for a SA. We therefore consider that this document has been titled incorrectly and although it would assist with the development of a SA through the SEA regulations it doesn't itself form scoping for a sustainability appraisal.</p> <p>3.8 Notably Paragraph 1.7 of the Scoping Report states that it is concerned with item 1 of paragraph 1.6, which states: 'SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004. Two key procedural requirements of the SEA regulations are that:</p> <ol style="list-style-type: none"> <li>6) When deciding on 'the scope and level of detail of the information' which must be included within the key output report – namely the report published for consultation alongside the draft plan – there is a consultation with certain nationally designated authorities, namely the Environment Agency, Historic England and Natural England.'</li> </ol> <p>3.9 This seems indicates that the Council's SA Scoping Report was prepared for the purpose of scoping a SEA. However, it is not abundantly clear at this point in the document. Moreover, we note that paragraphs 16.1 and 16.2 of the Scoping Report confirms that this document does relate to Stage A of the SA Scoping Report stage as set out in NPPG and that the next stage will look at reasonable alternatives under NPPG Stage B. The Scoping report goes on further to discuss 14 separate chapter topics, all of which would be expected within a SEA scoping report as outlined by the SEA Regulation requirement checklist.</p>	
SCOP040	Landowner/Developer	<p>3.10 Ultimately, the purpose of the report should be clarified both within the title of the report but also in the introductory text. We consider that the document should either be renamed 'Scoping Report for the Wirral Local Plan Strategic Environmental Assessment' or it should be restructured to address the requirements set out at the beginning of this section as defined by the NPPG.</p> <p>3.11 With regard to the latter option, we consider the following should be included as an absolute minimum:</p> <ul style="list-style-type: none"> <li>• More detailed background on the purpose of the SA and its involvement in the Local Plan process</li> <li>• Outline the role of sustainable development in the process including definition and national policy position and in the context of Wirral highlighting the key issues and difficulties the Council have faced in terms of delivering sustainable development to date;</li> <li>• Discuss the synergies between environmental, economic and social topics and how they lead to sustainable development at the national and local level.</li> <li>• Clearly set out a sustainability framework based on the three principal arms of Sustainable Development (i.e. economic, social and environmental considerations) rather than the 14 separate topics currently set out in Appendix A.</li> </ul> <p>3.12 We also consider that it would be prudent to set out key considerations that will impact on the assessment of 'reasonable alternatives' for the Local Plan. Whilst the NPPG assigns this task to Stage B of the process, Wirral in particular is faced with some critical decisions going forward in terms of ensuring economic regeneration, the delivery of sufficient homes and helping to mitigate climate change.</p> <p>3.13 We consider this approach should include growth strategies such as low – high economic development and similar with new housing figures. Links need to be made between these two strategies, how they connect with each other and also how they may impact the environment either positively or negatively. – Although this isn't required until stage 2 of the process it will help determine the effects of the Local Plan from an early stage thus potentially providing more opportunities for avoidance/ mitigation</p> <p>3.14 Indeed, it must be noted that Wirral has not had a Local Plan in place for a considerable period of time (since 2001). This will have ultimately placed additional burden on surrounding Local Planning Authority areas simply due to the fact that Wirral will not have meet all of its own development needs. Such inaction could have conceivably led to higher out migration patterns, longer commuting patterns and therefore an increase in the use of the private car. By proxy, this could have led to the development of land in surrounding areas that was not as suitable for meeting needs. Such trends could continue if Wirral does not act now and it is telling that that remains one of very few Local Planning Authorities that is still being monitored by the Secretary of State in terms of its Local Plan production.</p>	

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SCOP040	Landowner/Developer	<p>4. KEY TOPICS AND SUSTAINABILITY OBJECTIVES</p> <p>4.1 At present, the Council's proposed Sustainability Framework and Objectives are set out in Appendix A of the Scoping Report and follow the associated Chapters of the report (as we have set out in Section 1).</p> <p>4.2 With regard to the Sustainability Objectives, 2 are set for Air Quality, 2 for Bio-diversity, 1 for Climate Change Adaption, 1 for Climate Change Mitigation, 1 for Heritage, 1 for Land and Soils, 1 for Landscape, and 1 for Water. As such, 10 objectives are set in relation to environmental considerations. The remaining are 2 objectives for the Economy and Employment, 1 objective in relation to Health, 1 for Housing, 2 for Population and Communities and 1 for Transport. As such, only 7 sustainability objectives are spread across economic and social objectives.</p> <p>4.3 As previously noted, we consider the SA Scoping Report should be tailored and structured in accordance with the three arms of Sustainable Development as defined by paragraph 8 of the NPPF (i.e. economic, social and environmental considerations). Moreover, these considerations should then influence the Sustainability Framework and Objectives.</p> <p>4.4 Even if our principal suggestion is not endorsed by the Local Planning Authority, at the very least, we consider that the Council's list of SA objectives should be more evenly balanced so there is a more equitable distribution across the three arms of Sustainable Development. This could be achieved by compiling some of the environmental impacts into fewer objectives or increasing the number of objectives under economic and social considerations. For instance, a more encompassing environmental objective could be 'To promote the sustainable and prudent use of natural resources including Air Quality, Land and Soil and Protected Landscapes by minimising the use and impacts on such resources'. Such an approach would be justified on the basis that the Council's own scoping report confirms the following:  There are no Air Quality management Areas within Wirral and recent trends indicate key pollutant levels are decreasing (suggesting this is not a major issue for the Borough)  Most land is within Agricultural Grades 3 or below within the Borough and there is very little minerals related activity (suggesting Wirral is not renowned for major food or mineral production)  No AONBs or National Parks are located within Wirral (suggesting the landscape and open countryside is not regarded as the most valuable or scenic).</p> <p>4.5 The above approach could also arguable be applied to Bio-diversity and Water Resources. However, we note that the baseline position in Wirral in this regard is more sensitive and therefore, we can also see the value of separate objectives for these issues.</p>	
SCOP040	Landowner/Developer	<p>Environmental</p> <p>4.7 As part of this scoping appraisal a lot of focus has been provided on the current and potential environmental constraints, this is evident by the number of chapters which have an environmental focus and the few that revolve the social and economic impacts. The importance of the environment on sustainable development cannot be underestimated however this scoping appraisal forms more of an appraisal for a SEA rather than SA.</p> <p>4.8 Within this appraisal there is some contradiction around the location for new development. The environmental chapters are clear in promoting the re-use of previously developed land which, as evident in the housing chapters, is mostly located in the eastern parts of the Wirral, specifically Birkenhead. It is these areas that have also been identified as having significant flooding issues, the example of a large proportion of Wirral Waters being located in flood zone 3 is a prime example.</p> <p>4.9 Furthermore, the location of Ramsar sites along the River Mersey and the highlighted importance of green infrastructure in these areas seem to suggest that development of these areas are more appropriate to other uses rather than housing or industry.</p> <p>4.10 Air quality has been depicted as being a more problematic issue in eastern parts of the Wirral which again signals the need to reduce traffic congestion to these areas and locating new development here will have significant impact on people's health and the connectivity to recreational opportunities.</p> <p>4.11 Paragraph 4.3 of the climate change adaptation chapter specifically mentions the need to roll back development in coastal areas to avoid damage from flooding or coastal erosion. This has been set out in the Flood and Water Management Act (2010) and should provide a strategic consideration for new development which would therefore exclude large sections of previously developed land in the eastern side of the Wirral. Expectedly the flood risk decreases as you move further inland which provides more opportunities for new development.</p> <p>4.12 The land and soils chapter show a desire to re-use previously developed land for development purposes however, it has already been made clear that the housing allocation for the Wirral cannot be supplied through brownfield sites alone and although touched upon briefly in 10.14 the potential to release land which is not Best and Most Versatile should be considered in more detail.</p>	<p>The scoping report does not promote any particular approach to development. It aims to present the baseline position and important policy directions. The appraisal of different spatial options will be considered as the SA progresses. We disagree that the focus on environmental factors is too great. The requirements of the SEA Directive is what drove the planing regulations relating to SA. The framework includes sufficient additional social and economic factors to ensure all elements of sustainable development are considered.</p>
SCOP040	Landowner/Developer	<p>Economic and Social</p> <p>4.13 Economic stability and prosperity and social well-being is inevitably closely tied particularly in an area such as the Wirral. As such, we could see merit in these two arms being grouped together.</p> <p>4.14 Under the social arm of Sustainable Development, we would expect to see objectives tied to the following:</p> <ul style="list-style-type: none"> <li>i. The delivery of high standards of education and the mitigation against unsustainable class room sizes.</li> <li>ii. The improvement of physical and mental health and well-being including the delivery of necessary health care infrastructure, community facilities and opportunities to tackle loneliness</li> <li>iii. The promotion of development and policies that tackle deprivation and support social mobility including access to increased levels of education, housing, healthcare and employment opportunities.</li> <li>iv. Delivery of enough affordable housing and homes suitable for first time buyers in a range of locations across the Borough to meet the needs of individual communities.</li> <li>v. Delivery of enough specialist care related homes in a range of locations to meet the needs of an aging population.</li> <li>vi. Reduce crime rates and the fear of crime through well planned developments and regeneration policies.</li> </ul> <p>4.15 One key topic that appears to be missing within the Sustainability Framework relates to 'Social Mobility' which is a key issue in Wirral where social divides in terms of wealth and opportunities are very apparent. There are evidently areas within Wirral where poor levels of investment, employment, education and housing quality come together to generate high areas of deprivation.</p> <p>4.16 Conversely, there are areas of high wealth, shrink wrapped by Green Belt where development opportunities are been curtailed for a prolonged period (due to the lack of an up to date local plan), which have undoubtedly contributed to rising house prices, rents and loss of employment land, which will have inevitably curtailed social mobility in past years.</p>	<p>We consider that the range of social objectives reflects the key issues and the requirements of the legislation. It is not proportionate to include many objectives related to the same issues. Furthermore, these issues will be covered through the consideration of effects against the social objectives such as health, housing and population and communities.</p>

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SCOP040	Landowner/Developer	<p>4.17 With regard to Housing, we would expect to see outputs and objectives for the delivery of housing development contributing to economic and social objectives (including health and well-being). At the very least, the housing objective must ensure the timely delivery of the minimum number of homes as well as an appropriate mix and distribution to meet the needs of a range of groups within the Borough. At present, the objective focuses on mix when the amount and distribution of housing delivered will clearly have an impact on economic, social and environmental considerations.</p> <p>4.18 As noted above, under the social heading, a specific objective should relate to 'Support the timely delivery of sufficient affordable housing to meet the needs across the Borough for those unable to access the standard housing market.' Another housing linked objective could also relate to the delivery of aspirational housing to promote social mobility, retain or see an increase wealth, expenditure and tax revenues; new homes that could accommodate first time buyers, growing families etc.</p> <p>4.19 Due to the rising demographic of an elderly population, it would also be prudent to have a social objective that specifically looked to 'Support the timely delivery of specialist residential care accommodation through the delivery of care homes, extra care development and housing schemes that would accommodate those looking to downsize or obtain an alternative type of property to meet their specific needs'.</p> <p>4.20 The benefit of including more distinct objectives associated with the different types and form of housing would assist in the SA considering a wider range of social and economic objectives when looking at alternative potential sites. Indeed, we note that in Appendix B of the Scoping Report, the following is stated in relation to housing 'Spatial data unlikely to be available. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could potentially be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at large sites).'</p> <p>4.21 Whilst we do not disagree with the above statement, it is probably fair to say that many larger sites will have the ability to deliver a wider range of homes including affordable accommodation, elderly accommodation, etc. Alternatively, some sites might be more suitable in terms of attracting first time buyers and others will be better suited for meet the needs of a growing elderly population or for executive homes. Scoring a site against different housing / SA objectives should assist in helping to deliver a broad mix of sites that would ultimately assist in meeting the wide-ranging housing needs within the Borough.</p>	The assessment relating to the housing objective will cover a wide range of factors such as those suggested. There is no need to include several housing objectives. This is not proportionate and would lead to duplication of efforts. The appraisal of the housing element of sites will be considered when the site matrix is being finalised.
SCOP040	Landowner/Developer	<p>4.22 One of the key issues facing Wirral over the past decade has related to the 'timely delivery of new homes'. To date, much emphasis has been placed on the capacity and deliverability of Wirral Waters. Whilst this scheme will deliver many benefits, its lack of delivery (coupled with the distinct lack of any plan led alternative solutions for housing delivery) will have contributed to negative social and economic impacts within Wirral and possibly further afield. Moreover, Wirral Waters alone will not meet many of the distinct housing needs within the Borough and must only be regarded as part of the solution.</p> <p>4.23 Indeed, large problems with the redevelopment of previously developed sites is the viability and deliverability of the scheme especially in areas which do not retain high market values which is a problem for some eastern parts of the Wirral as explained in the population chapter. The slow development of Wirral Waters is a good example of the difficulties in providing a valuable return on development in areas such as Birkenhead. This will impact the ability to achieve the housing targets as laid out by the 2014 OAHN which will require 803 dpa as confirmed by the Secretary of State's letter to Wirral Council dated 28th January 2019.</p> <p>4.24 The number of completions over the previous 5 years is just over half this rate as there has been a focus on the redevelopment of brownfield land where between 83 and 92% of all new developments have been located. Chapter 67 of the NPPF states planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It is of great importance that economic viability of the previously developed sites is analysed and considered as part of any future allocations or strategic policies and further investigation of market rates need to be incorporated in to the sustainability appraisal. Furthermore, in line with para 11 the relevant policies to housing will be considered out of date if housing delivery is less than 75% of the housing requirement over the previous three years. Based on the current supply which has focussed the majority of developments on to brownfield land then Wirral would not be able to keep up with their housing requirement putting their planning policies in to jeopardy. Therefore, there needs to be a major consideration as part of the SA as to how housing delivery can be speed up to ensure the presumption in favour of sustainable development.</p> <p>4.25 Consistently through the scoping report there is a focus on the Wirral Waters scheme which has been proposed for Birkenhead docks. Understandably, this is an important part of the Wirral Emerging Plan because of its redevelopment potential however, there is consistently differing information being released from the scheme and it is widely understood that it is not going to be completed by the end of the Local Plan period. The focus of the SA therefore needs to assess the potential of the Wirral as a whole. There is very little strategic guidance provided in the SA appraisal as all future baselines focus on the 'potential' of Wirral Waters. This has the impact of losing sight of the potential of other areas in the Wirral to provide sustainable development for new housing and employment allocations along with significant environmental improvements. It is expected that Wirral Waters will only be able to provide between 2900 and 6450 homes under the local plan period with completion anticipated to be beyond 2040.</p>	Such issues will be explored and dealt with in subsequent stages of the SA process. With regards to Wirral Waters, this is mentioned in the scoping report in the future baseline position sections as it is an important strategic development. There is no assumption about the exact contribution that would be made towards housing and employment needs.
SCOP040	Landowner/Developer	<p>4.26 It is standard practice for the SA to assist in the comparison of all reasonable alternative site options being considered by the Local Planning Authority in order to identify the most sustainable options for inclusion in the Local Plan. Approximately 50 Green Belt sites have been put forward for release as part of the development options review, these have not been discussed in the scoping appraisal and yet they are the likely alternative for new housing development in the Borough. A scoring matrix will need to be created and used to help define which of these sites are sustainable for release, this is something that has been partially provided under previous consultations and this will need to form a large part of the SA.</p> <p>4.27 The focus on the Wirral Waters scheme has led to there being little strategic guidance of where new housing development should be located elsewhere in the Borough and besides sections in the transport chapter there is very little discussion as to how sustainability will be determined for new housing and employment allocations. Further work on the wider economic impact of Wirral Waters and other strategic sites needs to be provided and linked to employment and education opportunities. Further economic analysis has been provided in our economic statement.</p> <p>4.28 The SA should assess all of the topic chapters to provide suitable strategic guidance as to where new housing should be located. This scoping report fails to do this, it is only within the transport chapter where there is a strategic analysis of new growth opportunities where it indicates that growth potential could be located within the M53 and A41 corridor along with the Merseyrail Chester/ Ellesmere Port line. There needs to be further assessment on this principle and the assessment needs to cover the whole of the Wirral.</p> <p>4.29 The potential for new development of housing on greenfield areas is not principally discussed in the Housing chapter and only becomes a topic for discussion when assessing the best and most versatile land in the borough. Moreover, there needs to be a greater assessment of where development will be considered sustainable besides on PDL which is constrained.</p>	The scoping process is not required to 'assess' alternatives. These factors will be addressed at the subsequent stages of the SA process.
SCOP040	Landowner/Developer	<p>4.30 The SA should incorporate issues surrounding education as a separate chapter as this has large implications for social and economic factors in the area. We also consider that deprivation should also be considered separately. All of these principles have been pooled under populations however there needs to be a further analysis of each topic separately.</p> <p>4.31 Under the economic arm, we consider the Council's Sustainability Objectives are too narrow and many of the above comments could also apply. In addition, we would expect to see objective that support the following principles:</p> <ul style="list-style-type: none"> <li>i. The delivery of a sufficient number of homes to support planned or forecast jobs growth and objectively assessed needs to help support the construction industry and the wider economy;</li> <li>ii. The delivery of sufficient land and support of development that for town centre uses including retail, leisure, offices and other related uses;</li> <li>iii. The delivery of sufficient land to meet general industry, warehousing and other industries to support economic growth and social mobility;</li> <li>iv. The support of policies and delivery of land that would support the rural economy including agriculture, outdoor recreational economy, housing for villages, and uses that would make a village more sustainable or contribute to sustainable rural diversification.</li> </ul> <p>4.32 The intuition and rational for splitting up the different types of economic development considerations is that each have very different locational requirements. As such, the above split would assist in ensuring that a suitable range and mix of employment land is identified.</p>	It is considered that the SA Framework considers a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors. It should also be remembered that the legislation is founded in the SEA process, which focuses more strongly on environmental factors. The reasonable alternatives will consider a range of growth and distribution options, including assumptions about the contribution that is made by Wirral Waters.

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SCOP040	Landowner/Developer	<p>5. CONCLUSIONS</p> <p>5.1 The consultation response has been commenting on the Scoping for the Sustainability Appraisal produced by Aecom on behalf of Wirral Council.</p> <p>5.2 The scoping report does not fulfil the requirements for a Sustainability Appraisal (SA) required as part of a Local Plan submission under UK Law, policy and guidance. Instead, it is more geared towards a scoping report for a Strategic Environmental Assessment (SEA) appraisal, which forms a part of the SA process but should not be confused with the requirements of a SA as dictated by national planning policy and guidance.</p> <p>5.3 Indeed, the SA should inform and guide the principles and definition of what constitutes Sustainable Development, as defined within the UK and England. In order to do this, direct reference must be made to the NPPF and NPPG. Clarity needs to be provided as to the purpose of the Sustainability Appraisal as this report has not successfully identified the sustainability issues, nor has it established any synergies between environmental, economic and social topics which make up the purpose of sustainable development as outlined in the NPPF.</p> <p>5.4 The SA needs to be conducted to incorporate all three arms of sustainable development being; environmental, social and economic. There is currently an imbalance between these topics with a particular focus on the environment and minimal discussion on the economic and social objectives and the ramifications in terms of assessing reasonable alternative development scenarios. Whilst the consideration of reasonable alternatives will form part of the next stage of the SA, it is considered prudent to provide an indication as to what these alternatives might be at the earliest opportunity.</p> <p>5.5 We therefore consider the following focus recommendations are taken in to account as part of the SA:</p> <ul style="list-style-type: none"> <li>• Remove contradictions in the environmental objectives whilst providing synergies with both economic and social objectives;</li> <li>• Provide assessment of economic and social topics to including education, mental health and wellbeing, affordable housing and specialist care homes, crime and social mobility which itself is one of the key issues in the Wirral;</li> <li>• Focus on the viability and deliverability of new housing and employment land across the Borough following the consistent undersupply over the previous years;</li> <li>• Provide housing and sustainable assessments on the whole of the Wirral and reduce the focus on Wirral Waters which will only supply a small proportion of the sustainable objectives; and</li> <li>• Provide reasonable alternatives and assess them against the sustainability criteria through the preparation of a sustainability matrix.</li> </ul> <p>5.6 A greater focus on the 3 principles of sustainable development to include a wider range of topics will assist in providing a more robust scoping report which will form a major part of the SA and Local Plan development process.</p>	
SCOP040	Landowner/Developer	<p>1. Introduction</p> <p>1.1 This report provides representations relating to the consultation on the Sustainability Appraisal Scoping Report of the Wirral Local Plan. It has been prepared on behalf of the owner of the land at Marsh Lane in Bebington.</p> <p>1.2 We have previously submitted evidence outlining why the site at Marsh Lane should be considered for release from the green belt. The site has the potential to deliver up to 200 homes. Set against this content, this report highlights key issues that need to be considered when developing the Sustainability Appraisal and new Draft Local Plan for the Wirral.</p>	Comments noted.
SCOP040	Landowner/Developer	<p>2. Economy &amp; Employment Section of the Scoping Report</p> <p>2.1 Section six of the Scoping Report looks at the Wirral economy and we welcome the fact that one of the issues it identifies for the Sustainability Appraisal Framework (SAF) is to: "Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the Borough's town and local centres including through the identification of further regeneration opportunities..."</p> <p>2.2 The Scoping Report quite rightly highlights the need to increase employment in the District, and it compares the Wirral's recent economic performance with that of the North West and England. However, what it does not do is look at how the Wirral performs relative to the wider Liverpool City Region. For example, between 2015 and 2017, employment on the Wirral grew by only 1.0% - from 105,000 to 106,000. Over the same timeframe, job numbers in the City Region increased by 20,000 (3.2%) to reach 639,000, with Liverpool accounting for half this increase. The Wirral's share of total employment in the City Region also declined from 2015-17, falling from 17.0% to 16.6%.</p> <p>2.3 The Scoping Report also highlights how there are significant commuting flows to and from the Wirral, most notably with Cheshire and Liverpool. This is based on data from the 2011 Census and more detailed analysis of this data shows that the Wirral experiences a net outflow of around 27,000 commuters. Unsurprisingly, Cheshire West &amp; Chester and Liverpool are the most common destinations. This outflow is unlikely to be reversed in the long-term, however it seems reasonable to argue that the District needs to see significantly more jobs created over the 10-20 years in order to it be considered as the "strong, diverse and resilient economy" noted in the Scoping Report.</p> <p>2.4 For the District to achieve genuinely sustainable economic growth, the Wirral needs to see faster jobs growth and increase the number of people who live and work in the District. The Sustainability Appraisal and new Draft Local Plan need to outline how this will be achieved.</p> <p>2.5 When looking at how to increase the number of people who live and work in an area, the role of housing will be an important factor – not just in providing new homes for people wanting to move to the area, but in creating local economic benefits. For example, if residential dwellings were developed on the site at Marsh Lane, new job opportunities would be created in the construction sector, while residents in the new homes will be spending money in the local area and supporting permanent employment. Additional Council Tax would also be generated.</p>	Comments noted.
SCOP040	Landowner/Developer	<p>Local Economic Benefits Generated by the Construction Phase</p> <p>2.6 If the land at Marsh Lane is developed for new residential dwellings, this will generate significant benefits for the local economy:</p> <ul style="list-style-type: none"> <li>• The site has the potential to deliver up to 200 homes. Construction costs are estimated at £28.0million over the build programme, which is expected to be around four years. The construction costs have been estimated using the BCIS Online tool<sup>2</sup> and are exclusive of external works, contingencies, supporting infrastructure, fees, VAT, finance charges etc.</li> <li>• To estimate construction employment supported during the building phase, the total construction cost has been divided by the average turnover per construction employee in the North West of £122,500, based on figures derived from the 2018 edition of Business Population Estimates produced by the Office for National Statistics. This means that over the whole life of the construction phase, 225 construction years of employment could be supported. Dividing these years of employment by a potential build programme of four years suggests that on average, around 56 construction jobs on-site could be supported in total per annum over the life of the development.</li> <li>• It is widely recognised that housebuilding has knock-on effects for other sectors, which leads to increased demand for building materials and equipment at the construction phase, as well as domestic furniture and carpets etc. following completion. This generates and sustains employment in other sectors. The July 2018 'Economic Footprint of House Building in England and Wales' report by the Home Builders Federation found that for every 1 job in housing construction, the scale of employment supported is equivalent to between 2.4 and 3.1 direct, indirect and induced jobs per new dwelling built. Taking an average of these figures, a multiplier of 2.75 has been used – i.e. for every 1 job in house building, a further 1.75 jobs are supported in the wider economy. Therefore, as well as the 56 on-site jobs supported per annum during the build phase, the scheme could support a further 99 additional jobs per annum in the wider economy.</li> <li>• In total, around 155 temporary jobs could be supported per annum during the build phase.</li> <li>• Another way of looking at the economic impact of the construction phase is to calculate the contribution a development makes to wealth creation, as measured by the increase in the value of goods and services generated within an area. This can be done by looking at the increase in gross value added (GVA)<sup>3</sup>, a common proxy for economic output. Drawing on data published by the Office for National Statistics (ONS), based on the number of jobs supported during the build phase, developing the land at Marsh Lane for new residential dwellings could generate an additional £34.0million of GVA for the regional economy during the construction period.</li> </ul>	Comments noted.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP040	Landowner/Developer	<p>Household Spend and Supporting Permanent Employment</p> <p>2.7 In addition to the impact of the construction phase, developing the site at Marsh Lane for residential dwellings will bring long-term benefits to the economy in the form of increased household spend. Figures produced by the ONS4 at a regional level can be used to provide an estimate of what this spend could be worth on an annual basis. For the North West, average household spend on items such as food &amp; drink, households goods, leisure etc. is estimated by the ONS to be around £280 per week.</p> <p>2.8 Not all of the household spend will be retained in the local area (Wirral district). Analysis in the Wirral Retail &amp; Leisure Study, published in March 2016 by Lichfields, indicates that approximately 90% of convenience spend is retained on the Wirral, while around 60% of comparison spend is retained in the District. Taking this into account, weekly spend retained on the Wirral is estimated at £205. Over the course of a typical year, the 200 homes that could be developed on the land at Marsh Lane could generate around £2.0million of additional spend in the local economy, which could support up to 20 full-time equivalent (FTE) jobs.</p> <p>Additional Council Tax Revenue</p> <p>2.9 Assuming the new dwellings at Marsh Lane fall within Band D5, once fully occupied the site is estimated to generate over £365,000 on an annual basis in additional Council Tax payments, or around £3.6million over 10 years at 2019/20 rates.</p>	Consideration of housing and employment factors will be addressed at the next stages of the SA process. This will include consideration of cross boundary issues such as those raised here.
SCOP040	Landowner/Developer	<p>3. Housing Section of the Scoping Report</p> <p>3.1 Section nine of the Scoping Report deals with housing and it concludes that the SAF needs to:  “Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral’s residents, including older people, people with disabilities and families with children.”</p> <p>3.2 We support the objective above and the Scoping Report also helpfully outlines the current evidence on housing requirements in the District. This shows a range of figures:</p> <ul style="list-style-type: none"> <li>• Wirral’s SHMA, published in 2016 identifies an Objectively Assessed Housing Need (OAHN) of between 875 dwellings per annum (dpa) and 1,235 dpa.</li> <li>• The Government’s proposed standard methodology produces a housing need figure of 803 dpa.</li> <li>• The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) was published in draft for consultation in 2017, and identifies housing need at a regional scale, apportioning this need between the constituent LCR authorities. The SHELMA identifies an OAHN for the Wirral of between 664 and 737 dpa.</li> </ul> <p>3.3 Regarding the housing requirement figures outlined above, data published by the Ministry of Housing, Communities &amp; Local Government (MHCLG) show that the rate of housing delivery on the Wirral has been consistently below the required level over the last decade. The latest figures for 2017/18 indicate that there were 704 net additions to the dwellings stock in the District. As shown in Figure 3.1, this represents the highest number since 2007/08, however it is still well below the SHMA and standard methodology housing requirement estimates. It is also lower than the higher end estimate of 737 outlined in the Liverpool City Region SHELMA.  [Figure attached showing Net Additional Dwellings on the Wirral, 2008-18]</p> <p>3.4 Boosting the supply of housing is therefore a critical consideration for the SAF and the new Draft Local Plan of the Wirral if it is to achieve long-term sustainable development. Developing residential dwellings on the land at Marsh Lane can help in achieving this aim, by providing new homes that can attract people to the area. In particular, attracting economically active people to the District is an important consideration when looking at future labour supply. The Wirral has seen a significant increase in the number of people aged 65 and over in the last decade – experiencing a rise of 17.9% (10,000) within this cohort between 2007 and 2017. The number of people aged 0-15 and 16-64 in the District declined over the same period.</p> <p>3.5 The trend of an ageing population is expected to continue, raising the importance of the Wirral seeing new homes built that are attractive to people of working age. This younger population can help boost labour market supply as older members of the workforce reach retirement age and become economically inactive. Sites such as Marsh Lane can play an important role in increasing housing supply on the Wirral.</p>	Comments noted.
SCOP040	Landowner/Developer	<p>4. Conclusions</p> <p>4.1 Whilst we welcome the objectives relating to the economy &amp; employment and housing in the Scoping Report, the analysis presented in this report raises a number of important points from an economic perspective when responding to the consultation on the Sustainability Appraisal Scoping Report of the Wirral Local Plan.</p> <p>4.2 In terms of the economy &amp; employment, the Sustainability Appraisal needs to consider how the Wirral performs relative to the Liverpool City Region and look at how the District can make a greater contribution to this larger area to which it is so closely linked. The Wirral’s labour market has grown at a slower rate than the City Region’s in recent years, and it continues to see a net outflow of commuters – larger to Liverpool and Cheshire West &amp; Chester. The commuting outflow is unlikely to be reversed in the long-term, however it seems reasonable to argue that the District needs to see significantly more jobs created over the 10-20 years in order to it be considered as the “strong, diverse and resilient economy” noted in the Scoping Report.</p> <p>4.3 For the District to achieve genuinely sustainable economic growth, the Wirral needs to see faster jobs growth and increase the number of people who live and work in the District. The Sustainability Appraisal and new Draft Local Plan need to outline how this will be achieved. The role of housing will be an important factor in this respect and it can generate long-term local economic benefits. For example, if residential dwellings were developed on the site at Marsh Lane, it is estimated that the following economic benefits would be generated:</p> <ul style="list-style-type: none"> <li>• In total, around 155 temporary jobs could be supported per annum during the build phase.</li> <li>• An additional £34.0million of GVA (a proxy for economic output) for the regional economy during the construction period.</li> <li>• Around £2.0million of additional spend in the local economy, which could support up to 20 full-time equivalent (FTE) jobs.</li> <li>• Over £365,000 on an annual basis in additional Council Tax payments, or around £3.6million over 10 years at 2019/20 rates.</li> </ul> <p>4.4 In terms of housing, the rate of housing delivery on the Wirral has been consistently below the required level over the last decade, regardless of which housing target the District is measured against. Boosting the supply of housing is therefore a critical consideration for the SAF and new Draft Local Plan if the Wirral is to achieve long-term sustainable development. In particular, attracting economically active people to the District is an important consideration when looking at future labour supply. The Wirral has seen a significant increase in the number of people aged 65 and over the last decade and the trend of an ageing population is expected to continue, raising the importance of the Wirral seeing new homes built that are attractive to people of working age. This younger population can help boost labour market supply as older members of the workforce reach retirement age and become economically inactive. Sites such as Marsh Lane can play an important role in increasing housing supply on the Wirral.</p>	Consideration of housing and employment factors will be addressed at the next stages of the SA process. This will include consideration of cross boundary issues such as those raised here.
SCOP040	Landowner/Developer	<p>1. Introduction</p> <p>1.1 This report provides representations relating to the consultation on the Sustainability Appraisal Scoping Report of the Wirral Local Plan. It has been prepared on behalf of the owner of the land at Riverside Park in Bromborough.</p> <p>1.2 Modern office buildings have previously been developed at Riverside Park. These were originally built by Riverside Park Limited on a speculative basis in the mid-2000’s onwards. The developer’s rationale was to stimulate and grow an office market within this area of the Wirral, with the provision of a modern office product that was competitively priced and in an accessible location. However, despite initial successes in the lettings of floorspace within their office buildings and strong occupancy levels, after several years the economic downturn and recession took a significant toll. Vacancy rates increased as businesses went into administration or down-sized, while demand for office floorspace markedly fell away.</p> <p>1.3 We have previously submitted evidence outlining why the site at Riverside Park should be considered as more suitable for residential development. Set against this context, this report highlights key issues that need to be considered when developing the Sustainability Appraisal and new Draft Local Plan for the Wirral.</p>	Comments noted.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP040	Landowner/Developer	<p>2. Economy &amp; Employment Section of the Scoping Report</p> <p>2.1 Section six of the Scoping Report looks at the Wirral economy and we welcome the fact that one of the issues it identifies for the Sustainability Appraisal Framework (SAF) is to:  “Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the Borough’s town and local centres including through the identification of further regeneration opportunities...”</p> <p>2.2 The Scoping Report quite rightly highlights the need to increase employment in the District, and it compares the Wirral’s recent economic performance with that of the North West and England. However, what it does not do is look at how the Wirral performs relative to the wider Liverpool City Region. For example, between 2015 and 2017, employment on the Wirral grew by only 1.0% - from 105,000 to 106,000. Over the same timeframe, job numbers in the City Region increased by 20,000 (3.2%) to reach 639,000, with Liverpool accounting for half this increase. The Wirral’s share of total employment in the City Region also declined from 2015-17, falling from 17.0% to 16.6%1.</p> <p>2.3 The Scoping Report also highlights how there are significant commuting flows to and from the Wirral, most notably with Cheshire and Liverpool. This is based on data from the 2011 Census and more detailed analysis of this data shows that the Wirral experiences a net outflow of around 27,000 commuters. Unsurprisingly, Cheshire West &amp; Chester and Liverpool are the most common destinations. This outflow is unlikely to be reversed in the long-term, however it seems reasonable to argue that the District needs to see significantly more jobs created over the 10-20 years in order to it be considered as the “strong, diverse and resilient economy” noted in the Scoping Report.</p> <p>2.4 For the District to achieve genuinely sustainable economic growth, the Wirral needs to see faster jobs growth and increase the number of people who live and work in the District. The Sustainability Appraisal and new Draft Local Plan need to outline how this will be achieved.</p> <p>2.5 When looking at how to increase the number of people who live and work in an area, the role of housing will be an important factor – not just in providing new homes for people wanting to move to the area, but in creating local economic benefits. For example, if residential dwellings were developed on the site at Riverside Park, new job opportunities would be created in the construction sector, while residents in the new homes will be spending money in the local area and supporting permanent employment. Additional Council Tax would also be generated.</p>	Comments noted.
SCOP040	Landowner/Developer	<p>Local Economic Benefits Generated by the Construction Phase</p> <p>2.6 If the land at Riverside Park is developed for new residential dwellings, this will generate significant benefits for the local economy:</p> <ul style="list-style-type: none"> <li>• The site is 2.7 hectares. Assuming an average development density of 35 dwellings per hectare, around 95 homes could be built. Construction costs are estimated at £13.0million over the build programme, which expected to be two years. The construction costs have been estimated using the BCIS Online tool2 and are exclusive of external works, contingencies, supporting infrastructure, fees, VAT, finance charges etc.</li> <li>• To estimate construction employment supported during the building phase, the total construction cost has been divided by the average turnover per construction employee in the North West of £122,500, based on figures derived from the 2018 edition of Business Population Estimates produced by the Office for National Statistics. This means that over the whole life of the construction phase, 107 construction years of employment could be supported. Dividing these years of employment by a potential build programme of two years suggests that on average, around 53 construction jobs on-site could be supported in total per annum over the life of the development.</li> <li>• It is widely recognised that housebuilding has knock-on effects for other sectors, which leads to increased demand for building materials and equipment at the construction phase, as well as domestic furniture and carpets etc. following completion. This generates and sustains employment in other sectors. The July 2018 ‘Economic Footprint of House Building in England and Wales’ report by the Home Builders Federation found that for every 1 job in housing construction, the scale of employment supported is equivalent to between 2.4 and 3.1 direct, indirect and induced jobs per new dwelling built. Taking an average of these figures, a multiplier of 2.75 has been used – i.e. for every 1 job in house building, a further 1.75 jobs are supported in the wider economy. Therefore, as well as the 53 on-site jobs supported per annum during the build phase, the scheme could support a further 93 additional jobs per annum in the wider economy.</li> <li>• In total, around 146 temporary jobs could be supported per annum during the build phase.</li> <li>• Another way of looking at the economic impact of the construction phase is to calculate the contribution a development makes to wealth creation, as measured by the increase in the value of goods and services generated within an area. This can be done by looking at the increase in gross value added (GVA)3, a common proxy for economic output. Drawing on data published by the Office for National Statistics (ONS), based on the number of jobs supported during the build phase, developing the land at Riverside Park for new residential dwellings could generate an additional £16.0million of GVA for the regional economy during the construction period.</li> </ul>	Comments noted.
SCOP040	Landowner/Developer	<p>Household Spend and Supporting Permanent Employment</p> <p>2.7 In addition to the impact of the construction phase, developing the site at Riverside Park for residential dwellings will bring long-term benefits to the economy in the form of increased household spend. Figures produced by the ONS4 at a regional level can be used to provide an estimate of what this spend could be worth on an annual basis. For the North West, average household spend on items such as food &amp; drink, households goods, leisure etc. is estimated by the ONS to be around £280 per week.</p> <p>2.8 Not all of the household spend will be retained in the local area (Wirral district). Analysis in the Wirral Retail &amp; Leisure Study, published in March 2016 by Lichfields, indicates that approximately 90% of convenience spend is retained on the Wirral, while around 60% of comparison spend is retained in the District. Taking this into account, weekly spend retained on the Wirral is estimated at £205. Over the course of a typical year, the 200 homes that could be developed on the land at Riverside Park could generate around £1.0million of additional spend in the local economy, which could support up to 10 full-time equivalent (FTE) jobs.</p> <p>Additional Council Tax Revenue</p> <p>Assuming the new dwellings at Riverside Park fall within Band D5, once fully occupied the site is estimated to generate over £172,000 on an annual basis in additional Council Tax payments, or around £1.7million over 10 years at 2019/20 rates.</p>	Comments noted.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP040	Landowner/Developer	<p>3. Housing Section of the Scoping Report</p> <p>3.1 Section nine of the Scoping Report deals with housing and it concludes that the SAF needs to:  “Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral’s residents, including older people, people with disabilities and families with children.</p> <p>3.2 We support the objective above and the Scoping Report also helpfully outlines the current evidence on housing requirements in the District. This shows a range of figures:</p> <ul style="list-style-type: none"> <li>• Wirral’s SHMA, published in 2016 identifies an Objectively Assessed Housing Need (OAHN) of between 875 dwellings per annum (dpa) and 1,235 dpa.</li> <li>• The Government’s proposed standard methodology produces a housing need figure of 803 dpa.</li> <li>• The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) was published in draft for consultation in 2017, and identifies housing need at a regional scale, apportioning this need between the constituent LCR authorities. The SHELMA identifies an OAHN for the Wirral of between 664 and 737 dpa.</li> </ul> <p>3.3 Regarding the housing requirement figures outlined above, data published by the Ministry of Housing, Communities &amp; Local Government (MHCLG) show that the rate of housing delivery on the Wirral has been consistently below the required level over the last decade. The latest figures for 2017/18 indicate that there were 704 net additions to the dwellings stock in the District. As shown in Figure 3.1, this represents the highest number since 2007/08, however it is still well below the SHMA and standard methodology housing requirement estimates. It is also lower than the higher end estimate of 737 outlined in the Liverpool City Region SHELMA.  [Figure attached showing Net Additional Dwellings on the Wirral 2008-2018]</p> <p>3.4 Boosting the supply of housing is therefore a critical consideration for the SAF and the new Draft Local Plan of the Wirral if it is to achieve long-term sustainable development. Developing residential dwellings on the land at Riverside Park can help in achieving this aim, by providing new homes that can attract people to the area. In particular, attracting economically active people to the District is an important consideration when looking at future labour supply. The Wirral has seen a significant increase in the number of people aged 65 and over in the last decade – experiencing a rise of 17.9% (10,000) within this cohort between 2007 and 2017. The number of people aged 0-15 and 16-64 in the District declined over the same period.</p> <p>3.5 The trend of an ageing population is expected to continue, raising the importance of the Wirral seeing new homes built that are attractive to people of working age. This younger population can help boost labour market supply as older members of the workforce reach retirement age and become economically inactive. Sites such as Riverside Park can play an important role in increasing housing supply on the Wirral.</p>	Comments noted.
SCOP040	Landowner/Developer	<p>4. Summary and Conclusions</p> <p>4.1 Whilst we welcome the objectives relating to the economy &amp; employment and housing in the Scoping Report, the analysis presented in this report raises a number of important points from an economic perspective when responding to the consultation on the Sustainability Appraisal Scoping Report of the Wirral Local Plan.</p> <p>4.2 In terms of the economy &amp; employment, the Sustainability Appraisal needs to consider how the Wirral performs relative to the Liverpool City Region and look at how the District can make a greater contribution to this larger area to which it is so closely linked. The Wirral’s labour market has grown at a slower rate than the City Region’s in recent years, and it continues to see a net outflow of commuters – larger to Liverpool and Cheshire West &amp; Chester. The commuting outflow is unlikely to be reversed in the long-term, however it seems reasonable to argue that the District needs to see significantly more jobs created over the 10-20 years in order to it be considered as the “strong, diverse and resilient economy” noted in the Scoping Report.</p> <p>4.3 For the District to achieve genuinely sustainable economic growth, the Wirral needs to see faster jobs growth and increase the number of people who live and work in the District. The Sustainability Appraisal and new Draft Local Plan need to outline how this will be achieved. The role of housing will be an important factor in this respect and it can generate long-term local economic benefits. For example, if residential dwellings were developed on the site at Riverside Park, it is estimated that the following economic benefits would be generated:</p> <ul style="list-style-type: none"> <li>• In total, around 146 temporary jobs could be supported per annum during the build phase.</li> <li>• An additional £16.0million of GVA (a proxy for economic output) for the regional economy during the construction period.</li> <li>• Around £1.0million of additional spend in the local economy, which could support up to 10 full-time equivalent (FTE) jobs.</li> <li>• Over £172,000 on an annual basis in additional Council Tax payments, or around £1.7million over 10 years at 2019/20 rates.</li> </ul> <p>In terms of housing, the rate of housing delivery on the Wirral has been consistently below the required level over the last decade, regardless of which housing target the District is measured against. Boosting the supply of housing is therefore a critical consideration for the SAF and new Draft Local Plan if the Wirral is to achieve long-term sustainable development. In particular, attracting economically active people to the District is an important consideration when looking at future labour supply. The Wirral has seen a significant increase in the number of people aged 65 and over the last decade and the trend of an ageing population is expected to continue, raising the importance of the Wirral seeing new homes built that are attractive to people of working age. This younger population can help boost labour market supply as older members of the workforce reach retirement age and become economically inactive. Sites such as Riverside Park can play an important role in increasing housing supply on the Wirral.</p>	Consideration of housing and employment factors will be addressed at the next stages of the SA process. This will include consideration of cross boundary issues such as those raised here.
SCOP041	Landowner/Developer	<p>1. INTRODUCTION</p> <p>1.1 We have been instructed to prepare a response to the consultation that Wirral Council formally began on the 25th March which runs until the 8th May. This consultation outlines the scope of the Wirral Local Plan Sustainability Appraisal and Equalities Impact Assessment, which has been prepared by AECOM on the Council’s behalf.</p> <p>1.2 Although a major part of the SA process, a scoping report isn’t legally required to be conducted or opened up to consultation other than beyond the key bodies of Natural England, Historic England and the Environment Agency. However, we welcome Wirral Council’s approach and trust our comments will be fully considered as part of the SA process going forward. Indeed, it is noted that the results of this consultation are to help steer the Sustainability Appraisal to be legally conducted as part of the Local Development Plan process as required by Section 19 of the Planning and Compulsory Purchase Act 2004.</p> <p>1.3 The emerging Wirral Local Plan will form the spatial strategy outlining the locations for new housing and economic growth to the end of the plan period in 2035. We also note that the final Sustainability Appraisal will be released in tandem with the Draft Local Plan, will be open for further consultation and that the overall process is an iterative one that will evolve overtime. However, it is critical that the Scoping Assessment for the SA demonstrates that all relevant baseline information is being considered at this early stage in order to ensure that as part of preparing the Local Plan, all relevant and reasonable considerations are at the forefront of the Council’s decision making process. Indeed, the SA should ultimately contribute towards and influence the decision making process.</p> <p>1.4 Whilst a SA requires the inclusion of a Strategic Environmental Assessment to ensure environmental effects are given full consideration, this must also sit alongside with equally important economic and social considerations and impacts. Indeed, a Sustainability Appraisal is primarily tasked with assessing the delivery of ‘Sustainable Development’ and the associated impacts of doing so, together with assessing ‘reasonable alternatives’. Sustainable Development within England is defined by National Planning Policy but very few of the considerations set out within the NPPF are laid out in this Scoping Report for the Sustainability Assessment.</p>	The scoping report is not only geared towards an SEA process and this is clear from the introductory chapter. Some of the factors listed below go beyond the requirements of the scoping stage and will be addressed as the SA process progresses.



Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP041	Landowner/Developer	<p>1.5 The consultation document considers the baseline position for a range of individual topics to help form the scoping requirements for the Sustainability Appraisal. There are 14 chapters which have been determined as the key themes most relevant to the development of the emerging Local Plan by AECOM. These include:</p> <ul style="list-style-type: none"> <li>Air Quality; Biodiversity;</li> <li>Climate Change Adaptation;</li> <li>Climate Change Mitigation;</li> <li>Economy and Employment; (To be discussed in the economic statement)</li> <li>Health;</li> <li>Heritage;</li> <li>Housing;</li> <li>Land and Soils;</li> <li>Landscape;</li> <li>Population and Communities;</li> <li>Transport;</li> <li>Water Resources; and</li> <li>Water Quality.</li> </ul> <p>1.6 As noted above, the scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The above list is very much focused on environmental considerations that make up 8/9 of the topics and associated objectives.</p> <p>1.7 Our principal recommendation is that the Scoping Assessment and subsequent objectives are set out under the following three objectives as defined by paragraph 8 of the NPPF.</p> <ul style="list-style-type: none"> <li>• an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</li> <li>• a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</li> <li>• an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</li> </ul>	
SCOP041	Landowner/Developer	<p>2. SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT</p> <p>2.1 The preparation of all Local Plans within the UK must comply with EU Law and Acts relevant to the associated countries within the UK. In short, EU law calls for SEA’s to be carried out and UK Acts, policies and guidance require a SA to be carried out. Ultimately, it is considered best practice to incorporate requirements of the SEA Directive into a Sustainability Appraisal which must ensure that the potential environmental effects are given full consideration alongside social and economic issues. Indeed, the SA incorporates the requirements of SEA.</p> <p>The SEA European Directive</p> <p>2.2 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication ‘A Practical Guide to the Strategic Environmental Assessment Directive’ (ODPM 2005) and the NPPG also provides further guidance on the matter.</p> <p>2.3 The aim of the Directive is to ‘to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.’</p> <p>2.4 This Directive applies to a plan or programme related solely to England (or part of England) and any other part of the United Kingdom. The Directive therefore applies to the preparation of the emerging Wirral Local Plan and applies specific requirements that must be complied with and incorporated as an integral part of the sustainability appraisal process.</p>	
SCOP041	Landowner/Developer	<p>Strategic Environmental Assessment Regulations requirements checklist</p> <p>2.5 Regulation 12 – Preparation of an environmental report that ‘identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>2.6 This report should include the relevant information referred to in schedule 2 of the directive as required taking in to account ‘current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3))’.</p> <p>2.7 When deciding on the scope and detail of the information which should be included as part of the environmental report the consultation bodies being Natural England, Historic England and Environment Agency should be consulted. This is at the earliest stage of the preparation process and includes the following requirements:</p> <ul style="list-style-type: none"> <li>• It should form an outline of the contents;</li> <li>• main objectives of the plan and its relationship with other plans or programmes;</li> <li>• It should provide a baseline state of the environment which is as existing before the implementation of the plan;</li> <li>• It should include the environmental characteristics of the areas likely to be significantly affected by the plan over its period;</li> <li>• It must outline any existing environmental problems which are relevant to the plan including areas of particular environmental importance pursuant to Directives 2009/147/EC and 92/43/EEC (Habitats Directive);</li> <li>• It should include environmental protection objectives established at international, national or community level which are relevant to the plan and the way those objectives have been taken in to consideration throughout the preparation of the plan;</li> <li>• The following issues should be looked at as an overall effect on the environment: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors;</li> <li>• Measures should outlined which will be envisaged to prevent, reduce or offset any significant adverse effects on the environment from implementing the plan;</li> <li>• It should provide an outline the reasoning for selecting the alternatives that were dealt with outlining how the assessments were undertaken;</li> <li>• It should look at how it is going to monitor the impacts in accordance with regulation 17 of the Directive; and</li> <li>• It should provide a non-technical summary of the information provided under all of the above headings and topics.</li> </ul> <p>2.8 The above process is very much focused on identifying the key environmental considerations within an area and it is a process that must be carried out. Indeed, we consider the AECOM document prepared is very much focused on the above process. However, it is critical to note at this stage that the European Directive does not define ‘Sustainable Development’ in the context of preparing a Local Plan under UK legislation. Indeed, it is for each member state to define ‘Sustainable Development’ in this regard and it is the SA’s role to consider the implications of Sustainable Development policies in the round. Simply adhering to SEA legislation and the EU Directive is therefore not enough in itself to assess the impacts of a Local Plan and its associated policies.</p>	

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SCOP041	Landowner/Developer	<p>Planning Acts, National Policies and UK Guidance</p> <p>Planning Acts</p> <p>2.9 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. The 2008 Planning Act amended the requirement to undertake a Sustainability Appraisal for Development Plan Documents (DPDs) but did not remove the requirement to produce a Strategic Environmental Assessment. Moreover, Section 19(5) of the Planning and Compulsory Purchase Act 2004 (as amended) maintains that:</p> <p>‘The local planning authority must also –</p> <p>(a) Carry out an appraisal of the sustainability of the proposals in each development plan document;</p> <p>(b) Prepare a report of the findings of the appraisal.’</p> <p>2.10 Section 19(A) was introduced to the 2004 Act as part of the 2008 Act/amendments and stipulates that:</p> <p>‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.’</p> <p>2.11 This ensures that environmental impacts are still at the forefront of the overall process. However, it is still critical to note that Section 39(2) of the 2004 Act (as amended) states that ‘the person or body must exercise the function with the objective of contributing to the achievement of sustainable development.’ Furthermore, Section 39(3) confirms that for the purposes of achieving sub-section 2, ‘the person or body must have regard to national policies and advice contained in guidance issued by the Secretary of State...’</p>	
SCOP041	Landowner/Developer	<p>National Policy and Guidance</p> <p>2.12 National planning policy guidance confirms the following:</p> <p>‘A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.’</p> <p>2.13 Sustainable development is defined in the NPPF (2019) and is the principle by which the SA should be prepared against. Paragraph 8 of the NPPF states:</p> <p>‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’</p>	
SCOP041	Landowner/Developer	<p>2.14 Critically, any SA process has to be judged against reasonable alternatives to ensure that the Local Plan is the most appropriate to achieve sustainable development. The whole process should identify ways the Local Plan can contribute to improvements in economic, social and environmental conditions as well as mitigating any potential adverse effects that the plan may cause. This will ensure that the plan is the most appropriate against the reasonable alternatives and can be used to test the evidence underpinning the plan and is important in demonstrating how the tests of soundness have been met.</p> <p>2.15 The NPPG goes on to set out a 5 step process for the preparation of a SA as follows:</p> <ul style="list-style-type: none"> <li>• Stage A – Setting the context and objectives, establishing baselines and deciding on the scope: <ol style="list-style-type: none"> <li>1) Identification of other relevant policies, plans and sustainability objectives</li> <li>2) Pooling baseline information</li> <li>3) Identification of sustainability issues and problems</li> <li>4) Develop a sustainability appraisal framework</li> <li>5) Consultation of the relevant bodies</li> </ol> </li> <li>• Stage B – Developing and refining alternatives and assessing effects: <ol style="list-style-type: none"> <li>1) Test local plan objectives against sustainability appraisal framework</li> <li>2) Develop Local Plan options including reasonable alternatives</li> <li>3) Evaluate likely effects of Local Plan and alternatives</li> <li>4) Consider ways of mitigating adverse effects and maximising beneficial effects</li> <li>5) Propose measures to monitor significant effects of implementing the Local Plan</li> </ol> </li> <li>• Stage C – Prepare Sustainability Appraisal report</li> <li>• Stage D – Seek representations on sustainability appraisal report from consultation bodies and the public</li> <li>• Stage E – Post adoption reporting and monitoring</li> </ul> <p>2.16 The Scoping Stage (stage 1) is relevant to the current consultation document. It should identify the level of detail and the relevance of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and sustainability objectives.</p>	

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SCOP041	Landowner/Developer	<p>3. SCOPING REPORT FOR THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL</p> <p>Defining the Purpose and Scope of the Scoping Report</p> <p>3.2 Section 2 of this report has outlined the requirements of a scoping report for a Local Plan Sustainability Appraisal whilst also outlining the process as a whole. This helps to provide clarity behind what the Council has completed as a part of this consultation.</p> <p>3.3 Based on the title of the Council's document, the current consultation process is seemingly associated with Stage 1 of the Sustainability Appraisal development process. As recommended by the NPPG this stage/Scoping Report should therefore include the following information:</p> <ol style="list-style-type: none"> <li>1. Identification of other relevant policies, plans and sustainability objectives</li> <li>2. Pooling baseline information</li> <li>3. Identification of sustainability issues and problems</li> <li>4. Develop a sustainability appraisal framework</li> <li>5. Consultation of the relevant bodies</li> </ol> <p>3.4 However, within the introduction of the Scoping Report, it is not made clear that this is the process that is being undertaken. The background details provided to the Sustainability Appraisal process is minimal. It should clearly define and outline what information is required at each stage and its relationship with the SEA process.</p> <p>3.5 When assessing the information that should be provided as part of stage 1 it is evident that there are 2 sections missing from this scoping report, these being point 3 and 4 in paragraph 3.2. This report has not successfully identified the sustainability issues and problems which should be carried on for further investigation and the way in which the sustainability issues are connected with one another.</p> <p>3.6 Instead of providing this detail the scoping report is far more focussed on the requirements of the SEA Regulations which, as previously explained, form a part of the SA however they focus only on the environmental assessment. The scoping appraisal incorporates the requirements for a SEA scoping report, we feel therefore clarification should be provided as part of the introduction as to the purpose of this scoping report produced for the Wirral Local Plan.</p>	
SCOP041	Landowner/Developer	<p>3.7 The economic and social principles have not been considered in enough detail to be suitable as a scoping appraisal for a SA. We therefore consider that this document has been titled incorrectly and although it would assist with the development of a SA through the SEA regulations it doesn't itself form scoping for a sustainability appraisal.</p> <p>3.8 Notably Paragraph 1.7 of the Scoping Report states that it is concerned with item 1 of paragraph 1.6, which states: 'SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004. Two key procedural requirements of the SEA regulations are that:</p> <ol style="list-style-type: none"> <li>6) When deciding on 'the scope and level of detail of the information' which must be included within the key output report – namely the report published for consultation alongside the draft plan – there is a consultation with certain nationally designated authorities, namely the Environment Agency, Historic England and Natural England.'</li> </ol> <p>3.9 This seems indicates that the Council's SA Scoping Report was prepared for the purpose of scoping a SEA. However, it is not abundantly clear at this point in the document. Moreover, we note that paragraphs 16.1 and 16.2 of the Scoping Report confirms that this document does relate to Stage A of the SA Scoping Report stage as set out in NPPG and that the next stage will look at reasonable alternatives under NPPG Stage B. The Scoping report goes on further to discuss 14 separate chapter topics, all of which would be expected within a SEA scoping report as outlined by the SEA Regulation requirement checklist.</p>	
SCOP041	Landowner/Developer	<p>3.10 Ultimately, the purpose of the report should be clarified both within the title of the report but also in the introductory text. We consider that the document should either be renamed 'Scoping Report for the Wirral Local Plan Strategic Environmental Assessment' or it should be restructured to address the requirements set out at the beginning of this section as defined by the NPPG.</p> <p>3.11 With regard to the latter option, we consider the following should be included as an absolute minimum:</p> <ul style="list-style-type: none"> <li>• More detailed background on the purpose of the SA and its involvement in the Local Plan process</li> <li>• Outline the role of sustainable development in the process including definition and national policy position and in the context of Wirral highlighting the key issues and difficulties the Council have faced in terms of delivering sustainable development to date;</li> <li>• Discuss the synergies between environmental, economic and social topics and how they lead to sustainable development at the national and local level.</li> <li>• Clearly set out a sustainability framework based on the three principal arms of Sustainable Development (i.e. economic, social and environmental considerations) rather than the 14 separate topics currently set out in Appendix A.</li> </ul> <p>3.12 We also consider that it would be prudent to set out key considerations that will impact on the assessment of 'reasonable alternatives' for the Local Plan. Whilst the NPPG assigns this task to Stage B of the process, Wirral in particular is faced with some critical decisions going forward in terms of ensuring economic regeneration, the delivery of sufficient homes and helping to mitigate climate change.</p> <p>3.13 We consider this approach should include growth strategies such as low – high economic development and similar with new housing figures. Links need to be made between these two strategies, how they connect with each other and also how they may impact the environment either positively or negatively. – Although this isn't required until stage 2 of the process it will help determine the effects of the Local Plan from an early stage thus potentially providing more opportunities for avoidance/ mitigation</p> <p>3.14 Indeed, it must be noted that Wirral has not had a Local Plan in place for a considerable period of time (since 2001). This will have ultimately placed additional burden on surrounding Local Planning Authority areas simply due to the fact that Wirral will not have meet all of its own development needs. Such inaction could have conceivably led to higher out migration patterns, longer commuting patterns and therefore an increase in the use of the private car. By proxy, this could have led to the development of land in surrounding areas that was not as suitable for meeting needs. Such trends could continue if Wirral does not act now and it is telling that at remains one of very few Local Planning Authorities that is still being monitored by the Secretary of State in terms of its Local Plan production.</p>	

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SCOP041	Landowner/Developer	<p>4. KEY TOPICS AND SUSTAINABILITY OBJECTIVES</p> <p>4.1 At present, the Council's proposed Sustainability Framework and Objectives are set out in Appendix A of the Scoping Report and follow the associated Chapters of the report (as we have set out in Section 1).</p> <p>4.2 With regard to the Sustainability Objectives, 2 are set for Air Quality, 2 for Bio-diversity, 1 for Climate Change Adaption, 1 for Climate Change Mitigation, 1 for Heritage, 1 for Land and Soils, 1 for Landscape, and 1 for Water. As such, 10 objectives are set in relation to environmental considerations. The remaining are 2 objectives for the Economy and Employment, 1 objective in relation to Health, 1 for Housing, 2 for Population and Communities and 1 for Transport. As such, only 7 sustainability objectives are spread across economic and social objectives.</p> <p>4.3 As previously noted, we consider the SA Scoping Report should be tailored and structured in accordance with the three arms of Sustainable Development as defined by paragraph 8 of the NPPF (i.e. economic, social and environmental considerations). Moreover, these considerations should then influence the Sustainability Framework and Objectives.</p> <p>4.4 Even if our principal suggestion is not endorsed by the Local Planning Authority, at the very least, we consider that the Council's list of SA objectives should be more evenly balanced so there is a more equitable distribution across the three arms of Sustainable Development. This could be achieved by compiling some of the environmental impacts into fewer objectives or increasing the number of objectives under economic and social considerations. For instance, a more encompassing environmental objective could be 'To promote the sustainable and prudent use of natural resources including Air Quality, Land and Soil and Protected Landscapes by minimising the use and impacts on such resources'. Such an approach would be justified on the basis that the Council's own scoping report confirms the following:  There are no Air Quality management Areas within Wirral and recent trends indicate key pollutant levels are decreasing (suggesting this is not a major issue for the Borough)  Most land is within Agricultural Grades 3 or below within the Borough and there is very little minerals related activity (suggesting Wirral is not renowned for major food or mineral production)  No AONBs or National Parks are located within Wirral (suggesting the landscape and open countryside is not regarded as the most valuable or scenic).</p> <p>4.5 The above approach could also arguable be applied to Bio-diversity and Water Resources. However, we note that the baseline position in Wirral in this regard is more sensitive and therefore, we can also see the value of separate objectives for these issues.</p>	
SCOP041	Landowner/Developer	<p>Environmental</p> <p>4.7 As part of this scoping appraisal a lot of focus has been provided on the current and potential environmental constraints, this is evident by the number of chapters which have an environmental focus and the few that revolve the social and economic impacts. The importance of the environment on sustainable development cannot be underestimated however this scoping appraisal forms more of an appraisal for a SEA rather than SA.</p> <p>4.8 Within this appraisal there is some contradiction around the location for new development. The environmental chapters are clear in promoting the re-use of previously developed land which, as evident in the housing chapters, is mostly located in the eastern parts of the Wirral, specifically Birkenhead. It is these areas that have also been identified as having significant flooding issues, the example of a large proportion of Wirral Waters being located in flood zone 3 is a prime example.</p> <p>4.9 Furthermore, the location of Ramsar sites along the River Mersey and the highlighted importance of green infrastructure in these areas seem to suggest that development of these areas are more appropriate to other uses rather than housing or industry.</p> <p>4.10 Air quality has been depicted as being a more problematic issue in eastern parts of the Wirral which again signals the need to reduce traffic congestion to these areas and locating new development here will have significant impact on people's health and the connectivity to recreational opportunities.</p> <p>4.11 Paragraph 4.3 of the climate change adaptation chapter specifically mentions the need to roll back development in coastal areas to avoid damage from flooding or coastal erosion. This has been set out in the Flood and Water Management Act (2010) and should provide a strategic consideration for new development which would therefore exclude large sections of previously developed land in the eastern side of the Wirral. Expectedly the flood risk decreases as you move further inland which provides more opportunities for new development.</p> <p>4.12 The land and soils chapter show a desire to re-use previously developed land for development purposes however, it has already been made clear that the housing allocation for the Wirral cannot be supplied through brownfield sites alone and although touched upon briefly in 10.14 the potential to release land which is not Best and Most Versatile should be considered in more detail.</p>	<p>The scoping report does not promote any particular approach to development. It aims to present the baseline position and important policy directions. The appraisal of different spatial options will be considered as the SA progresses. We disagree that the focus on environmental factors is too great. The requirements of the SEA Directive is what drove the planing regulations relating to SA. The framework includes sufficient additional social and economic factors to ensure all elements of sustainable development are considered.</p>
SCOP041	Landowner/Developer	<p>Economic and Social</p> <p>4.13 Economic stability and prosperity and social well-being is inevitably closely tied particularly in an area such as the Wirral. As such, we could see merit in these two arms being grouped together.</p> <p>4.14 Under the social arm of Sustainable Development, we would expect to see objectives tied to the following:</p> <ul style="list-style-type: none"> <li>i. The delivery of high standards of education and the mitigation against unsustainable class room sizes.</li> <li>ii. The improvement of physical and mental health and well-being including the delivery of necessary health care infrastructure, community facilities and opportunities to tackle loneliness</li> <li>iii. The promotion of development and policies that tackle deprivation and support social mobility including access to increased levels of education, housing, healthcare and employment opportunities.</li> <li>iv. Delivery of enough affordable housing and homes suitable for first time buyers in a range of locations across the Borough to meet the needs of individual communities.</li> <li>v. Delivery of enough specialist care related homes in a range of locations to meet the needs of an aging population.</li> <li>vi. Reduce crime rates and the fear of crime through well planned developments and regeneration policies.</li> </ul> <p>4.15 One key topic that appears to be missing within the Sustainability Framework relates to 'Social Mobility' which is a key issue in Wirral where social divides in terms of wealth and opportunities are very apparent. There are evidently areas within Wirral where poor levels of investment, employment, education and housing quality come together to generate high areas of deprivation.</p> <p>4.16 Conversely, there are areas of high wealth, shrink wrapped by Green Belt where development opportunities are been curtailed for a prolonged period (due to the lack of an up to date local plan), which have undoubtedly contributed to rising house prices, rents and loss of employment land, which will have inevitably curtailed social mobility in past years.</p>	<p>We consider that the range of social objectives reflects the key issues and the requirements of the legislation. It is not proportionate to include many objectives related to the same issues. Furthermore, these issues will be covered through the consideration of effects against the social objectives such as health, housing and population and communities.</p>

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SCOP041	Landowner/Developer	<p>4.17 With regard to Housing, we would expect to see outputs and objectives for the delivery of housing development contributing to economic and social objectives (including health and well-being). At the very least, the housing objective must ensure the timely delivery of the minimum number of homes as well as an appropriate mix and distribution to meet the needs of a range of groups within the Borough. At present, the objective focuses on mix when the amount and distribution of housing delivered will clearly have an impact on economic, social and environmental considerations.</p> <p>4.18 As noted above, under the social heading, a specific objective should relate to 'Support the timely delivery of sufficient affordable housing to meet the needs across the Borough for those unable to access the standard housing market.' Another housing linked objective could also relate to the delivery of aspirational housing to promote social mobility, retain or see an increase wealth, expenditure and tax revenues; new homes that could accommodate first time buyers, growing families etc.</p> <p>4.19 Due to the rising demographic of an elderly population, it would also be prudent to have a social objective that specifically looked to 'Support the timely delivery of specialist residential care accommodation through the delivery of care homes, extra care development and housing schemes that would accommodate those looking to downsize or obtain an alternative type of property to meet their specific needs'.</p> <p>4.20 The benefit of including more distinct objectives associated with the different types and form of housing would assist in the SA considering a wider range of social and economic objectives when looking at alternative potential sites. Indeed, we note that in Appendix B of the Scoping Report, the following is stated in relation to housing 'Spatial data unlikely to be available. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could potentially be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at large sites).'</p> <p>4.21 Whilst we do not disagree with the above statement, it is probably fair to say that many larger sites will have the ability to deliver a wider range of homes including affordable accommodation, elderly accommodation, etc. Alternatively, some sites might be more suitable in terms of attracting first time buyers and others will be better suited for meet the needs of a growing elderly population or for executive homes. Scoring a site against different housing / SA objectives should assist in helping to deliver a broad mix of sites that would ultimately assist in meeting the wide-ranging housing needs within the Borough.</p>	The assessment relating to the housing objective will cover a wide range of factors such as those suggested. There is no need to include several housing objectives. This is not proportionate and would lead to duplication of efforts. The appraisal of the housing element of sites will be considered when the site matrix is being finalised.
SCOP041	Landowner/Developer	<p>4.22 One of the key issues facing Wirral over the past decade has related to the 'timely delivery of new homes'. To date, much emphasis has been placed on the capacity and deliverability of Wirral Waters. Whilst this scheme will deliver many benefits, its lack of delivery (coupled with the distinct lack of any plan led alternative solutions for housing delivery) will have contributed to negative social and economic impacts within Wirral and possibly further afield. Moreover, Wirral Waters alone will not meet many of the distinct housing needs within the Borough and must only be regarded as part of the solution.</p> <p>4.23 Indeed, large problems with the redevelopment of previously developed sites is the viability and deliverability of the scheme especially in areas which do not retain high market values which is a problem for some eastern parts of the Wirral as explained in the population chapter. The slow development of Wirral Waters is a good example of the difficulties in providing a valuable return on development in areas such as Birkenhead. This will impact the ability to achieve the housing targets as laid out by the 2014 OAHN which will require 803 dpa as confirmed by the Secretary of State's letter to Wirral Council dated 28th January 2019.</p> <p>4.24 The number of completions over the previous 5 years is just over half this rate as there has been a focus on the redevelopment of brownfield land where between 83 and 92% of all new developments have been located. Chapter 67 of the NPPF states planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It is of great importance that economic viability of the previously developed sites is analysed and considered as part of any future allocations or strategic policies and further investigation of market rates need to be incorporated in to the sustainability appraisal. Furthermore, in line with para 11 the relevant policies to housing will be considered out of date if housing delivery is less than 75% of the housing requirement over the previous three years. Based on the current supply which has focussed the majority of developments on to brownfield land then Wirral would not be able to keep up with their housing requirement putting their planning policies in to jeopardy. Therefore, there needs to be a major consideration as part of the SA as to how housing delivery can be speed up to ensure the presumption in favour of sustainable development.</p>	Such issues will be explored and dealt with in subsequent stages of the SA process. With regards to Wirral Waters, this is mentioned in the scoping report in the future baseline position sections as it is an important strategic development. There is no assumption about the exact contribution that would be made towards housing and employment needs.
SCOP041	Landowner/Developer	<p>4.25 Consistently through the scoping report there is a focus on the Wirral Waters scheme which has been proposed for Birkenhead docks. Understandably, this is an important part of the Wirral Emerging Plan because of its redevelopment potential however, there is consistently differing information being released from the scheme and it is widely understood that it is not going to be completed by the end of the Local Plan period. The focus of the SA therefore needs to assess the potential of the Wirral as a whole. There is very little strategic guidance provided in the SA appraisal as all future baselines focus on the 'potential' of Wirral Waters. This has the impact of losing sight of the potential of other areas in the Wirral to provide sustainable development for new housing and employment allocations along with significant environmental improvements. It is expected that Wirral Waters will only be able to provide between 2900 and 6450 homes under the local plan period with completion anticipated to be beyond 2040.</p> <p>4.26 It is standard practice for the SA to assist in the comparison of all reasonable alternative site options being considered by the Local Planning Authority in order to identify the most sustainable options for inclusion in the Local Plan. Approximately 50 Green Belt sites have been put forward for release as part of the development options review, these have not been discussed in the scoping appraisal and yet they are the likely alternative for new housing development in the Borough. A scoring matrix will need to be created and used to help define which of these sites are sustainable for release, this is something that has been partially provided under previous consultations and this will need to form a large part of the SA.</p> <p>4.27 The focus on the Wirral Waters scheme has led to there being little strategic guidance of where new housing development should be located elsewhere in the Borough and besides sections in the transport chapter there is very little discussion as to how sustainability will be determined for new housing and employment allocations. Further work on the wider economic impact of Wirral Waters and other strategic sites needs to be provided and linked to employment and education opportunities. Further economic analysis has been provided in our economic statement.</p> <p>4.28 The SA should assess all of the topic chapters to provide suitable strategic guidance as to where new housing should be located. This scoping report fails to do this, it is only within the transport chapter where there is a strategic analysis of new growth opportunities where it indicates that growth potential could be located within the M53 and A41 corridor along with the Merseyrail Chester/ Ellesmere Port line. There needs to be further assessment on this principle and the assessment needs to cover the whole of the Wirral.</p> <p>4.29 The potential for new development of housing on greenfield areas is not principally discussed in the Housing chapter and only becomes a topic for discussion when assessing the best and most versatile land in the borough. Moreover, there needs to be a greater assessment of where development will be considered sustainable besides on PDL which is constrained.</p> <p>4.30 The SA should incorporate issues surrounding education as a separate chapter as this has large implications for social and economic factors in the area. We also consider that deprivation should also be considered separately. All of these principles have been pooled under populations however there needs to be a further analysis of each topic separately.</p>	The scoping process is not required to 'assess' alternatives. These factors will be addressed at the subsequent stages of the SA process.
SCOP041	Landowner/Developer	<p>4.31 Under the economic arm, we consider the Council's Sustainability Objectives are too narrow and many of the above comments could also apply. In addition, we would expect to see objective that support the following principles:</p> <ul style="list-style-type: none"> <li>i. The delivery of a sufficient number of homes to support planned or forecast jobs growth and objectively assessed needs to help support the construction industry and the wider economy;</li> <li>ii. The delivery of sufficient land and support of development that for town centre uses including retail, leisure, offices and other related uses;</li> <li>iii. The delivery of sufficient land to meet general industry, warehousing and other industries to support economic growth and social mobility;</li> <li>iv. The support of policies and delivery of land that would support the rural economy including agriculture, outdoor recreational economy, housing for villages, and uses that would make a village more sustainable or contribute to sustainable rural diversification.</li> </ul> <p>4.32 The intuition and rational for splitting up the different types of economic development considerations is that each have very different locational requirements. As such, the above split would assist in ensuring that a suitable range and mix of employment land is identified.</p>	It is considered that the SA Framework considers a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors. It should also be remembered that the legislation is founded in the SEA process, which focuses more strongly on environmental factors. The reasonable alternatives will consider a range of growth and distribution options, including assumptions about the contribution that is made by Wirral Waters.

