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1	ID	Name	Organisation	Comments
2	HNDP 1	Miles Meridith Jones		Does not accept that proposals for the beach should not be included in the Hoylake NDP. Earlier consultation event had vast majority in favour of maintaining beaches as a crucial asset and tourist attraction. Left to nature they become an eyesore and ultimately present problems. The grasses spreading from Meols to Red Rocks should be suppressed by the approved chemicals successfully employed in the past. Concerned about lack of long term approach by the Council/budgetary restraints affecting long term maintenance. Highlight this to those responsible for maintenance. The beach is integral to the wellbeing and income of the community.
3	HNDP 2	Neil Grant		Hoylake NDP looks very well researched and comprehensive. Supports provision of food / drink places on the promenade for both local residents and tourists, The area next to the old lifeboat house would be perfect for this. Not having to visit West Kirby to go to a café near the beach would make a massive improvement to the area.
4	HNDP 3	Robert Heywood	Highways England	Highways England have no comment to make.
5	HNDP 4	Gillain Laybourn	Historic England	Historic England have no comment to make.
6	HNDP 5	Stephen Savce	The Environment Agency	The Environment Agency have no comment to make.
7	HNDP 6	Rebecca Pemberton	United Utilities	Request that United Utilities are kept aware of any additional growth proposed within the Neighbourhood Plan over and above the Council's allocations. Encourage early consultation with UU should additional development sites be allocated in the future.
8	HNDP 7	Robert Deanwood	Amec Foster Wheeler on behalf of National Grid	Request ongoing involvement in preparation of plans and strategies. Assessed National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan Area. There may be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites - contact details provided if further information needed. Weblinks provided for National Grid and SP Energy Networks Assets.
9	HNDP 8	Graeme McGaffney		On pages 2 and 3, the document makes reference to the required conformity with the National Planning Policy Framework (NPPF) and that the Neighbourhood Development Plan (NDP) must not promote less development than a District Plan and must be based on a robust evidence base. The current document to which the NDP turns for guidance in its policy making is the Unitary Development Plan (UDP). This document is the District Plan for Wirral. The document is now 15 years out of date, its envisaged term having expired in 2000. This document is time expired, does not itself accord with the NPPF and the requirements therein. It has to be recalled that elements of the document were superseded by the former Regional Spatial Strategy which has subsequently been revoked. This document provides neither an appropriate evidence base or starting point for an NDP for Hoylake which should seek to be positive and plan for the future needs and growth of the settlement. It is intrinsically wedded to the past and based upon needs that finished 15 years ago. It is somewhat disappointing that the plan has therefore not sought to plan positively for the current time. The emerging Core Strategy / District Plan, has been in gestation for a considerable time and has yet to be submitted to the Secretary of State for consideration. It is not based on up to date evidence and as yet does not demonstrably comply with the requirements of the Framework. Very little regard can and should be had to the contents of that document as a reference point as it is out of date and will inevitably be the subject of review and consultation. By its very nature that the proposed NDP is out of date in respect of matters relating to meeting housing and employment needs. This should be made clear within the document and that the NDP in similar vein to the defunct UDP does not attempt to meet the ethos of the NPPF whose golden thread is one of promoting sustainable and viable communities. There is no part of the emerging District Plan that seeks to meet the needs, already identified in independent evidence gathered as part of the development process for the District Plan. An approach that is mirrored in the NDP by choosing to ignore the contents of the 2010 SHMA and the 2012 SHLAA.

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10	HNDP 8	Graeme McGaffney		Page 4 of the document enumerates 6 themes as the issues and priorities that have been identified as important to the people who live and work in Hoylake. However the document does not seek to meet the identified needs for employment or housing but rather to circumscribe any potential provision with overly restrictive and negative policies. This does not accord with the directions of the Secretary of State or indeed the NPPF. As a minimum the document's scope and purpose should be qualified so that should it progress to a referendum, then all interested parties are made more aware in layman terms of the constraints that will be played on them as a community. However, fundamentally it is considered the plan as a draft is flawed.
11	HNDP 8	Graeme McGaffney		There is a requirement for the document to take into consideration information from a robust evidence base in formulating its policies. The only such evidence and guidance available at present is that which has been undertaken in the preparation of the yet to be submitted LDP, together with the published undertaking of the Local Council. The most pertinent in terms of meeting housing need are the Strategic Housing Market Assessment (SHMA) 2010, the Strategic Housing Land Availability Assessment (SHLAA) 2012 and the Wirral Council announcement that it will provide 3500 net new homes by 2020. Which by extrapolation indicates 70 per annum in Hoylake. The SHMA, which is referred to on page 12 of the proposed NDP, recognises an independent assessment for the provision of 153 new dwellings per annum in Hoylake. Similarly on page 12, reference is made to the SHLAA and it's identified sites for the provision of housing on Category 1 sites in Hoylake and West Kirby. These amounted to a total provision 90 dwellings across all sites of which 32 dwellings were on one site in Hoylake. However, these 32 were at Hoose Court which have already been built and actually resulted in a net loss of 7 dwellings on the site. There are no other Cat 1 sites available in Hoylake.
12	HNDP 8	Graeme McGaffney		The final piece of guidance is in the Wirral Council published Housing Strategy states a key objective as "Increasing the availability of housing and delivering affordable homes". On page 7, reference is made to the fact that, based on the 2011 Census, another piece of robust evidence, there are more teenagers than the national average. This is something to be welcomed for the future of the community and is lauded in the NDP Vision Statement as follows "There is a strong indication that Hoylake is an increasingly popular place for young families to live and that consequently the town is likely to increase in population rather than decrease.". Recognised but not addressed. The plan certainly makes no attempt to meet needs arising from this fact or plan for a continued, vibrant and sustainable community.
13	HNDP 8	Graeme McGaffney		Page 13 further states 'The priority is to maintain Hoylake as an attractive residential environment for its existing and projected population.' Again, the question that is begged but not answered, is how this is to be achieved. In reality, the various housing policies that are being proposed seem to wish to preserve the area in aspic. The recognition and preservation of Edwardian Villas is one thing but how many mid twenty year old couples with two children can afford to live in one?
14	HNDP 8	Graeme McGaffney		In relation to Page 14 [this page number relates to the pre-submission consultation draft- Page 15 of the Submission Draft refers] "Developing a Consensus", whilst the efforts of Hoylake Vision to engage with the local community are to be respected, nevertheless, with a response rate of 550 households representing only 10% of the total available the concept of consensus seems a misuse of the english language. Thereafter the use of percentages throughout the body of the document rather than the actual numbers in order to justify policy direction is extremely questionable.
15	HNDP 8	Graeme McGaffney		Pages 16 and 17 set out the vision and objectives for Hoylake. The vision sets out nothing in respect of housing and its only reference to employment is to the continued role of Carr Lane Industrial Estate. There are 9 main objectives constituting this vision. These make no reference in any way to addressing the needs for housing and specifically the provision of affordable homes. These must be provided in order to create a sustainable community which is a significant shortcoming of the document and illustrates its limited scope as set out above. This is the 'golden thread of the NPPF' and has been totally ignored in this NDP and thereby should almost certainly render the whole exercise as invalid.
16	HNDP 8	Graeme McGaffney		To state at the end of every section that the proposed restrictive policies ' <i>is in general conformity with all relevant national and strategic local planning policies</i> ' does not mean that these policies should [not?] be scrutinised in detail for their impact on the future of the total community. The statement is in any event blatantly incorrect as no attempts are made as to conformity with national planning policies and the NDP adopts an almost entirely negative approach to any development.