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SCOP041	Landowner/Developer	<p>5. CONCLUSIONS</p> <p>5.1 The consultation response has been commenting on the Scoping for the Sustainability Appraisal produced by Aecom on behalf of Wirral Council.</p> <p>5.2 The scoping report does not fulfil the requirements for a Sustainability Appraisal (SA) required as part of a Local Plan submission under UK Law, policy and guidance. Instead, it is more geared towards a scoping report for a Strategic Environmental Assessment (SEA) appraisal, which forms a part of the SA process but should not be confused with the requirements of a SA as dictated by national planning policy and guidance.</p> <p>5.3 Indeed, the SA should inform and guide the principles and definition of what constitutes Sustainable Development, as defined within the UK and England. In order to do this, direct reference must be made to the NPPF and NPPG. Clarity needs to be provided as to the purpose of the Sustainability Appraisal as this report has not successfully identified the sustainability issues, nor has it established any synergies between environmental, economic and social topics which make up the purpose of sustainable development as outlined in the NPPF.</p> <p>5.4 The SA needs to be conducted to incorporate all three arms of sustainable development being; environmental, social and economic. There is currently an imbalance between these topics with a particular focus on the environment and minimal discussion on the economic and social objectives and the ramifications in terms of assessing reasonable alternative development scenarios. Whilst the consideration of reasonable alternatives will form part of the next stage of the SA, it is considered prudent to provide an indication as to what these alternatives might be at the earliest opportunity.</p> <p>5.5 We therefore consider the following focus recommendations are taken in to account as part of the SA:</p> <ul style="list-style-type: none"> <li>• Remove contradictions in the environmental objectives whilst providing synergies with both economic and social objectives;</li> <li>• Provide assessment of economic and social topics to including education, mental health and wellbeing, affordable housing and specialist care homes, crime and social mobility which itself is one of the key issues in the Wirral;</li> <li>• Focus on the viability and deliverability of new housing and employment land across the Borough following the consistent undersupply over the previous years;</li> <li>• Provide housing and sustainable assessments on the whole of the Wirral and reduce the focus on Wirral Waters which will only supply a small proportion of the sustainable objectives; and</li> <li>• Provide reasonable alternatives and assess them against the sustainability criteria through the preparation of a sustainability matrix.</li> </ul> <p>5.6 A greater focus on the 3 principles of sustainable development to include a wider range of topics will assist in providing a more robust scoping report which will form a major part of the SA and Local Plan development process.</p>	
SCOP042	Landowner/Developer	<p>1. Introduction</p> <p>1.1 This report provides representations relating to the consultation on the Sustainability Appraisal Scoping Report of the Wirral Local Plan. It has been prepared on behalf of the owner of the land at Roman Road in Bebington.</p> <p>1.2 We have previously submitted evidence outlining why the site at Roman Road should be considered for release from the green belt. The site has the potential to deliver an estimated 99 homes, based on a site area of 3.3ha and a development density of 30 dwellings per hectare. Set against this content, this report highlights key issues that need to be considered when developing the Sustainability Appraisal and new Draft Local Plan for the Wirral.</p>	Comments noted.
SCOP042	Landowner/Developer	<p>2. Economy &amp; Employment Section of the Scoping Report</p> <p>2.1 Section six of the Scoping Report looks at the Wirral economy and we welcome the fact that one of the issues it identifies for the Sustainability Appraisal Framework (SAF) is to: "Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the Borough's town and local centres including through the identification of further regeneration opportunities..."</p> <p>2.2 The Scoping Report quite rightly highlights the need to increase employment in the District, and it compares the Wirral's recent economic performance with that of the North West and England. However, what it does not do is look at how the Wirral performs relative to the wider Liverpool City Region. For example, between 2015 and 2017, employment on the Wirral grew by only 1.0% - from 105,000 to 106,000. Over the same timeframe, job numbers in the City Region increased by 20,000 (3.2%) to reach 639,000, with Liverpool accounting for half this increase. The Wirral's share of total employment in the City Region also declined from 2015-17, falling from 17.0% to 16.6%.</p> <p>2.3 The Scoping Report also highlights how there are significant commuting flows to and from the Wirral, most notably with Cheshire and Liverpool. This is based on data from the 2011 Census and more detailed analysis of this data shows that the Wirral experiences a net outflow of around 27,000 commuters. Unsurprisingly, Cheshire West &amp; Chester and Liverpool are the most common destinations. This outflow is unlikely to be reversed in the long-term, however it seems reasonable to argue that the District needs to see significantly more jobs created over the 10-20 years in order to it be considered as the "strong, diverse and resilient economy" noted in the Scoping Report.</p> <p>2.4 For the District to achieve genuinely sustainable economic growth, the Wirral needs to see faster jobs growth and increase the number of people who live and work in the District. The Sustainability Appraisal and new Draft Local Plan need to outline how this will be achieved.</p> <p>2.5 When looking at how to increase the number of people who live and work in an area, the role of housing will be an important factor – not just in providing new homes for people wanting to move to the area, but in creating local economic benefits. For example, if residential dwellings were developed on the site at Roman Road, new job opportunities would be created in the construction sector, while residents in the new homes will be spending money in the local area and supporting permanent employment. Additional Council Tax would also be generated.</p>	Comments noted.
SCOP042	Landowner/Developer	<p>Local Economic Benefits Generated by the Construction Phase</p> <p>2.6 If the land at Roman Road is developed for new residential dwellings, this will generate significant benefits for the local economy:</p> <ul style="list-style-type: none"> <li>• The site has the potential to deliver around 99 homes. Construction costs are estimated at £14.0million over the build programme, which is expected to be around two years. The construction costs have been estimated using the BCIS Online tool2 and are exclusive of external works, contingencies, supporting infrastructure, fees, VAT, finance charges etc.</li> <li>• To estimate construction employment supported during the building phase, the total construction cost has been divided by the average turnover per construction employee in the North West of £122,500, based on figures derived from the 2018 edition of Business Population Estimates produced by the Office for National Statistics. This means that over the whole life of the construction phase, 112 construction years of employment could be supported. Dividing these years of employment by a potential build programme of four years suggests that on average, around 56 construction jobs on-site could be supported in total per annum over the life of the development.</li> <li>• It is widely recognised that housebuilding has knock-on effects for other sectors, which leads to increased demand for building materials and equipment at the construction phase, as well as domestic furniture and carpets etc. following completion. This generates and sustains employment in other sectors. The July 2018 'Economic Footprint of House Building in England and Wales' report by the Home Builders Federation found that for every 1 job in housing construction, the scale of employment supported is equivalent to between 2.4 and 3.1 direct, indirect and induced jobs per new dwelling built. Taking an average of these figures, a multiplier of 2.75 has been used – i.e. for every 1 job in house building, a further 1.75 jobs are supported in the wider economy. Therefore, as well as the 56 on-site jobs supported per annum during the build phase, the scheme could support a further 98 additional jobs per annum in the wider economy.</li> <li>• In total, around 153 temporary jobs could be supported per annum during the build phase.</li> <li>• Another way of looking at the economic impact of the construction phase is to calculate the contribution a development makes to wealth creation, as measured by the increase in the value of goods and services generated within an area. This can be done by looking at the increase in gross value added (GVA)3, a common proxy for economic output. Drawing on data published by the Office for National Statistics (ONS), based on the number of jobs supported during the build phase, developing the land at Roman Road for new residential dwellings could generate an additional £17.0million of GVA for the regional economy during the construction period.</li> </ul>	Comments noted.

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SCOP042	Landowner/Developer	<p>Household Spend and Supporting Permanent Employment</p> <p>2.7 In addition to the impact of the construction phase, developing the site at Roman Road for residential dwellings will bring long-term benefits to the economy in the form of increased household spend. Figures produced by the ONS4 at a regional level can be used to provide an estimate of what this spend could be worth on an annual basis. For the North West, average household spend on items such as food &amp; drink, households goods, leisure etc. is estimated by the ONS to be around £280 per week.</p> <p>2.8 Not all of the household spend will be retained in the local area (Wirral district). Analysis in the Wirral Retail &amp; Leisure Study, published in March 2016 by Lichfields, indicates that approximately 90% of convenience spend is retained on the Wirral, while around 60% of comparison spend is retained in the District. Taking this into account, weekly spend retained on the Wirral is estimated at £205. Over the course of a typical year, the 99 homes that could be developed on the land at Roman Road could generate around £1.1million of additional spend in the local economy, which could support up to 10 full-time equivalent (FTE) jobs.</p> <p>Additional Council Tax Revenue</p> <p>2.9 Assuming the new dwellings at Roman Road fall within Band D5, once fully occupied the site is estimated to generate over £181,000 on an annual basis in additional Council Tax payments, or around £1.8million over 10 years at 2019/20 rates.</p>	Comments noted.
SCOP042	Landowner/Developer	<p>3. Housing Section of the Scoping Report</p> <p>3.1 Section nine of the Scoping Report deals with housing and it concludes that the SAF needs to:  “Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral’s residents, including older people, people with disabilities and families with children.”</p> <p>3.2 We support the objective above and the Scoping Report also helpfully outlines the current evidence on housing requirements in the District. This shows a range of figures:</p> <ul style="list-style-type: none"> <li>• Wirral’s SHMA, published in 2016 identifies an Objectively Assessed Housing Need (OAHN) of between 875 dwellings per annum (dpa) and 1,235 dpa.</li> <li>• The Government’s proposed standard methodology produces a housing need figure of 803 dpa.</li> <li>• The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) was published in draft for consultation in 2017, and identifies housing need at a regional scale, apportioning this need between the constituent LCR authorities. The SHELMA identifies an OAHN for the Wirral of between 664 and 737 dpa.</li> </ul>	Comments noted.
SCOP042	Landowner/Developer	<p>3.3 Regarding the housing requirement figures outlined above, data published by the Ministry of Housing, Communities &amp; Local Government (MHCLG) show that the rate of housing delivery on the Wirral has been consistently below the required level over the last decade. The latest figures for 2017/18 indicate that there were 704 net additions to the dwellings stock in the District. As shown in Figure 3.1, this represents the highest number since 2007/08, however it is still well below the SHMA and standard methodology housing requirement estimates. It is also lower than the higher end estimate of 737 outlined in the Liverpool City Region SHELMA.</p> <p>[Figure Attached showing Net Additional Dwellings on the Wirral 2008 – 2018]</p> <p>3.4 Boosting the supply of housing is therefore a critical consideration for the SAF and the new Draft Local Plan of the Wirral if it is to achieve long-term sustainable development. Developing residential dwellings on the land at Roman Road can help in achieving this aim, by providing new homes that can attract people to the area. In particular, attracting economically active people to the District is an important consideration when looking at future labour supply. The Wirral has seen a significant increase in the number of people aged 65 and over in the last decade – experiencing a rise of 17.9% (10,000) within this cohort between 2007 and 2017. The number of people aged 0-15 and 16-64 in the District declined over the same period.</p> <p>3.5 The trend of an ageing population is expected to continue, raising the importance of the Wirral seeing new homes built that are attractive to people of working age. This younger population can help boost labour market supply as older members of the workforce reach retirement age and become economically inactive. Sites such as Roman Road can play an important role in increasing housing supply on the Wirral.</p>	
SCOP042	Landowner/Developer	<p>4. Conclusions</p> <p>4.1 Whilst we welcome the objectives relating to the economy &amp; employment and housing in the Scoping Report, the analysis presented in this report raises a number of important points from an economic perspective when responding to the consultation on the Sustainability Appraisal Scoping Report of the Wirral Local Plan.</p> <p>4.2 In terms of the economy &amp; employment, the Sustainability Appraisal needs to consider how the Wirral performs relative to the Liverpool City Region and look at how the District can make a greater contribution to this larger area to which it is so closely linked. The Wirral’s labour market has grown at a slower rate than the City Region’s in recent years, and it continues to see a net outflow of commuters – larger to Liverpool and Cheshire West &amp; Chester. The commuting outflow is unlikely to be reversed in the long-term, however it seems reasonable to argue that the District needs to see significantly more jobs created over the 10-20 years in order to it be considered as the “strong, diverse and resilient economy” noted in the Scoping Report.</p> <p>4.3 For the District to achieve genuinely sustainable economic growth, the Wirral needs to see faster jobs growth and increase the number of people who live and work in the District. The Sustainability Appraisal and new Draft Local Plan need to outline how this will be achieved. The role of housing will be an important factor in this respect and it can generate long-term local economic benefits. For example, if residential dwellings were developed on the site at Roman Road, it is estimated that the following economic benefits would be generated:</p> <ul style="list-style-type: none"> <li>• In total, around 153 temporary jobs could be supported per annum during the build phase.</li> <li>• An additional £17.0million of GVA (a proxy for economic output) for the regional economy during the construction period.</li> <li>• Around £1.1million of additional spend in the local economy, which could support up to 10 full-time equivalent (FTE) jobs.</li> <li>• Over £181,000 on an annual basis in additional Council Tax payments, or around £1.8million over 10 years at 2019/20 rates.</li> </ul> <p>4.4 In terms of housing, the rate of housing delivery on the Wirral has been consistently below the required level over the last decade, regardless of which housing target the District is measured against. Boosting the supply of housing is therefore a critical consideration for the SAF and new Draft Local Plan if the Wirral is to achieve long-term sustainable development. In particular, attracting economically active people to the District is an important consideration when looking at future labour supply. The Wirral has seen a significant increase in the number of people aged 65 and over the last decade and the trend of an ageing population is expected to continue, raising the importance of the Wirral seeing new homes built that are attractive to people of working age. This younger population can help boost labour market supply as older members of the workforce reach retirement age and become economically inactive. Sites such as Roman Road can play an important role in increasing housing supply on the Wirral.</p>	Consideration of housing and employment factors will be addressed at the next stages of the SA process. This will include consideration of cross boundary issues such as those raised here.

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SCOP042	Landowner/Developer	<p>1. INTRODUCTION</p> <p>1.1 We have been instructed to prepare a response to the consultation that Wirral Council formally began on the 25th March which runs until the 8th May. This consultation outlines the scope of the Wirral Local Plan Sustainability Appraisal and Equalities Impact Assessment, which has been prepared by AECOM on the Council's behalf.</p> <p>1.2 Although a major part of the SA process, a scoping report isn't legally required to be conducted or opened up to consultation other than beyond the key bodies of Natural England, Historic England and the Environment Agency. However, we welcome Wirral Council's approach and trust our comments will be fully considered as part of the SA process going forward. Indeed, it is noted that the results of this consultation are to help steer the Sustainability Appraisal to be legally conducted as part of the Local Development Plan process as required by Section 19 of the Planning and Compulsory Purchase Act 2004.</p> <p>1.3 The emerging Wirral Local Plan will form the spatial strategy outlining the locations for new housing and economic growth to the end of the plan period in 2035. We also note that the final Sustainability Appraisal will be released in tandem with the Draft Local Plan, will be open for further consultation and that the overall process is an iterative one that will evolve overtime. However, it is critical that the Scoping Assessment for the SA demonstrates that all relevant baseline information is being considered at this early stage in order to ensure that as part of preparing the Local Plan, all relevant and reasonable considerations are at the forefront of the Council's decision making process. Indeed, the SA should ultimately contribute towards and influence the decision making process.</p> <p>1.4 Whilst a SA requires the inclusion of a Strategic Environmental Assessment to ensure environmental effects are given full consideration, this must also sit alongside with equally important economic and social considerations and impacts. Indeed, a Sustainability Appraisal is primarily tasked with assessing the delivery of 'Sustainable Development' and the associated impacts of doing so, together with assessing 'reasonable alternatives'. Sustainable Development within England is defined by National Planning Policy but very few of the considerations set out within the NPPF are laid out in this Scoping Report for the Sustainability Assessment.</p>	<p>The scoping report is not only geared towards an SEA process and this is clear from the introductory chapter. Some of the factors listed below go beyond the requirements of the scoping stage and will be addressed as the SA process progresses.</p>
SCOP042	Landowner/Developer	<p>1.5 The consultation document considers the baseline position for a range of individual topics to help form the scoping requirements for the Sustainability Appraisal. There are 14 chapters which have been determined as the key themes most relevant to the development of the emerging Local Plan by AECOM. These include:</p> <ul style="list-style-type: none"> <li>Air Quality;</li> <li>Biodiversity;</li> <li>Climate Change Adaptation;</li> <li>Climate Change Mitigation;</li> <li>Economy and Employment; (To be discussed in the economic statement)</li> <li>Health;</li> <li>Heritage;</li> <li>Housing;</li> <li>Land and Soils;</li> <li>Landscape;</li> <li>Population and Communities;</li> <li>Transport;</li> <li>Water Resources; and</li> <li>Water Quality.</li> </ul> <p>1.6 As noted above, the scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The above list is very much focused on environmental considerations that make up 8/9 of the topics and associated objectives.</p> <p>1.7 Our principal recommendation is that the Scoping Assessment and subsequent objectives are set out under the following three objectives as defined by paragraph 8 of the NPPF.</p> <ul style="list-style-type: none"> <li>an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</li> <li>a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and an</li> <li>environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</li> </ul>	
SCOP042	Landowner/Developer	<p>2. SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT</p> <p>2.1 The preparation of all Local Plans within the UK must comply with EU Law and Acts relevant to the associated countries within the UK. In short, EU law calls for SEA's to be carried out and UK Acts, policies and guidance require a SA to be carried out. Ultimately, it is considered best practice to incorporate requirements of the SEA Directive into a Sustainability Appraisal which must ensure that the potential environmental effects are given full consideration alongside social and economic issues. Indeed, the SA incorporates the requirements of SEA.</p> <p>The SEA European Directive</p> <p>2.2 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005) and the NPPG also provides further guidance on the matter.</p> <p>2.3 The aim of the Directive is to 'to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.'</p> <p>2.4 This Directive applies to a plan or programme related solely to England (or part of England) and any other part of the United Kingdom. The Directive therefore applies to the preparation of the emerging Wirral Local Plan and applies specific requirements that must be complied with and incorporated as an integral part of the sustainability appraisal process.</p>	



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SCOP042	Landowner/Developer	<p>Strategic Environmental Assessment Regulations requirements checklist</p> <p>2.5 Regulation 12 – Preparation of an environmental report that ‘identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>2.6 This report should include the relevant information referred to in schedule 2 of the directive as required taking in to account ‘current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3))’.</p> <p>2.7 When deciding on the scope and detail of the information which should be included as part of the environmental report the consultation bodies being Natural England, Historic England and Environment Agency should be consulted. This is at the earliest stage of the preparation process and includes the following requirements:</p> <ul style="list-style-type: none"> <li>• It should form an outline of the contents;</li> <li>• main objectives of the plan and its relationship with other plans or programmes;</li> <li>• It should provide a baseline state of the environment which is as existing before the implementation of the plan;</li> <li>• It should include the environmental characteristics of the areas likely to be significantly affected by the plan over its period;</li> <li>• It must outline any existing environmental problems which are relevant to the plan including areas of particular environmental importance pursuant to Directives 2009/147/EC and 92/43/EEC (Habitats Directive);</li> <li>• It should include environmental protection objectives established at international, national or community level which are relevant to the plan and the way those objectives have been taken in to consideration throughout the preparation of the plan;</li> <li>• The following issues should be looked at as an overall effect on the environment: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors;</li> <li>• Measures should outlined which will be envisaged to prevent, reduce or offset any significant adverse effects on the environment from implementing the plan;</li> <li>• It should provide an outline the reasoning for selecting the alternatives that were dealt with outlining how the assessments were undertaken;</li> <li>• It should look at how it is going to monitor the impacts in accordance with regulation 17 of the Directive; and</li> <li>• It should provide a non-technical summary of the information provided under all of the above headings and topics.</li> </ul> <p>2.8 The above process is very much focused on identifying the key environmental considerations within an area and it is a process that must be carried out. Indeed, we consider the AECOM document prepared is very much focused on the above process. However, it is critical to note at this stage that the European Directive does not define ‘Sustainable Development’ in the context of preparing a Local Plan under UK legislation. Indeed, it is for each member state to define ‘Sustainable Development’ in this regard and it is the SA’s role to consider the implications of Sustainable Development policies in the round. Simply adhering to SEA legislation and the EU Directive is therefore not enough in itself to assess the impacts of a Local Plan and its associated policies.</p>	
SCOP042	Landowner/Developer	<p>Planning Acts, National Policies and UK Guidance</p> <p>Planning Acts</p> <p>2.9 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. The 2008 Planning Act amended the requirement to undertake a Sustainability Appraisal for Development Plan Documents (DPDs) but did not remove the requirement to produce a Strategic Environmental Assessment. Moreover, Section 19(5) of the Planning and Compulsory Purchase Act 2004 (as amended) maintains that:</p> <p>‘The local planning authority must also –</p> <p>(a) Carry out an appraisal of the sustainability of the proposals in each development plan document;</p> <p>(b) Prepare a report of the findings of the appraisal.’</p> <p>2.10 Section 19(A) was introduced to the 2004 Act as part of the 2008 Act/amendments and stipulates that:</p> <p>‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.’</p> <p>2.11 This ensures that environmental impacts are still at the forefront of the overall process. However, it is still critical to note that Section 39(2) of the 2004 Act (as amended) states that ‘the person or body must exercise the function with the objective of contributing to the achievement of sustainable development.’ Furthermore, Section 39(3) confirms that for the purposes of achieving sub-section 2, ‘the person or body must have regard to national policies and advice contained in guidance issued by the Secretary of State...’</p>	
SCOP042	Landowner/Developer	<p>National Policy and Guidance</p> <p>2.12 National planning policy guidance confirms the following:</p> <p>‘A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.’</p> <p>2.13 Sustainable development is defined in the NPPF (2019) and is the principle by which the SA should be prepared against. Paragraph 8 of the NPPF states:</p> <p>‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’</p>	

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SCOP042	Landowner/Developer	<p>2.14 Critically, any SA process has to be judged against reasonable alternatives to ensure that the Local Plan is the most appropriate to achieve sustainable development. The whole process should identify ways the Local Plan can contribute to improvements in economic, social and environmental conditions as well as mitigating any potential adverse effects that the plan may cause. This will ensure that the plan is the most appropriate against the reasonable alternatives and can be used to test the evidence underpinning the plan and is important in demonstrating how the tests of soundness have been met.</p> <p>2.15 The NPPG goes on to set out a 5 step process for the preparation of a SA as follows:</p> <ul style="list-style-type: none"> <li>• Stage A – Setting the context and objectives, establishing baselines and deciding on the scope: <ol style="list-style-type: none"> <li>1) Identification of other relevant policies, plans and sustainability objectives</li> <li>2) Pooling baseline information</li> <li>3) Identification of sustainability issues and problems</li> <li>4) Develop a sustainability appraisal framework</li> <li>5) Consultation of the relevant bodies</li> </ol> </li> <li>• Stage B – Developing and refining alternatives and assessing effects: <ol style="list-style-type: none"> <li>1) Test local plan objectives against sustainability appraisal framework</li> <li>2) Develop Local Plan options including reasonable alternatives</li> <li>3) Evaluate likely effects of Local Plan and alternatives</li> <li>4) Consider ways of mitigating adverse effects and maximising beneficial effects</li> <li>5) Propose measures to monitor significant effects of implementing the Local Plan</li> </ol> </li> <li>• Stage C – Prepare Sustainability Appraisal report</li> <li>• Stage D – Seek representations on sustainability appraisal report from consultation bodies and the public</li> <li>• Stage E – Post adoption reporting and monitoring</li> </ul> <p>2.16 The Scoping Stage (stage 1) is relevant to the current consultation document. It should identify the level of detail and the relevance of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and sustainability objectives.</p>	
SCOP042	Landowner/Developer	<p>3. SCOPING REPORT FOR THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL</p> <p>Defining the Purpose and Scope of the Scoping Report</p> <p>3.2 Section 2 of this report has outlined the requirements of a scoping report for a Local Plan Sustainability Appraisal whilst also outlining the process as a whole. This helps to provide clarity behind what the Council has completed as a part of this consultation.</p> <p>3.3 Based on the title of the Council's document, the current consultation process is seemingly associated with Stage 1 of the Sustainability Appraisal development process. As recommended by the NPPG this stage/Scoping Report should therefore include the following information:</p> <ol style="list-style-type: none"> <li>1. Identification of other relevant policies, plans and sustainability objectives</li> <li>2. Pooling baseline information</li> <li>3. Identification of sustainability issues and problems</li> <li>4. Develop a sustainability appraisal framework</li> <li>5. Consultation of the relevant bodies</li> </ol> <p>3.4 However, within the introduction of the Scoping Report, it is not made clear that this is the process that is being undertaken. The background details provided to the Sustainability Appraisal process is minimal. It should clearly define and outline what information is required at each stage and its relationship with the SEA process.</p> <p>3.5 When assessing the information that should be provided as part of stage 1 it is evident that there are 2 sections missing from this scoping report, these being point 3 and 4 in paragraph 3.2. This report has not successfully identified the sustainability issues and problems which should be carried on for further investigation and the way in which the sustainability issues are connected with one another.</p> <p>3.6 Instead of providing this detail the scoping report is far more focussed on the requirements of the SEA Regulations which, as previously explained, form a part of the SA however they focus only on the environmental assessment. The scoping appraisal incorporates the requirements for a SEA scoping report, we feel therefore clarification should be provided as part of the introduction as to the purpose of this scoping report produced for the Wirral Local Plan.</p>	
SCOP042	Landowner/Developer	<p>3.7 The economic and social principles have not been considered in enough detail to be suitable as a scoping appraisal for a SA. We therefore consider that this document has been titled incorrectly and although it would assist with the development of a SA through the SEA regulations it doesn't itself form scoping for a sustainability appraisal.</p> <p>3.8 Notably Paragraph 1.7 of the Scoping Report states that it is concerned with item 1 of paragraph 1.6, which states: 'SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004. Two key procedural requirements of the SEA regulations are that:</p> <ol style="list-style-type: none"> <li>6) When deciding on 'the scope and level of detail of the information' which must be included within the key output report – namely the report published for consultation alongside the draft plan – there is a consultation with certain nationally designated authorities, namely the Environment Agency, Historic England and Natural England.'</li> </ol> <p>3.9 This seems indicates that the Council's SA Scoping Report was prepared for the purpose of scoping a SEA. However, it is not abundantly clear at this point in the document. Moreover, we note that paragraphs 16.1 and 16.2 of the Scoping Report confirms that this document does relate to Stage A of the SA Scoping Report stage as set out in NPPG and that the next stage will look at reasonable alternatives under NPPG Stage B. The Scoping report goes on further to discuss 14 separate chapter topics, all of which would be expected within a SEA scoping report as outlined by the SEA Regulation requirement checklist.</p>	

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SCOP042	Landowner/Developer	<p>3.10 Ultimately, the purpose of the report should be clarified both within the title of the report but also in the introductory text. We consider that the document should either be renamed ‘Scoping Report for the Wirral Local Plan Strategic Environmental Assessment’ or it should be restructured to address the requirements set out at the beginning of this section as defined by the NPPG.</p> <p>3.11 With regard to the latter option, we consider the following should be included as an absolute minimum:</p> <ul style="list-style-type: none"> <li>• More detailed background on the purpose of the SA and its involvement in the Local Plan process</li> <li>• Outline the role of sustainable development in the process including definition and national policy position and in the context of Wirral highlighting the key issues and difficulties the Council have faced in terms of delivering sustainable development to date;</li> <li>• Discuss the synergies between environmental, economic and social topics and how they lead to sustainable development at the national and local level.</li> <li>• Clearly set out a sustainability framework based on the three principal arms of Sustainable Development (i.e. economic, social and environmental considerations) rather than the 14 separate topics currently set out in Appendix A.</li> </ul> <p>3.12 We also consider that it would be prudent to set out key considerations that will impact on the assessment of ‘reasonable alternatives’ for the Local Plan. Whilst the NPPG assigns this task to Stage B of the process, Wirral in particular is faced with some critical decisions going forward in terms of ensuring economic regeneration, the delivery of sufficient homes and helping to mitigate climate change.</p> <p>3.13 We consider this approach should include growth strategies such as low – high economic development and similar with new housing figures. Links need to be made between these two strategies, how they connect with each other and also how they may impact the environment either positively or negatively. – Although this isn’t required until stage 2 of the process it will help determine the effects of the Local Plan from an early stage thus potentially providing more opportunities for avoidance/ mitigation</p> <p>3.14 Indeed, it must be noted that Wirral has not had a Local Plan in place for a considerable period of time (since 2001). This will have ultimately placed additional burden on surrounding Local Planning Authority areas simply due to the fact that Wirral will not have meet all of its own development needs. Such inaction could have conceivably led to higher out migration patterns, longer commuting patterns and therefore an increase in the use of the private car. By proxy, this could have led to the development of land in surrounding areas that was not as suitable for meeting needs. Such trends could continue if Wirral does not act now and it is telling that at remains one of very few Local Planning Authorities that is still being monitored by the Secretary of State in terms of its Local Plan production.</p>	A range of spatial strategy approaches will be established and appraised at the next stages of the SA process.
SCOP042	Landowner/Developer	<p>4. KEY TOPICS AND SUSTAINABILITY OBJECTIVES</p> <p>4.1 At present, the Council’s proposed Sustainability Framework and Objectives are set out in Appendix A of the Scoping Report and follow the associated Chapters of the report (as we have set out in Section 1).</p> <p>4.2 With regard to the Sustainability Objectives, 2 are set for Air Quality, 2 for Bio-diversity, 1 for Climate Change Adaption, 1 for Climate Change Mitigation, 1 for Heritage, 1 for Land and Soils, 1 for Landscape, and 1 for Water. As such, 10 objectives are set in relation to environmental considerations. The remaining are 2 objectives for the Economy and Employment, 1 objective in relation to Health, 1 for Housing, 2 for Population and Communities and 1 for Transport. As such, only 7 sustainability objectives are spread across economic and social objectives.</p> <p>4.3 As previously noted, we consider the SA Scoping Report should be tailored and structured in accordance with the three arms of Sustainable Development as defined by paragraph 8 of the NPPF (i.e. economic, social and environmental considerations). Moreover, these considerations should then influence the Sustainability Framework and Objectives.</p> <p>4.4 Even if our principal suggestion is not endorsed by the Local Planning Authority, at the very least, we consider that the Council’s list of SA objectives should be more evenly balanced so there is a more equitable distribution across the three arms of Sustainable Development. This could be achieved by compiling some of the environmental impacts into fewer objectives or increasing the number of objectives under economic and social considerations. For instance, a more encompassing environmental objective could be ‘To promote the sustainable and prudent use of natural resources including Air Quality, Land and Soil and Protected Landscapes by minimising the use and impacts on such resources’. Such an approach would be justified on the basis that the Council’s own scoping report confirms the following:</p> <p>There are no Air Quality management Areas within Wirral and recent trends indicate key pollutant levels are decreasing (suggesting this is not a major issue for the Borough)</p> <p>Most land is within Agricultural Grades 3 or below within the Borough and there is very little minerals related activity (suggesting Wirral is not renowned for major food or mineral production)</p> <p>No AONBs or National Parks are located within Wirral (suggesting the landscape and open countryside is not regarded as the most valuable or scenic).</p> <p>4.5 The above approach could also arguable be applied to Bio-diversity and Water Resources. However, we note that the baseline position in Wirral in this regard is more sensitive and therefore, we can also see the value of separate objectives for these issues.</p>	It is considered that the SA Framework considers a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors. It should also be remembered that the legislation is founded in the SEA process, which focuses more strongly on environmental factors. The reasonable alternatives will consider a range of growth and distribution options, including assumptions about the contribution that is made by Wirral Waters.
SCOP042	Landowner/Developer	<p>Environmental</p> <p>4.7 As part of this scoping appraisal a lot of focus has been provided on the current and potential environmental constraints, this is evident by the number of chapters which have an environmental focus and the few that revolve the social and economic impacts. The importance of the environment on sustainable development cannot be underestimated however this scoping appraisal forms more of an appraisal for a SEA rather than SA.</p> <p>4.8 Within this appraisal there is some contradiction around the location for new development. The environmental chapters are clear in promoting the re-use of previously developed land which, as evident in the housing chapters, is mostly located in the eastern parts of the Wirral, specifically Birkenhead. It is these areas that have also been identified as having significant flooding issues, the example of a large proportion of Wirral Waters being located in flood zone 3 is a prime example.</p> <p>4.9 Furthermore, the location of Ramsar sites along the River Mersey and the highlighted importance of green infrastructure in these areas seem to suggest that development of these areas are more appropriate to other uses rather than housing or industry.</p> <p>4.10 Air quality has been depicted as being a more problematic issue in eastern parts of the Wirral which again signals the need to reduce traffic congestion to these areas and locating new development here will have significant impact on people’s health and the connectivity to recreational opportunities.</p> <p>4.11 Paragraph 4.3 of the climate change adaptation chapter specifically mentions the need to roll back development in coastal areas to avoid damage from flooding or coastal erosion. This has been set out in the Flood and Water Management Act (2010) and should provide a strategic consideration for new development which would therefore exclude large sections of previously developed land in the eastern side of the Wirral. Expectedly the flood risk decreases as you move further inland which provides more opportunities for new development.</p> <p>4.12 The land and soils chapter show a desire to re-use previously developed land for development purposes however, it has already been made clear that the housing allocation for the Wirral cannot be supplied through brownfield sites alone and although touched upon briefly in 10.14 the potential to release land which is not Best and Most Versatile should be considered in more detail.</p>	

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP042	Landowner/Developer	<p>Economic and Social</p> <p>4.13 Economic stability and prosperity and social well-being is inevitably closely tied particularly in an area such as the Wirral. As such, we could see merit in these two arms being grouped together.</p> <p>4.14 Under the social arm of Sustainable Development, we would expect to see objectives tied to the following:</p> <ul style="list-style-type: none"> <li>i. The delivery of high standards of education and the mitigation against unsustainable class room sizes.</li> <li>ii. The improvement of physical and mental health and well-being including the delivery of necessary health care infrastructure, community facilities and opportunities to tackle loneliness</li> <li>iii. The promotion of development and policies that tackle deprivation and support social mobility including access to increased levels of education, housing, healthcare and employment opportunities.</li> <li>iv. Delivery of enough affordable housing and homes suitable for first time buyers in a range of locations across the Borough to meet the needs of individual communities.</li> <li>v. Delivery of enough specialist care related homes in a range of locations to meet the needs of an aging population.</li> <li>vi. Reduce crime rates and the fear of crime through well planned developments and regeneration policies.</li> </ul> <p>4.15 One key topic that appears to be missing within the Sustainability Framework relates to 'Social Mobility' which is a key issue in Wirral where social divides in terms of wealth and opportunities are very apparent. There are evidently areas within Wirral where poor levels of investment, employment, education and housing quality come together to generate high areas of deprivation.</p> <p>4.16 Conversely, there are areas of high wealth, shrink wrapped by Green Belt where development opportunities are been curtailed for a prolonged period (due to the lack of an up to date local plan), which have undoubtedly contributed to rising house prices, rents and loss of employment land, which will have inevitably curtailed social mobility in past years.</p>	
SCOP042	Landowner/Developer	<p>4.17 With regard to Housing, we would expect to see outputs and objectives for the delivery of housing development contributing to economic and social objectives (including health and well-being). At the very least, the housing objective must ensure the timely delivery of the minimum number of homes as well as an appropriate mix and distribution to meet the needs of a range of groups within the Borough. At present, the objective focuses on mix when the amount and distribution of housing delivered will clearly have an impact on economic, social and environmental considerations.</p> <p>4.18 As noted above, under the social heading, a specific objective should relate to 'Support the timely delivery of sufficient affordable housing to meet the needs across the Borough for those unable to access the standard housing market.' Another housing linked objective could also relate to the delivery of aspirational housing to promote social mobility, retain or see an increase wealth, expenditure and tax revenues; new homes that could accommodate first time buyers, growing families etc.</p> <p>4.19 Due to the rising demographic of an elderly population, it would also be prudent to have a social objective that specifically looked to 'Support the timely delivery of specialist residential care accommodation through the delivery of care homes, extra care development and housing schemes that would accommodate those looking to downsize or obtain an alternative type of property to meet their specific needs'.</p> <p>4.20 The benefit of including more distinct objectives associated with the different types and form of housing would assist in the SA considering a wider range of social and economic objectives when looking at alternative potential sites. Indeed, we note that in Appendix B of the Scoping Report, the following is stated in relation to housing 'Spatial data unlikely to be available. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could potentially be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at large sites).'</p> <p>4.21 Whilst we do not disagree with the above statement, it is probably fair to say that many larger sites will have the ability to deliver a wider range of homes including affordable accommodation, elderly accommodation, etc. Alternatively, some sites might be more suitable in terms of attracting first time buyers and others will be better suited for meet the needs of a growing elderly population or for executive homes. Scoring a site against different housing / SA objectives should assist in helping to deliver a broad mix of sites that would ultimately assist in meeting the wide-ranging housing needs within the Borough.</p>	
SCOP042	Landowner/Developer	<p>4.22 One of the key issues facing Wirral over the past decade has related to the 'timely delivery of new homes'. To date, much emphasis has been placed on the capacity and deliverability of Wirral Waters. Whilst this scheme will deliver many benefits, its lack of delivery (coupled with the distinct lack of any plan led alternative solutions for housing delivery) will have contributed to negative social and economic impacts within Wirral and possibly further afield. Moreover, Wirral Waters alone will not meet many of the distinct housing needs within the Borough and must only be regarded as part of the solution.</p> <p>4.23 Indeed, large problems with the redevelopment of previously developed sites is the viability and deliverability of the scheme especially in areas which do not retain high market values which is a problem for some eastern parts of the Wirral as explained in the population chapter. The slow development of Wirral Waters is a good example of the difficulties in providing a valuable return on development in areas such as Birkenhead. This will impact the ability to achieve the housing targets as laid out by the 2014 OAHN which will require 803 dpa as confirmed by the Secretary of State's letter to Wirral Council dated 28th January 2019.</p> <p>4.24 The number of completions over the previous 5 years is just over half this rate as there has been a focus on the redevelopment of brownfield land where between 83 and 92% of all new developments have been located. Chapter 67 of the NPPF states planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It is of great importance that economic viability of the previously developed sites is analysed and considered as part of any future allocations or strategic policies and further investigation of market rates need to be incorporated in to the sustainability appraisal. Furthermore, in line with para 11 the relevant policies to housing will be considered out of date if housing delivery is less than 75% of the housing requirement over the previous three years. Based on the current supply which has focussed the majority of developments on to brownfield land then Wirral would not be able to keep up with their housing requirement putting their planning policies in to jeopardy. Therefore, there needs to be a major consideration as part of the SA as to how housing delivery can be speed up to ensure the presumption in favour of sustainable development.</p> <p>4.25 Consistently through the scoping report there is a focus on the Wirral Waters scheme which has been proposed for Birkenhead docks. Understandably, this is an important part of the Wirral Emerging Plan because of its redevelopment potential however, there is consistently differing information being released from the scheme and it is widely understood that it is not going to be completed by the end of the Local Plan period. The focus of the SA therefore needs to assess the potential of the Wirral as a whole. There is very little strategic guidance provided in the SA appraisal as all future baselines focus on the 'potential' of Wirral Waters. This has the impact of losing sight of the potential of other areas in the Wirral to provide sustainable development for new housing and employment allocations along with significant environmental improvements. It is expected that Wirral Waters will only be able to provide between 2900 and 6450 homes under the local plan period with completion anticipated to be beyond 2040.</p>	
SCOP042	Landowner/Developer	<p>4.26 It is standard practice for the SA to assist in the comparison of all reasonable alternative site options being considered by the Local Planning Authority in order to identify the most sustainable options for inclusion in the Local Plan. Approximately 50 Green Belt sites have been put forward for release as part of the development options review, these have not been discussed in the scoping appraisal and yet they are the likely alternative for new housing development in the Borough. A scoring matrix will need to be created and used to help define which of these sites are sustainable for release, this is something that has been partially provided under previous consultations and this will need to form a large part of the SA.</p> <p>4.27 The focus on the Wirral Waters scheme has led to there being little strategic guidance of where new housing development should be located elsewhere in the Borough and besides sections in the transport chapter there is very little discussion as to how sustainability will be determined for new housing and employment allocations. Further work on the wider economic impact of Wirral Waters and other strategic sites needs to be provided and linked to employment and education opportunities. Further economic analysis has been provided in our economic statement.</p> <p>4.28 The SA should assess all of the topic chapters to provide suitable strategic guidance as to where new housing should be located. This scoping report fails to do this, it is only within the transport chapter where there is a strategic analysis of new growth opportunities where it indicates that growth potential could be located within the M53 and A41 corridor along with the Merseyrail Chester/ Ellesmere Port line. There needs to be further assessment on this principle and the assessment needs to cover the whole of the Wirral.</p> <p>4.29 The potential for new development of housing on greenfield areas is not principally discussed in the Housing chapter and only becomes a topic for discussion when assessing the best and most versatile land in the borough. Moreover, there needs to be a greater assessment of where development will be considered sustainable besides on PDL which is constrained.</p>	

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SCOP042	Landowner/Developer	<p>4.30 The SA should incorporate issues surrounding education as a separate chapter as this has large implications for social and economic factors in the area. We also consider that deprivation should also be considered separately. All of these principles have been pooled under populations however there needs to be a further analysis of each topic separately.</p> <p>4.31 Under the economic arm, we consider the Council's Sustainability Objectives are too narrow and many of the above comments could also apply. In addition, we would expect to see objective that support the following principles:</p> <ul style="list-style-type: none"> <li>i. The delivery of a sufficient number of homes to support planned or forecast jobs growth and objectively assessed needs to help support the construction industry and the wider economy;</li> <li>ii. The delivery of sufficient land and support of development that for town centre uses including retail, leisure, offices and other related uses;</li> <li>iii. The delivery of sufficient land to meet general industry, warehousing and other industries to support economic growth and social mobility;</li> <li>iv. The support of policies and delivery of land that would support the rural economy including agriculture, outdoor recreational economy, housing for villages, and uses that would make a village more sustainable or contribute to sustainable rural diversification.</li> </ul> <p>4.32 The intuition and rationale for splitting up the different types of economic development considerations is that each have very different locational requirements. As such, the above split would assist in ensuring that a suitable range and mix of employment land is identified.</p>	
SCOP042	Landowner/Developer	<p>5. CONCLUSIONS</p> <p>5.1 The consultation response has been commenting on the Scoping for the Sustainability Appraisal produced by Aecom on behalf of Wirral Council.</p> <p>5.2 The scoping report does not fulfil the requirements for a Sustainability Appraisal (SA) required as part of a Local Plan submission under UK Law, policy and guidance. Instead, it is more geared towards a scoping report for a Strategic Environmental Assessment (SEA) appraisal, which forms a part of the SA process but should not be confused with the requirements of a SA as dictated by national planning policy and guidance.</p> <p>5.3 Indeed, the SA should inform and guide the principles and definition of what constitutes Sustainable Development, as defined within the UK and England. In order to do this, direct reference must be made to the NPPF and NPPG. Clarity needs to be provided as to the purpose of the Sustainability Appraisal as this report has not successfully identified the sustainability issues, nor has it established any synergies between environmental, economic and social topics which make up the purpose of sustainable development as outlined in the NPPF.</p> <p>5.4 The SA needs to be conducted to incorporate all three arms of sustainable development being; environmental, social and economic. There is currently an imbalance between these topics with a particular focus on the environment and minimal discussion on the economic and social objectives and the ramifications in terms of assessing reasonable alternative development scenarios. Whilst the consideration of reasonable alternatives will form part of the next stage of the SA, it is considered prudent to provide an indication as to what these alternatives might be at the earliest opportunity.</p> <p>5.5 We therefore consider the following focus recommendations are taken in to account as part of the SA:</p> <ul style="list-style-type: none"> <li>• Remove contradictions in the environmental objectives whilst providing synergies with both economic and social objectives;</li> <li>• Provide assessment of economic and social topics to including education, mental health and wellbeing, affordable housing and specialist care homes, crime and social mobility which itself is one of the key issues in the Wirral;</li> <li>• Focus on the viability and deliverability of new housing and employment land across the Borough following the consistent undersupply over the previous years;</li> <li>• Provide housing and sustainable assessments on the whole of the Wirral and reduce the focus on Wirral Waters which will only supply a small proportion of the sustainable objectives; and</li> <li>• Provide reasonable alternatives and assess them against the sustainability criteria through the preparation of a sustainability matrix.</li> </ul> <p>5.6 A greater focus on the 3 principles of sustainable development to include a wider range of topics will assist in providing a more robust scoping report which will form a major part of the SA and Local Plan development process.</p>	
SCOP043	Local Resident	<p>I am personally extremely concerned by the threatened loss of the greenbelt on Wirral. As our country is slowly acknowledging a climate emergency, Wirral's plans seem to entirely ignore and undermine the associated issues.</p> <p>We know that building in areas of greenbelt is going to necessitate further traffic congestion, increased building of roads and loss of air quality. Furthermore, the type of development proposed for these sites is for luxury dwellings, thereby implying multiple vehicles per household. At this time we need to be focusing on improving public transport, and an infrastructure of safe cycle paths, not encouraging the use of fossil fuels for personal vehicles. Building in greenbelt areas will not be alongside areas of employment thus involves residents travelling far afield to their work places. New estates built by private developers seem intent on squeezing the maximum number of houses into a plot, intent on financial gain and with no apparent consideration for the benefits which greenery in our environment provides. National statistics show shocking rises in asthma levels and mental health issues amongst our young people, plus increases in dementia and mental health problems in adults. Greenery is known to benefit all these issues.</p> <p>We have seen that the building of new housing developments also involves the destruction of wildlife. Trees, hedgerows, wildlife areas are demolished with no consideration for the animals living in it. Many areas proposed to be released include areas of scientific interest and are homes to protected species. Wildlife numbers are in decline and Wirral will be implicit in continuing this trend. Similarly floodplains are contained within the proposed areas for release which will have a devastating impact on our area. We have seen over recent years the increase in rainfall and the effects this has had on local people's lives.</p> <p>Many local farmers are now living under a cloud. They have successfully farmed their land for generations but now, as tenant farmers they have no say or control over their futures. At this time of economic uncertainty, why would Wirral wish to displace successful farmers against their wishes and destroy not only their homes and livelihoods, but to destroy good quality agricultural land? Why would the council seek to destroy healthy local businesses? Presumably because they do not bring in enough revenue for their vanity projects such as The Hoylake Golf Resort.</p> <p>As a long time resident of Upton, I have recently seen our local area disappear under concrete and tarmac. What used to be a field on Manor Drive now consists of 2 housing estates; Low Hill Gardens and Fender Mews, comprising several hundred houses. The bottom of the estate is still flooded, as it always was when it was a field for horses, so drainage clearly has not been adequately addressed by planning. We have also seen the development of Upton Pines behind Sainsbury's which is still under construction. The back end of this estate is also flooded, despite drainage ponds which supposedly drain into the Arrows Brook which, on its own merits, is known to be a flood risk. A planning request for a further 127 houses has now been put on the champion site (APP/19/00315). We now see that, if further greenbelt is released in Greasby (SP010A East of Rigby Drive), there is to be a new road to service a housing estate of another several hundred more homes and this will link up with Irby. Traffic congestion already causes the Sainsbury's roundabout to be gridlocked at weekends and bank holidays, access to Arrows park hospital is compromised and road safety is a real concern.</p> <p>Please stand up for Wirral residents against profit hungry developers, and deny planning approval,</p>	Not directly related to the scoping process.

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SCOP044	Local Resident	<p>I am writing regarding the current consultation on the Sustainability Appraisal Report.</p> <p>Having been alerted to this consultation by members of ITPAS, it has become clear to me that the aims and suggestions of the report are commendable, but the report as it stands does not go far enough to ensure that Wirral Council will be bound to find the most sustainable approaches to future development. Any loopholes need to be tied up so there is no chance that unsustainable plans can be put in place when there are clear and viable sustainable alternatives.</p> <p>This is the time to act to ensure the sustainability of our environment - locally and globally. There will not be a second chance to get this right. Environmental, social, and economic sustainability are interlinked and we need all three for our communities to thrive. For too long environmental sustainability has been reduced to a tick box exercise in planning and development matters. Much more rigorous guidance needs to be put in place to ensure corners can't be cut.</p> <p>There is clear desire from the general public for those in power to make the changes required to turn things around. In order for this to be achieved, there need to be clear, measurable targets in place, and clear, measurable criteria against which Wirral Council (and others) will have to test their plans.</p> <p>Most obviously to me, wording should be in place within the report to ensure that green belt land is only ever released for development as a very last resort. This is not only common sense but in line with National Planning Policy.</p> <p>Further, Wirral Council must be forced to justify the numbers of new houses actually needed based on local evidence.</p> <p>All available brownfield sites (of which there are many within Wirral) should be used for development as a top priority. It is not acceptable that any green belt land is earmarked for development when such great areas of brownfield sites (and other non green belt sites) exist across the Borough. These sites are crying out for development, especially those in some of the most deprived areas of Wirral that would benefit most from regeneration. These often already have the infrastructure in place to support larger communities, making them clear sustainable places for development.</p> <p>Wirral is a wonderful place to live and visit, made so by the many areas of green open space that provide opportunities for leisure and habitats for varied and valued wildlife. These green spaces also separate distinct communities, which if removed would result in the loss of local identity that is so important to existing residents.</p> <p>I could go on about the many and interconnected issues the loss of green belt land would cause to the environmental and social sustainability of Wirral, but it is clear to all what the problems are.</p> <p>Please take this opportunity to ensure that the Sustainability Scoping Report has the robustness to force the council to take a responsible route to future development rather than the reckless approach being taken to date.</p> <p>Once the green belt is gone it is gone for good and the many and varied environmental and social benefits are lost too.</p>	<p>Misunderstanding of the scope and purpose of the scoping report.</p> <p>No action required.</p>
SCOP045	Local Resident	<p>No doubt this is an extensive and expensive report from these consultants. Their use of plain English is abysmal.</p> <p>Having scanned the content I am unconvinced that this represents value for local taxpayers money; there are far too many generalisations and assumptions using statistics to form opinions that appear unrepresentative of what is actually happening at ground level on the Wirral. I have lived here all my life and can only observe lowering standards and degradation of services provided by the local authority. I trust the authority will develop a realistic action plan from this exercise though, based on past performance, I remain sceptical.</p>	<p>Not directly related to the scoping process.</p>
SCOP046	Local Resident	<p>I would like to submit the following comments to the consultation for the Sustainability appraisal:</p> <p>Wirral Waters is without doubt the most sustainable option for house building on the Wirral and the Council must do all it can to bring forward as much housing as possible on the site.</p> <p>The Government have recently declared a climate emergency which gives even more impetus to developing a Local Plan that is sustainable. Developing on the Green belt can not under any circumstances be considered sustainable. The Council should challenge the housing target produced by the standard methodology to produce a properly evidenced and assessed variation from the target. There should be a "brownfield only" policy utilising the brownfield sites and empty homes. If the target still can not be met then the Local Plan should set out the Green Belt as a "constraint" which means that the target cannot be met. Green belt should not be released to meet a target.</p> <p><b>Air quality</b> More emphasis should be given to other types of pollution in addition to NO2 such as particulates. The current air quality monitoring regime is not robust enough to give a true picture and should measure other pollutants not just NO2 New houses should be concentrated in areas closest to existing transport links and employment areas. Building on the green belt will only increase car dependency and should be avoided. Building near the M53 should also be avoided. Wirral Waters should be encouraged to build a tram system</p> <p><b>Biodiversity</b> "Biodiversity net gain" opportunities should not be used as justification for building on the Green belt. Biodiversity enhancements should not be used as a bargaining tool by housing developers to build on greenbelt. Protecting and enhancing biodiversity can be achieved by working with other stakeholders and partners and should not be brought about by releasing greenbelt land. With the current ecological emergency faced by the world it is imperative that as much land as possible remains as designated green belt</p>	<p>Not directly related to the scoping process.</p>
SCOP046	Local Resident	<p><b>Climate Change Adaption</b> Due to the unpredictability of future climate change it is essential that no flood plains are built on (such as that proposed for the Hoylake Golf Resort). Planning policy guidance is not keeping up with climate change and continues to permit building on flood plains if the flood risk assessment shows that flooding will not be made worse up to a 1 in 100 year storm. As 1 in 100 year storms are now occurring on a much more regular basis it is essential that new developments only occur where there is a very low risk of fluvial, coastal and surface water flooding Many of the Green Belt sites selected for potential release are in areas that have suffered flooding, particularly surface water flooding, and should be avoided.</p> <p><b>Climate Change Mitigation</b> New developments should only be given permission if they can prove that the houses are built to the highest energy efficiency standards and come with solar panels as standard and are built close to sustainable transport systems</p> <p><b>Economy and Employment</b> Section 6.14 - the statement is misleading "there is a strong visitor economy with a key attraction centred on the Boroughs Coast Countryside and Golf offer" The Councils own tourism study showed that only 0.2% of visitors come for golf. It seems that this statement has been written to justify building the Hoylake Golf Resort – a completely unsustainable development which will not only build on a flood plain and the green belt but will bring new roads, increased traffic and pollution, encourage international travel and car travel and can not be justified in terms of sustainability. The carbon footprint of the project is massive and it should be abandoned. Wirral Waters should be encouraged, not only for its employment opportunities, but its location close to Liverpool which is the location for many employers</p> <p><b>Health</b> Many studies prove that Green Spaces are essential for health and wellbeing at it is a big reason why Green Belt should be left untouched</p>	<p>The scoping report is a high level overview of the baseline context of the plan area and does not support or challenge specific developments.</p>

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SCOP047	Landowner/Developer	<p>INTRODUCTION AND CONTEXT</p> <p>We have been instructed to prepare and submit a response to the consultation set out by Wirral Metropolitan Borough Council (WMBC) on the scope of the Sustainability Appraisal and Equalities Impact Assessment for the Wirral Local Plan.</p> <p>This consultation response has been produced in consultation with the estate's managing agents. It is a non-site-specific response that focuses on the methodology itself in response to the emerging Local Plan consultation.</p> <p>In summary, we do have some points of objection to parts of the scoping reports as written, which are set out in more detail below.</p>	Introductory text.
SCOP047	Landowner/Developer	<p>SCOPING REPORT FOR THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL (SA)</p> <p>The purpose of the scoping report, as set out within the document, is explained as being to identify the sustainability issues and objectives that should be the focus of the appraisal of the emerging plan. Generally, we are in agreement with the issues and objectives identified within the AECOM document. However, we do have some significant concerns regarding a small number of matters which are outlined below.</p> <p>Primarily we are concerned with the lack of acknowledgement within the document of both the issues facing the rural communities within the borough, in addition to the potential for the rural area to contribute towards meeting the key objectives identified.</p> <p>Within the Economy and Employment section, for example, the SA scoping report makes no reference to the significant contribution the rural economy makes to the economic performance of the Wirral. The rural areas currently host 18% of Wirral jobs. National policy also seeks to support a prosperous rural economy, requiring that planning policies should enable the sustainable growth and expansion of all kinds of business in rural areas. There is no recognition of paragraph 83 with the SA scoping report (6.1).</p> <p>The Wirral countryside is also an important leisure and tourism asset and home to a number of high-quality tourism businesses that make a significant contribution to the local and regional economy. The Merseyside Rural Economic Strategy identified the continued evolution of rural destinations as a strategic priority for Wirral in order to keep pace with the increasing competition in a growing staycation market. The SA scoping report currently shows a lack of understanding and acknowledgement of this important contribution (6.14; 6.23).</p> <p>It is noted at 3.19, that the project at Wirral Waters provides an opportunity to deliver green infrastructure and enhance biodiversity networks. However, there is no mention made within the SA scoping report of the obvious contribution the rural area can make to biodiversity enhancement through its significant environmental assets.</p> <p>Similarly, it is noted at 7.6 that the Wirral Waters development provides a strategic opportunity to deliver substantial new green infrastructure connectivity. Again, there is a failure to recognise the significant opportunities available in rural areas to enhance accessibility and environmental quality as part of an overall approach to sustainable development.</p>	The role of the Rural economy has been strengthened in the SA Framework.
SCOP047	Landowner/Developer	<p>The Estate comprises of around 2,000 hectares of land within the rural areas and already provides multiple opportunities for recreation (formal and informal) and leisure. The extent and situation of the estate landholding provides an extraordinary opportunity to further enhance public access, enable improved health and well-being and to increase environmental and biodiversity benefits across the area. Single ownership, and the integrated stewardship that derives from it, is unrivalled in the Borough. It provides the opportunity to develop a co-ordinated and secure green infrastructure strategy alongside a committed delivery partner.</p> <p>Such a strategy might include the creation of more integrated networks of green connections between people and places, including an enhanced off-road cycle network and Public Rights of Way network to promote public health improvements; and the delivery of net environmental gain via investment in and works to improve carbon storage by enhanced soil management techniques, create more habitat for wildlife, enhance biodiversity and extend the area of the estate managed for environmental gain.</p> <p>This would respond directly to the Framework (paragraph 138) including the new requirement (introduced in the revision of the Framework in July 2018) to 'offset the impact of removing land from the Green Belt through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt'.</p> <p>Such contributions add to the sustainability credentials of rural sites and the opportunities for large rural landowners to deliver such benefits at a meaningful scale is unrecognised by the SA scoping report.</p> <p>The spatial development of the Wirral Peninsular means that many of the existing urban areas are in close proximity to the central core of the rural areas, providing an opportunity for easy access to such areas for leisure and recreation, and the acknowledged health and well-being benefits of such to be available to a large section of the borough's urban population.</p>	
SCOP047	Landowner/Developer	<p>Whilst we acknowledge the commitment by the council to the Wirral Waters regeneration project, we are concerned that this document makes so numerous mentions to how the project complies with or contributes to the proposed issues and objectives identified for the sustainability appraisal. We do not consider it the role of this scoping document to discuss the merits or otherwise of individual development schemes. As set out, there is a clear risk that the SA will fail to provide an appropriately objective assessment and be at risk of a legal challenge. There also appears a risk that the document becomes focussed on devising a SA that fits this development scenario, rather than responding to the full picture across the borough, as demonstrated by our comments above on the lack of recognition of the opportunities in the rural areas.</p> <p>We also have significant concerns with the approach taken in the Housing section of the SA scoping report, which only seems to consider the challenges facing rural areas as one of meeting housing needs, including delivering affordable housing via rural exception sites. The lack of reference to paragraph 78 of the Framework, is surprising. The Government's approach to housing in rural areas is not just one of addressing need, but also identifying opportunities to support rural communities to thrive.</p> <p>Paragraph 78 states that to promote sustainable development, housing should be located where it will 'enhance and maintain' the vitality of rural communities. The reference to enhance is an enabling context and goes beyond simply meeting needs but also looking for opportunities to help communities thrive and grow.</p> <p>The SA scoping report refers to the Housing White Paper 'Fixing our broken housing market' (9.2) but again only sees this in an urban context. The white paper clearly supports housing development in rural areas; with references to 'allowing rural communities to grow' (Pg. 21) and 'encourage(ing) local planning authorities to identify opportunities for villages to thrive' (A.54).</p> <p>The SHMA and economic strategy for Wirral identifies the need for new family homes and for aspirational homes. The SHMA also identifies that persuading existing children to remain in the area as they become economically active will be an important part of sustaining the labour force. Such new adults should have the opportunity to remain in their rural communities if they choose; by focussing all housing growth on Wirral Waters and similar urban locations, they are being deprived of that opportunity.</p> <p>Whilst the current Green Belt status of the entire countryside area inevitably limits development opportunities, the SA must not approach this initial scoping exercise from a 'policy-on' perspective but should provide a comprehensive and inclusive appraisal of issues and opportunities facing the borough.</p> <p>The reality is that without a change to Green Belt boundaries or Green Belt policy within the emerging plan, there are threats to the ability of the borough to meet its housing and economic needs. Account also must be taken of the future sustainability of the borough's rural communities. 46% of the Wirral Borough is rural, and within the Green Belt. The local plan needs to reflect that and at present, the emerging SA does not suggest it will approach the appraisal of such matters in an informed and balanced way.</p>	Comments noted. The role of housing in rural areas has been updated to reflect the issues raised. The potential role of Wirral Waters is highlighted in the future baseline position as it is a major development in the area that could have impacts on the baseline position. The scoping report in no way seeks to support any particular scheme and a range of strategies will be tested in the SA as it progresses through Stage B and beyond.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP047	Landowner/Developer	<p>The most important element of the SA scoping report is perhaps the proposed objectives which suggest the criteria against how the local plan policies will be judged. These policies need to have fully understood and allowed for appropriate development across the borough, in rural as well as urban areas. At present, the criteria are too heavily weighted towards a focus on urban regeneration, neglecting to include a relevant and appropriate response for the rural area.</p> <p>In summary therefore:</p> <ul style="list-style-type: none"> <li>• We object to the proposed Housing Objective which seeks to ‘focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Wirral’s residents’.</li> </ul> <p>As drafted, we are concerned that in its application this objective would only consider brownfield urban sites sustainable, which is inconsistent with the Frameworks approach to the delivery of housing and would clearly not meet housing needs across the Wirral, including those in rural areas.</p> <p>The heavy focus on brownfield sites expressed in this objective is also inconsistent with the SA scoping report’s comment that Brownfield sites in the borough are a finite resource (10.17) and will not likely meet all development needs in a timely fashion, necessitating the need for some Green Belt release (11.12). The SA objectives need to make provision for development to come forward on sustainable greenfield sites where it is required to ensure sufficient housing delivery to meet housing needs of residents across all areas of the Wirral.</p> <p>On a related matter we challenge the reference at 10. 2 which suggests the PPG sets out that the reason for Brownfield Registers ‘is to help achieve maximum planning value and efficiency from available land, whilst avoiding unnecessary land take at greenfield sites’. We are not aware of such a reference in the NPPG and it is suggested this is the authors view and should be made clearer as such.</p> <ul style="list-style-type: none"> <li>• We also object to the Economy and Employment Objective which makes no reference to supporting the rural economy, focussing instead on the towns and local centres. This is inconsistent with Paragraph 83 of the Framework.</li> </ul> <p>The next stage of SA work is advised to involve the development and assessment of reasonable alternatives for the Local Plan. It will be important that this work reflects the reality of the requirements of the rural areas, and the opportunities the rural areas present for meeting Wirral Council’s strategic objectives, especially those associated with creating sustainable communities across the whole of Wirral.</p>	The role of the Rural economy and housing factors has been strengthened in the SA Framework.
SCOP047	Landowner/Developer	<p>SCOPING REPORT FOR THE WIRRAL LOCAL PLAN EQUALITY IMPACT ASSESSMENT</p> <p>Generally, we agree with the issues identified within the AECOM document.</p> <p>In line with our comments above on the SA scoping report, we simply reinforce our view that the plan will fail in its objective to achieve ‘equality of opportunity for all Wirral residents’ if it fails to properly plan for its rural areas.</p> <p>It is acknowledged that the position faced by Wirral is unusual in that all of its rural areas are also designated Green Belt. This means it is not possible for the Council to apply in full the enabling approach to development in rural areas required by national policy (paragraph 78 &amp; 83) in order to allow rural communities and the economy to thrive. Unless the plan, therefore, finds a positive and enabling approach to managing development in its rural areas, it risks discriminating against its rural communities, contrary to the Equality Act 2010 obligations.</p> <p>We trust these comments are helpful. We will be pleased to engage in dialogue with WMBC to expand on the submission, to provide clarity, or to provide further information to inform the rationale for the views expressed, if that would be useful.</p>	Comments noted.
SCOP048	Local Resident	<p>Ref 2.10 Future Baseline, You need to ensure you are not reducing the ‘Green lung’ capacity of Wirral Green spaces thus not only reducing Air Quality but also reducing its capacity to ‘clean’ and filter the air we breathe. Emphasis must be given to not selecting Greenbelt sites which would harm Air Quality particularly next to areas of Biodiversity or farmland.</p> <p>2. Ref to Section 2. There appears to be no mention of the M53 and traffic issues at (Junction 4 Clatterbridge) or the massive tailbacks everyday on B5137 Spital Road as we see traffic try to get across to the croft estate? This one of the worst areas on the Wirral. Have you monitored air quality at the Spital crossroads? This is where Children walk to school every day. Emphasis must be given to preventing a decrease in Air Quality on routes children use to walk to school. This needs to be included in your Sustainability Appraisal.</p> <p>3. Ref 2.11 how can Key pollutant levels ‘decreasing’ be a justification for development? What ‘key pollutant levels does this actually refer to and where had they been measured? Air Quality needs to be improved and the Objective needs to state how you plan to achieve this. I.e. no building on Greenbelt.</p> <p>4. Ref 2.12 Your second bullet point is not acceptable. You must state that Current and future residents will not be exposed to a decrease in current Air Quality and that measures will be taken to improve Air Quality. In addition unless you have measured Air Quality at all of the proposed Sites how can you benchmark and quantify this?</p> <p>5. Ref 3. The maps do not include the Biodiversity areas as shown on the Biodiversity maps Wirral Borough Council have produced as such these maps are misleading and fail to show the true extent of Biodiversity on the Wirral These need updating to take ALL Biodiverse areas into account ( I have attached a copy of your own Biodiversity Map) This must be updated as its misleading and fails to show all Biodiverse areas on the Wirral.</p> <p>6. Ref 3. As an example to what is missing this report fails to map the biodiversity of SP043 Vineyard Farm as shown in (Appendix 5, Core Biodiversity Areas) This is misleading and incorrect. You must update this reports (Scoping Report for the Wirral Local Plan Sustainability Appraisal, March 2019) maps to reflect what is identified as Core biodiversity Area of the Wirral. It is not acceptable to not include these and I would question your reasoning for failing to include it?</p> <p>7. Ref 3.17 This statement is in some way trying to ‘accept’ an impact on biodiversity. It needs to be re written to explain any impact to biodiversity shall be prevented and not tolerated in any future development decision.</p> <p>8. Ref 3.18 Disagree, this is another statement trying to justify building on or next to Greenbelt and sites of Biodiversity. You must re word this to state future growth in areas where there is No Biodiversity could unlock new opportunities to improve biodiversity.</p> <p>9. Ref 3.19 But it’s not the same as what you are describing in 3.18, as such 3.18 and 3.19 used together are misleading. You must re word 3.18 to explain that this is for sites where no biodiversity currently exists otherwise you are allowing development anywhere using very vague terms and interpretation as to what ‘enhance’ actually means.</p> <p>10. Ref 3.21 Objectives provide no protection to Biodiversity as currently written. The use of ‘Minimise’ and ‘where possible’ must be removed. The objective is to retain and improve areas of Biodiversity and ensure a buffer is included to protect them.</p> <p>11. Ref 3.21 There are several sites (SP043) for example that are connected to open countryside via SP042, SP044, SP078, SP045, SP080. You must include an objective not to ‘cut off’ areas of Biodiversity from Open Countryside, if you don’t then you cannot meet either objective.</p> <p>12. Ref 3.21 You must add in a specific buffer from development ref: Appendix 5 Core Biodiversity Areas maps to achieve the second bullet point. This must be included as an objective</p> <p>13. Ref 3.21 In general not enough protection is has been included in this section and leaves the door wide open for the destruction of biodiversity on the Wirral at some of our most precious sites.</p>	Data on air quality is taken from the Council's monitoring process. Additional information relating to biodiversity areas has been added to the scoping report. With regards to the objectives, and biodiversity in particular, there is a need to achieve net gain, which is a key factor in ensuring that biodiversity is protected and enhanced.