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17	HNDP 8	Graeme McGaffney		Pages 35 to 37 [these page numbers relate to the pre-submission consultation draft- Pages 37-39 of the Submission Draft refer] -address the theme "Homes in Hoylake". On page 35 [this page number relates to the pre-submission consultation draft- page 37 of the Submission Draft refers], lip service is paid to the above by including the following statement: <i>'even so, both the availability and affordability of housing remain a national and local priority'</i> . However the NDP fails to address this recognised need in the entire document in any way. Reference is made to the emerging Core Strategy and that housing needs will need to be met by infill development. This is not borne out by any evidence on housing land supply that supports either the emerging Core Strategy or the NDP. Indeed this assertion runs completely contrary to the subsequent Policy H3 which indicates that infill development will only be permitted in "exceptional circumstances". An example is given as development required to allow an elderly or disabled person to continue to live in their home [this is deleted in the Submission Draft]. This is assumed to be a reference to annex accommodation, rather than additional dwellings. Either way, it indicates the limited prospects for additional infill development to meet identified housing needs. In the unlikely event that such infill sites might address some of the housing requirement, abiding by policies D11 and D12 on page 33 [this page number relates to the pre-submission consultation draft] would in any event render a scheme as uneconomic. For by definition, the only buildings with sufficient curtilage to provide infill sites would be those praised as contributing to the character of Hoylake. In addition they would also be debarred by the conditions of Policy H3 on page 36 [this page number relates to the pre-submission consultation draft].
18	HNDP 8	Graeme McGaffney		Policy HS6 refers to the very qualified acceptability of residential uses above shops, a fact that is hardly going to provide for meeting the needs of all forms of housing. In addition, Wirral's Town, District and Local centres, delivery and framework published June 2011 and referred to on page 8 of the NDP, already identified that 59% of the upper floors on Market Street were being used for residential purposes. This hardly leaves a great reservoir of potential housing and one which would in any event be severely limited by this policy.
19	HNDP 8	Graeme McGaffney		The emerging Core Strategy indicates that the area could accommodate 193-308 new homes per annum but to achieve the higher figure would involve providing new homes on greenfield sites. The figures provided at the beginning of this document indicate the non-existence of any Category 1 developable sites in Hoylake. Rather than ignore this issue, the NDP and emerging Core Strategy need to address the housing and employment land crisis that is looming. If necessary they should recognise that greenfield sites and even Green Belt sites may need to be considered. Whilst it is accepted that the NDP cannot review the Green Belt boundary, it should set out its preferred position should a review of the current boundary become necessary to address the crisis in housing land supply that exists.
20	HNDP 8	Graeme McGaffney		Policy CL1 seeks to introduce a sequential approach to local employment development. This policy test is found nowhere in national or local policy and flies in the face of the ambition to create new jobs. Indeed it is directly contrary to other policies in the NDP which seek to allow employment uses in the town centre. The policy has no regard to the commercial realities of business and the locations they need to successfully operate. The application of such policies will represent a noose around the neck of any commercial prospects for employment growth in Hoylake.
21	HNDP 8	Graeme McGaffney		As a point of detail, it is considered that the NDP should be the subject of a Sustainability Appraisal / Strategic Environmental Assessment as well as Habitat Regulations Assessment, bearing in mind the potential implications for national and internationally designated sites.
22	HNDP 8	Graeme McGaffney		Appendix 1 sets out a character appraisal which comprises snapshot images of various buildings. Whilst these may be notable buildings, they represent a tiny proportion of the built environment within the NDP area and the text does not in itself adequately describe the character of Hoylake. Nor does it identify opportunities for new development to improve that character. Indeed the plan has not been drawn in a positive manner as required by the Framework and fails to address any development needs of the community.
23	HNDP 8	Graeme McGaffney		In summary, it is considered that the proposed neighbourhood plan fails to meet the basic condition tests set out in the act. It does not have any regard to the national policies and advice contained in guidance issued by the Secretary of State. The NDP does not contribute to the achievement of sustainable development. The NDP does not plan positively but seeks to establish a policy of restraint and is the precise antithesis of the ambitions of the NPPF in terms of planning for and meeting identified needs for housing and economic development.

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24	HNDP 9A	John Hutchinson		<p>Dear Councillors and Chief Executive,</p> <p>I ask again, why is there no such plan for West Kirby? Why have our Councillors failed us? Why do our Councillors not reply?</p> <p>It is noteworthy that the final paragraph of the foreword to the 'Basic Conditions Statement' says that "Hoylake is located within the 'Hoylake and West Kirby Settlement Area', as described in the Proposed Submission Draft Spatial Portrait."</p> <p>I do not understand the Spatial Portrait but I would like to have seen West Kirby in it. It is like having a family photograph taken done with one of the brothers or sisters omitted.</p>
25	HNDP 9B	John Hutchinson		<p>1. There is much of value commenting on protection of Natura 2000 sites. The proposed golf resort will have a great negative impact on these and other sites of scientific importance. The area proposed for the resort is important and so too are it's nearby neighbours. If animal wildlife is disturbed, the animals (vertebrates, invertebrates, mammals, reptiles) will either leave forever or persist in returning, to the annoyance of golfers. To achieve the balance of rainfall on site, retention for irrigation and outflow to downstream nature important nature sites, is going to be problematical because of the nature of ground and its form. Run-off chemical fertilisers, herbicides and pesticides will poison water courses.</p>
26	HNDP 9B	John Hutchinson		<p>2. According to David Ball, the resort is named for Hoylake because it is the nearest place to the site. The resort will have no impact on the town centre. When I was an anticipatory golf resort owner, the resorts were to be made so attractive that clients / patrons would not want to leave. Every penny spent off-resort, was a penny not in our profit.</p>
27	HNDP 9B	John Hutchinson		<p>3. The resort will have a negative impact on getting around Hoylake. I estimate that there will be approximately 1000 extra vehicles per day on resort. These will either clog Market Street and the level crossing or, and more likely, will avoid Hoylake and approach the resort from the area of Heron Road , Saughall Massie Road and the A540 or Motorway. Thus, this traffic will have a negative impact upon the surrounding wards without benefit to Hoylake.</p>
28	HNDP 9B	John Hutchinson		<p>4. The Resort will add nothing to the identity of Hoylake because golfers around the World know of Hoylake and will come to Hoylake regardless of the Resort. Staying on Resort will not add to their kudos of having played the Open Course because they will not have been there.</p>
29	HNDP 9B	John Hutchinson		<p>5. The resort provides none of the homes sought in the plan. S.5.6 Homes in Hoylake says "An analysis of the housing market in Hoylake (see the SHMA data summary in Section 2) indicates that there is a need to identify and manage the provision of windfall sites for more new homes that meet existing local demand. Affordability is likely to be a significant issue and all major housing proposals should include an affordable component." Not only are there no affordable houses on site, all being priced more than £700,000 judging by Machynys, but these are being built on Green Belt land contrary to any hopes regarding nature conservation and leisure.</p>
30	HNDP 9B	John Hutchinson		<p>6. The hotel for the Resort will be close by Carr Lane Industrial Estate. Maybe Developer can be persuaded to meet the cost of making an industrial area look attractive? Since the Resort hotel will be in the same place as the extant Golf Club, it will have the same postcode as the industrial estate premises.</p>

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31	HNDP 9B	John Hutchinson		7. "Map 8 : Open Spaces" is of particular interest because it includes part of the golf resort Site listing it as "Green belt" (from my screen resolution, I am unable to distinguish "Greenspace"). At present, public have reasonable access to the entire area of the proposed Golf Resort by way of Public Rights of Way and Permissive Paths. When the Resort is built, the entire site will be under private ownership and access will be granted only by permission. Public RoW will be retained but expect them to be diverted. BUT, remember, it is not safe to walk across a golf course, especially of the parks-style, which this will be, because lines of sight are restricted by features planted and maintained to make the course interesting to play. It will not be possible to regard the land comprising the Golf Resort as "Open space." If the hedges and fences are sufficiently low, then it will be possible to look across the Resort, but it will not be the same as the existing mixed agricultural land. It will be uniformly green with many maintenance, buggies and visitors' (on the new access road) vehicles crossing it. If there is an aspect, it will be entirely changed from the existing.
32	HNDP 9B	John Hutchinson		8. There will be no advantage gained by Hoylake from the Resort "S4. The Vision for Hoylake." Visitors to the Resort, will be encouraged to stay and spend their money there. If they leave, it will be to play other nearby notable courses at reduced fee. They will spend very little money in the town. There will be an increase in employment. Unless the Resort Director and departmental heads live in the area (Wirral, even), all of those employed locally by the Resort will be in the low-paid service sector that will do nothing to increase the skill-set of the Borough.
33	HNDP 9B	John Hutchinson		9. The Golf Resort will do nothing for "The Vision of Hoylake" because it will provide nothing except low-paid jobs. As previously said, patrons / clients will not visit the town because that is not in the interest of the owners. The town centre will not grow because of the Resort. Footfall will not be increased, especially if there are 1000 extra cars per day driving along Market Street. The homes to be built discourage inclusivity unless residents want the town be homes to wealthy home-owners. Evening life will not be increased by the Resort. All that is required, will be on Resort. The Resort will reduce accessibility to the site it occupies because it will be private land. Carr Lane will not be affected by the Resort. It might benefit but not if room-rates are too high for visiting business people. Pedestrian and cyclist access to the site of the Resort will be limited because it is private and because golf is an inherently unsafe to walkers and cyclists. Improvement to on-street car parking will be essential to cope with increased traffic flow.
34	HNDP 9B	John Hutchinson		10. These comments have been posted to Hoylake Vision, Hoylake Village Life and Hoylake Junction for the sake of public awareness. Comments have been invited in the past but none has been received. Councillors have been asked to comment. None has been received. David Ball (Council official) has been asked to justify the Resort. He has been unable.
35	HNDP 10	Kathryn Kelsall	Natural England	Natural England would like to see the natural environment better reflected in the Neighbourhood Plan (NP). Natural England would encourage more consideration to be given to protecting and enhancing the natural environment and wildlife habitats. Presently, the NP only includes a policy to protect Natura 2000 sites (NC1. Protection of Natura 2000 Sites), but the NP boundary is adjacent/in close proximity to a number of Sites of Special Scientific Interest (SSSIs) which are of national importance for nature conservation. Natural England therefore advise including a policy to protect these sites. It might be useful to look at the policies within the nature conservation topic of the Wirral UDP when developing this policy.
36	HNDP10	Kathryn Kelsall	Natural England	Opportunities to incorporate features into new build or retro fitted buildings which are beneficial for wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposals
37	HNDP 10	Kathryn Kelsall	Natural England	Should consider whether the NP has any impacts on protected species. Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following the receipt of survey information, Natural England should be consulted.