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SCOP048	Local Resident	<p>14. For some reason (SP043) remains in the Local Plan yet has the highest value agricultural land on the Wirral, is recognised for its Biodiversity (ref Appendix 5 Core Biodiversity Map) houses Grade II listed buildings, is one of only five inland SSSI which also is home to Ancient Woodland. The objectives in section 3.21 do not offer these sites enough protection, are vague and open enough to be misinterpreted. They must be made more robust and clear that Biodiversity is to be increased as an objective with no loss of existing Biodiversity sites.</p> <p>15. Ref 6.26 What provision to local services will be covered in this report to deal with the influx of individuals at proposed development sites? Where are the studies to show where new schools will be needed due to no space being available at current schools?</p> <p>16. Ref 7.14 Objective must be to not deprive existing areas from Greenspaces by development and if development is permitted adequate provision for greenspaces must be provided within the developers proposal.</p> <p>17. Ref 9.4 The SHMA uses data regarding growth on the Wirral that is unrealistic and without basis, such using the SHMA 2016 is flawed logic. The figures quoted in this section are grossly over estimated and require re calculation.</p> <p>18. Ref 9.6 The use of 803dpa must not appear in this report. The figure to be used is the one WBC must calculate based on evidence and actual need not the target set by Governments proposed standard methodology, This figure is a target set for WBC to challenge it is NOT mandatory. The SHMA needs updating first though as the growth model WBC specified is grossly inaccurate and over specified.</p> <p>19. Ref 9.7 The suggestion written here is not backed up by fact and must be removed. The fact is that developments on the Wirral have been approved like Wirral Waters yet the current authors of the 'Local Plan' don't want to include these numbers. We are also aware of 'Political Preferences' that have been made public showing that WBC have political preference to develop greenbelt sites irrespective of there being 6000 empty properties on the Wirral and ample room on Brownfield sites to fulfil even the higher number quoted as a target (12000 homes) None of this includes the 15000 houses permitted at Wirral Waters.</p> <p>20. Ref 9.7 This section only serves to mislead and try to justify the use of a higher number of houses required and a false 'suggestion' that greenbelt is the hold up. If you insist on using this suggestion then you must also include other suggestions like Land banking, or a suggestion that WBC are unwilling to take account of Wirral Waters projected houses numbers for some reason or other. I would strongly recommend you removed the suggestion in 9.7!</p> <p>21. Ref 9.13 From 'However onwards'. Again you are using a suggestion, this is again misleading and based on no facts. The number of houses has not been determined so to suggest it is the figure quoted in 9.6 is incorrect and only serves to mislead. You cannot make this reference as you do not know the number until you have worked it out using the SHMA or calculation based on evidence which you don't currently have.</p> <p>22. Ref 9.14 more emphasis needs to be placed on Wirral Waters throughout this report.</p> <p>23. Ref 9.15 OAHN number is out of date and uses incorrect growth forecasts. It must be updated before being used here</p> <p>24. Ref 9.15 use of the government target is of no relevance other than to try and justify a higher number. You need to use the number calculated by WBC new SHMA</p> <p>25. The objective here needs to be backed up with actual need on the Wirral and not just a figure passed down from Government. Shouldn't you include here that we will build what we actually need based on a</p>	<p>It is not the role of the scoping report to say what level of housing will be planned for in the Local Plan, and this is not what it does. The Biodiversity objectives mention the need for net gain, which addresses the concerns raised here. It is not the role of the scoping report to state that development in certain locations is not permissible. The impact of the plan will be determined and such factors will play an important role in highlighting where significant effects could occur (and should be avoided).</p>
SCOP048	Local Resident	<p>26. Ref 10.14 - Not enough emphasis is placed on protecting our best farmland. Why not go further and clearly state no development permitted on Grade 2 land? This is our best land, it must be protected. 10.17 needs to go further and rule out development on on close to Grade 2 land.</p> <p>27. Ref 10.17 There must be a hierarchy which determines what has the highest levels of protection , Grade 2 is not permitted for development under any circumstances, Grade 3 not permitted for development unless all other options have been exhausted i.e. grade 4,5,6 have all been used.</p> <p>28. Ref 10.17 there has been recently massive emphasis on soil quality , erosion and its impact to Biodiversity. The report needs to take account of this before being finalised. There is a link between soil quality, farmland and biodiversity that must be given the highest levels of protection. Provide an update before acceptance and approval of this report.</p>	
SCOP048	Local Resident	<p>29. Ref section 11. The way the current Local Plan is heading there is a unhealthy bias to development on one side of the M53. The use of the M53 as a new Greenbelt boundary is flawed and does little to improve Air Quality, congestion, Biodiversity or protection of our highest quality farmland. Re drawing the boundary this way is a massive mistake and cannot be justified. The A41 is now so busy that people try to avoid it. The pressure this causes to Spital road is immense and is seen daily as commuters make their way to Junction 4 of the M53 another traffic black spot. By concentrating further developments in this corridor between the A41 and M53 there problems associated with Air Quality congestion and reduction in biodiversity in these areas will only get worse. The proposed redrawing of the greenbelt must be stopped to prevent catastrophe in this area.</p> <p>30. Ref section 11 Green belt Extent. It is clear from this map that there are fingers of greenbelt which are at threat from being cut off from the wider open countryside if certain sites are developed. This must be prevented and these crucial corridors remain open. Using the same example SP043 Vineyard farm, which houses a nature reserve, SSSI, Ancient woodland and High value agricultural land Grade 2, by trying to develop part of the site or the adjacent sites would massively reduce biodiversity and have a huge impact to local air quality and would amount to encroachment on the countryside. This issue is further compounded due to poor access and only routes available being Spital Road, the A41 or the M53 Junction 4 which as previously stated are already heavily congested roads.</p> <p>31. Ref 12.4 perhaps housing numbers need to be based on actual population growth rather than SHMA or Government figures. Clearly Wirral population isn't growing fast and shows an ever increasing ageing population.</p> <p>32. Ref 12.5 this clearly shows that more emphasis needs to be placed on Wirral Waters to increase growth and not just dumping 12000 houses on our greenbelt. Build Wirral waters and create a true demand before trying to build houses to prop up council tax income.</p> <p>33. Ref 13.5 the M53 is mentioned but not the A41? Why? The A41 is possibly busier than the M53, it is overburdened and requires measures to try and take traffic away from this area not increase it. What measures / objectives are in here to achieve this. I cannot find any.</p> <p>34. Ref 13.10 This makes a point about train network what has been explored to what extent has this been explored to reduce the overburden on the A41. What have you looked at in terms of alternatives to filling all the gaps between the M53 and A41 corridor in terms of Train links?</p> <p>35. Ref 13.15 disagree with statement that the A41 M53 corridor can sustain any more growth. It is already overburdened and not an option for further growth.</p> <p>36. Ref 13.15 South Wirral is at saturation point, developing further here risks detrimental impact to Air Quality , Biodiversity and massive increase in congestion. Why are you so fixated on using the A41 and M53 these are not sustainable options?</p> <p>37. Ref 13.15 disagree with misleading statement regarding standing traffic. Provide evidence as to when these studies were undertaken. Daily there is standing traffic along Spital Road at peak times and off slip roads to M53 junction 4. Provide times dates when assessment have been made to back up your claim. The A41, Spital Road and Junction 4 M53 are over utilised and becoming more dangerous. You must put measures in place to develop away from these overburdened areas.</p> <p>38. Ref 13.16 one area of concern not tackled here is access and minor roads. Some proposed sites are even suggesting using roads like Poulton Road &amp; Poulton Hall Road as an acceptable route (as specified in Persimmon plan for Sp043, obtained via WBC) Both of these roads are extremely dangerous in the winter and autumn when leaves are on the road. You need to take into account minor roads as well when assessing proposed sites and sustainability. It is not sustainable to use roads such as these.</p> <p>39. Ref 15 watercourses are under threat from surface run off and decreasing local drainage. I have great concerns regarding building on around our water courses and the impact this will have to the local area. The loss of fields around watercourses must be prevented.</p>	<p>The Local Plan is being reviewed and thus issues relating to greenbelt, air quality, biodiversity and soil are being reconsidered. The transport and air quality elements of the SA objectiveS will explore impacts on the road network.</p>

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP048	Local Resident	<p>General comments.</p> <p>a. This report does not go far enough to protect our greenspaces, Biodiversity, Air Quality or Farmland.</p> <p>b. It allows for too much interpretation and misleads significantly regarding the need for housing on the Wirral and why land isn't available.</p> <p>c. Suggestions and all non-evidence backed statements must be removed.</p> <p>d. There is too much emphasis leading to the release of greenbelt and why it is justified based on no evidence and suggestions rather than facts.</p> <p>e. This report needs to do a lot more to protect Biodiversity and ensure it includes ALL areas identified as the maps it contains are NOT complete (ref Appendix 5 Core Biodiversity Areas)</p> <p>f. Grade 2 Farmland must be removed from the local plan and protected from any future development</p> <p>g. Housing need figures are suggestions and not based on facts or actual need.</p> <p>h. The lack of understanding regarding congestion on the A41 and M53 junction 4 are staggering. Clearly have been overlooked but are required to be fully embedded into any decision regarding suitable development locations</p> <p>i. The use of M53 as a new Greenbelt and filling all the gaps between the A41 and M53 is fundamentally flawed and will meet none of the criteria in terms of protecting Biodiversity, reducing congestion, improving Air Quality or providing actual house need in these area.</p> <p>j. It is clear that jobs and growth must be a priority at Wirral Waters along with the redevelopment of Birkenhead. The report suggests not enough supply due to greenbelt yet there is room for 15000 homes at Wirral Waters, 6000 empty properties on the Wirral and space on Brownfield sites for 15000 homes? There is an attempt via this report to justify greenbelt release based on suggestions and no facts.</p> <p>k. It is also clear that recent reports have demonstrated that WBC have a Political Preference to develop certain Greenbelt site like (SP043 Vineyard Farm) having not taken any of the proposed criteria into account. Some of the suggestions in this report would appear to be an attempt to help steer those preferences, this cannot be tolerated and this report must act and demonstrate based on evidence what sites could be developed which cause no harm to our Biodiversity, Farmland, Greenbelt and Air Quality.</p>	<p>It is not the role of a scoping report to set the strategy for a Local Plan. With regards to the protection of environmental assets, there are SA Objectives relating to all the issues raised and an assessment of the impact on these elements will be undertaken. Where significant effects are identified these will be made clear to the Council. The information included in the Scoping Report is based on the currently available data sources and is only a snapshot in time. Any additional data is welcomed and will be taken into account at future stages of the appraisal. The report does not seek to justify any particular approach to development and the impacts of a range of approaches will be explored at Stage B of the SA process.</p>
SCOP049	Natural England	<p>Natural England welcomes this opportunity to comment on the "Scoping Report for the Wirral Local Plan Sustainability Appraisal" (dated March 2019). Please note that the advice contained within this letter focuses on the Sustainability Appraisal (SA) only and in particular comments on section 3 Biodiversity. Natural England has not reviewed the "Equalities Impact Assessment (EqIA) of the Wirral Local Plan Scoping Report" (dated March 2019) that was also submitted as part of this consultation as this document is not within scope of our remit.</p> <p>In preparing your new Local Plan, the protection, conservation and enhancement of Wirral's natural assets should be a key focus within the Local Plan. Natural England would expect biodiversity and geodiversity, ancient woodlands, soils, priority habitats, ecological networks, protected sites and species to be covered (as appropriate) under the heading of the natural environment.</p> <p>Natural England has a range of data sources that you may find useful in the production of the SA please refer to <a href="https://www.gov.uk/guidance/how-to-access-natural-englands-maps-and-data">https://www.gov.uk/guidance/how-to-access-natural-englands-maps-and-data</a> where you will be able to download all the available data sets.</p>	<p>General advice.</p>
SCOP049	Natural England	<p>3. Biodiversity</p> <p>We welcome the clear statement indicating the internationally designated sites that are within and adjacent to the plan area, however, Liverpool Bay Special Protection Area (SPA) is not included, and whilst it is a marine SPA, we advise that this site should be included as it is within the plan area and activities within the plan area have the potential to affect the features of this site. Please ensure you update any maps showing the designated sites to ensure that Liverpool Bay SPA is included- e.g. Figure 3.2. (page 13).</p> <p>Whilst clear detail and explanation on the Ramsar sites is provided within the text we suggest that the key features of the sites are highlighted (for example, breeding and/or non-breeding birds and habitats) to clearly explain the importance of the baseline environment of the SPAs, Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs). Further consideration of land that may be functionally linked to the SPAs/Ramsar sites should also be considered, notably as these areas provide support for essential ecological functions, such as foraging. These areas are afforded the same protection as the areas within the designated site boundary.</p> <p>To aid further identification of the current state of the environment and trends of the designated sites we advise you refer to the Conservation Advice packages on Natural England's Designated Sites System and this will assist the provision of suitable evidence of the current baseline and future assessment. Additionally the Site Improvement Plans (SIPs) for the designated sites will provide additional evidence towards currently recognised threats and pressures for the designated sites. We further encourage you to consider engagement with local organisations and groups that may hold additional local data for the environment e.g. local bird groups.</p>	<p>The key features of the designations have been highlighted. Any information relating to supporting habitats / areas is welcomed and would be added to the report, but AECOM has not had sight of this.</p>
SCOP049	Natural England	<p>Recreational disturbance is a currently a recognised pressure on coastal designated sites within the Liverpool City Region, with particular concerns focused upon, Dee Estuary SPA/Ramsar, Mersey Narrows and North Wirral Foreshore SPA/Ramsar and Sefton Coast SAC. We agree that future development, particularly housing will increase the pressure of recreational disturbance on the designated sites. Whilst the scoping report recognises the potential for increasing recreational pressure, there is no consideration of this being a current issue as part of the baseline evidence which we advise should be further considered. Further information and evidence is available within the recently updated Conservation Advice packages and Site Improvement Plans.</p> <p>As recognised within the future baseline, additional pressure on the designated sites comes from increasing development and impacts of disturbance (noise and light), habitat loss and fragmentation and atmospheric pollution. You should ensure to represent and highlight cumulative impacts of allotted development on environmental assets, and further consideration to whether impacts may be regarded as short or long term and whether these are temporary or permanent impacts.</p> <p>We note that Wirral Waters development has been highlighted within the future baseline (and throughout topics in the scoping report) and whilst we agree with the comments made that this provides a good opportunity to deliver on green infrastructure and biodiversity enhancement, it is important that further recognition towards mitigation as required by the Habitats Regulations (2017 as amended) should be highlighted.</p> <p>The Liverpool City Region Ecological Network Report by MEAS (dated 2015) identified a Nature Improvement Area for the LCR and further provides recommendations for the local plan. We advise this document is considered as part of the evidence base within the SA.</p>	<p>Impacts are to be determined at later stages. These do not need to be outlined in the scoping report. The LCR Ecological Network Report findings have been incorporated into the scoping report as appropriate.</p>
SCOP049	Natural England	<p>Biodiversity objectives</p> <p>The objectives for biodiversity should also consider (as appropriate) the scope of habitat restoration, re-creation, but also expansion.</p> <p>We welcome the objective to achieve biodiversity net gain and suggest that this objective could further reflect a commitment to securing management to deliver on monitoring and long term enhancement of biodiversity.</p> <p>Green infrastructure has the potential to support biodiversity enhancement and connectivity and therefore should be included in the objectives of the SA. It is not clear whether green infrastructure includes reference to any measures connected with the water environment, however, with the coastline being a significant asset to Wirral further consideration to Blue-Green Infrastructure should be made.</p> <p>Habitats Regulations Assessment (HRA)</p> <p>There is no statement within the SA scoping report to highlight the required Habitats Regulations Assessment (HRA), there is no further detail explaining that this will be produced and under what timeframe and how information will be included within the SA (Section 16 Next Steps). There should be consistency across the emerging HRA and SA and the documents should inform each other and influence the development of the plan. HRA findings should be reported within the Biodiversity section of the SA and the findings should be used to inform the summary of significance of effect.</p> <p>Monitoring</p> <p>There is no information within the SA scoping report on how monitoring is proposed to be undertaken.</p>	<p>Role of blue-green infrastructure now recognised in the biodiversity objectives. HRA findings will be referenced in the SA Report.</p>

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SCOP049	Natural England	<p>As set out in Planning Practice Guidance, you should monitor the significant environmental effects of implementing the local plan. This should include indicators for monitoring the effects of the plan on biodiversity. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions. Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> <li>• Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.</li> <li>• Percentage of major developments generating overall biodiversity enhancement.</li> <li>• Hectares of biodiversity habitat delivered through strategic site allocations.</li> </ul> <p>Green infrastructure:</p> <ul style="list-style-type: none"> <li>• Percentage of the population having access to a natural greenspace within 400 metres of their home.</li> <li>• Length of greenways constructed.</li> <li>• Hectares of accessible open space per 1000 population.</li> </ul> <p>11. Landscape</p> <p>Due to Wirral's significant expanse of coastline you should further consider the information and evidence available in the National Seascape Character Assessment for England (MMO 1134) and the Marine Character Areas (MCA) see MCA 36: Dee and Mersey Estuaries and Coastal Waters.</p> <p>We would also expect the plan to consider the marine environment and apply an Integrated Coastal Zone Management approach. Where marine plans are in place, local plans should also take these into account, therefore we encourage consistency and join up (where relevant) with the emerging North West Marine Plan.</p> <p>13. Transport</p> <p>Further consideration and linkages to strategic plans should be considered, including Rights of Way Improvement Plans (Liverpool City Region Combined Authority Rights of Way Improvement Plan 2018-2028) should be considered.</p> <p>Further recognition of the England Coastal Path could be made as part of the future baseline. Natural England have a legal duty (under Marine and Coastal Access Act 2009) to secure a long distance national trail around the English coast, these proposals are progressing in your local authority- please see here for further information:  <a href="https://www.gov.uk/government/collections/england-coast-path-birkenhead-to-the-welsh-border">https://www.gov.uk/government/collections/england-coast-path-birkenhead-to-the-welsh-border</a></p> <p>Natural England will provide further detailed advice in due course during further consultations associated with the emerging Local Plan. We would welcome early discussion on the HRA (and SA) and would be happy to offer further advice as policy options are progressed. Please don't hesitate to contact me to discuss engagement opportunities further.</p>	Suggestions will be taken into consideration when monitoring measures are being established.
SCOP050	Natural Resources Wales	<p>Biodiversity</p> <p>We note that a Habitats Regulations Assessment (HRA) will be undertaken by or on behalf of Wirral Council in parallel with the SA of the Local Plan; this must identify and address all potential significant negative effects on the European sites identified in Chapter 3 of the Scoping Report (AECOM, March 2019). NRW would wish to be consulted on the HRA to ensure that protection of the Dee Estuary SSSI/SAC/SPA/Ramsar has been considered.</p> <p>Climate change</p> <p>While we acknowledge that the Environment Agency will likely take the consultation lead on this topic, we wish to raise the following comments (concerns) in terms of the context/baseline and proposed SA framework and site assessment criteria on flood risk.</p> <p>Chapter 4 (context and baseline) of the Scoping Report (AECOM, March 2019) includes some important coastal and fluvial evidence with regards to the coastal SMP2 and its regional context. However, it refers to a strategic flood risk assessment completed in 2009 which predates the National Planning Policy Framework (2012) and technical guidance updates since then on flood risk and is ten years out of date. The information taken from the Preliminary Flood Risk Assessment (PFRA) and Local Flood Risk Management Strategy (LFRMS) in terms of the significant flooding events or strategic areas is insufficient. There is no information provided in terms of the Environment Agency's 97km of flood defences or the key Wirral Waters strategic site referred to in Chapters 4.12 and 9.14 respectively.</p> <p>The key impacts of climate change and flood risk identified in Chapter 4 are not reflected in the SA framework (Appendix A) as significant. There is also no context provided in terms of the 2012 sustainability review and the indicators reviewed as part of previous SA framework and objective SA20 and emerging data from the annual monitoring reports.</p> <p>We consider that the proposed SA framework is weak and does not clearly identify "climate change and flood risk" as a potential significant effect on the environment and the inter-relationships between factors/effects (topics). The site assessment in Appendix B is reflective of the gaps/outdated data identified in the Chapter 4 context and baseline review.</p>	There are two objectives that relate directly to climate change (mitigation and adaptation). This covers flood risk. None of the objectives are identified as more significant than any other. Updated studies will be utilised and referred to at the assessment stage if they are available. We will add additional information about flood defence into the baseline review.
SCOP050	Natural Resources Wales	<p>Landscape</p> <p>Please be aware that the boundary of the Clwydian Range and Dee Valley AONB lies 13km to the south-west of Neston. Planning Policy Wales edition 10 requires the setting of designated landscapes in Wales to be considered within strategic planning and site-specific development management considerations. Should, for example, the Wirral Local Plan be considering the potential for onshore wind development within the county area, then the visual setting of the AONB would be a relevant planning issue.</p> <p>Water</p> <p>The Dee Estuary is a designated Water Framework Directive 'Transitional Waterbody' (GB531106708200). It is currently failing to reach its target status of good ecological status (current status is 'moderate') for determinands such as dissolved inorganic nitrogen and phytoplankton blooms. Therefore, NRW would not want any further development to have a detrimental impact on the estuary's WFD status and water quality.</p> <p>Please note that there is partnership working within the Dee Estuary area e.g. the Tidal Dee Steering Group, which is comprised of organisations with a vested interest in the estuary. The group are currently working on a successful Heritage Lottery Fund bid to deliver the 'Dee Coastliners' project. Many of the project's themes overlap with the objectives set out in the Wirral Local Plan.</p> <p>If you have any queries, or if you require any further information, please do not hesitate to contact us at the above address.</p>	Comments noted.
SCOP051	Local Amenity Society	<p>The Wirral Society would wish to endorse the responses by our umbrella organisation "Wirral Green Space Alliance" (WGSA) and our associate organisation ITPAS.</p> <p>The Wirral Society remains deeply concerned that the Council has merely adopted and not countered the MHCLG's massively inflated and unrealistic housing "need" figures.</p> <p>The housing calculation work done by a local Professor for the local societies using the standard method, indicated a housing "need" a fraction of the number proposed. This is in line with the expected population and job creation with Wirral's population continuing to decline and age. The MHCLG's figures are wildly inaccurate and it is surely the Council's duty to correct them.</p> <p>Re the issue of "sustainability" there are fundamental issues that must be addressed:-</p> <ol style="list-style-type: none"> <li>1. It can only be SUSTAINABLE if development occurs in the existing developed areas, i.e. development of brownfield sites. If these are not all fully used, then you are promoting a form of "slash and burn" development with old developed areas being abandoned and new "green fields" being desecrated.</li> <li>2. For a country that can only produce some 50-60% of its food needs, it is obviously UNSUSTAINABLE to lose any land that is farmed or could be farmed to development. One cannot farm a housing estate, or golf resort.</li> <li>3. The green fields are an active counter to CO2 and global warming. Housing estates create CO2 and have little ability to absorb CO2.</li> </ol>	Comments are not related to the scoping process.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP052	Local Resident	<p><b>Air Quality:</b> It is clear that we need to reduce the air pollution on the Wirral peninsular. These are some ways in which to achieve this. You should concentrate any new and refurbished housing projects in the North East area of the borough, i.e. in Birkenhead, Wallasey, Rock Ferry and New Ferry. Whilst these areas are in desperate need of regeneration housing provision would also serve to reduce travelling times and needs, owing to the location of employment opportunities. Additionally, you should enhance and major on the Wirral waters project with Peel Holdings. For too long now there has been little activity. I find it astonishing that you are allowing this malaise to continue.</p> <p>I would suggest that you need to ensure that brownfield sites are “greened up” during redevelopment, thus ensuring affordable better quality homes are provided. Such areas should include enhanced transport options, examples include cycle paths and public transport featuring electric buses.</p> <p>It is clear that any proposed housing development should not be sited anywhere near the M53 motorway or in fact any busy road junction. The recent report by a local Professor demonstrated that to do so would have a catastrophic result health consequences.</p>	The comments seem to relate more to the actual strategies that will be set by the Local Plan rather than the content and methods set out in the scoping report. Comments are noted and all of the issues highlighted will be explored in the next stages of the appraisal process.
SCOP052	Local Resident	<p><b>Biodiversity:</b> The Council’s short list of Green Belt sites for potential release include many with significant, fragile and irreplaceable biodiversity. The suggestion to release such sites is a reckless and an ill-considered one, which will only serve to endanger identified protected species in ancient woodland, watercourses and foraging fields.</p> <p>I understand that the Council’s own consultants have recommended that “as most of the Green Belt sites listed have highly rated and core biodiversity status, these should be protected”.</p> <p>The UK Government has put increased emphasis on biodiversity net gain. Therefore, as per the report issued earlier this week in Paris by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), this issue can no longer just be paid lip-service to by the Council. It is now abundantly clear that “there must be change when it comes to financial incentives that damage biodiversity”.</p>	
SCOP052	Local Resident	<p><b>Economy and Employment:</b> It is important that the vitality of the borough’s town and local centres are enhanced. Regeneration opportunities on the Wirral peninsular are desperately needed, particularly in the most deprived areas. These areas provide the opportunity to deliver a wide range of suitable and affordable housing opportunities to a wide range of people, including first-time buyers, those wishing to downsize and those requiring a better standard of housing. I believe it is also important to provide accommodation to those with mental and other health conditions where a mixed, balanced, vibrant and caring community can flourish.</p>	
SCOP052	Local Resident	<p><b>Housing:</b> I am aware that the Council has been told by successive Secretaries of State that the figure of 12000 housing units by 2035 is not a target. The most recent letter from James Brokenshire in January 2019 to the outgoing leader of the Labour group, was just the latest example confirming this.</p> <p>It is incomprehensible to me why you should insist on the contrary.</p> <p>You have been asked to make your own assessment based upon actual local and national data. You have been asked to argue the case for local exceptions, ie Green Belt release and have been requested to work with other local councils who could provide a better solution when lower figures are sought.</p> <p>This is clearly the case for Wirral owing to the fact that there are now two specialist reports existing, which involve technical assessment, confirming that actual housing need is very much lower.</p> <p>I understand that the Council have identified numerous brownfield sites on the Wirral peninsular, that more than meet our housing need to 2035. It has been estimated that, along with the Wirral Waters project, these could deliver 18000 units. Consequently, it is clear that all our brownfield sites (and any previously developed Green Belt) must be exhaustively explored and utilised to its maximum potential, before any Green Belt is considered. The Wirral Waters project needs to be enhanced in order to realise its full potential. I am also aware of the Appeal Court Ruling in the Lindblom 2017 case. I don’t believe you can continue to ignore this ruling owing to the fact that currently the unused housing units stock that the Council have is somewhere in the region of 4000-6000 units. These should be brought back into use, as a matter of priority. Failure to do so would be tantamount to the Council ignoring the wishes and more importantly, the needs of its citizens.</p>	
SCOP052	Local Resident	<p><b>Land and Soils:</b> Many of the proposed Green Belt sites identified for release involve farmland where soil quality is of an extremely high agricultural standard. Again, as we saw earlier this week (IPBES Report, Paris 6th May 2019), as a nation, we need to maintain these areas and avoid development on all our valuable farmland. This is of particular importance to the economy of Wirral.</p> <p><b>Population and Communities:</b> North and East Wirral have areas of great deprivation, high crime rates and the worst housing conditions. It is in these areas that we should be focusing our efforts. Failure to do so by Wirral Borough Council will only condemn them, and the inhabitants to further decline in terms of crime rates, employment, health and quality of life.</p>	
SCOP053 SA +EQIA	Local Resident	<p><b>Sustainable Assessment</b></p> <p><b>Air Quality</b></p> <p>2.12 states that there should be encouragement to use low emission technologies and sustainable modes of transport such as walking and cycling. However, in the sustainability report 3.54 it states that population predictions indicate that the older population in Wirral is expected to increase by 30% by 2030 and even larger increases are predicted for the 90+ age group. It’s just not realistic to expect older people to walk and cycle and the report shows that the population will, as a percentage, be much older in the future.</p> <p>5.18 notes that the increases in the built footprint of the Borough may lead to increases in overall emissions if efficiency measures do not keep pace. In theory you can say that you can make people use public transport/ more environmentally efficient ways to travel, but in reality this does not happen. The number of households with more than 1 car (especially in higher priced properties) will ensure that the air quality on the Wirral will deteriorate if housing in the numbers suggested is built. Under point 3.14 in the Equalities Impact Assessment it is pointed out that pregnant women can be more susceptible to experience negative effects associated with development and the built environment. An example given in the report is that pregnant women can be more susceptible to poor air quality which can have a negative impact on birth weight.</p> <p><b>Biodiversity</b></p> <p>3.1 The actual designated sites of importance for biodiversity may be protected, but not enough is being done to highlight the wildlife corridors and the stepping stones that connect them. How have these been located and what has been provided for in the Local Plan to protect them?</p>	The comments seem to relate more to the actual strategies that will be set by the Local Plan rather than the content and methods set out in the scoping report. Issues relating to air quality, employment and housing will all be considered in subsequent stages of appraisal.
SCOP053	Local Resident	<p><b>Economy and Employment</b></p> <p>The report points out that Wirral Waters is intended to eventually deliver 20,000 new jobs. It also says that the Land and Premises Study excludes mixed use opportunities at Wirral Waters which could have the potential to include some B class uses (6.17). Why has this been excluded from the Plan? However, when it comes to housing, the report is even more vague. More information should be obtained from Peel Holdings to include a realistic figure of housing which can be supplied over the life of the Plan.</p> <p>6.22 The LCR growth strategy identifies a number of strategic growth sectors for the region which includes visitor economy. If the Green Belt is built upon as planned, our green and open spaces will no longer be an attraction for visitors from outside the area.</p> <p><b>Health</b></p> <p>7.9 table 7.1 shows that residents in Wirral have worse long term health outcomes than at regional and national levels. Building on our green spaces (such as SP030) which are used by residents for recreational activities, providing exercise and fresh air, will only widen this gap</p>	