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38	HNDP 10	Kathryn Kelsall	Natural England	If the Neighbourhood Plan changes and there is potential for environmental impacts, Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening exercises may need to be undertaken. Should the proposal be amended in a way which significantly affects its impact on the natural environment then in accordance with S.4 of the NERC Act 2006 Natural England should be consulted again.
39	HNDP 11	Mr G Stevens		<p>Summary of Comments</p> <p>Agree thoroughly with (i) the NDP's picture that Hoylake has a distinctive Victorian and Edwardian character with a Promenade for good walking and sailing exercise, and with a beach style nature area; (ii) NDP reference to a "Classic Resort, Charming, Distinctive and Special Character, Quality Shops and Eating and Character housing.."; (iii) the Eastern end of Market Street be improved in look and feel; and (iv) all of this should be protected and, indeed, enhanced. However, the NDP should include more or strengthening words on issues of consensus that arose in the consultation: (i) The NDP and Policies (HS2) should have stronger words to protect this charm and character, for example, the ... "heritage should be preserved and enhanced and any changes should conform to and keep well in scale with the existing Victorian and Edwardian architecture"; (ii) Access across Market Street be increased, for example through pedestrian crossings and traffic calming (Consultation, page 27); (iii) The plans on how the Council will "smarten up" the promenade; (iv) No new drinking outlets – a key demand in the consultation; (v) While a skate park is cited, the NDP and LPA must address the issues of anti-social behaviour and safety (Consultation, page 9); and (vi) NDP rightly seeks to encourage visitors & businesses (Consultation pages 28-9) but fails to address the resulting car-parking requirement without silting up local roads.</p> <p>Given the length of the NDP and other issues of no consensus, the NDP raises unnecessary objectives, some based on confusing statistics, poorly interpreted; (i) On the statistics cited, Hoylake has an older profile of workers and retired people which, with the projected increase in older people in Wirral, the main point is an increase in older groups not younger; (ii) Access across Market Street and the railway is important - not a cycle lane along the Promenade (where safety issues for pedestrians and the elderly arise anyway); (iii) The point about new housing (NDP page 12) is based on a miss-use of statistics, which are at a Wirral level, not applicable here. The Consultation seeks a re-use of buildings and Hoylake's image improved through arts, visitors, retail and better appearance of buildings (Consultation pages 28-31). This would help draw in young professionals.</p> <p>[issues not directly repeated elsewhere are: The plans on how the Council will "smarten up" the promenade; While a skate park is cited, the NDP and LPA must</p>
40	HNDP 11	Mr G Stevens		<p><u>1 Introduction.</u> (NDP page 2). The statement about the "NDP must not promote less development than the UDP" is dangerous and not needed. The NDP, by its nature and reference to a "Classic Resort" will add conditions to development which then must fit in and harmonise with the distinctive character of Hoylake. Otherwise the NDP has not the value envisaged by the consultees of Hoylake in shaping Hoylake in its classic and distinctive character.</p>
41	HNDP 11	Mr G Stevens		<p><u>1. Introduction.</u> (NDP page 5). The reference to the Carr Lane Area under Green Belt is useful because the Golf Resort proposals imply "landscape renewal" in the form of green golf courses. This should raise the profile of Wirral as a golf and tourist resort, and retain the open and special nature of the Hoylake green spaces and its hinterland.</p>

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42	HNDP 11	Mr G Stevens		<p><u>2. Hoylake Today and Tomorrow:</u> (NDP pages 6 and 7). Firstly, the age profiles, pie charts and Census statistics are of differing cuts of the population, and then offer confusion in messaging. The bullets on page 7 show that Hoylake's population is "older" than the national average: older adults (45+) and retired people account for 52% in Hoylake compared with 42% nationally; and just 28% are "young adults" compared with 37% nationally. And this is supported by the four groups identified by research for Hoylake in that three out of four are deemed "comfortably off, wealthy or prosperous" (though not all may share this interpretation). The quoted increase over ten years to 2011 of 2% in people of working age covers all types of workers, older and younger. And Hoylake has less than one percentage point more teenagers than the national average (10.4% compared with 9.5%). However, the SHMA (table 7.2) provides a useful projection of the Wirral population to 2029. The only groups projected to increase are the pensioner households – and by a substantial percentage. Other age groups are projected to decrease. So, given the older profile of Hoylake, and the influence of the population trends, it is clear that the older groups (not others) increasingly come to Hoylake - one eventual aim for workers and the retired. Clearly, this age and working profile requires a distinctive place to live with sympathetic refurbishment of existing buildings, quality restaurants, development of small and high quality services, and (sensitive) car parking to support those businesses. <u>The NDP refers to such improvements which should be its main focus.</u> The theme of quality is supported by the classic resort approach and golfing centre envisaged elsewhere. Improvement in quality and the distinctive character of Hoylake's building fits in with the regeneration aims of the 2004 masterplan which sees Hoylake as a "Classic Resort, Charming, Distinctive and Special Character, Quality Shops and Eating and character housing..". This characterisation should be a golden thread throughout the Hoylake NDP and a robust benchmark by which to offer any improvement (change must only be an improvement against the benchmark).</p>
43	HNDP 11	Mr G Stevens		<p><u>Theme 1 Improving the town Centre:</u> The general results above and the consultation argue for improving the shop fronts and general look of the eastern end of market Street. In this respect the theme captures a key point for Hoylake. What is lacking is a clear statement about supporting parking for businesses. Small, businesses rely on not just local people to walk to their premises but visitors who shop and travel by car. While there is pressure on space in a linear town like Hoylake, a provision for car parking is essential and that provision should not rely on silting up local roads to the disruption of local residents who use their road frontage.</p>
44	HNDP 11	Mr G Stevens		<p><u>Theme 2 The Promenade and Recreation:</u> This is the Classic Resort that is Hoylake. The promenade is used by many for walking, running, sailing, and general low intensity exercise. A key point in the NDP.</p>
45	HNDP 11	Mr G Stevens		<p><u>Theme 4 special buildings and places.</u> Agree entirely with the sentiments of the final para on NDP page 12 and harmonise with the golden thread "Classic Resort, Charming, Distinctive and Special Character, Quality Shops and Eating and Character housing.." As this final para suggests, better or strengthened protection of conservation area and most parts of Hoylake (and into the Meols Drive area) should be a theme if not an objective of the NDP.</p>
46	HNDP 11	Mr G Stevens		<p><u>Theme 5 Homes in Hoylake:</u> The figures in the bullets are taken out of context and represent a poor use of statistics. The first bullet on house prices do not relate to Hoylake but to Wirral compared with the Northwest – not a suitable comparison. Indeed, a comparison is not necessary to characterise Hoylake. The descriptions of housing and buildings are given at length elsewhere.</p>
47	HNDP 11	Mr G Stevens		<p><u>Theme 5 Homes in Hoylake:</u> The next two bullets [2 and 3] refer to Wirral as a whole. Hoylake and West Kirby differ in their stock and capacity of housing from other parts of Wirral where housing is probably more available. And on the 40% affordable new housing bullet – it really refers to a net Wirral need - where the needs appear greatest in wards that are not rural like Hoylake (as the SHMA notes at tables 6.14 & 6.15, p61). Also, the 170 "need" figure appears as a modelling estimate, based on a pro-rata approach . However, the consultation (page 30) actually refers to re-use of buildings and upper floors.</p>