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP053	Local Resident	<p>Housing</p> <p>Even WBC consultants drawing up this report have noted that the figures of 803 pa is too high. Contrary to what has been said, we are aware that if a robust case is presented by the Council for reduced figures, and the figures are scrutinised by the Planning Inspector, the housing needs number can be reduced in the Plan.</p> <p>Soil</p> <p>10.14 Says that, "The widespread areas of Grade 3 agricultural land outside the main urban areas of the Borough means that there is potential for future development to affect areas of BMV land" This would potentially give the green light to releasing farming land from the Green Belt and goes against paragraph 170 of the NPPF. Also, at a full council meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." This means that any land which is farmed should be removed from consideration of release from the Green Belt.</p>	
SCOP053 EQIA	Local Resident	<p>Equalities Impact Assessment</p> <p>Population</p> <p>The assessment shows how the population in the Wirral is ageing and slowing down. This provides further evidence that the Housing Assessment figure of 803pa is grossly overestimated. The evidence for this in the report is as follows:-</p> <p>3.6 As shown in Table 3.1, the population of Wirral increased at a lower rate between 2001 and 2011 in comparison to the North West of England and England averages.</p> <p>3.8 There is also a larger proportion of elderly residents aged 60+ within Wirral (25.7%) than in the North West (22.8%) and England (22.3%), as shown in Table 3.2.</p> <p>3.54 Population projections indicate that the older population in Wirral is expected to increase by 30% by 2030. Even larger increases are predicted for the 90+ age group which is predicted to increase by 103% by 2030</p> <p>3.31 The proportion of households requiring 3 or more bedrooms is significantly lower than the proportion of properties let with 3 or more bedrooms. This would suggest that more 'smaller' properties are needed, particularly 1-bed properties, within the affordable housing stock</p> <p>3.57 By 2032, the vast majority of households in Wirral with children in 2032 are expected to have 1 or 2 children. The proportion of households comprising larger families (with 3 or more children) is projected to equate to less than 13% of the total of households with children.</p> <p>Table 3.6 shows that there is not much movement of population into Wirral in comparison to the rest of the UK. 96% of residents born on the Wirral in comparison to 86.2 in the rest of England and 91.8 in the North West.</p>	Comments noted. We would also point out that the EqIA assessment stages have not yet been undertaken. This is baseline report.
SCOP053 EQIA	Local Resident	<p>Health</p> <p>3.14 Pregnant women can be more susceptible to experience negative effects associated with development and the built environment. For example, pregnant women can be more susceptible to poor air quality, which can have a negative impact on birth weight. 5.18 in the Sustainability Appraisal actually says that the increases in the built footprint of the Borough may lead to increases in overall emissions if efficiency measures do not keep pace. In theory you can say that you can make people use public transport/ more environmentally efficient ways to travel, but in reality this does not happen. The number of households with more than 1 car (especially in higher priced properties) will ensure that the air quality on the Wirral will deteriorate if housing in the numbers suggested is built.</p> <p>3.52 For the North West of England in 2015, the biggest population-level risk factor for early death was tobacco smoking, followed by dietary risks (e.g. not eating enough fruit and vegetables or eating too much salt), high blood pressure, high cholesterol and being overweight or obese. Cancer and cardiovascular disease are the biggest contributors of death within Wirral, so reducing the amount of green space (which has a direct correlation to wellbeing) and reducing the quality of air in the Borough will only further exacerbate this.</p> <p>3.56 Estimates suggest that the number of people in Wirral surviving a stroke and heart attack who are left with a longstanding health condition as a result will rise by a third by 2030, with significant implications for health and social care services. Medical evidence shows that exercise and a feeling of wellbeing can reduce this figure. Our green and open spaces are an important factor in helping tackle this upward trend. The actual summary of the Equalities Impact Assessment says that the provision for good quality family accommodation in sustainable locations should be balanced against the need for smaller housing to meet the needs of an ageing population with increasing numbers of single person households. Obviously, if more smaller units are built, there should be less pressure to build on the Green Belt.</p>	Comments noted.
SCOP054	Local Resident	<p>While I recognise that the normal process of, so called, democratic consultation, has now passed on the ever delayed, Wirral Local Plan, I feel compelled to register my concerns about how this essential activity is progressing.</p> <p>The housing needs calculation has proven to be entirely politically derived despite the faux scientific methodology. The fact that the target has been based upon outdated data, by direction of a political party representative, removes it of all scientific integrity.</p> <p>Given that council officers are required to be apolitical, and have a duty of care to the residents of their borough would it not be appropriate to reject this political interference with your role?</p> <p>Clearly the dysfunctional target is only part of the current problems, as even the use of the most recent data would lead to redesignation of greenbelt land according to your calculations.</p> <p>My understanding of the decision process is that existing, developed sites need to be considered for redevelopment, and discounted due to extreme difficulties, before redesignation of greenbelt land can be considered.</p> <p>Once this point has been reached, it appears that the process defaults to the least worst outcome for the greenbelt possibilities, without reference back to the evaluation of the brownfield options.</p> <p>The Sustainability Appraisal Framework objectives are all negatively impacted by the development of greenbelt sites, but can be positively impacted by the use of brownfield sites. Is this being given sufficient weight in the evaluation process?</p>	Some points made are not related to the scoping process or content of the report. Factors such as the impact of brownfield and green belt sites will be explored throughout the appraisal process.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP055	Local Amenity Society	<p>1 Section 4 - Climate Change adaptation</p> <p>We were pleased to see the comments in 4.1 relating to "Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). This is particularly relevant to the Parcel of land identified as SP004A/B which is being considered for release from the Green Belt for future housing development. In the Environment Agency flood map for Saughall Massie, this land is shown as a "high flood risk" which should render it unsuitable for release from the Green Belt. This land should fall into the Sustainability Appraisal's definition of "well planned green infrastructure" as a "proactive strategy to adaptation", point 4 in 4.1, as part of the plan to reduce risks from flooding to local infrastructure.</p> <p>2 Section 8 – Heritage</p> <p>We were pleased to see the emphasis that the Appraisal places on Wirral's Heritage Assets and Conservation Areas – particularly the need for a "positive strategy for the conservation and enjoyment of the historic environment, including those heritage assets that are most at risk", 8.1, point 4. In 8.8 it was noted that the "majority of the Borough's 26 Conservation areas has a management plan" – however, it is disappointing to note that two of the most important CA's in Birkenhead, namely Clifton Park and Hamilton Square, do not. This surely must be an important aim for the Council in the near future. In 8.13, we were pleased to see "the range of historic contexts presents potential for a variety of negative effects from inappropriate development".</p> <p>In 8.18, we were pleased to see the following objective:  "Protect, conserve and enhance heritage assets, including their setting and significance,..." . Once again in relation to Saughall Massie, the possible release of green belt around the village could destroy the reason for the village's CA appraisal which states that :  "Saughall Massie retains its rural character..... Agricultural land and related features are seen throughout the conservation area and are important in distinguishing Saughall Massie from the many suburbanised historic villages in Wirral ... The open fields around the village form an attractive setting for the conservation area and are critical to its continued agricultural use and character.."</p>	Comments noted.
SCOP055	Local Amenity Society	<p>3 Section 9 – Housing</p> <p>We fully support the use of existing brownfield sites which are more likely to be in areas of highest need for affordable housing and we were pleased to see, in 9.16:  "Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality affordable and specialist housing that meets the needs of Wirral's residents ..."</p> <p>4 Section 10 – Land and Soils</p> <p>The fields around Saughall Massie are still farmed with arable and livestock making use of them. We were therefore pleased to see 10.1, point 4:  "..... Planning Policies and decisions should promote an effective use of land ..... making as much use as possible of previously developed or brownfield land."  10.14 states "The widespread areas of Grade 3 agricultural land outside the main urban areas of the Borough means there is potential for future development to affect areas of BMV land ." ..... "Localised survey work .... could help ensure future development is directed away from areas of BMV land."  10.16 states:  "Significant opportunities exist at brownfield sites within the Borough and it is anticipated that these opportunities, particularly those with extant permission, will continue to come forward for development over the plan period."  We would support the 10.18 objective therefore:  10.18 "Promote the efficient and sustainable use of natural resources, including supporting development which avoids the best and most versatile agricultural land and development which makes effective use of previously developed land."  We would hope that these objectives would go some way to protecting the farmland around Saughall Massie as it is in productive and versatile agricultural use.</p>	Comments noted
SCOP055	Local Amenity Society	<p>5 Section 11 – Landscape</p> <p>We were pleased to see 11.1, point 4 b:  "recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services ..... other benefits of the best and most versatile agricultural land and of trees and woodland "  And 11.1, point 5: "The government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open".  We feel that this statement underpins our objections to removing the Green Belt designation of the fields around Saughall Massie Conservation Area as this would only result in urban sprawl and remove the reasons for Saughall Massie's CA designation in 1974.  Our argument is supported in the Baseline section:  11.8 "...much of the Borough is characterised by distinct settlements within a rural landscape, giving the gaps between these smaller settlements a key role in defining the Borough's landscape character."  And 11.9  "Currently, these gaps between settlements are protected by the Green Belt .... is an effective policy tool in maintaining characterful green spaces between the Borough's smaller towns and villages."  We were therefore pleased to see in the Sustainability Appraisal document, 11.15 stating that a key objective should be:  "Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development including the preservation of important open gaps between settlements, mindful of the need to make careful choices about Green Belt release."  Many of these objectives meet the need to keep Saughall Massie CA within its agricultural setting, namely avoiding future flood risk, avoiding merging of settlements, maintaining agricultural land for productive use and keeping the landscape open. We sincerely hope that the Sustainability Appraisal is applied and used to protect Wirral's Green Belt.</p>	Comments noted
SCOP056	Local Resident	Regarding the consultation for the Local Plan. I, and most of Wirral's residents are totally opposed to any building on Green Belt Land, especially when there are Brownfield sites available. Central government has made it clear that their house building target is for guidance only and not binding. Wirral has already got a higher population density than the rest of the UK.	Not related to the scoping process.

Reference Number	Respondent	Comments on SA/EQIA Scoping Report	AECOM Response
SCOP057 EQIA	Local Resident	<p>WIRRAL LOCAL PLAN EQUALITIES IMPACT ASSESSMENT FRAMEWORK</p> <p>With reference to the objectives listed at Appendix A of the Framework, I find nothing to object to. However, although acceptable as broad objectives, the mechanisms for achieving the objectives are unclear and require much more work if the Local Plan is to comply with the Public Sector Equality Duty (s.149 Equality Act 2010).</p> <p>The council must do more than demonstrate that it knows what it ought to do to meet the duty. It must actively address (the legislation uses the word "eliminate") inequalities that have arisen as a result of previous decisions (s149(1)(a)).</p> <p>So, in order for the council to demonstrate that it is meeting the duty, it must address inequalities that have arisen as a result of the council's failure to adopt an up-to-date Local Plan since the Equality Act 2010 came into force.</p> <p>The objective of providing a "mix of good quality, affordable and specialist housing" is a particularly appropriate inequality for the Local Plan to address.</p> <p>The main difficulty in eliminating this inequality is the reluctance of market housing providers to build specialist (Levels 3 and 4 - wheelchair accessible) housing to meet the needs of wheelchair-users. One of the Wirral Plan aims is to allow disabled people to live independently. Having a home that meets one's needs is essential to independent living. So, alternative methods of delivery need to be investigated by the council.</p> <p>There is a community-led housing co-operative in Birkenhead &amp; Tranmere that could be used to help the council to deliver more specialist housing of all types. This organisation is the Birkenhead &amp; Tranmere Community Benefit Society Limited. There are similar organisations working in other geographic areas of Wirral. This is the sort of community-led body that could help to deliver another of the Framework's objectives, namely to "support a diverse and resilient economy" that could include support for "social enterprise, voluntary and community sectors".</p> <p>I consider that the following pieces of work need to be undertaken before interventions are designed to address existing inequalities:</p> <ol style="list-style-type: none"> <li>1) A survey of the equalities impacts of the absence of an up-to-date Local Plan since 2010;</li> <li>2) An assessment of the equalities impacts of reductions in core council funding since 2010;</li> <li>3) Mapping of community and voluntary bodies (dormant and active) that the council could work together with to eliminate identified inequalities;</li> <li>4) Consideration of how eliminating identified inequalities could be addressed by the Wirral Growth Company setting up a community bond scheme or other financial mechanisms to fund projects and the development of community and voluntary organisations, especially those run by and for disabled people and others with a protected characteristic.</li> </ol>	Such factors will be explored in the EqIA process as the plan-making process progresses.
SCOP058	Local Resident	<p>Point 10.14 in the Sustainability Appraisal says that, "The widespread areas of Grade 3 agricultural land outside the main urban areas of the Borough means that there is potential for future development to affect areas of BMV land" This would potentially give the green light to releasing farming land from the Green Belt and goes against paragraph 170 of the NPPF. Also, at a full council meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." This means that any land which is farmed should be removed from consideration of release from the Green Belt.</p>	The Scoping Report does not state that agricultural land 'should' be built upon. It identifies the potential for such loss as a key issue that needs to be addressed.
SCOP059	Landowner/Developer	<p>1. INTRODUCTION</p> <p>1.1 We have been instructed to prepare a response to the consultation that Wirral Council formally began on the 25th March which runs until the 8th May. This consultation outlines the scope of the Wirral Local Plan Sustainability Appraisal and Equalities Impact Assessment, which has been prepared by AECOM on the Council's behalf.</p> <p>1.2 We welcome Wirral Council's decision to consult on the Scoping Assessment and trust our comments will be fully considered as part of the SA process going forward. Indeed, it is noted that the results of this consultation are to help steer the Sustainability Appraisal to be legally conducted as part of the Local Development Plan process as required by Section 19 of the Planning and Compulsory Purchase Act 2004.</p> <p>1.3 The emerging Wirral Local Plan will form the spatial strategy outlining the locations for new housing and economic growth to the end of the plan period in 2035. We also note that the final Sustainability Appraisal will be released in tandem with the Draft Local Plan, will be open for further consultation and that the overall process is an iterative one that will evolve overtime. However, it is critical that the Scoping Assessment for the SA demonstrates that all relevant baseline information is being considered at this early stage in order to ensure that as part of preparing the Local Plan, all relevant and reasonable considerations are at the forefront of the Council's decision making process. Indeed, the SA should ultimately contribute towards and influence the decision making process.</p> <p>1.4 Whilst a SA requires the inclusion of a Strategic Environmental Assessment to ensure environmental effects are given full consideration, this must also sit alongside with equally important economic and social considerations and impacts. Indeed, a Sustainability Appraisal is primarily tasked with assessing the delivery of 'Sustainable Development' and the associated impacts of doing so, together with assessing 'reasonable alternatives'. Sustainable Development within England is defined by National Planning Policy but very few of the considerations set out within the NPPF are laid out in this Scoping Report for the Sustainability Assessment.</p>	The scoping report is not only geared towards an SEA process and this is clear from the introductory chapter. Some of the factors listed below go beyond the requirements of the scoping stage and will be addressed as the SA process progresses.
SCOP059	Landowner/Developer	<p>1.5 The consultation document considers the baseline position for a range of individual topics to help form the scoping requirements for the Sustainability Appraisal. There are 14 chapters which have been determined as the key themes most relevant to the development of the emerging Local Plan by AECOM. These include:</p> <ul style="list-style-type: none"> <li>Air Quality;</li> <li>Biodiversity;</li> <li>Climate Change Adaptation;</li> <li>Climate Change Mitigation;</li> <li>Economy and Employment; (To be discussed in the economic statement)</li> <li>Health;</li> <li>Heritage;</li> <li>Housing;</li> <li>Land and Soils;</li> <li>Landscape;</li> <li>Population and Communities;</li> <li>Transport;</li> <li>Water Resources; and</li> <li>Water Quality.</li> </ul> <p>1.6 As noted above, the scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The above list is very much focused on environmental considerations that make up 8/9 of the topics and associated objectives.</p> <p>Our representation largely focuses on the fact that the Scoping Report prepared by AECOM principally reflects the scoping assessment for a Strategic Environmental Assessment (SEA) rather than a Sustainability Assessment (SA). As such, we do not consider it to be a complete, robust or sufficiently rounded document to truly examine the options for delivering Sustainable Development as defined by National Planning Policy and Guidance.</p>	

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SCOP059	Landowner/Developer	<p>1.7 Our principal recommendation is that the Scoping Assessment and subsequent objectives are set out under the following three objectives as defined by paragraph 8 of the NPPF. an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	
SCOP059	Landowner/Developer	<p>2. SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT</p> <p>2.1 The preparation of all Local Plans within the UK must comply with EU Law and Acts relevant to the associated countries within the UK. In short, EU law calls for SEA’s to be carried out and UK Acts, policies and guidance require a SA to be carried out. Ultimately, it is considered best practice to incorporate requirements of the SEA Directive into a Sustainability Appraisal which must ensure that the potential environmental effects are given full consideration alongside social and economic issues. Indeed, the SA incorporates the requirements of SEA.</p> <p>The SEA European Directive</p> <p>2.2 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication ‘A Practical Guide to the Strategic Environmental Assessment Directive’ (ODPM 2005) and the NPPG also provides further guidance on the matter.</p> <p>2.3 The aim of the Directive is to ‘to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.’</p> <p>2.4 This Directive applies to a plan or programme related solely to England (or part of England) and any other part of the United Kingdom. The Directive therefore applies to the preparation of the emerging Wirral Local Plan and applies specific requirements that must be complied with and incorporated as an integral part of the sustainability appraisal process.</p> <p>Strategic Environmental Assessment Regulations requirements checklist</p> <p>2.5 Regulation 12 – Preparation of an environmental report that ‘identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>2.6 This report should include the relevant information referred to in schedule 2 of the directive as required taking in to account ‘current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3))’.</p>	
SCOP059	Landowner/Developer	<p>2.7 When deciding on the scope and detail of the information which should be included as part of the environmental report the consultation bodies being Natural England, Historic England and Environment Agency should be consulted. This is at the earliest stage of the preparation process and includes the following requirements:</p> <ul style="list-style-type: none"> <li>• It should form an outline of the contents;</li> <li>• main objectives of the plan and its relationship with other plans or programmes;</li> <li>• It should provide a baseline state of the environment which is as existing before the implementation of the plan;</li> <li>• It should include the environmental characteristics of the areas likely to be significantly affected by the plan over its period;</li> <li>• It must outline any existing environmental problems which are relevant to the plan including areas of particular environmental importance pursuant to Directives 2009/147/EC and 92/43/EEC (Habitats Directive);</li> <li>• It should include environmental protection objectives established at international, national or community level which are relevant to the plan and the way those objectives have been taken in to consideration throughout the preparation of the plan;</li> <li>• The following issues should be looked at as an overall effect on the environment: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors;</li> <li>• Measures should outlined which will be envisaged to prevent, reduce or offset any significant adverse effects on the environment from implementing the plan;</li> <li>• It should provide an outline the reasoning for selecting the alternatives that were dealt with outlining how the assessments were undertaken;</li> <li>• It should look at how it is going to monitor the impacts in accordance with regulation 17 of the Directive; and</li> <li>• It should provide a non-technical summary of the information provided under all of the above headings and topics.</li> </ul> <p>2.8 The above process is very much focused on identifying the key environmental considerations within an area and it is a process that must be carried out. Indeed, we consider the AECOM document prepared is very much focused on the above process. However, it is critical to note at this stage that the European Directive does not define ‘Sustainable Development’ in the context of preparing a Local Plan under UK legislation. Indeed, it is for each member state to define ‘Sustainable Development’ in this regard and it is the SA’s role to consider the implications of Sustainable Development policies in the round. Simply adhering to SEA legislation and the EU Directive is therefore not enough in itself to assess the impacts of a Local Plan and its associated policies.</p>	
SCOP059	Landowner/Developer	<p>Planning Acts, National Policies and UK Guidance</p> <p>Planning Acts</p> <p>2.9 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. The 2008 Planning Act amended the requirement to undertake a Sustainability Appraisal for Development Plan Documents (DPDs) but did not remove the requirement to produce a Strategic Environmental Assessment. Moreover, Section 19(5) of the Planning and Compulsory Purchase Act 2004 (as amended) maintains that:</p> <p>‘The local planning authority must also –</p> <p>(a) Carry out an appraisal of the sustainability of the proposals in each development plan document;</p> <p>(b) Prepare a report of the findings of the appraisal.’</p> <p>2.10 Section 19(A) was introduced to the 2004 Act as part of the 2008 Act/amendments and stipulates that: ‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.’</p> <p>2.11 This ensures that environmental impacts are still at the forefront of the overall process. However, it is still critical to note that Section 39(2) of the 2004 Act (as amended) states that ‘the person or body must exercise the function with the objective of contributing to the achievement of sustainable development.’ Furthermore, Section 39(3) confirms that for the purposes of achieving sub-section 2, ‘the person or body must have regard to national policies and advice contained in guidance issued by the Secretary of State...’</p>	



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SCOP059	Landowner/Developer	<p>National Policy and Guidance</p> <p>2.12 National planning policy guidance confirms the following: ‘A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.’</p> <p>2.13 Sustainable development is defined in the NPPF (2019) and is the principle by which the SA should be prepared against. Paragraph 8 of the NPPF states: ‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <ol style="list-style-type: none"> <li>an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</li> <li>a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</li> <li>an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’</li> </ol> <p>2.14 Critically, any SA process has to be judged against reasonable alternatives to ensure that the Local Plan is the most appropriate to achieve sustainable development. The whole process should identify ways the Local Plan can contribute to improvements in economic, social and environmental conditions as well as mitigating any potential adverse effects that the plan may cause. This will ensure that the plan is the most appropriate against the reasonable alternatives and can be used to test the evidence underpinning the plan and is important in demonstrating how the tests of soundness have been met.</p>	
SCOP059	Landowner/Developer	<p>2.15 The NPPG goes on to set out a 5 step process for the preparation of a SA as follows:</p> <ul style="list-style-type: none"> <li>• Stage A – Setting the context and objectives, establishing baselines and deciding on the scope: <ol style="list-style-type: none"> <li>1) Identification of other relevant policies, plans and sustainability objectives</li> <li>2) Pooling baseline information</li> <li>3) Identification of sustainability issues and problems</li> <li>4) Develop a sustainability appraisal framework</li> <li>5) Consultation of the relevant bodies</li> </ol> </li> <li>• Stage B – Developing and refining alternatives and assessing effects: <ol style="list-style-type: none"> <li>1) Test local plan objectives against sustainability appraisal framework</li> <li>2) Develop Local Plan options including reasonable alternatives</li> <li>3) Evaluate likely effects of Local Plan and alternatives</li> <li>4) Consider ways of mitigating adverse effects and maximising beneficial effects</li> <li>5) Propose measures to monitor significant effects of implementing the Local Plan</li> </ol> </li> <li>• Stage C – Prepare Sustainability Appraisal report</li> <li>• Stage D – Seek representations on sustainability appraisal report from consultation bodies and the public</li> <li>• Stage E – Post adoption reporting and monitoring</li> </ul> <p>2.16 The Scoping Stage (stage 1) is relevant to the current consultation document. It should identify the level of detail and the relevance of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and sustainability objectives.</p>	
SCOP059	Landowner/Developer	<p>3. SCOPING REPORT FOR THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL</p> <p>Defining the Purpose and Scope of the Scoping Report</p> <p>3.2 Section 2 of this report has outlined the requirements of a scoping report for a Local Plan Sustainability Appraisal whilst also outlining the process as a whole. This helps to provide clarity behind what the Council has completed as a part of this consultation.</p> <p>3.3 Based on the title of the Council’s document, the current consultation process is seemingly associated with Stage 1 of the Sustainability Appraisal development process. As recommended by the NPPG this stage/Scoping Report should therefore include the following information:</p> <ol style="list-style-type: none"> <li>1. Identification of other relevant policies, plans and sustainability objectives</li> <li>2. Pooling baseline information</li> <li>3. Identification of sustainability issues and problems</li> <li>4. Develop a sustainability appraisal framework</li> <li>5. Consultation of the relevant bodies</li> </ol> <p>3.4 However, within the introduction of the Scoping Report, it is not made clear that this is the process that is being undertaken. The background details provided to the Sustainability Appraisal process is minimal. It should clearly define and outline what information is required at each stage and its relationship with the SEA process.</p> <p>3.5 When assessing the information that should be provided as part of stage 1 it is evident that there are 2 sections missing from this scoping report, these being point 3 and 4 in paragraph 3.2. This report has not successfully identified the sustainability issues and problems which should be carried on for further investigation and the way in which the sustainability issues are connected with one another.</p> <p>3.6 Instead of providing this detail the scoping report is far more focussed on the requirements of the SEA Regulations which, as previously explained, form a part of the SA however they focus only on the environmental assessment. The scoping appraisal incorporates the requirements for a SEA scoping report, we feel therefore clarification should be provided as part of the introduction as to the purpose of this scoping report produced for the Wirral Local Plan.</p> <p>3.7 The economic and social principles have not been considered in enough detail to be suitable as a scoping appraisal for a SA. We therefore consider that this document has been titled incorrectly and although it would assist with the development of a SA through the SEA regulations it doesn’t itself form scoping for a sustainability appraisal.</p>	

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SCOP059	Landowner/Developer	<p>3.8 Notably Paragraph 1.7 of the Scoping Report states that it is concerned with item 1 of paragraph 1.6, which states:  ‘SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004. Two key procedural requirements of the SEA regulations are that:  6) When deciding on ‘the scope and level of detail of the information’ which must be included within the key output report – namely the report published for consultation alongside the draft plan – there is a consultation with certain nationally designated authorities, namely the Environment Agency, Historic England and Natural England.’</p> <p>3.9 This seems indicates that the Council’s SA Scoping Report was prepared for the purpose of scoping a SEA. However, it is not abundantly clear at this point in the document. Moreover, we note that paragraphs 16.1 and 16.2 of the Scoping Report confirms that this document does relate to Stage A of the SA Scoping Report stage as set out in NPPG and that the next stage will look at reasonable alternatives under NPPG Stage B. The Scoping report goes on further to discuss 14 separate chapter topics, all of which would be expected within a SEA scoping report as outlined by the SEA Regulation requirement checklist.</p> <p>3.10 Ultimately, the purpose of the report should be clarified both within the title of the report but also in the introductory text. We consider that the document should either be renamed ‘Scoping Report for the Wirral Local Plan Strategic Environmental Assessment’ or it should be restructured to address the requirements set out at the beginning of this section as defined by the NPPG.</p> <p>3.11 With regard to the latter option, we consider the following should be included as an absolute minimum:</p> <ul style="list-style-type: none"> <li>• More detailed background on the purpose of the SA and its involvement in the Local Plan process</li> <li>• Outline the role of sustainable development in the process including definition and national policy position and in the context of Wirral highlighting the key issues and difficulties the Council have faced in terms of delivering sustainable development to date;</li> <li>• Discuss the synergies between environmental, economic and social topics and how they lead to sustainable development at the national and local level.</li> <li>• Clearly set out a sustainability framework based on the three principal arms of Sustainable Development (i.e. economic, social and environmental considerations) rather than the 14 separate topics currently set out in Appendix A.</li> </ul>	
SCOP059	Landowner/Developer	<p>3.12 We also consider that it would be prudent to set out key considerations that will impact on the assessment of ‘reasonable alternatives’ for the Local Plan. Whilst the NPPG assigns this task to Stage B of the process, Wirral in particular is faced with some critical decisions going forward in terms of ensuring economic regeneration, the delivery of sufficient homes and helping to mitigate climate change.</p> <p>3.13 We consider this approach should include growth strategies such as low – high economic development and similar with new housing figures. Links need to be made between these two strategies, how they connect with each other and also how they may impact the environment either positively or negatively. – Although this isn’t required until stage 2 of the process it will help determine the effects of the Local Plan from an early stage thus potentially providing more opportunities for avoidance/ mitigation</p> <p>3.14 Indeed, it must be noted that Wirral has not had a Local Plan in place for a considerable period of time (since 2001). This will have ultimately placed additional burden on surrounding Local Planning Authority areas simply due to the fact that Wirral will not have meet all of its own development needs. Such inaction could have conceivably led to higher out migration patterns, longer commuting patterns and therefore an increase in the use of the private car. By proxy, this could have led to the development of land in surrounding areas that was not as suitable for meeting needs. Such trends could continue if Wirral does not act now and it is telling that at remains one of very few Local Planning Authorities that is still being monitored by the Secretary of State in terms of its Local Plan production.</p>	Such issues will be explored and dealt with in subsequent stages of the SA process. It is not necessary to set these factors out in the scoping report, and not practical at this stage given that alternatives are still being explored.
SCOP059	Landowner/Developer	<p>4. KEY TOPICS AND SUSTAINABILITY OBJECTIVES</p> <p>4.1 At present, the Council’s proposed Sustainability Framework and Objectives are set out in Appendix A of the Scoping Report and follow the associated Chapters of the report (as we have set out in Section 1).</p> <p>4.2 With regard to the Sustainability Objectives, 2 are set for Air Quality, 2 for Bio-diversity, 1 for Climate Change Adaption, 1 for Climate Change Mitigation, 1 for Heritage, 1 for Land and Soils, 1 for Landscape, and 1 for Water. As such, 10 objectives are set in relation to environmental considerations. The remaining are 2 objectives for the Economy and Employment, 1 objective in relation to Health, 1 for Housing, 2 for Population and Communities and 1 for Transport. As such, only 7 sustainability objectives are spread across economic and social objectives.</p> <p>4.3 As previously noted, we consider the SA Scoping Report should be tailored and structured in accordance with the three arms of Sustainable Development as defined by paragraph 8 of the NPPF (i.e. economic, social and environmental considerations). Moreover, these considerations should then influence the Sustainability Framework and Objectives.</p> <p>4.4 Even if our principal suggestion is not endorsed by the Local Planning Authority, at the very least, we consider that the Council’s list of SA objectives should be more evenly balanced so there is a more equitable distribution across the three arms of Sustainable Development. This could be achieved by compiling some of the environmental impacts into fewer objectives or increasing the number of objectives under economic and social considerations. For instance, a more encompassing environmental objective could be ‘To promote the sustainable and prudent use of natural resources including Air Quality, Land and Soil and Protected Landscapes by minimising the use and impacts on such resources’. Such an approach would be justified on the basis that the Council’s own scoping report confirms the following: There are no Air Quality management Areas within Wirral and recent trends indicate key pollutant levels are decreasing (suggesting this is not a major issue for the Borough) Most land is within Agricultural Grades 3 or below within the Borough and there is very little minerals related activity (suggesting Wirral is not renowned for major food or mineral production) No AONBs or National Parks are located within Wirral (suggesting the landscape and open countryside is not regarded as the most valuable or scenic).</p> <p>4.5 The above approach could also arguably be applied to Bio-diversity and Water Resources. However, we note that the baseline position in Wirral in this regard is more sensitive and therefore, we can also see the value of separate objectives for these issues.</p>	It is considered that the SA Framework considers a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors. It should also be remembered that the legislation is founded in the SEA process, which focuses more strongly on environmental factors. The reasonable alternatives will consider a range of growth and distribution options, including assumptions about the contribution that is made by Wirral Waters.
SCOP059	Landowner/Developer	<p>Environmental</p> <p>4.7 As part of this scoping appraisal a lot of focus has been provided on the current and potential environmental constraints, this is evident by the number of chapters which have an environmental focus and the few that involve the social and economic impacts. The importance of the environment on sustainable development cannot be underestimated however this scoping appraisal forms more of an appraisal for a SEA rather than SA.</p> <p>4.8 Within this appraisal there is some contradiction around the location for new development. The environmental chapters are clear in promoting the re-use of previously developed land which, as evident in the housing chapters, is mostly located in the eastern parts of the Wirral, specifically Birkenhead. It is these areas that have also been identified as having significant flooding issues, the example of a large proportion of Wirral Waters being located in flood zone 3 is a prime example.</p> <p>4.9 Furthermore, the location of Ramsar sites along the River Mersey and the highlighted importance of green infrastructure in these areas seem to suggest that development of these areas are more appropriate to other uses rather than housing or industry.</p> <p>4.10 Air quality has been depicted as being a more problematic issue in eastern parts of the Wirral which again signals the need to reduce traffic congestion to these areas and locating new development here will have significant impact on people’s health and the connectivity to recreational opportunities.</p> <p>4.11 Paragraph 4.3 of the climate change adaptation chapter specifically mentions the need to roll back development in coastal areas to avoid damage from flooding or coastal erosion. This has been set out in the Flood and Water Management Act (2010) and should provide a strategic consideration for new development which would therefore exclude large sections of previously developed land in the eastern side of the Wirral. Expectedly the flood risk decreases as you move further inland which provides more opportunities for new development.</p> <p>4.12 The land and soils chapter show a desire to re-use previously developed land for development purposes however, it has already been made clear that the housing allocation for the Wirral cannot be supplied through brownfield sites alone and although touched upon briefly in 10.14 the potential to release land which is not Best and Most Versatile should be considered in more detail.</p>	