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48	HNDP 11	Mr G Stevens		<u>Theme 5 Homes in Hoylake</u> : The NDP paragraph [at the bottom of] page 37 starting “The CSLP...”, is confusing and not needed given that the Green Belt is for green purposes (as UDP Policy GB2 makes clear), and that the Consultation mentioned re-use of existing buildings. The next paragraph on page 38 is similarly confusing. It starts with the Green belt provides “very limited” opportunities for major housing developments but then follows this with a point about “new housing developments ...should contribute positively to the character of Hoylake”. The two points should not be linked and the latter is not needed. [The] Paragraphs [on pages] 37 & 38 are confusing, not needed, raise fears about Green Belt, and are best dropped.
49	HNDP 11	Mr G Stevens		<u>Theme 5 Homes in Hoylake</u> : New paragraphs on the aims for Hoylake as a place of character, tourism and charming resort would fit better, for example, if they said simply that the character is to be preserved and small scale re-use of buildings etc should be well designed and conform to the Victorian character of Hoylake. In summary, these bullets do not help with the main point of the NDP which is to raise the attractiveness, employment, and national image of Hoylake and West Wirral in tourism – as noted in the consultation. The final sentence needs to reflect this.
50	HNDP 11	Mr G Stevens		<u>Theme 6 Enhancing Carr Lane</u> : This theme is intertwined with the proposals for the Golf Resort. The proposals envisage a road from Carr Lane area to Saughall Massie Road and thus opens a back route for businesses and residents. A highly rated Golfing Hotel should raise the image of the area and encourage visitors, and potential buyers of houses. The traffic backlogs around Hoylake round-about would need to be better managed.
51	HNDP 11	Mr G Stevens		<u>Theme 6 Enhancing Carr Lane</u> : The Golf idea may not be a point for the NDP but the NDP reference to “landscape renewal” [page 40] should have extra words to protect the green fields and green belt from other housing development.
52	HNDP 11	Mr G Stevens		<u>4 The Vision for Hoylake</u> (pages 16 and 17): Many objectives support the golden thread idea above - “Classic Resort, Charming, Distinctive and Special Character, Quality Shops and Eating and Character housing..”
53	HNDP 11	Mr G Stevens		<u>Objective 1</u> appears odd and looks an unsmart objective. The emphasis in the NDP is to make Hoylake an attractive place to live and work (and some commute). It is more honest and simpler to use an objective of a living place as a general point in the following way. To ensure Hoylake is an attractive place to live and work through the following: ... list of 8 bullets currently numbered 2 through to 9 on pages 16 and 17.
54	HNDP 11	Mr G Stevens		<u>Objective 2</u> needs to include a line about supporting businesses through the provision of parking space as a priority.
55	HNDP 11	Mr G Stevens		<u>Objective 3</u> on a “vibrant evening economy” refers rightly to food and drink etc. However, 84% of consultees sought outlets that do not sell alcohol (NDP page 21, Consultation page 28). The countermeasure to the alcohol harm (“without prejudicing good local living conditions”) is weak. Objective 3 should be more specific and robust – i.e supporting high quality food and drink establishments that <u>ensure the good living conditions and do not raise the alcohol image of Hoylake as a drinking resort</u> . Policy HS5 (NDP page 23) should reflect this also.
56	HNDP 11	Mr G Stevens		<u>Objective 7</u> rightly says to “preserve and enhance..”. but in view of planning history, these words do not offer enough protection for existing buildings or standards for new development. The public want greater controls to support protection (NDP page 34, Consultation page 27). Turn objective 7 into a clearer high standard (as in Policy HS2 below), for example: “To fully preserve and enhance the distinctive the Victorian and Edwardian character of Hoylake ...maritime and golfing heritage, ensuring that change conforms to this distinctive character.”.
57	HNDP 11	Mr G Stevens		Delete <u>Objective 8</u> which is complex, self-contradictory and not SMART. Pedestrian access is a priority in the consultation. All that is needed is to add a point about safe pedestrian access to objective number 9 which covers this issue. Parking can be covered at objective number 2.

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58	HNDP 11	Mr G Stevens		5.1 [Protection of Natura 2000 sites] Understandable policies on the natural habitat and natural sites.
59	HNDP 11	Mr G Stevens		5.2 [Improving the Town Centre] Policy HS2 needs to ensure objective 7 is met. Extra words are needed to ensure preservation/enhancement of the special character of Hoylake, and the designs should be well within proportion and space, massing of existing character buildings. For example, two developments which do not “respond” (i.e. conflict with) are the retirement block at Kings Gap roundabout and the block addition to the Kings Gap Court Hotel. The latter is both unsympathetic and massive in relation to the Victorian Hotel. Suggest “preserve and enhance so that...conform and keep in scale with...”
60	HNDP 11	Mr G Stevens		[5.2 Improving the Town Centre] Strengthen Policy HS5 to protect the good living and ensure no harm from alcohol as above for objective number 3 of the Vision.
61	HNDP 11	Mr G Stevens		[5.2 Improving the Town Centre] The supporting priorities (NDP pages 23-24) seem sensible but are unsmart with no measure of how they are to be achieved. Overall, the policies here need to be underlined by and meet fully the UDP Policy HS15 on “Non-residential uses in a Primarily Residential Area”.
62	HNDP 11	Mr G Stevens		5.3 [The Promenade and Recreation] The background points about the promenade as a natural and valuable asset are well made. Many families and the elderly walk along the promenades, particularly in the spring and summer. The exercise is good and well recognised. Four of the six priorities seem reasonable.
63	HNDP 11	Mr G Stevens		[5.3 The Promenade and Recreation]: On priority 4, [skate park] finding space is tricky and the consultation (Consultation page 9) showed concern for trouble and safety issues.
64	HNDP 11	Mr G Stevens		[5.3 The Promenade and Recreation]: On priority 6, [cycle infrastructure] the consultation points (NDP page 26) do not raise the point about cycle infrastructure.
65	HNDP 11	Mr G Stevens		[5.3 The Promenade and Recreation]: However, the priorities fail to cover the public’s stated requirement for public toilets, as noted in the background.
66	HNDP 11	Mr G Stevens		[5.3 The Promenade and Recreation]: 5.3 [sic] In Policy BR1, “Enhancing the public realm” means what?
67	HNDP 11	Mr G Stevens		5.4 [Getting Around Hoylake]: Policy TR1 is complex. The background is relevant because one isolated priority is about cycle paths along the promenade. This would create conflicts along the promenade with families and the elderly pedestrians but the public are concerned about crossing Market Street (Consultation page 27). UDP TR10 (just a proposal) notes the coastal paths but a cycle lane exists between Hoylake and West Kirby. Given this evidence, it is more honest and necessary to replace the cycle priority with a paragraph on how access across Market Street is to be achieved. This should then be reflected in a simpler bullet, Policy TR1.
68	HNDP 11	Mr G Stevens		5.5 [A Distinctive Identity: Special Buildings and Places] On the DI Policies 1 and 2 (NDP page 35), the words on permission and protection need to be strengthened to reflect the consultation and the special character of Hoylake, oft noted in this NDP (Consultation page 27). For example in DI 1, replace the words...“will be permitted unless the proposed changes would materially diminish the significant character of the buildings..”, by “... will only be permitted if the proposed changes materially preserve and enhance the character of the buildings...”.
69	HNDP 11	Mr G Stevens		[5.5 A Distinctive Identity: Special Buildings and Places] In Policy DI 2, the word “respond” does not cover the requirement to preserve, enhance, keep in scale, massing and shape. Use of words like “conform and keep in scale” or “harmonise sympathetically and keep in scale with” would be clearer to most people and offer a clearer standard on which to judge proposals. Also the last clause on sustainability is not needed because it confuses the issue in question and is covered elsewhere.

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70	HNDP 11	Mr G Stevens		5.6 [Homes in Hoylake] On Policy H1, The main point in the consultation is about re-use of buildings and upper floors of commercial premises (NDP page 38; Consultation, page 30). And the context rightly notes the harm from "infill" .
71	HNDP 11	Mr G Stevens		[5.6 Homes in Hoylake] Policy HS3 helps but needs strengthening to say that "... proposals will not be permitted unless they conform and preserve the distinctive character of Hoylake (Victorian heritage)".
72	HNDP 11	Mr G Stevens		[5.6 Homes in Hoylake] Further, the public seeks improvements in the image of Hoylake, for example, in terms of the appearance of buildings, arts and culture venues and quality retail outlets (Consultation pages 28-30). Thus the emphasis should be on re-use but in a high quality development which is sensitive to the character of Hoylake, and enjoyment of local residents in neighbouring properties. And there was no consensus in the consultation about supplying new low cost homes and a view against new development for uses other than residential (Consultation page 24, 10 & analysis on Hoylake Vision website).
73	HNDP 11	Mr G Stevens		[5.6 Homes in Hoylake] This section should be more honest and include the above point that the statistics show that Hoylake is a destination for older workers and the retired because that is the profile of Hoylake, supported by population projections of large increases in pensioner households. Further, an image of Hoylake as a place of quality, culture and charm may draw in younger professionals and create the charming and quality township as sought by the NDP.
74	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	Scope of this Document [CPRE letter para 11] CPRE Wirral is supportive of the adoption of a Neighbourhood Plan to provide the third tier of planning policy protection to steer development to the most sustainable locations of Hoylake and to ensure it remains a place that people wish to live and visit. Importantly the Neighbourhood Plan must include: a defined area that is a suitable geography and appropriate forum; an accurate and representative evidence base; a widely accepted underpinning vision; priorities and policies based on aims and objectives evidenced as needed; engagement and consensus during its formulation from local stakeholders and residents; an independent examination; consensus via a local referendum and subsequent order to bring it into force. It is with these important seven elements in mind that CPRE Wirral commissioned this critical appraisal. Therefore the purpose of this report, is to query the relevance and appropriateness of the key elements of the Neighbourhood Plan.
75	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	Background [CPRE para 15] The NDP must dovetail with the national and local planning policies, but it must express what is important and distinct about Hoylake and set out a vision that will build on the strengths and make good any deficiencies. Local Wildlife Areas as well as natural habitat protected by National and International legislation should be protected. Also local green space that provides for community gatherings, visitor attractions and recreation should be identified. Is there potential to register Village Greens, Common Land or Nature Improvement Areas for example?
76	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 16] Future planning problems such as traffic congestion, insufficient affordable housing and flood risk ought to be identified and addressed. Essential new needed development will need to cover the costs of associated additional infrastructure, such as additional public transport services or water pumping stations, via identified development contributions achieved through Community Infrastructure Levy, and, where appropriate, Section 106 Agreements.
77	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 17] The environment lacks real attention in the NDP despite the fact the half the area is characterised as being rural and protected by Green Belt. This underlines that the rural area has little connection with Hoylake and should therefore be excluded from the Hoylake Neighbourhood Plan.
78	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 18] The NDP does not refer to the Climate Change Act 2008 at all. This is a significant omission. All new planning policies ought to enable 'sustainable' development. Energy demand must be reduced in the future to reduce greenhouse gases. Waste landfill must be reduced via the waste hierarchy of reuse and recycling in advance of landfilling. Everyone has a duty to make decisions that protect the resources for future generations and tackle climate change.

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79	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 19] There is no reference to improving air quality, protecting and enhancing tranquillity, no mention of protecting and replenishing mature trees, or hedgerows that contribute significantly to habitat and wildlife and flora.
80	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Background/Neighbourhood Plan Themes</u> [CPRE paras 20-21] A seventh theme to protect and enhance Hoylake's natural assets ought to be the starting point for the NDP as this is a key attraction for people remaining and moving into the area. It offers immense residential amenity and keeps people fit and healthy by offering walking and cycling opportunities on the doorstep. The identified themes of the NDP ought to be: 1. <i>Protect and enhance Hoylake's Natural Assets</i> (existing themes retained and renumbered 2-7).
81	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Neighbourhood Plan Themes</u> [CPRE para 22] It is good that Hoylake Vision wants to be a good neighbour, which is important under the NPPF Duty to Cooperate requirements.
82	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE paras 23-24] The NDP has no statutory authority to alter the Wirral Green Belt boundary. This can happen only as part of a Strategic Green Belt Review as part of the Wirral Local Plan making process. Landscaping works that do not adversely impact on the openness of the Green Belt area are acceptable. Concern is however expressed at the potential adverse impact on the five important Green Belt purposes if the proposal for a new resort golf course and 'enabling development' of a new road and major housing development.
83	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 25] The protection of Natura 2000 sites is important and is required by European legislation. The lack of a map showing the Natura 2000 and other protected sites is worrying and we recommend that one is provided, even if the rural areas are to be excluded from the Neighbourhood Plan. A key theme for the local community must be to look after nature and facilitate its conservation and access by the public. The NDP should as a minimum seek to protect and enhance these very special sites.
84	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Hoylake Today and Tomorrow</u> [CPRE para 26] The summary of Hoylake Today and Tomorrow is rather subjective in nature. It lacks robustness. The section would benefit immensely from inclusion of factual data to back up a number of statements, which without such data are unclear, difficult to understand, and lack rigor.
85	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 27] An average household annual income is stated as £35,608, but it is not clear whether this refers to a specific year (in which case which year) or whether it is the mean for a longer period. Dear prospective, it would be helpful to know how this figure compares with those for the rest of Wirral, Merseyside and national averages. It would be helpful to know the percentage of population in the Acorn geo-demographic population groups. It would be helpful to express the average household income as a percentage of the average house price to better show the affordability issues.
86	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 28] The Hoylake Neighbourhood Plan covers approximately one third of the local population of the two neighbouring townships of Meols and, West Kirby. The summary bullet points on page 7 would again be better understood if the background data tables could be viewed, either as an appendix or as a separate evidence base document.
87	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Theme 1: Improving the Town Centre</u> [CPRE para 29-30] It may be true that Hoylake is vibrant but further economic data is required to back up this claim. How many VAT registrations, businesses going into administration, and new starts in the last decade? There are a lot of charity shops, betting shops and A1 type food take-away shops and this can imply that the trade has radically diminished over the years due to changing retail patterns, e.g. internet shopping and the trend for out of town retail. Retail data can give a real insight into what the retail changes have been over a period of time.
88	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 31] It would be helpful to understand the crime and community safety issues, relating to the rural area, and impact, if any, on farming.

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89	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 32] It is a boost to the economy to have an occasional sporting event, but the frequency is not sufficient to keep those businesses that may benefit such as local hotels, restaurants, cafes busy each year, all year round.
90	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 33-34] On our area visit we noted the streetscape and public realm improvements which do make the area look smarter. These tend to be focused at the western end of the district centre. Public realm investments can make a place more attractive, but must maintain accessibility for all including elderly and wheelchairs/pushchair users. Shop security shutters can make an area look bleak and in decline, especially at night time, but there are innovative ways of overcoming this problem through 'Designing out Crime' solutions.
91	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Theme 2: The Promenade and Recreation:</u> [CPRE para 35- 37] The medium to long term aim of enhancing the promenade is laudable. However, care should be taken not to overlook the high level of existing users. In fact some research to understand the current usage may be beneficial. The International Sand Yachting status is relevant. During the site visit there were a large number of people walking on the promenade and beach, including bird-watchers, and dog walkers. It is likely that the coastal area is already frequently used, on a daily and/or several times a week basis. Currently there is little amenity in terms of café or shops, and the promenade is at a short walking distance to the main district centre. The map indicates that Hoylake extends a spur into Meols at the northern end to capture the recreational facilities next to the new life boat station.
92	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 38-40] it is a mini-boost to the economy to have an occasional sporting event, but a reality check may need to be applied on to the value of another golf resort on the economic development of the area. With fourteen golf courses [list provided in footnote] there appears to be a saturation of golf facilities in the Wirral. Does it need another? As it is, you can almost walk around the Wirral Peninsula from one Golf Course to the next. Neither a need assessment nor economic impact assessment has been undertaken to justify a new golf resort. The multiplier effect of another golf club and possible benefits to supply chain businesses need to be better understood, as it is likely it would not yield significant local benefit. Furthermore, the likely environmental impacts such as impact on natural habitats, water supply and drainage and need to be more fully informed. An environmental impact statement and a hydrology report would be required to understand the issues fully.
93	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 41] Cycling should be supported with additional infrastructure for cyclists such as cycle lanes, secure parking racks and signage to help them navigate the area safely.
94	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 42] It is good that the MORI poll indicates more visitors are satisfied with the area. The potential for golf related tourism cannot be based only on the increase in Council website traffic.
95	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Theme 3: Getting Around Hoylake:</u> [CPRE para 43] It is good that a large proportion of the population of the Neighbourhood are within a 10 minute walk of the town centre. Cycling could increase with improved infrastructure to promote it.
96	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE paras 44-46] Direct bus services in each direction linking West Kirby and Birkenhead are every 15 minutes during the week, half-hourly on Saturdays and hourly on Sundays. For further destinations an improvement is required. The area is served by two rail stations with regular (every 15 minutes) services to West Hoylake and Liverpool. Hoylake is located along a single highway (A540/A553). Traffic flow is congested at peak times. Also of note is that the promenade is one-way from Kings Gap in the West to Hoyle Road in the East. No aspiration to improve local public transport is stated under this theme.
97	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Theme 4: Special Buildings and Places:</u> [CPRE paras 47-48] There are two Conservation Areas and numerous listed buildings within the boundary. Heritage assets of the area are well documented in Appendix 1, and locations identified on Map 3, and a comment that more buildings would qualify for listing but currently do not benefit from statutory protection. Protecting and enhancing the built heritage is crucially important due to their intrinsic value and for attracting people to visit the area.

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98	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Theme 5: Homes in Hoylake:</u> [CPRE paras 50-51] The Wirral Strategic Housing Market Area (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) provide the evidence base for this theme. Key housing issues are identified. Forty per cent affordable new-build housing is recommended and this will help to house those who are least well off, and should help to achieve a balanced community in the future.
99	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE paras 52-53] The housing requirement for Hoylake and Meols is 153 dwelling per annum (dpa). This figure should be reduced to reflect the smaller area covered by the Neighbourhood Plan to understand how much housing, and what type and size of dwellings ought to be brought forward to respond to objectively assessed need. By scaling down the requirement we consider a figure of approximately 25 dpa to be an acceptable level of homes in the Neighbourhood Plan area. A significant development has already been built out on Market Street, and a further outline consent exists on Charles Road, it could be said that the Hoylake Neighbourhood Plan should be planning for approximately 18 dpa. The supply of housing land is identified to be able to accommodate 90 dwellings, 67 dwellings on brownfield (previously developed), and 23 dwellings on greenfield land. Assuming the sites are viable and immediately available this means Hoylake can demonstrate a 5-year supply of housing.
100	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Theme 6: Enhancing Carr Lane Industrial Estate:</u> [CPRE paras 54-55] The site accommodates 120 small and medium sized enterprises, is well occupied and has potential to bring forward four further sites for use. Scottish Power has a base there due to the location of a National Grid high voltage point. A housing scheme at Carr Lane, was recently refused to the south of Hoylake at appeal.
101	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>3: Developing a Consensus</u> [CPRE paras 56-57] A household survey was completed in 2012/12 with 550 responses, equal to ten per cent of households. The feedback was analysed. Further consultation informed the exercise. It is claimed, without robust linkage between the household survey, that a clear consensus was arrived at to inform the policies and priorities. Until the responses have been submitted to this consultation it is difficult to know what the level of support, or opposition, is in fact.
102	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Hoylake Vision Forum and the Area Geography:</u> [CPRE paras 58-59]The Hoylake Community Planning Forum (Hoylake Vision) was designated as the formal body to progress the Neighbourhood Plan in April 2013. CPRE Wirral represented by The Wirral Society would like to be included in Hoylake Vision in the future to better represent the interests of those who value the rural parts of Hoylake and the wider Wirral Peninsula.
103	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Is the boundary suitable for the Hoylake Neighbourhood Plan?</u> [CPRE paras 60-61] It is important that the Neighbourhood Plan is more than a site development brief for the new golf resort. Having undertaken an area visit the area boundary is questionable. The neighbourhood boundary to the south and east area very closely resembles the defined area of the proposed new resort golf course. The West boundary again stretches west beyond the "Hoylake" sign and again resembles the area defined for the new resort golf course. The inclusion of the open Green Belt land to the south of the Hoylake township must be questioned. It would appear that its inclusion is, as referred elsewhere, only to make this Neighbourhood Plan a brochure for the resort golf course. The boundaries should reflect not just the signage, but the historical area, and functioning economic boundaries of Hoylake. The boundary stops short of the beach, and there is no explanation as to why the beach is excluded from the Neighbourhood Plan.
104	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Is the evidence base accurate?</u> [CPRE para 62] The evidence base should be more fully written into the Neighbourhood Plan to provide the justification for the policies and priorities. Currently the connections are loose.
105	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 63-64] There is no evidence to suggest there is a need for a fifteenth Wirral Golf course. There has been no economic impact or leisure study to justify why a new golf resort on land currently used for farming. The land is outside the settlement boundary and most importantly is protected by its Green Belt designation. An access via the level crossing would need to be considered and a new road would have a significant adverse impact on the environment. An Environmental Impact Assessment would be required to understand the adverse consequence to habitat, wildlife, water quality, water supply, use of pesticides/fertiliser of a new golf resort and associated road and housing developments. An understanding of the mitigation, compensatory works and other issues need to be fully understood.