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SCOP059	Landowner/Developer	<p>Economic and Social</p> <p>4.13 Economic stability and prosperity and social well-being is inevitably closely tied particularly in an area such as the Wirral. As such, we could see merit in these two arms being grouped together.</p> <p>4.14 Under the social arm of Sustainable Development, we would expect to see objectives tied to the following:</p> <ul style="list-style-type: none"> <li>i. The delivery of high standards of education and the mitigation against unsustainable class room sizes.</li> <li>ii. The improvement of physical and mental health and well-being including the delivery of necessary health care infrastructure (including amenity space and green infrastructure) community facilities and opportunities to tackle loneliness</li> <li>iii. The promotion of development and policies that tackle deprivation and support social mobility including access to increased levels of education, housing, healthcare and employment opportunities.</li> <li>iv. Delivery of enough affordable housing and homes suitable for first time buyers in a range of locations across the Borough to meet the needs of individual communities.</li> <li>v. Delivery of enough specialist care related homes in a range of locations to meet the needs of an aging population.</li> <li>vi. Reduce crime rates and the fear of crime through well planned developments and regeneration policies.</li> </ul> <p>4.15 One key topic that appears to be missing within the Sustainability Framework relates to 'Social Mobility' which is a key issue in Wirral where social divides in terms of wealth and opportunities are very apparent. There are evidently areas within Wirral where poor levels of investment, employment, education and housing quality come together to generate high areas of deprivation.</p> <p>4.16 Conversely, there are areas of high wealth, shrink wrapped by Green Belt where development opportunities are been curtailed for a prolonged period (due to the lack of an up to date local plan), which have undoubtedly contributed to rising house prices, rents and loss of employment land, which will have inevitably curtailed social mobility in past years.</p>	
SCOP059	Landowner/Developer	<p>4.17 With regard to Housing, we would expect to see outputs and objectives for the delivery of housing development contributing to economic and social objectives (including health and well-being). At the very least, the housing objective must ensure the timely delivery of the minimum number of homes as well as an appropriate mix and distribution to meet the needs of a range of groups within the Borough. At present, the objective focuses on mix when the amount and distribution of housing delivered will clearly have an impact on economic, social and environmental considerations.</p> <p>4.18 As noted above, under the social heading, a specific objective should relate to 'Support the timely delivery of sufficient affordable housing to meet the needs across the Borough for those unable to access the standard housing market.' Another housing linked objective could also relate to the delivery of aspirational housing to promote social mobility, retain or see an increase wealth, expenditure and tax revenues; new homes that could accommodate first time buyers, growing families etc.</p> <p>4.19 Due to the rising demographic of an elderly population, it would also be prudent to have a social objective that specifically looked to 'Support the timely delivery of specialist residential care accommodation through the delivery of care homes, extra care development and housing schemes that would accommodate those looking to downsize or obtain an alternative type of property to meet their specific needs'.</p> <p>4.20 The benefit of including more distinct objectives associated with the different types and form of housing would assist in the SA considering a wider range of social and economic objectives when looking at alternative potential sites. Indeed, we note that in Appendix B of the Scoping Report, the following is stated in relation to housing 'Spatial data unlikely to be available. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could potentially be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at large sites).'</p> <p>4.21 Whilst we do not disagree with the above statement, it is probably fair to say that many larger sites will have the ability to deliver a wider range of homes including affordable accommodation, elderly accommodation, etc. Alternatively, some sites might be more suitable in terms of attracting first time buyers and others will be better suited for meet the needs of a growing elderly population or for executive homes. Scoring a site against different housing / SA objectives should assist in helping to deliver a broad mix of sites that would ultimately assist in meeting the wide-ranging housing needs within the Borough.</p>	
SCOP059	Landowner/Developer	<p>4.22 One of the key issues facing Wirral over the past decade has related to the 'timely delivery of new homes'. To date, much emphasis has been placed on the capacity and deliverability of Wirral Waters. Whilst this scheme will deliver many benefits, its lack of delivery (coupled with the distinct lack of any plan led alternative solutions for housing delivery and social infrastructure to attract new homeowners and create a community) will have contributed to negative social and economic impacts within Wirral and possibly further afield. Moreover, Wirral Waters alone will not meet many of the distinct housing needs within the Borough and must only be regarded as part of the solution.</p> <p>4.23 Indeed, large problems with the redevelopment of previously developed sites is the viability and deliverability of the scheme especially in areas which do not retain high market values which is a problem for some eastern parts of the Wirral as explained in the population chapter, and risk undermining the ability to bring forward affordable housing and other required social infrastructure to make a development acceptable. The slow development of Wirral Waters is a good example of the difficulties in providing a valuable return on development in areas such as Birkenhead. This will impact the ability to achieve the housing targets as laid out by the 2014 OAHN which will require 803 dpa as confirmed by the Secretary of State's letter to Wirral Council dated 28th January 2019.</p> <p>4.24 The number of completions over the previous 5 years is just over half this rate as there has been a focus on the redevelopment of brownfield land where between 83 and 92% of all new developments have been located. Chapter 67 of the NPPF states planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It is of great importance that economic viability of the previously developed sites is analysed and considered as part of any future allocations or strategic policies and further investigation of market rates need to be incorporated in to the sustainability appraisal. Furthermore, in line with para 11 the relevant policies to housing will be considered out of date if housing delivery is less than 75% of the housing requirement over the previous three years. Based on the current supply which has focussed the majority of developments on to brownfield land then Wirral would not be able to keep up with their housing requirement putting their planning policies into jeopardy. Therefore, there needs to be a major consideration as part of the SA as to how housing delivery can speed up. Clearly, larger Green Belt sites of a critical mass, with economies of scale suffer limited viability risks and thus can be delivered on time whilst still meet its responsibilities to deliver social infrastructure etc.</p>	
SCOP059	Landowner/Developer	<p>4.25 Consistently through the scoping report there is a focus on the Wirral Waters scheme which has been proposed for Birkenhead docks. Understandably, this is an important part of the Wirral Emerging Plan because of its redevelopment potential, however there is consistently differing information being released from the scheme and it is widely understood that it is not going to be completed by the end of the Local Plan period. The focus of the SA therefore needs to assess the potential of the Wirral as a whole. There is very little strategic guidance provided in the SA appraisal as all future baselines focus on the 'potential' of Wirral Waters. This has the impact of losing sight of the potential of other areas in the Wirral to provide sustainable development for new housing and employment allocations along with significant environmental improvements. It is expected that Wirral Waters will only be able to provide between 2900 and 6450 homes under the local plan period with completion anticipated to be beyond 2040.</p> <p>4.26 It is standard practice for the SA to assist in the comparison of all reasonable alternative site options being considered by the Local Planning Authority in order to identify the most sustainable options for inclusion in the Local Plan. Approximately 50 Green Belt sites have been put forward for release as part of the development options review. These have not been discussed in the scoping appraisal, yet Green belt release represents the only realistic alternative planning strategy if housing needs are to be met within the Borough. A scoring matrix will need to be created and used to help define which of these sites are sustainable for release, this is something that has been partially provided under previous consultations and this will need to form a large part of the SA.</p> <p>4.27 The focus on the Wirral Waters scheme has led to there being little strategic guidance of where new housing development should be located elsewhere in the Borough and besides sections in the transport chapter there is very little discussion as to how sustainability will be determined for new housing and employment allocations. Further work on the wider economic impact of Wirral Waters and other strategic sites needs to be provided and linked to employment and education opportunities. Further economic analysis has been provided in our economic statement.</p> <p>4.28 The SA should assess all of the topic chapters to provide suitable strategic guidance as to where new housing should be located. This scoping report fails to do this, it is only within the transport chapter where there is a strategic analysis of new growth opportunities where it indicates that growth potential could be located within the M53 and A41 corridor along with the Merseyrail Chester/ Ellesmere Port line. There needs to be further assessment on this principle and the assessment needs to cover the whole of the Wirral.</p>	

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SCOP059	Landowner/Developer	<p>4.29 The potential for new development of housing on greenfield areas is not principally discussed in the Housing chapter and only becomes a topic for discussion when assessing the best and most versatile land in the borough. Moreover, there needs to be a greater assessment of where development will be considered sustainable besides on PDL which is constrained.</p> <p>4.30 The SA should incorporate issues surrounding education as a separate chapter as this has large implications for social and economic factors in the area. We also consider that deprivation should also be considered separately. All of these principles have been pooled under populations however there needs to be a further analysis of each topic separately.</p> <p>4.31 Under the economic arm, we consider the Council's Sustainability Objectives are too narrow and many of the above comments could also apply. In addition, we would expect to see objective that support the following principles:</p> <ul style="list-style-type: none"> <li>i. The delivery of a sufficient number of homes to support planned or forecast jobs growth and objectively assessed needs to help support the construction industry and the wider economy;</li> <li>ii. The delivery of sufficient land and support of development that for town centre uses including retail, leisure, offices and other related uses;</li> <li>iii. The delivery of sufficient land to meet general industry, warehousing and other industries to support economic growth and social mobility;</li> <li>iv. The support of policies and delivery of land that would support the rural economy including agriculture, outdoor recreational economy, housing for villages, and uses that would make a village more sustainable or contribute to sustainable rural diversification.</li> </ul> <p>4.32 The intuition and rationale for splitting up the different types of economic development considerations is that each have very different locational requirements. As such, the above split would assist in ensuring that a suitable range and mix of employment land is identified.</p>	
SCOP059	Landowner/Developer	<p>4.33 In terms of further more detailed points/topics, we would like to highlight the following issues:</p> <ul style="list-style-type: none"> <li>i. Under the Population and Communities topic, Figure 12.2 maps the location of key services, town centres and district centres and other facilities. However, it fails to pick up on a number of smaller local and neighbourhood centres that should be formally identified. Indeed, these centres also provide important day to day services that contribute to community cohesion, health and well-being and sustainable travel patterns as they allow for the delivery of 'walkable neighbourhoods' and provide services where communities can meet and shop. Accordingly, they have a role to play and should be identified regardless of whether they are formally identified in the adopted Local Plan or not. By way of an example, there are two local/neighbourhood centres within Greasby that are not identified on the plan provided. We are also aware of others in West Kirby and elsewhere.</li> <li>ii. Under the Transport topic, we consider Figure 13.3 should also map key town, district, local and neighbourhood centres so as to better illustrate areas that can be regarded as delivering walkable neighbourhoods. We also consider that it would be prudent to include routes where planned transport investment is targeted. For instance, we note that Saughall Massie Road in the Wirral UDP is identified for upgrading and whilst part of this investment has taken place, there remains a section up to West Kirby that has yet to be implemented. If undertaken, this could facilitate or alter the direction of existing bus routes and extend the cycle path network from Greasby to West Kirby.</li> </ul>	
SCOP059	Landowner/Developer	<p>5. CONCLUSIONS</p> <p>5.1 The consultation response has been commenting on the Scoping for the Sustainability Appraisal produced by Aecom on behalf of Wirral Council.</p> <p>5.2 The scoping report does not fulfil the requirements for a Sustainability Appraisal (SA) required as part of a Local Plan submission under UK Law, policy and guidance. Instead, it is more geared towards a scoping report for a Strategic Environmental Assessment (SEA) appraisal, which forms a part of the SA process but should not be confused with the requirements of a SA as dictated by national planning policy and guidance.</p> <p>5.3 Indeed, the SA should inform and guide the principles and definition of what constitutes Sustainable Development, as defined within the UK and England. In order to do this, direct reference must be made to the NPPF and NPPG. Clarity needs to be provided as to the purpose of the Sustainability Appraisal as this report has not successfully identified the sustainability issues, nor has it established any synergies between environmental, economic and social topics which make up the purpose of sustainable development as outlined in the NPPF.</p> <p>5.4 The SA needs to be conducted to incorporate all three arms of sustainable development being; environmental, social and economic. There is currently an imbalance between these topics with a particular focus on the environment and minimal discussion on the economic and social objectives and the ramifications in terms of assessing reasonable alternative development scenarios. Whilst the consideration of reasonable alternatives will form part of the next stage of the SA, it is considered prudent to provide an indication as to what these alternatives might be at the earliest opportunity.</p>	
SCOP059	Landowner/Developer	<p>5.5 We therefore consider the following focus recommendations are taken in to account as part of the SA:</p> <ul style="list-style-type: none"> <li>• Remove contradictions in the environmental objectives whilst providing synergies with both economic and social objectives;</li> <li>• Provide assessment of economic and social topics to including education, mental health and wellbeing, affordable housing and specialist care homes, crime and social mobility which itself is one of the key issues in the Wirral;</li> <li>• Focus on the viability and deliverability of new housing and employment land across the Borough following the consistent undersupply over the previous years;</li> <li>• Add existing local centres to the baseline data for Population and Communities and Transport so as to ensure all local services are identified as this will rightly influence the sustainability credentials of certain settlements and sites.</li> <li>• Add planned infrastructure and policies for road improvements, which could influence bus routes and cycle route provision, as well as increase road capacity in certain locations.</li> <li>• Provide housing and sustainable assessments on the whole of the Wirral and reduce the focus on Wirral Waters which will only supply a small proportion of the sustainable objectives; and</li> <li>• Provide reasonable alternatives and assess them against the sustainability criteria through the preparation of a sustainability matrix.</li> </ul> <p>5.6 A greater focus on the 3 principles of sustainable development to include a wider range of topics will assist in providing a more robust scoping report which will form a major part of the SA and Local Plan development process.</p>	
SCOP060	Local Amenity Society	<p>IMPACT ASSESSMENT</p> <p>Thank you for your letter of March 25 regarding the above</p> <p>The document has been studied with interest. We are highlighting our concerns, mainly about heritage, housing and green spaces.</p> <p>The writher of this letter spent over 14 years working on the predecessors of the current Local Historic Environment record at Liverpool Museum. At the request of the 5 Local Councils, who each part funded the scheme, documentary sources (published &amp; unpublished) and Field Observations were carried out and the results forwarded to the 5 Councils, as appropriate to each one, so as to provide the essential information for their planning policies. Not only were the printed detail sent but also the all-important "Hazard Maps"; 8 figure OS references were included. A member of the team, I was a research assistant. We recommended several Conservation Areas, Scheduled Ancient Monuments, and what has become Heritage Assets. Museum Staff carried out Desk Based Assessments and Excavations where necessary. All sites covered a wide range, collectively – from Mesolithic period, through to Warehouses, Glass Works and all kinds of other sites – with updates.</p> <p>As a Society, of which I have been a member since 1957, we have a number of concerns about our own area.</p>	General comments - no specific updates to scoping required

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SCOP060	Local Amenity Society	<p>APPENDIX A The Sustainability Assessment- HERITAGE All matters (pp32-3,4&amp;5) are of particular interest. We urge, most strongly, that all the recommendations be carried out in great detail by Staff who have all the relevant information to hand. Any pre application discussion with council Offices must include all aspects of "Heritage" "our irreplaceable resources" Two examples in Bromborough are 1) SHODWELL "SLACK WOOD" – see attached article, aerial photograph &amp; copy of our previous letter. 2) Bromborough Pool Village Conservation Area (Article 4). No one can believe that the totally out of character houses were approved by the Council. A more recent replacement of housing, on South View, where the original houses had been demolished due to their proximity to the nearby factory, is far more in keeping with the original dwellings in the Village. The current HER is given prominence in the current 'Assessment' &amp; Management Plan' Document with its Appendix – that should always be ready-to-hand. We do not agree with the rather – vague reference to development in Conservation Areas, for example; far more scrutiny would be necessary to judge each individual case so no glaring errors could be made and the amount allowed, if any, very limited indeed.</p>	
SCOP060	Local Amenity Society	<p>APPENDIX B. SITE ASSESSMENT CRITERIA pp.69-70, we comment  HERITAGE – in addition to our comments (above) we have the following matters on: a) Climate Change Adaptation. A rise in the water table takes place when development is permitted; in Bromborough, much of the land is impermeable boulder clay. Two local examples are on sites where the original developers in the 1950s avoided the ponds/marl pits, knowing the consequence if they had not. 'Fast forward' in both examples, later developers thought that piles &amp; concrete would be sufficient – meaning adjacent or opposite properties have flooding in rainy/snowy times. Current work (on the Acre Lane site) is being watched by the residents in nearby properties to see what might happen there. Recent heavy rain produced a pond on the site.  b) Economy &amp; Employment. See Shodwell/Slack Wood references (above &amp; attached)  c) Health &amp; Schools. Local Health facilities, so essential to well-being, are currently very stretched. How will extra provision be possible? The same can be said of our schools, which of course need ample GREENSPACE round them – essential for the pupils.  d) Housing, Land &amp; Soils. Affordable, Appropriate and Accessible most needed (N.B. Not Luxury houses) A scheme where '2 into 1' for the older terraced properties can be FIT FOR PURPOSE or great difficulties can arise – Pool Lane Bromborough – 2 houses are suffering sinking – built on site of an underground tank. Within the nearby Conservation Area, contractors carrying out the demolition and clearing up of the site of garages – dug down to at least 1 metre – giving as their reason, they had detected a significant problem. Cyanide - not previously recognised by the Council. People wait to see what might happen on the New ferry side of Bromborough Pool waterway – the old Golf Range site where tipping went on for over a century – all 'made' land, to fill in a steep incline.  e) Population &amp; Communities. See above, under c) also Our Nature Reserves eg.Woodslee are invaluable but need more Council staff!  f) Landscape. Leave our Wirral Green Belt alone!  g) Transport. Generally good.  h) Water. See above under a) &amp; d)  i) Article 4. Bromborough Pool Village Conservation Area – needs constant checks – Bromborough Village Conservation Area could greatly benefit having an Article 4 Directive.  We hope that a good outcome for all Wirral residents will be the result of this Consultation.  [Photograph attached]</p>	
SCOP061	Local Resident	<p>1.Although this has been put out for public consultation, as with many other consultations, it is clearly not aimed at the 'average man in the street'. It is extremely lengthy and very complex and I therefore doubt if many residents will bother to respond to the consultation, even though they feel very passionate about many aspects. I often wonder if this approach is a predetermined plan to get the result that the Council wants.  2. I have contributed to previous Council consultations but often feel that this has been a waste of time, as the results of some of the consultations have never been published. I refer specifically to the consultation on the Initial Review of Green Belt and the Development Options Review.  3. In this response, I am specifically commenting on the Sustainability aspect of the review, App A - the SA Framework, and in particular, its affects on Green Belt.  4. In respect of 'Sustainability', at the time of the release of the NPPF proposals, the then Environment Scty. , Caroline Spielman, said that "the plans would give local communities the power to protect green spaces that mean so much to them". Unfortunately, this turned out to be pure 'news speak' as the published NPPF went on to include 'a presumption in favour of sustainable development' and its limited definition of sustainable development clearly favoured economic development at the expense of the environment.  However, 'sustainability is a development that satisfies the needs of the present without the risk that future generations will not be able to meet their own needs'. In this context, releasing Green Belt for development will negatively impact the natural environment for future generations since, as we all know, once it's gone, it's gone forever.  5. The five principles of the Green Belt, as outlined in para. 134 of the NPPF, remain as relevant and sacrosanct as the day they were brought into being. As para. 136 states, "once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified". This can hardly be seen to be the case in respect of release of Green belt to build The Warrens Health Centre and the fire statrion at Saughall Massie and is certainly in question in proposals to release Green Belt for the Hoylake Golf Resort and the forthcoming Local Plan.</p>	<p>SA scoping is a technical exercise and there is no requirement for public consultation. There will be several further opportunities over the course of plan preparation for interested parties to express their views via public consultation.</p>

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SCOP061	Local Resident	<p>6. Comments on App A - SA Framework.</p> <p>Obviously a good many of the 13 Topics overlap each other and I have chosen to comment on the most relevant . I have also chosen in some cases to use comments made by ITPAS, which succinctly express my own opinions.</p> <p>Air Quality:- Any removal of Green Belt results in the loss of the natural 'green lungs' of the environment. Green spaces are essential for the maintenance of air quality and this is becoming more and more evident as scientific evidence shows how poor the air quality is in many areas of our towns and cities and the massive cost of alleviating such problems. Wirral must maintain its Green Belt to ensure its air quality and avoid such problems.</p> <p>Bio Diversity:- We are in the middle of a mass extinction event. The latest UN report shows the importance of habitat in maintaining bio diversity. There can be no doubt that the removal of Green Belt must adversely affect regional bio diversity through loss of habitat.</p> <p>Climate Change Adaptation:- The emphasis of this topic seems to be the avoidance of flooding. In many of the areas where it is proposed to remove Green Belt land in favour of housing development (eg areas surrounding Irby, Pensby, Thurstaston and Barnston) the natural environment is, to a great extent, able to control flooding. Housing development results in swathes of concrete and vastly increased rain water run off. The areas drainage system is already at full stretch and several housing developments on Wirral have suffered from flooding as a result of this. With wetter winters forecast due to climate change, we should not be contemplating exacerbating the problem by building on Green Belt land.</p> <p>Health:- There is plenty of published evidence that being in the countryside, or among open green spaces, is beneficial to both physical and mental health. Curtailing the amount of green spaces, by building on present Green Belt land, limits the access to the public of these beneficial places.</p> <p>Heritage:- The Council admit to having done little to investigate and appraise heritage assets within sites short-listed for release from Green Belt. Worse, work done by their Consultants is being ignored (in the rush to stave off possible 'Intervention'). In Irby alone, this means that a Scheduled Monument, Listed Buildings, a Roman Well, a rare example of medieval farming practice in its land formation, and remains of its original settlement as well as ancient woodland, vulnerable watercourses and 'best quality' open ponds are all at risk of damage and loss, unnecessarily and possibly unlawfully.</p>	
SCOP061	Local Resident	<p>Housing:- Successive Secretaries of State and others have repeatedly told WBC that the 'base figure for 'Housing Need' derived from the 'standard method' does not constitute a target and that the Council should determine its own assessment of 'Need' using actual local and national data, and to compare that number with the base figure and strongly argue the case and 'exceptional circumstances' (e.g. marked loss of Green Belt, neighbouring Councils to provide a proportion; etc) where a lower figure is sought. Whilst the Council refuses to take this line, two specialists within the WGS Alliance have prepared technical papers showing that actual housing need is very much lower than WBC's out-of-date figures.</p> <p>The Council's own Consultants had concluded that the local housing need (for Irby, Pensby, etc.) is predominantly for the elderly (mainly to downsize) and those groups needing supported living and not, as are proposed by the Council and the ruling Cabinet, larger houses in Green Belt which would deliver higher Council Tax Receipts.</p> <p>Potential of 'Brownfield' and 'Previously Developed Land' must now be exhaustively explored and used to its maximum before other areas, particularly Green Belt, are considered for housing development. There is no apparent determination by WBC to maximise the considerable opportunities that exist, nor to encourage the full potential of 'Wirral Waters' and surrounding areas, nor to achieve better results in returning empty properties back into use, nor to increase housing capacity by applying required higher standard densities but, instead, there is an assumption and acceptance from the outset that Green Belt land should be released for larger houses when there is absolutely no clear need or significant demand for such.</p> <p>Opportunities for rationalisation of the Council's own properties locally (proposed by ITPAS and others) have been spurned and, contrary to the Appeal Court Ruling (Lindblom 2017) regarding not prejudging the housing market and thereby limiting 'availability' in the housing supply, there appears to have been actions which did just that, with the effect of minimising non-Green Belt site availability and capacity, and thus artificially bolstering the case for release of Green Belt.</p> <p>Wirral Waters must remain the cornerstone of the Council's strategy for the long-overdue regeneration of the most deprived areas of Wirral. It is unacceptable that WBC has been silent regarding the 'Lindblom Ruling', which made it clear to councils, developers and others that proposals only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven 'deliverability' to be included in 5-year housing supplies. This supports Peel Holding's figure of 6450 for its housing delivery during the Local Plan Period rather than the 1100 included by the Council.</p> <p>Wirral's real housing need is a range of small and medium sized, well designed dwellings in the right places, with appropriately higher, but standard densities, to fulfill the guidance requirement for 'the efficient use of land'.</p>	
SCOP061	Local Resident	<p>Land and Soil:- WBC's selection of Green Belt sites for potential release include many designated as high quality agricultural land' (ie the 'Best and Most Versatile'), where development should be avoided and land maintained for future security of food production. The Council are planning to review the quality of soils, possibly leading to downgrading, but the counter argument is that all productive farmland should be protected. (n.b. Recent private testing upheld the quality of the soil).</p> <p>Landscape:- Sites short-listed by the Council include those, like SP059E (Rear of Irby Hall), previously characterised as "the essence of Wirral", to be retained for the benefit of residents and visitors alike and contributing to the local tourism economy.</p> <p>Several short-listed sites conflict with the second 'purpose of green belt' (NPPF para. 134) which precludes 'infilling' developments that merge distinct towns (settlements or communities) and as well as the fifth, where 'permanence' is specifically designed "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". Worse, the Council has expanded sites to increase the extent of their 'enclosure' (by perimeter housing), classifying what is effectively inappropriate, massive urban sprawl and expansion into countryside as simply 'infilling within Settlements'. e.g. Site SP060 (South of Thingwall Road), which would see Irby, Thingwall and Pensby all merged into one. Worse still, it appears that, to achieve the status of 'highly enclosed', the Council has artificially expanded sites to include protected woodland and even a covered reservoir that cannot be developed, but which happens to be bounded by existing housing.</p> <p>Population and Communities:- North and east Wirral are areas of greatest deprivation, highest crime rate and worst housing conditions. Not to concentrate on redeveloping these areas in the (admitted) pursuit of higher Council Tax Receipts from west Wirral, is to condemn these aforementioned areas and their communities to yet further decline. Whereas, to follow the albeit more difficult opportunities there are to improve life-chances and living conditions in the more deprived areas through sustainable, attractive and 'green' developments (spearheaded by 'Wirral Waters') would surely deliver lower crime rates, higher employment, better health, improved quality of life and rejuvenated communities.</p>	
SCOP062	The Environment Agency	<p>We generally agree with the proposed scope of the Sustainability Appraisal in terms of its 'thematic heading' recommendations with regards to matters within our remit.</p> <p>In consideration to the thematic chapters, our principle areas of interest will be linked to;</p> <ul style="list-style-type: none"> <li>- Air quality</li> <li>- Biodiversity</li> <li>- Climate change adaptation</li> <li>- Climate change mitigation</li> <li>- Land and soils</li> <li>- Water resources</li> <li>- Water quality</li> </ul>	Support welcomed.

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SCOP062	The Environment Agency	<p>Waste</p> <p>Waste has been scoped out and assume this is because it has already been subject to the sustainability appraisal process as part of the Waste Local Plan. We have no objections/concerns to this, but moving forward you should ensure the Waste Local Plan is still relevant and sound with regards to the future management of waste for Wirral Metropolitan Borough Council. A Green Future: Our 25 Year Environment Plan to Improve the Environment. We welcome the Government's 25 Year Environment Plan (2018) 'for managing and enhancing the natural environment, embedding 'net gain' principles as key to environmental considerations has been recognised as this is something we fully support. The plan goes wider however, its ambitions are cross-cutting and each of the thematic chapters of the Scoping Report can contribute to the Governments ambition to make the plan a success in some way.</p> <p>Climate Change</p> <p>The Scoping Report proposes two chapters relating to climate change, 1. Mitigation and 2. Adaptation, and we note and agree they seem to relate to reducing the causes of climate change (mitigation) and planning how to manage the impacts of climate change (adaptation). Climate change adaptation appears to focus almost entirely on flood risk, while the Key Issue is focused entirely on flood risk. We welcome the focus on flood risk, however adaptation needs linking to wider areas of concern, such as changing climates and weather patterns, impacts to the natural and built environment etc. As the focus of 'climate change adaptation' is currently focused on flood risk you should consider flood risk either having its own thematic theme, or potentially included within a wider 'Water' theme.</p> <p>Water resources, water quality &amp; flood risk</p> <p>We note paragraph 15.14 (Page 66) suggests 'In light of the key issues discussed above it is proposed that the SA framework should combine the water resources and water quality SA themes under a single comprehensive 'Water' objective'. We would agree with this recommendation and suggest flood risk could also be included.</p>	<p>Flood risk is considered separately from water resources and water quality on the basis that combining them would create a very broad topic against which to appraise the reasonable alternatives and could easily end up not telling us anything useful. For example, a site which performs very strongly in terms of fluvial flood risk may also be poorly sited for access to the utilities network - a combined objective would face both ways and it would be challenging to reconcile these differing performances into a single meaningful conclusion.</p>
SCOP063	Local Amenity Society	<p>2 Air Quality</p> <p>The HS notes (2.5 and 2.6) that as at January 2018 "NO2 monitoring is carried out at 31 passive diffusion monitoring sites across the Borough. Particulate matter is monitored via two Automatic Urban Rural Network (AURN) sites. and WBC has identified a number of traffic hot spots where there is considered to be a particular likelihood of elevated emissions. These hot spots are at Singleton Avenue and Arrowe Park, both in Birkenhead, and at the A41/Port Sunlight roundabout. No hotspots are associated with the Borough's motorway junctions, nor toll point of the Kingsway Tunnel, suggesting that the presence of significant strategic road network (SRN) infrastructure does not currently give rise to notable air quality concerns." The Air Monitoring Report states "Through the course of the Local Air Quality Management programme, monitoring has been tailored to include those areas identified as traffic 'hot spots'. This focus is determined using local intelligence, historical data and information obtained from the Authority's sustainable transport team.</p> <p>The main 'hotspots' have been identified as Singleton Avenue (monitoring locations W3, W6, W20 and W21), Arrowe Park (monitoring locations W15 and W16), A41/Port Sunlight roundabout (monitoring locations W5, W7, W12, W13) and Wallasey Road (W18)."</p> <p>The January 2018 monitoring stations do not include the later roadside monitoring station (W32) in Telegraph Road Heswall in 2018.</p> <p>The A540 (Telegraph Road) passes through the actual shopping / commercial / social centre of Heswall - identified as a "key town centre". The UDP under Proposal TR5 identified Heswall Town Centre as "a site which exhibits traffic problems in relation to congestion at peak periods and vehicular / pedestrian conflict. The situation will be monitored, and detailed schemes may be drawn up in the future to alleviate such unsatisfactory conditions."</p> <p>Since the UDP was adopted in 2000 the traffic situation in Heswall has significantly deteriorated and congestion is no longer only experienced at peak periods. Traffic travelling in a south easterly direction commonly starts queuing north of the Heswall Medical Centre (sometimes as far north as Quarry Road), factors are the junction with Tesco, the junction with Pensby Road, the bus station entrance / exit, the Rocky Lane junction and the Marks and Spencer store. In the opposite direction queues of traffic frequently south of Marks and Spencer and continue to Tesco.</p>	<p>Not directly related to scoping process but rather Council methods of data collection.</p>
SCOP063	Local Amenity Society	<p>Over many years the Heswall Society has expressed its concerns about Telegraph Road. In response to the consultation on the "Proposed Submission Draft Core Strategy December 2012" in Policy CS10 Clause 8 the Society noted the emphasis on "maximising the efficiency on routes through Heswall Town Centre to Birkenhead and the M53" and asked that the policy be expanded to include "and improve the pedestrian experience in the Town Centre" We would include health and safety within the all-encompassing term "pedestrian experience". When written, that statement had the pedestrian "shopper" in mind, and, in retrospect, we recognise that the need to address traffic harm also applies to cyclists.</p> <p>The impact of development in and near Heswall Ward needs to be considered in the context of the impact on Heswall Centre.</p> <p>8 Heritage</p> <p>Appendix 3 "Site Assessment Criteria" identifies "Relevant Criteria". Against Heritage there are 6 criteria, the last in the list being "Locally Listed Buildings". We suggest that the Local Plan should include provisions, based on NPPF, relating to heritage assets which are not nationally listed and should consider Local Listing.</p>	
SCOP063	Local Amenity Society	<p>9 Housing</p> <p>In 9.6 to 9.9. the document refers to the average rate of dwelling completions over the 5 years before the 2017/8 Monitoring Report and to the distribution of housing completions within Wirral between 2003/4 and 2014/15. It speculates that "Whilst this is positive in principle, it could suggest that housing from Greenfield sites is being severely constrained by protective designations, particularly Green Belt". This high proportion of completed dwellings on brownfield land does represent the successful achievement of Council policy. I would refer to the Council's "Interim Housing Policy", introduced in 2005 and reviewed and retained unaltered in 2009 Link: <a href="https://democracy.wirral.gov.uk/ieDecisionDetails.aspx?Allid=3877">https://democracy.wirral.gov.uk/ieDecisionDetails.aspx?Allid=3877</a></p> <p>The Council initially adopted an Interim Planning Policy for New Housing Development in December 2003 in response to the spatial priorities set out in Regional Planning Guidance for the North West (RPG13, March 2003). The Interim Planning Policy was further revised in October 2005 to more strongly focus new housing development into identified regeneration priority areas, including the Newheartlands Housing Market Renewal Pathfinder Area.</p> <p>The Interim Planning Policy was reviewed in March 2009, in response to the publication of the North West of England Plan and the findings of two planning appeals; and again in July 2010, following the initial proposals to revoke the Regional Spatial Strategy. It was determined that the Interim Planning Policy would remain unaltered until replaced by the emerging Core Strategy Development Plan Document.</p> <p>The Council's Interim Planning Policy for New Housing Development was revoked by the Council in October 2012.</p>	<p>These comments query Council data rather than the scoping process per se.</p>
SCOP063	Local Amenity Society	<p>The purpose of the policy was to focus new housing development within a number of identified regeneration priority areas including the Newheartlands Housing Market Renewal Pathfinder. The policy included a restraint on new housing development in West Wirral (with certain exemptions) which placed a virtual embargo on new dwellings in West Wirral. Appendix 10 of the SHLAA Update 2011 lists sites restricted by the Interim Housing Policy at that time. It will be seen that there are many non-Green Belt greenfield sites.</p> <p>The following Wirral Council table of 2016 shows the geographical pattern of gross housing completions from 2003/4 to 2014/15.</p> <p>The sharp fall in number of completions in West Wirral reflects, not Green Belt constraints, but the Council's Interim Housing Policy with its specific focus on regenerating the many run-down areas of the Borough. There was an inevitable time lapse between the ending of the Interim Housing Policy in October 2012, the granting of planning permissions in West Wirral and actual completions. A further factor noted in the 2012/13 Monitoring Report was "Market conditions have, therefore, had a significant impact on the ability of developers to deliver new housing to the pre-recession levels envisaged in RSS."</p> <p>There still remain considerable problems of run-down areas including Wirral Waters and the neighbouring areas, especially between the docks and the town centre. A sustainable approach to meeting the need for homes must focus first on making use of despoiled areas, which are generally close to employment areas, and the overcoming of the factors which hinder their regeneration.</p> <p>Turning to the analysis of dwelling completions - we have raised a number of concerns about the accuracy of the Council's completion data in our response to the Council's previous consultation on the 2018 Development Options Review.</p>	