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106	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 65] Understanding the hydrology of the upper part of the Birket catchment, a low-lying, low-gradient flood plain across north Wirral is important. The area has been subject to flooding at frequent intervals.
107	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 66] A map showing Natural England's Agricultural Land Classification (ALC) should be included. We understand the mapping shows part of the green fields to the south of Hoylake as very good quality and this is protected by the NPPF Paragraph 112 and 143 as they are Agricultural Land Classification Grade 1, 2 or 3a. [extract of ALC map and proposed golf course boundary provided]. The proposed golf resort is unlikely to enhance the quality of the soil, and this is another reason that we think it should not be pursued.
108	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Is the evidence base representative?</u> [CPRE para 67] There seems to be a high degree of subjectivity in the document concerning the desirability of the proposal for a new golf resort on farmland to the south of Carr Lane Industrial Estate.
109	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Hoylake Neighbourhood Plan Vision</u> [CPRE paras 68-70] Is the Vision an acceptable starting point to underpin the Neighbourhood Plan? There is no mention of natural assets and given half of the, questionable, area is rural this is a significant omission. For example, the neighbouring habitat is significant for Black Tailed Godwits. [NDP Vision reproduced in para 69] [The Vision] is a series of statements and not a proper vision. It is weighted heavily towards economic factors relative to social and environmental factors (see NPPF paragraph 7) and, therefore is not balanced. The environment is a key attractor for people and businesses alike, it keeps people healthy and adds to the quality of life, and it has intrinsic value in its own right.
110	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>5.1 Protection of Natura 2000 Sites</u> [CPRE para 71, 73-75] A definition of Natura 2000 sites may provide clarity to Policy NC1. Natura 2000 sites consist of a network of nature protection areas in the territory of the European Union. It is made up of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated respectively under the Habitats Directive and Birds Directive. The network includes both terrestrial and marine sites (Marine Protected Areas). It is possible that Policy NC1 contravenes European legislation such as Habitats Regulations 2010 on Natura 2000 sites and our view it misrepresents the intention of NPPF Paragraph 116 which sets out that, when determining planning applications, Local Planning Authorities refuse proposals that are harmful to protected sites, except in exceptional circumstances and where it can be demonstrated that the proposals are in the public interest. There is nothing in the Neighbourhood Plan that constitutes very special circumstance. The proposed new golf resort could not be judged to be an exceptional circumstance in Hoylake due to the existence of 14 golf courses in Wirral alone, including private and municipal golf courses. This includes and the world famous Links course, the Royal Liverpool Golf Club in Hoylake which played host to The Men's Open Championships in 2006, 2014, and The Women's Open in 2012. It is not generally in the public interest to destroy Natura 2000 sites. Mitigation or compensatory provision is less sustainable than leaving habitat and wildlife undisturbed. The Policy NC1 ought to be written to actually conserve and enhance biodiversity.
111	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 72] It is essential that all necessary studies are carried out to best practice standards. In 2008 there was a proposal to designate part of the area as Site of Biological Importance, therefore understanding the mammals, reptiles, birds, plants, trees and hedgerows is clearly very important. [2 photos of land included in the Golf resort referenced].
112	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>5.2 Improving the Town Centre</u> [CPRE para 76-77, 80] The priority set out is to maintain the extent of retail uses along the linear corridor, despite the indication from Wirral Council in the Core Strategy Local Plan that Hoylake is to be defined as a 'District' rather than 'Key Service Sector' and to accommodate changes in retail patterns. High quality public realm is sought and increased use of upper floors of shops to add to the vibrancy of the district centre, particularly at night time. The community indicated that further non-alcohol based leisure facilities are required such as cinema, arts venue etc. Job creation would help the economic fortunes of the area.

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113	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 78] Whilst policies HS1 to HS6 are primarily urban focused it is worth mentioning for HS1 Active Frontages that care should be taken not to over represent charity shops, pound shops, betting shops and takeaways as this can actually tip the balance between a place being attractive or not. NOTE: Reliance on takeaways has been shown to have adverse health impacts.
114	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 79] There is a disconnect between the shops and the promenade as users have to travel through residential streets causing disturbance. A masterplan would help to better link the two places and encourage the right mix of development to support the improvement of the town centre, whilst the shop front design guide would help improve the street scene.
115	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>5.3 The Promenade and Recreation</u> [CPRE para 81] The promenade is no longer being as effectively utilised as it should be. There are toilets at the eastern end of the promenade in Meols, but the toilets at the end of Trinity Road have been closed. Innovative ways of increasing visitor numbers are required. This in part is to do with physical infrastructure, including amenities, and the other is to communicate that it exists, via signage and to advertise a wider programme of events to attract different groups of residents and visitors of all ages and backgrounds.
116	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 82-83] The beach is not included in the area boundary. This strip of coast ought to be included if the promenade and recreation is an identified priority for Neighbourhood Plan policy. The map shows how the seafront attractions of Meols have been captured in the area, which represents a spur extending from the area to the north. [photo of the sea facing houses on the promenade included]. The paragraph about the beach being an ecological asset is confusing due to the use of a double negative and would benefit from a re-write
117	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 84] Other recreational facilities are referred to. Some key facilities are not mentioned such as the play area on Carr Lane.[photo included]
118	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 85] A new skate park is identified as needed/desired by residents. A statement is made about there being a clear mandate from residents from the community to improve the promenade and recreation. Whilst it may be true the household survey did show support for the promenade and recreation the public has not yet signed up for the policies and priorities. The purpose of this current consultation is to gauge the level of consensus.
119	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 86] The policies and priorities BR1 and BR2 seem acceptable.
120	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>5.4 Getting around Hoylake</u> [CPRE para 87-88] TR1 Market Street is a bit limited given the issues and opportunities and community views. The Neighbourhood Plan ought to more fully embrace sustainable transport modes and public transport to help relieve congestion on Market Street. Planning policies can identify sustainable transport infrastructure requirements, and ensure that any new development that comes forward covers the costs of a range of non-motor based transport improvements.
121	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 89] We are supportive of improving the Public Rights of Way across Hoylake, especially enabling people to walk and cycle into the beautiful local countryside.
122	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>5.5 A Distinctive Identity: Special Buildings and Places</u> [CPRE para 90] The DI Policies are generally acceptable. They will support the protection and enhancement of Hoylake's built environment.
123	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 91] The creation of a heritage trail should include reference to the important work of Sir Patrick Abercrombie, world renowned architect and Professor of Civic Design at Liverpool University. He was a founder of the Wirral Society, whose members have combined to ensure much of Wirral Peninsula's natural environment has been protected to date.