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SCOP063	Local Amenity Society	<p>11 Landscape The proposed SA Framework reads: "Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps between settlements, mindful of the need to make careful choices about Green Belt release." We are concerned that this statement does not reflect the need to protect those parts of the Green Belt which comprise coastal belts.</p> <p>12 Transport In para 3.15 we note the statement "The A540 corridor could have potential to provide a focus for more limited growth in the west of the Borough. There is limited strategic east- west connectivity within the Borough."</p> <p>Under the heading of Air Quality we have already drawn attention to our concerns about the harmful impact of further traffic growth through Heswall Centre. However, our concerns are not limited to air quality but to the quality, vitality and sustainability of Heswall as a key town centre. This includes user experience and ease of crossing the busy highway between businesses. Further development which adds to the problems of Telegraph Road should be avoided.</p> <p>Traffic growth on the A540 is also resulting in congestion at the Gayton Rounabout (junction with A551 and A5137) outside peak times.</p> <p>With reference to the rail network para 3.15 states: "The Borough's rail network is good and train travel represents a much higher proportion of travel to work than elsewhere in the North West. Despite this it remains a low proportion of people's travel choices overall, suggesting there could be opportunities to unlock further growth in sustainable travel to work."</p> <p>We question whether this is the case from Heswall because the Bidston to Wrexham Line is not integrated into the Merseyrail electric network, facilities at Heswall Hills Station are limited, as are public transport connections to the station.</p> <p>[Table attached]</p>	The effects will be determined taking account of the full extent of the Green Belt. Impacts upon traffic and air quality will be considered at Stage B of the SA process.
SCOP064	Landowner/Developer	<p>1. INTRODUCTION</p> <p>1.1 We have been instructed to prepare a response to the consultation that Wirral Council formally began on the 25th March which runs until the 8th May. This consultation outlines the scope of the Wirral Local Plan Sustainability Appraisal and Equalities Impact Assessment, which has been prepared by AECOM on the Council's behalf.</p> <p>1.2 Although a major part of the SA process, a scoping report isn't legally required to be conducted or opened up to consultation other than beyond the key bodies of Natural England, Historic England and the Environment Agency. However, we welcome Wirral Council's approach and trust our comments will be fully considered as part of the SA process going forward. Indeed, it is noted that the results of this consultation are to help steer the Sustainability Appraisal to be legally conducted as part of the Local Development Plan process as required by Section 19 of the Planning and Compulsory Purchase Act 2004.</p> <p>1.3 The emerging Wirral Local Plan will form the spatial strategy outlining the locations for new housing and economic growth to the end of the plan period in 2035. We also note that the final Sustainability Appraisal will be released in tandem with the Draft Local Plan, will be open for further consultation and that the overall process is an iterative one that will evolve overtime. However, it is critical that the Scoping Assessment for the SA demonstrates that all relevant baseline information is being considered at this early stage in order to ensure that as part of preparing the Local Plan, all relevant and reasonable considerations are at the forefront of the Council's decision making process. Indeed, the SA should ultimately contribute towards and influence the decision making process.</p> <p>1.4 Whilst a SA requires the inclusion of a Strategic Environmental Assessment to ensure environmental effects are given full consideration, this must also sit alongside with equally important economic and social considerations and impacts. Indeed, a Sustainability Appraisal is primarily tasked with assessing the delivery of 'Sustainable Development' and the associated impacts of doing so, together with assessing 'reasonable alternatives'. Sustainable Development within England is defined by National Planning Policy but very few of the considerations set out within the NPPF are laid out in this Scoping Report for the Sustainability Assessment.</p>	The scoping report is not only geared towards an SEA process and this is clear from the introductory chapter. Some of the factors listed below go beyond the requirements of the scoping stage and will be addressed as the SA process progresses.
SCOP064	Landowner/Developer	<p>1.5 The consultation document considers the baseline position for a range of individual topics to help form the scoping requirements for the Sustainability Appraisal. There are 14 chapters which have been determined as the key themes most relevant to the development of the emerging Local Plan by AECOM. These include: Air Quality; Biodiversity; Climate Change Adaptation; Climate Change Mitigation; Economy and Employment; (To be discussed in the economic statement) Health; Heritage; Housing; Land and Soils; Landscape; Population and Communities; Transport; Water Resources; and Water Quality.</p> <p>1.6 As noted above, the scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The above list is very much focused on environmental considerations that make up 8/9 of the topics and associated objectives.</p>	
SCOP064	Landowner/Developer	<p>Our representation largely focuses on the fact that the Scoping Report prepared by AECOM principally reflects the scoping assessment for a Strategic Environmental Assessment (SEA) rather than a Sustainability Assessment (SA). As such, we do not consider it to be a complete, robust or sufficiently rounded document to truly examine the options for delivering Sustainable Development as defined by National Planning Policy and Guidance.</p> <p>1.7 Our principal recommendation is that the Scoping Assessment and subsequent objectives are set out under the following three objectives as defined by paragraph 8 of the NPPF.</p> <ul style="list-style-type: none"> <li>- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</li> <li>- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</li> <li>- an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</li> </ul>	
SCOP064	Landowner/Developer	<p>2. SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT</p> <p>2.1 The preparation of all Local Plans within the UK must comply with EU Law and Acts relevant to the associated countries within the UK. In short, EU law calls for SEA's to be carried out and UK Acts, policies and guidance require a SA to be carried out. Ultimately, it is considered best practice to incorporate requirements of the SEA Directive into a Sustainability Appraisal which must ensure that the potential environmental effects are given full consideration alongside social and economic issues. Indeed, the SA incorporates the requirements of SEA.</p> <p>The SEA European Directive</p> <p>2.2 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005) and the NPPG also provides further guidance on the matter.</p> <p>2.3 The aim of the Directive is to 'to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.'</p> <p>2.4 This Directive applies to a plan or programme related solely to England (or part of England) and any other part of the United Kingdom. The Directive therefore applies to the preparation of the emerging Wirral Local Plan and applies specific requirements that must be complied with and incorporated as an integral part of the sustainability appraisal process.</p>	



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SCOP064	Landowner/Developer	<p>Strategic Environmental Assessment Regulations requirements checklist</p> <p>2.5 Regulation 12 – Preparation of an environmental report that ‘identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>2.6 This report should include the relevant information referred to in schedule 2 of the directive as required taking in to account ‘current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3))’.</p> <p>2.7 When deciding on the scope and detail of the information which should be included as part of the environmental report the consultation bodies being Natural England, Historic England and Environment Agency should be consulted. This is at the earliest stage of the preparation process and includes the following requirements:</p> <ul style="list-style-type: none"> <li>• It should form an outline of the contents;</li> <li>• main objectives of the plan and its relationship with other plans or programmes;</li> <li>• It should provide a baseline state of the environment which is as existing before the implementation of the plan;</li> <li>• It should include the environmental characteristics of the areas likely to be significantly affected by the plan over its period;</li> <li>• It must outline any existing environmental problems which are relevant to the plan including areas of particular environmental importance pursuant to Directives 2009/147/EC and 92/43/EEC (Habitats Directive);</li> <li>• It should include environmental protection objectives established at international, national or community level which are relevant to the plan and the way those objectives have been taken in to consideration throughout the preparation of the plan;</li> <li>• The following issues should be looked at as an overall effect on the environment: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors;</li> <li>• Measures should outlined which will be envisaged to prevent, reduce or offset any significant adverse effects on the environment from implementing the plan;</li> <li>• It should provide an outline the reasoning for selecting the alternatives that were dealt with outlining how the assessments were undertaken;</li> <li>• It should look at how it is going to monitor the impacts in accordance with regulation 17 of the Directive; and</li> <li>• It should provide a non-technical summary of the information provided under all of the above headings and topics.</li> </ul>	
SCOP064	Landowner/Developer	<p>2.8 The above process is very much focused on identifying the key environmental considerations within an area and it is a process that must be carried out. Indeed, we consider the AECOM document prepared is very much focused on the above process. However, it is critical to note at this stage that the European Directive does not define ‘Sustainable Development’ in the context of preparing a Local Plan under UK legislation. Indeed, it is for each member state to define ‘Sustainable Development’ in this regard and it is the SA’s role to consider the implications of Sustainable Development policies in the round. Simply adhering to SEA legislation and the EU Directive is therefore not enough in itself to assess the impacts of a Local Plan and its associated policies.</p>	
SCOP064	Landowner/Developer	<p>Planning Acts, National Policies and UK Guidance</p> <p>Planning Acts</p> <p>2.9 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. The 2008 Planning Act amended the requirement to undertake a Sustainability Appraisal for Development Plan Documents (DPDs) but did not remove the requirement to produce a Strategic Environmental Assessment. Moreover, Section 19(5) of the Planning and Compulsory Purchase Act 2004 (as amended) maintains that:</p> <p>‘The local planning authority must also –</p> <p>(a) Carry out an appraisal of the sustainability of the proposals in each development plan document;</p> <p>(b) Prepare a report of the findings of the appraisal.’</p> <p>2.10 Section 19(A) was introduced to the 2004 Act as part of the 2008 Act/amendments and stipulates that: ‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.’</p> <p>2.11 This ensures that environmental impacts are still at the forefront of the overall process. However, it is still critical to note that Section 39(2) of the 2004 Act (as amended) states that ‘the person or body must exercise the function with the objective of contributing to the achievement of sustainable development.’ Furthermore, Section 39(3) confirms that for the purposes of achieving sub-section 2, ‘the person or body must have regard to national policies and advice contained in guidance issued by the Secretary of State...’</p>	<p>Explaining the purpose of SA in a scoping report is not a requirement. The scoping report is not only geared towards an SEA process and this is clear from the introductory chapter.</p>
SCOP064	Landowner/Developer	<p>National Policy and Guidance</p> <p>2.12 National planning policy guidance confirms the following:</p> <p>‘A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.’</p> <p>2.13 Sustainable development is defined in the NPPF (2019) and is the principle by which the SA should be prepared against. Paragraph 8 of the NPPF states:</p> <p>‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’</p> <p>2.14 Critically, any SA process has to be judged against reasonable alternatives to ensure that the Local Plan is the most appropriate to achieve sustainable development. The whole process should identify ways the Local Plan can contribute to improvements in economic, social and environmental conditions as well as mitigating any potential adverse effects that the plan may cause. This will ensure that the plan is the most appropriate against the reasonable alternatives and can be used to test the evidence underpinning the plan and is important in demonstrating how the tests of soundness have been met.</p>	

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SCOP064	Landowner/Developer	<p>2.15 The NPPG goes on to set out a 5 step process for the preparation of a SA as follows:</p> <ul style="list-style-type: none"> <li>• Stage A – Setting the context and objectives, establishing baselines and deciding on the scope: <ol style="list-style-type: none"> <li>1) Identification of other relevant policies, plans and sustainability objectives</li> <li>2) Pooling baseline information</li> <li>3) Identification of sustainability issues and problems</li> <li>4) Develop a sustainability appraisal framework</li> <li>5) Consultation of the relevant bodies</li> </ol> </li> <li>• Stage B – Developing and refining alternatives and assessing effects: <ol style="list-style-type: none"> <li>1) Test local plan objectives against sustainability appraisal framework</li> <li>2) Develop Local Plan options including reasonable alternatives</li> <li>3) Evaluate likely effects of Local Plan and alternatives</li> <li>4) Consider ways of mitigating adverse effects and maximising beneficial effects</li> <li>5) Propose measures to monitor significant effects of implementing the Local Plan</li> </ol> </li> <li>• Stage C – Prepare Sustainability Appraisal report</li> <li>• Stage D – Seek representations on sustainability appraisal report from consultation bodies and the public</li> <li>• Stage E – Post adoption reporting and monitoring</li> </ul> <p>2.16 The Scoping Stage (stage 1) is relevant to the current consultation document. It should identify the level of detail and the relevance of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and sustainability objectives.</p>	
SCOP064	Landowner/Developer	<p>3. SCOPING REPORT FOR THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL</p> <p>Defining the Purpose and Scope of the Scoping Report</p> <p>3.2 Section 2 of this report has outlined the requirements of a scoping report for a Local Plan Sustainability Appraisal whilst also outlining the process as a whole. This helps to provide clarity behind what the Council has completed as a part of this consultation.</p> <p>3.3 Based on the title of the Council’s document, the current consultation process is seemingly associated with Stage 1 of the Sustainability Appraisal development process. As recommended by the NPPG this stage/Scoping Report should therefore include the following information:</p> <ol style="list-style-type: none"> <li>1. Identification of other relevant policies, plans and sustainability objectives</li> <li>2. Pooling baseline information</li> <li>3. Identification of sustainability issues and problems</li> <li>4. Develop a sustainability appraisal framework</li> <li>5. Consultation of the relevant bodies</li> </ol> <p>3.4 However, within the introduction of the Scoping Report, it is not made clear that this is the process that is being undertaken. The background details provided to the Sustainability Appraisal process is minimal. It should clearly define and outline what information is required at each stage and its relationship with the SEA process.</p> <p>3.5 When assessing the information that should be provided as part of stage 1 it is evident that there are 2 sections missing from this scoping report, these being point 3 and 4 in paragraph 3.2. This report has not successfully identified the sustainability issues and problems which should be carried on for further investigation and the way in which the sustainability issues are connected with one another.</p> <p>3.6 Instead of providing this detail the scoping report is far more focussed on the requirements of the SEA Regulations which, as previously explained, form a part of the SA however they focus only on the environmental assessment. The scoping appraisal incorporates the requirements for a SEA scoping report, we feel therefore clarification should be provided as part of the introduction as to the purpose of this scoping report produced for the Wirral Local Plan.</p>	
SCOP064	Landowner/Developer	<p>3.7 The economic and social principles have not been considered in enough detail to be suitable as a scoping appraisal for a SA. We therefore consider that this document has been titled incorrectly and although it would assist with the development of a SA through the SEA regulations it doesn’t itself form scoping for a sustainability appraisal.</p> <p>3.8 Notably Paragraph 1.7 of the Scoping Report states that it is concerned with item 1 of paragraph 1.6, which states:  ‘SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004. Two key procedural requirements of the SEA regulations are that:</p> <ol style="list-style-type: none"> <li>6) When deciding on ‘the scope and level of detail of the information’ which must be included within the key output report – namely the report published for consultation alongside the draft plan – there is a consultation with certain nationally designated authorities, namely the Environment Agency, Historic England and Natural England.’</li> </ol> <p>3.9 This seems indicates that the Council’s SA Scoping Report was prepared for the purpose of scoping a SEA. However, it is not abundantly clear at this point in the document. Moreover, we note that paragraphs 16.1 and 16.2 of the Scoping Report confirms that this document does relate to Stage A of the SA Scoping Report stage as set out in NPPG and that the next stage will look at reasonable alternatives under NPPG Stage B. The Scoping report goes on further to discuss 14 separate chapter topics, all of which would be expected within a SEA scoping report as outlined by the SEA Regulation requirement checklist.</p>	We consider that an appropriate range of sustainability factors have been addressed. The scoping report is not only geared towards an SEA process and this is clear from the introductory chapter.
SCOP064	Landowner/Developer	<p>3.10 Ultimately, the purpose of the report should be clarified both within the title of the report but also in the introductory text. We consider that the document should either be renamed ‘Scoping Report for the Wirral Local Plan Strategic Environmental Assessment’ or it should be restructured to address the requirements set out at the beginning of this section as defined by the NPPG.</p> <p>3.11 With regard to the latter option, we consider the following should be included as an absolute minimum:</p> <ul style="list-style-type: none"> <li>• More detailed background on the purpose of the SA and its involvement in the Local Plan process</li> <li>• Outline the role of sustainable development in the process including definition and national policy position and in the context of Wirral highlighting the key issues and difficulties the Council have faced in terms of delivering sustainable development to date;</li> <li>• Discuss the synergies between environmental, economic and social topics and how they lead to sustainable development at the national and local level.</li> <li>• Clearly set out a sustainability framework based on the three principal arms of Sustainable Development (i.e. economic, social and environmental considerations) rather than the 14 separate topics currently set out in Appendix A.</li> </ul> <p>3.12 We also consider that it would be prudent to set out key considerations that will impact on the assessment of ‘reasonable alternatives’ for the Local Plan. Whilst the NPPG assigns this task to Stage B of the process, Wirral in particular is faced with some critical decisions going forward in terms of ensuring economic regeneration, the delivery of sufficient homes and helping to mitigate climate change.</p>	Explaining the purpose of SA in a scoping report is not a requirement. The issues raised will be considered at Stage B of the process, including conclusions about how the plan (and alternatives) balance the three arms of sustainability.

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SCOP064	Landowner/Developer	<p>3.13 We consider this approach should include growth strategies such as low – high economic development and similar with new housing figures. Links need to be made between these two strategies, how they connect with each other and also how they may impact the environment either positively or negatively. – Although this isn't required until stage 2 of the process it will help determine the effects of the Local Plan from an early stage thus potentially providing more opportunities for avoidance/ mitigation</p> <p>3.14 Indeed, it must be noted that Wirral has not had a Local Plan in place for a considerable period of time (since 2001). This will have ultimately placed additional burden on surrounding Local Planning Authority areas simply due to the fact that Wirral will not have meet all of its own development needs. Such inaction could have conceivably led to higher out migration patterns, longer commuting patterns and therefore an increase in the use of the private car. By proxy, this could have led to the development of land in surrounding areas that was not as suitable for meeting needs. Such trends could continue if Wirral does not act now and it is telling that at remains one of very few Local Planning Authorities that is still being monitored by the Secretary of State in terms of its Local Plan production.</p>	Such issues will be explored and dealt with in subsequent stages of the SA process.
SCOP064	Landowner/Developer	<p>4. KEY TOPICS AND SUSTAINABILITY OBJECTIVES</p> <p>4.1 At present, the Council's proposed Sustainability Framework and Objectives are set out in Appendix A of the Scoping Report and follow the associated Chapters of the report (as we have set out in Section 1).</p> <p>4.2 With regard to the Sustainability Objectives, 2 are set for Air Quality, 2 for Bio-diversity, 1 for Climate Change Adaption, 1 for Climate Change Mitigation, 1 for Heritage, 1 for Land and Soils, 1 for Landscape, and 1 for Water. As such, 10 objectives are set in relation to environmental considerations. The remaining are 2 objectives for the Economy and Employment, 1 objective in relation to Health, 1 for Housing, 2 for Population and Communities and 1 for Transport. As such, only 7 sustainability objectives are spread across economic and social objectives.</p> <p>4.3 As previously noted, we consider the SA Scoping Report should be tailored and structured in accordance with the three arms of Sustainable Development as defined by paragraph 8 of the NPPF (i.e. economic, social and environmental considerations). Moreover, these considerations should then influence the Sustainability Framework and Objectives.</p>	Scoping reports can be structured in a number of ways. We consider that the approach taken is appropriate. We also consider that the range of factors considered is suitable and the range is reflective of many SA processes that have been undertaken across the country.
SCOP064	Landowner/Developer	<p>4.4 Even if our principal suggestion is not endorsed by the Local Planning Authority, at the very least, we consider that the Council's list of SA objectives should be more evenly balanced so there is a more equitable distribution across the three arms of Sustainable Development. This could be achieved by compiling some of the environmental impacts into fewer objectives or increasing the number of objectives under economic and social considerations. For instance, a more encompassing environmental objective could be 'To promote the sustainable and prudent use of natural resources including Air Quality, Land and Soil and Protected Landscapes by minimising the use and impacts on such resources'. Such an approach would be justified on the basis that the Council's own scoping report confirms the following: There are no Air Quality management Areas within Wirral and recent trends indicate key pollutant levels are decreasing (suggesting this is not a major issue for the Borough) Most land is within Agricultural Grades 3 or below within the Borough and there is very little minerals related activity (suggesting Wirral is not renowned for major food or mineral production) No AONBs or National Parks are located within Wirral (suggesting the landscape and open countryside is not regarded as the most valuable or scenic).</p> <p>4.5 The above approach could also arguable be applied to Bio-diversity and Water Resources. However, we note that the baseline position in Wirral in this regard is more sensitive and therefore, we can also see the value of separate objectives for these issues.</p> <p>4.6 We provide more generalised comments below.</p>	
SCOP064	Landowner/Developer	<p>Environmental</p> <p>4.7 As part of this scoping appraisal a lot of focus has been provided on the current and potential environmental constraints, this is evident by the number of chapters which have an environmental focus and the few that revolve the social and economic impacts. The importance of the environment on sustainable development cannot be underestimated however this scoping appraisal forms more of an appraisal for a SEA rather than SA.</p> <p>4.8 Within this appraisal there is some contradiction around the location for new development. The environmental chapters are clear in promoting the re-use of previously developed land which, as evident in the housing chapters, is mostly located in the eastern parts of the Wirral, specifically Birkenhead. It is these areas that have also been identified as having significant flooding issues, the example of a large proportion of Wirral Waters being located in flood zone 3 is a prime example.</p> <p>4.9 Furthermore, the location of Ramsar sites along the River Mersey and the highlighted importance of green infrastructure in these areas seem to suggest that development of these areas are more appropriate to other uses rather than housing or industry.</p> <p>4.10 Air quality has been depicted as being a more problematic issue in eastern parts of the Wirral which again signals the need to reduce traffic congestion to these areas and locating new development here will have significant impact on people's health and the connectivity to recreational opportunities.</p> <p>4.11 Paragraph 4.3 of the climate change adaptation chapter specifically mentions the need to roll back development in coastal areas to avoid damage from flooding or coastal erosion. This has been set out in the Flood and Water Management Act (2010) and should provide a strategic consideration for new development which would therefore exclude large sections of previously developed land in the eastern side of the Wirral. Expectedly the flood risk decreases as you move further inland which provides more opportunities for new development.</p> <p>4.12 The land and soils chapter show a desire to re-use previously developed land for development purposes however, it has already been made clear that the housing allocation for the Wirral cannot be supplied through brownfield sites alone and although touched upon briefly in 10.14 the potential to release land which is not Best and Most Versatile should be considered in more detail.</p>	The scoping report does not promote any particular approach to development. It aims to present the baseline position and important policy directions. The appraisal of different spatial options will be considered as the SA progresses. We disagree that the focus on environmental factors is too great. The requirements of the SEA Directive is what drove the planing regulations relating to SA. The framework includes sufficient additional social and economic factors to ensure all elements of sustainable development are considered.
SCOP064	Landowner/Developer	<p>Economic and Social</p> <p>4.13 Economic stability and prosperity and social well-being is inevitably closely tied particularly in an area such as the Wirral. As such, we could see merit in these two arms being grouped together.</p> <p>4.14 Under the social arm of Sustainable Development, we would expect to see objectives tied to the following:</p> <ol style="list-style-type: none"> <li>The delivery of high standards of education and the mitigation against unsustainable class room sizes.</li> <li>The improvement of physical and mental health and well-being including the delivery of necessary health care infrastructure, community facilities and opportunities to tackle loneliness</li> <li>The promotion of development and policies that tackle deprivation and support social mobility including access to increased levels of education, housing, healthcare and employment opportunities.</li> <li>Delivery of enough affordable housing and homes suitable for first time buyers in a range of locations across the Borough to meet the needs of individual communities.</li> <li>Delivery of enough specialist care related homes in a range of locations to meet the needs of an aging population.</li> <li>Reduce crime rates and the fear of crime through well planned developments and regeneration policies.</li> </ol> <p>4.15 One key topic that appears to be missing within the Sustainability Framework relates to 'Social Mobility' which is a key issue in Wirral where social divides in terms of wealth and opportunities are very apparent. There are evidently areas within Wirral where poor levels of investment, employment, education and housing quality come together to generate high areas of deprivation.</p> <p>4.16 Conversely, there are areas of high wealth, shrink wrapped by Green Belt where development opportunities are been curtailed for a prolonged period (due to the lack of an up to date local plan), which have undoubtably contributed to rising house prices, rents and loss of employment land, which will have inevitably curtailed social mobility in past years.</p>	We consider that the range of social objectives reflects the key issues and the requirements of the legislation. It is not proportionate to include many objectives related to the same issues. Furthermore, these issues will be covered through the consideration of effects against the social objectives such as health, housing and population and communities.

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SCOP064	Landowner/Developer	<p>4.17 With regard to Housing, we would expect to see outputs and objectives for the delivery of housing development contributing to economic and social objectives (including health and well-being). At the very least, the housing objective must ensure the timely delivery of the minimum number of homes as well as an appropriate mix and distribution to meet the needs of a range of groups within the Borough. At present, the objective focuses on mix when the amount and distribution of housing delivered will clearly have an impact on economic, social and environmental considerations.</p> <p>4.18 As noted above, under the social heading, a specific objective should relate to 'Support the timely delivery of sufficient affordable housing to meet the needs across the Borough for those unable to access the standard housing market.' Another housing linked objective could also relate to the delivery of aspirational housing to promote social mobility, retain or see an increase wealth, expenditure and tax revenues; new homes that could accommodate first time buyers, growing families etc.</p> <p>4.19 Due to the rising demographic of an elderly population, it would also be prudent to have a social objective that specifically looked to 'Support the timely delivery of specialist residential care accommodation through the delivery of care homes, extra care development and housing schemes that would accommodate those looking to downsize or obtain an alternative type of property to meet their specific needs'.</p> <p>4.20 The benefit of including more distinct objectives associated with the different types and form of housing would assist in the SA considering a wider range of social and economic objectives when looking at alternative potential sites. Indeed, we note that in Appendix B of the Scoping Report, the following is stated in relation to housing 'Spatial data unlikely to be available. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could potentially be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at large sites).'</p> <p>4.21 Whilst we do not disagree with the above statement, it is probably fair to say that many larger sites will have the ability to deliver a wider range of homes including affordable accommodation, elderly accommodation, etc. Alternatively, some sites might be more suitable in terms of attracting first time buyers and others will be better suited for meet the needs of a growing elderly population or for executive homes. Scoring a site against different housing / SA objectives should assist in helping to deliver a broad mix of sites that would ultimately assist in meeting the wide-ranging housing needs within the Borough.</p>	The assessment relating to the housing objective will cover a wide range of factors such as those suggested. There is no need to include several housing objectives. This is not proportionate and would lead to duplication of efforts. The appraisal of the housing element of sites will be considered when the site matrix is being finalised.
SCOP064	Landowner/Developer	<p>4.22 One of the key issues facing Wirral over the past decade has related to the 'timely delivery of new homes'. To date, much emphasis has been placed on the capacity and deliverability of Wirral Waters. Whilst this scheme will deliver many benefits, its lack of delivery (coupled with the distinct lack of any plan led alternative solutions for housing delivery) will have contributed to negative social and economic impacts within Wirral and possibly further afield. Moreover, Wirral Waters alone will not meet many of the distinct housing needs within the Borough and must only be regarded as part of the solution.</p> <p>4.23 Indeed, large problems with the redevelopment of previously developed sites is the viability and deliverability of the scheme especially in areas which do not retain high market values which is a problem for some eastern parts of the Wirral as explained in the population chapter. The slow development of Wirral Waters is a good example of the difficulties in providing a valuable return on development in areas such as Birkenhead. This will impact the ability to achieve the housing targets as laid out by the 2014 OAHN which will require 803 dpa as confirmed by the Secretary of State's letter to Wirral Council dated 28th January 2019.</p> <p>4.24 The number of completions over the previous 5 years is just over half this rate as there has been a focus on the redevelopment of brownfield land where between 83 and 92% of all new developments have been located. Chapter 67 of the NPPF states planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It is of great importance that economic viability of the previously developed sites is analysed and considered as part of any future allocations or strategic policies and further investigation of market rates need to be incorporated in to the sustainability appraisal. Furthermore, in line with para 11 the relevant policies to housing will be considered out of date if housing delivery is less than 75% of the housing requirement over the previous three years. Based on the current supply which has focussed the majority of developments on to brownfield land then Wirral would not be able to keep up with their housing requirement putting their planning policies in to jeopardy. Therefore, there needs to be a major consideration as part of the SA as to how housing delivery can be speed up to ensure the presumption in favour of sustainable development.</p> <p>4.25 Consistently through the scoping report there is a focus on the Wirral Waters scheme which has been proposed for Birkenhead docks. Understandably, this is an important part of the Wirral Emerging Plan because of its redevelopment potential however, there is consistently differing information being released from the scheme and it is widely understood that it is not going to be completed by the end of the Local Plan period. The focus of the SA therefore needs to assess the potential of the Wirral as a whole. There is very little strategic guidance provided in the SA appraisal as all future baselines focus on the 'potential' of Wirral Waters. This has the impact of losing sight of the potential of other areas in the Wirral to provide sustainable development for new housing and employment allocations along with significant environmental improvements. It is expected that Wirral Waters will only be able to provide between 2900 and 6450 homes under the local plan period with completion anticipated to be beyond 2040.</p>	Such issues will be explored and dealt with in subsequent stages of the SA process. With regards to Wirral Waters, this is mentioned in the scoping report in the future baseline position sections as it is an important strategic development. There is no assumption about the exact contribution that would be made towards housing and employment needs.
SCOP064	Landowner/Developer	<p>4.26 It is standard practice for the SA to assist in the comparison of all reasonable alternative site options being considered by the Local Planning Authority in order to identify the most sustainable options for inclusion in the Local Plan. Approximately 50 Green Belt sites have been put forward for release as part of the development options review, these have not been discussed in the scoping appraisal and yet they are the likely alternative for new housing development in the Borough. A scoring matrix will need to be created and used to help define which of these sites are sustainable for release, this is something that has been partially provided under previous consultations and this will need to form a large part of the SA.</p> <p>4.27 The focus on the Wirral Waters scheme has led to there being little strategic guidance of where new housing development should be located elsewhere in the Borough and besides sections in the transport chapter there is very little discussion as to how sustainability will be determined for new housing and employment allocations. Further work on the wider economic impact of Wirral Waters and other strategic sites needs to be provided and linked to employment and education opportunities. Further economic analysis has been provided in our economic statement.</p> <p>4.28 The SA should assess all of the topic chapters to provide suitable strategic guidance as to where new housing should be located. This scoping report fails to do this, it is only within the transport chapter where there is a strategic analysis of new growth opportunities where it indicates that growth potential could be located within the M53 and A41 corridor along with the Merseyrail Chester/ Ellesmere Port line. There needs to be further assessment on this principle and the assessment needs to cover the whole of the Wirral.</p> <p>4.29 The potential for new development of housing on greenfield areas is not principally discussed in the Housing chapter and only becomes a topic for discussion when assessing the best and most versatile land in the borough. Moreover, there needs to be a greater assessment of where development will be considered sustainable besides on PDL which is constrained.</p> <p>4.30 The SA should incorporate issues surrounding education as a separate chapter as this has large implications for social and economic factors in the area. We also consider that deprivation should also be considered separately. All of these principles have been pooled under populations however there needs to be a further analysis of each topic separately.</p>	The scoping process is not required to 'assess' alternatives. These factors will be addressed at the subsequent stages of the SA process.

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SCOP064	Landowner/Developer	<p>4.31 Under the economic arm, we consider the Council's Sustainability Objectives are too narrow and many of the above comments could also apply. In addition, we would expect to see objective that support the following principles:</p> <ul style="list-style-type: none"> <li>i. The delivery of a sufficient number of homes to support planned or forecast jobs growth and objectively assessed needs to help support the construction industry and the wider economy;</li> <li>ii. The delivery of sufficient land and support of development that for town centre uses including retail, leisure, offices and other related uses;</li> <li>iii. The delivery of sufficient land to meet general industry, warehousing and other industries to support economic growth and social mobility;</li> <li>iv. The support of policies and delivery of land that would support the rural economy including agriculture, outdoor recreational economy, housing for villages, and uses that would make a village more sustainable or contribute to sustainable rural diversification.</li> </ul> <p>4.32 The intuition and rationale for splitting up the different types of economic development considerations is that each have very different locational requirements. As such, the above split would assist in ensuring that a suitable range and mix of employment land is identified.</p> <p>4.33 In terms of further more detailed points/topics, we would like to highlight the following issues:</p> <ul style="list-style-type: none"> <li>i. Under the Population and Communities topic, Figure 12.2 maps the location of key services, town centres and district centres and other facilities. However, it fails to pick up on a number of smaller local and neighbourhood centres that should be formally identified. Indeed, these centres also provide important day to day services that contribute to community cohesion, health and well-being and sustainable travel patterns as they allow for the delivery of 'walkable neighbourhoods' and provide services where communities can meet and shop. These areas should be identified regardless of whether they are formally identified in the adopted Local Plan or not. By way of an example, there are two local/neighbourhood centres within Greasby that are not identified on the plan provided. We are also aware of others in West Kirby and elsewhere.</li> <li>ii. Under the Transport topic, we consider Figure 13.3 should also map key town, district, local and neighbourhood centres so as to better illustrate areas that can be regarded as delivering walkable neighbourhoods. We also consider that it would be prudent to include routes where planned transport investment is targeted. For instance, we note that Saughall Massie Road in the Wirral UDP is identified for upgrading and whilst part of this investment has taken place, there remains a section up to West Kirby that has yet to be implemented. If undertaken, this could facilitate or alter the direction of existing bus routes and extend the cycle path network from Greasby to West Kirby.</li> </ul>	<p>We consider that the framework is proportionate and testing the plan against more objectives will be repetitive. The delivery of land will be considered as part of the housing and employment objectives (which also includes town centres). Appraisal of the alternatives will also consider the implications of releasing different amounts of land. With regards to local services and facilities, whilst not included on the map they will be considered as part of site assessments and an overall assessment of the sustainability of settlements.</p>
SCOP064	Landowner/Developer	<p>5. CONCLUSIONS</p> <p>5.1 The consultation response has been commenting on the Scoping for the Sustainability Appraisal produced by Aecom on behalf of Wirral Council.</p> <p>5.2 The scoping report does not fulfil the requirements for a Sustainability Appraisal (SA) required as part of a Local Plan submission under UK Law, policy and guidance. Instead, it is more geared towards a scoping report for a Strategic Environmental Assessment (SEA) appraisal, which forms a part of the SA process but should not be confused with the requirements of a SA as dictated by national planning policy and guidance.</p> <p>5.3 Indeed, the SA should inform and guide the principles and definition of what constitutes Sustainable Development, as defined within the UK and England. In order to do this, direct reference must be made to the NPPF and NPPG. Clarity needs to be provided as to the purpose of the Sustainability Appraisal as this report has not successfully identified the sustainability issues, nor has it established any synergies between environmental, economic and social topics which make up the purpose of sustainable development as outlined in the NPPF.</p> <p>5.4 The SA needs to be conducted to incorporate all three arms of sustainable development being; environmental, social and economic. There is currently an imbalance between these topics with a particular focus on the environment and minimal discussion on the economic and social objectives and the ramifications in terms of assessing reasonable alternative development scenarios. Whilst the consideration of reasonable alternatives will form part of the next stage of the SA, it is considered prudent to provide an indication as to what these alternatives might be at the earliest opportunity.</p>	<p>It is considered that the SA Framework considers a suitable and balanced range of factors. Housing and economy are included, as are transport and other social factors. It should also be remembered that the legislation is founded in the SEA process, which focuses more strongly on environmental factors. The reasonable alternatives will consider a range of growth and distribution options, including assumptions about the contribution that is made by Wirral Waters.</p>
SCOP064	Landowner/Developer	<p>5.5 We therefore consider the following focus recommendations are taken in to account as part of the SA:</p> <ul style="list-style-type: none"> <li>• Remove contradictions in the environmental objectives whilst providing synergies with both economic and social objectives;</li> <li>• Provide assessment of economic and social topics to including education, mental health and wellbeing, affordable housing and specialist care homes, crime and social mobility which itself is one of the key issues in the Wirral;</li> <li>• Focus on the viability and deliverability of new housing and employment land across the Borough following the consistent undersupply over the previous years;</li> <li>• Provide housing and sustainable assessments on the whole of the Wirral and reduce the focus on Wirral Waters which will only supply a small proportion of the sustainable objectives; and</li> <li>• Provide reasonable alternatives and assess them against the sustainability criteria through the preparation of a sustainability matrix.</li> </ul> <p>5.6 A greater focus on the 3 principles of sustainable development to include a wider range of topics will assist in providing a more robust scoping report which will form a major part of the SA and Local Plan development process.</p>	