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124	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>5.6 Homes in Hoylake</u> [CPRE para 92] CPRE believes it is right that planning should ensure everyone has a decent home to live in. Issues with availability and affordability should be addressed. We are generally supportive of policies H1, H2 and H3. Living over the shops would address upper floor vacancy in the district centre.
125	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 93-94] We advocate that previously used land is used in advance of farmland to provide for an identified need of new homes. Where new housing is identified as needed and cannot be accommodated on brownfield land, infill, or windfall sites, and planned extensions to urban areas should be based in most sustainable locations with adequate infrastructure included to ensure economic, social and environmental factors are truly brought into balance. Land with Green Belt designation should not be developed for new housing unless it can be demonstrated that very special circumstances exist
126	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>H.7. Enhancing Carr Lane Industrial Estate</u> [CPRE para 95] The new golf resort is seen as an opportunity to build a new road across land designated as Green Belt. The proposed new road would be contrary to the purposes of Green Belt designation and many organisations would object to the proposal.
127	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 96] If a wildlife and wetland centre is evidenced as needed, because of the visitors it could attract and educational benefits, the Neighbourhood Plan should support its development. In fact the Neighbourhood Plan suggests non-alcohol based leisure developments would help the visitor economy and it would help diversify what is a saturated golf market.
128	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 97] CL1 is good as it includes a sequential approach to the development of land (i.e. using previously developed land in advance of greenfield land).
129	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	[CPRE para 98] Policy CL2 Comprehensive Redevelopment accepts employment development in land designated as Green Belt. The Neighbourhood Plan has no statutory remit release Green Belt land for development and is contrary to the NPPF Section 9. This policy is in effect unsound and would be challenged; it would not stand up to the independent examination.
130	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>6. Making it Happen</u> [CPRE para 99-100] Hoylake Vision with the Council will monitor the effectiveness of the Neighbourhood Plan. Hoylake Vision will actively pursue funding and political consensus to implement the area action planning work identified.
131	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Stakeholders:</u> [CPRE para 101-102] It is difficult to ascertain whether the Neighbourhood Plan Process has been truly inclusive of all stakeholders; as there is a lack of reference to the environment, it is doubtful that other environmental organisations have been consulted. This can be remedied in the future. There is no reference to those people who disagree with any element and on what grounds they object? There must be some local stakeholders who do not wish to see their local countryside developed.
132	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<u>Independent Examination</u> [CPRE para 103] To comply with the National Planning Policy Framework, 2012 (NPPF), the Neighbourhood Plan must be judged to be positively prepared, justified, effective and consistent with national policy.

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133	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<p>Conclusions [CPRE para 104-105] The NPPF requires that sustainable development should be enabled bringing economic, social and environmental factors into balance. It is only by striking a balance will truly 'sustainable development' be enabled, thereby protecting and enhancing Hoylake's distinctiveness of place. The Wirral Peninsula's natural beauty, architecture, flora and fauna and its coast should be protected and enhanced in the future. Problems identified with the Submission Draft Neighbourhood Plan are as follows:</p> <ul style="list-style-type: none"> • The boundary is poorly defined and ought to include the beach, and should exclude the fields to the south and either be drawn tightly around Hoylake town or extend to Graham Road in the West and include Queens Park to the East (if it is going to include Meols sea front attractions). • The summary of Hoylake Today and Tomorrow is rather subjective in nature. It lacks robustness. The section would benefit immensely from inclusion of factual data to back up a number of statements, which without such data are unclear, difficult to understand, and lack rigor. • There is no reference to Climate Change Act 2008 and this is a significant omission. • There are no references to air quality, tranquillity, trees, or hedgerows. • No theme relates to the environment of natural assets, arguably the natural starting point for the Neighbourhood Plan as it offers immense residential amenity and keeps people fit and healthy by offering walking and cycling opportunities on the doorstep. • The evidence base should capture the biological importance of the area if it is to include the rural area. The Neighbourhood Plan omits reference to the rural character of half the area, indicating that this out of settlement area should be logically omitted. • The Neighbourhood Plan is too economically focused • The Neighbourhood Plan is contrary to European legislation and the NPPF concerning biodiversity protection and enhancement • In places, the document reads like a development brief for a new golf resort, without the necessary supporting evidence base to demonstrate a fifteenth Wirral golf course is in fact needed. The hydrology of the area may be adversely impacted. • The Neighbourhood supports Green Belt loss without very special circumstances being demonstrated. • The natural assets are not properly evidenced, mapped or prioritised • The Neighbourhood Plan ought to more fully embrace sustainable transport modes and public transport to help relieve congestion on Market Street. • Infrastructure requirements need to be more fully considered. • Access to rural areas could be improved.

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134	HNDP 12	Jackie Copley	Campaign to Protect Rural England (CPRE)	<p><u>Recommendations: [CPRE para 106]</u> The Submission Draft would be improved by the following considerations:</p> <ul style="list-style-type: none"> - An area boundary revision. - Strengthening the evidence base in justification the proposed policies and priorities. - The Climate Change Act 2008 ought to be referred to in the document. - Reference to protecting and enhancing the area's air quality, tranquillity, trees, and hedgerows would help improve the quality of Hoylake as a place in the future. - The introduction of a natural environment theme, or a cross cutting theme underpinning all the policies and priorities, is important. - Reference to the rural half of the geography would make the document more complete. The grade of farmland is not referred to. Is it BMV, i.e. ALC Grade 1, 2 or 3a? If so, is protected? - The Neighbourhood Plan should include more reference to social issues and the natural environment. - The Neighbourhood Plan must comply with European legislation and the NPPF environmental protection. - The Neighbourhood Plan should be more about the whole community of Hoylake and not be a development brief for a new golf resort. If the planning case is made a development brief would occur later in the process. - No planning case has been made for the need for a further golf course. The proposal and the new road and major housing development would be contrary to the five important purposes of Green Belt designation. - An assessment of the hydrology is important to understand flooding issues more fully. - The Neighbourhood Plan cannot promote Green Belt loss. - The natural assets need to be fully evidenced, mapped and prioritised with specific policies to ensure protection and enhancement in the future. - Sustainable transport mode improvements should be incorporated. - Infrastructure requirements should be fully detailed. - New and improved Public Rights of Way, with signage/waymarkers and other amenities would improve the local communities access to their rural areas. - Stakeholder engagement should be widened. The Wirral Society has a real interest in the economic, social and environmental future of Hoylake and needs to fully engage with the planning process.
135	HNDP 13	Hilary Ash	Wirral Wildlife	<p><u>NC1 Protection of Natura 2000 sites.</u> Support. Sad that "the protection of wildlife and the natural environment was not identified as a priority by the people of Hoylake". While the beach and foreshore have all the designations they need to protect them, maybe Wirral Wildlife and other conservation organisations need to do more to explain and promote the wildlife there.</p>
136	HNDP 13	Hilary Ash	Wirral Wildlife	<p><u>NC1 Protection of Natura 2000 sites.</u> In the light of the Paris agreement in December 2015, and the overwhelming evidence of climate change, all development needs to be assessed against carbon reduction targets and adapting to, or mitigating, climate change. This should be recognised formally in this plan.</p>
137	HNDP 13	Hilary Ash	Wirral Wildlife	<p><u>5.3 Promenade and BR1 Seafront Recreation.</u> The beach lies outside the NDP area. While the NDP says "its policies would not directly affect any wildlife sites" there is occasional scope for conflict. For example, kite-surfing and sand-racing at times when the wintering birds are present, leading to disturbance which uses up the birds' valuable energy. Since the birds are present autumn-winter and most beach activities take place spring-summer, currently the conflict is limited to early autumn (September), but may increase if continual mild autumns lead to people wanting to do such activities further on in the year. Proposals under BR1 Seafront Recreation do therefore need to consider any effects on the wildlife of the North Wirral Foreshore SPA/Ramsar/SSSI, even though in most cases there would be no problem. Wirral Wildlife support the sentence that says that the Plan would not promote "anything that harms coastal defence or nature sites".</p>

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138	HNDP 13	Hilary Ash	Wirral Wildlife	<u>BR2 New and enhanced public open space</u> Subject to comments made concerning NC1 and BR1, Wirral Wildlife support the development of visitor facilities such as toilets and car park. There is scope for promoting Hoylake further as a bird-watching destination, with close views possible on appropriate tides. This would be good for local suppliers of food, drink and accommodation as it increases business in the quiet season. The first Wirral Wader Festival in November 2015 was generally agreed by the organisations behind it to be successful and is likely to be repeated.
139	HNDP 13	Hilary Ash	Wirral Wildlife	<u>BR2 New and enhanced public open space</u> Wirral Wildlife support increased and enhanced Public Open Space in principal, as Hoylake is densely-built. Access to high-quality open space, especially that managed in a naturalistic fashion, has proven benefits to physical and mental health. Because of the dense urban building, continued access to the land south of the town is important. A Golf Resort may impede this.
140	HNDP 13	Hilary Ash	Wirral Wildlife	<u>BR 2 New and enhanced public open space</u> The WBC Beach Management Plan is up for review next year (postponed from this year because of the cuts in staff). The continued natural accretion may necessitate changes in the way the beach is currently managed.
141	HNDP 13	Hilary Ash	Wirral Wildlife	<u>CL2 area for comprehensive redevelopment</u> , designated in the UDP as an area "in need of landscape renewal". The nature of such renewal is not specified. Such a designation does not mean that built development or usage change was envisaged, more likely measures such as tidying of waste, better maintenance of hedges and ditches, and good horticultural practice would be encouraged. CL2 includes part of the proposed Hoylake Golf Resort area, and we have commented in considerable detail on that to Wirral Borough Council. We have major concerns about the possible effects of the proposed golf resort on wildlife, especially the wintering birds. This is Green Belt land, so any built development would have to fulfil "very special circumstances".
142	HNDP 13	Hilary Ash	Wirral Wildlife	<u>CL2 area for comprehensive redevelopment</u> For the purposes of the NDP, it should be noted that land to the south of the designated area holds sufficient waders and wildfowl, roosting during high tides, that it is proposed by RSPB to apply for it to be part of the Dee Estuary Special Protection Area. Whether or not that succeeds, a number of damp fields within and to the south of CL2 are certainly functionally part of the SPA. They act as Supporting Habitat to the SPA by providing high tide roosts for the birds. Roosting habitat is in short supply round the Dee Estuary, North Wirral Foreshore and Mersey estuary. Any development on CL2 would therefore have to take account of the wintering birds and prove that the proposed development would not do any harm to the Natura 2000 sites. There is also other wildlife present in the area, including species that are internationally protected (bats), nationally protected (water vole, barn owl, brown hare, breeding lapwing, breeding grey partridge) and of local importance (greater pond sedge, orchids, various invertebrates). Any proposals for CL2 should also take the possible presence of these species into account. We would obviously be interested in any proposals to create a wildlife and wetland centre in this area or nearby (p40 of NDP).
143	HNDP 13	Hilary Ash	Wirral Wildlife	SUMMARY of changes we ask you to consider: NC1 We support this, but suggest the addition of a sentence to recognise that all development should consider the necessity to adapt to global climate change, and to mitigate it wherever possible. BR1 should recognise that there is scope for conflict between wildlife, specifically wintering birds, and recreational activities, though this will normally be limited to a short time period in autumn. Proposals should therefore consider impacts on wildlife. BR2 We support this, but would include the desirability of keeping access to the land south of the railway line, including existing public footpaths. CL2 The policy should recognise that there is important wildlife on and adjacent to this area, which must be taken into account in any proposals to upgrade the current landscape. We congratulate the people of Hoylake on getting this far in the NDP process, and ask you to consider some small changes to the NDP, as above, so that the plan is truly sustainable.

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144	HNDP 14	Neil Parry	The Wirral Society	<p><u>Summary</u> The Wirral Society supports the concept of bringing decision for the locality to the locality. It is easy to see how this may work for townships with a long history of town or parish councils, having well defined areas.</p> <p>However, for the Wirral, being a "Unitary Authority" there must be a robust process to decide the boundaries that may have only existed before as say postal addresses. The only relevant previous authority for Hoylake was Hoylake UDC, covering West Kirby, Hoylake and Meols.</p> <p>We have grave concerns that the Neighbourhood Plan has correctly identified the area that is "Hoylake" and object.</p>
145	HNDP 14	Neil Parry	The Wirral Society	<p>Concerned that the only project with any definition presented is the "out of town" Hoylake Golf Resort, that appears to require "illegal" development in the Green Belt to gain any developers' interest. The HNP would seem to be written as supporting evidence for the much disputed development proposal of the Hoylake Golf Resort.</p>
146	HNDP 14	Neil Parry	The Wirral Society	<p>Understand that the Neighbourhood Plans must fit within a Council's Local Plan, and therefore must assume that the Local Plan must be completed and agreed before any weight is given to this Neighbourhood Plan.</p>
147	HNDP 14	Neil Parry	The Wirral Society	<p><u>General Comments</u> Appreciate that the Neighbourhood Planning system is new and is still finding its way. It could be an important adjunct to the Council's Local Plan adding needed detail applicable to each township. However, it is difficult to understand how the Hoylake Neighbourhood Plan can be considered without similar Neighbourhood Plans from the surrounding townships..., e.g. West Kirby, Meols, Newton etc.. Further, how does Neighbourhood Plan work for the areas of open field, noticeably lacking in residents or businesses, perhaps just a farmer and birdlife? Is it even appropriate to include these areas in a Neighbourhood Plan? Who has the responsibility to ensure that the land area assumed by the Neighbourhood Plan is correct, that the Neighbourhood Plan is not detrimental to the surrounding townships or rural areas?</p>
148	HNDP14	Neil Parry	The Wirral Society	<p><u>The Area of the Hoylake Neighbourhood Plan</u> [Map 1] The map clearly shows the Hoylake township but also includes large areas of farmland south far beyond the Carr Lane estate. This cannot be considered part of the township. Where is the "robust evidence" to support the open land inclusion in the HNP? The map clearly shows that Hoylake has "annexed" land that is part of Meols to the east. The boundary must surely be Hoyle Road, as identified by the Promenade becoming Meols Parade at that point and Market Street becoming Birkenhead Road.</p> <p>Again, where is the robust evidence and consultation process to justify this annexation? Of additional concern, the Council has obviously spent taxpayers money setting up "Welcome to Hoylake" signs at the end of Deneshey Road and now a new sign further east by Queens Park.</p> <p>It would seem as if the Council spending taxpayers' money to meet the boundaries claimed by the authors of the un-adopted Hoylake Neighbourhood Plan. The HNP area having extended eastwards then ruins [sic] inland taking in a number of fields and roads towards Meols. Strangely going as far into Meols as the disputed Hoylake Golf Resort proposal. Again where is the evidence for this annexation? These fields are not Hoylake. Similarly, on the Western end, the road sign "Welcome to Hoylake" is to the east of Airlie Rd by Hoylake roundabout, yet the HNP takes land along Meols Drive, westwards, past the Royal Liverpool Golf Club. Again, where is the justification?</p> <p>This gives the authors of the HNP claim over the farm land towards West Kirby, again conveniently similar to the land for the disputed "out of town" Hoylake Golf Resort proposal. Who has approved the borders of the HNP, and what justification has been given as there are no countering Neighbourhood Plans from Meols, West Kirby etc. against which the borders can be set and approved?</p> <p>As it stands, we must object to the area taken by the HNP authors to be in Hoylake Neighbourhood Plan.</p>
149	HNDP 14	Neil Parry	The Wirral Society	<p>[NDP] Page 9 At paragraph 3.121 (p.44), the masterplan [this is the Hoylake and West Kirby Masterplan] proposes an upgrade of facilities at Meols Parade Gardens in order to facilitate a better range and quality of family-oriented recreational facilities under the branding of a "Beach Activity Zone". This statement underlines the concern at Hoylake taking over Meols without a challenging Meols Neighbourhood Plan. The Gardens are called "Meols Parade Gardens", not "Hoylake Parade Gardens". The upgrade in facilities is to be welcome, but unlike the Hoylake Golf Resort proposal there is little detail. The HNP strangely talks about the "Beach Activity Zone" but fails to include any of the beach in the area assumed by the HNP.</p>

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150	HNDP 14	Neil Parry	The Wirral Society	<u>Town Centre</u> page 8 [first para on NDP p8 quoted] "Since 2009, the town centre's performance has improved. As a result, in part, of the 2006 and 2014 Golf Open Championship events, the service sector has continued to strengthen; most notably with the opening of the Holiday Inn Express and associated Marco Pierre White restaurant brand. This has had the effect of increasing quality and boosting market confidence" Where is the financial evidence to justify this statement? There was a boost in the number of Wine Bars etc. at the "West End" of Hoylake, but this has now become the area of derelict wine bars. The assertion that the "Opens" have had a lasting effect must be dismissed until real evidence can be produced. It is very difficult to understand how an event lasting a week that may not come to Hoylake again for 20 years, or never, can be taken as any basis for "growth".
151	HNDP 14	Neil Parry	The Wirral Society	<u>Golf Resort</u> Page 9 [part of final para on NDP p9 quoted] "Hoylake then hosted a very successful Golf Open Championship in 2006, which raised hopes that Hoylake would be positioned at the centre of a region-level golf and spa resort brand. This would offer the prospect of long term investment and regeneration." The site of the proposed Hoylake Golf Resort is outside of Hoylake Town. It is on land between West Kirby and Meols, behind Hoylake. It is obviously an "out of town" development and cannot be considered as part of Hoylake. (See above re the concerns over the definition of the HNP area.) The Hoylake Golf Resort started as a concept pre 2002, gained no traction with the 2006 Open, nor with the 2014 Open, although the Council had promised a developer would be announced. In September 2015 we were told a developer had been found but one must assume only because the Council is now promoting the euphemism of ("illegal") "Enabling Development" on its own Green Belt farm land. This promotion of inappropriate development by the landowning Council is surely in itself totally "inappropriate". It also is contrary to the Council's rejection of affordable housing development on the neighbouring Green Belt land referred to in our response to page 13 of the HNP. The area of the Golf Resort is outside of Hoylake town. It is not a development in the existing township that would boost trade in the existing town. As a "resort", it would only prosper if it retains custom in the resort and does not "encourage" customers to leak away into neighbouring Hoylake Town. At best it will add to the traffic congestion during construction if not after. It will more likely transfer business from Hoylake Town to the "resort" in a manner similar to the facilities provided at the "Opens". Therefore, we must strongly object to any assumption that the so called Hoylake Golf Resort will be of benefit to Hoylake since the authors are unable to give any balanced figures for the benefit to Hoylake, or the losses due to regular shoppers etc. keeping away as per during the "Opens".
152	HNDP 14	Neil Parry	The Wirral Society	[NDP page 9, Footnote 10] A New Vision for Northwest Coastal Resorts: summary report, Locum Destination Consulting, Northwest Development Agency, March 2003" This report is now almost 15 years out of date. Surely, after the World Banking Collapse, what is now possible has changed dramatically. [Bottom of NDP Page 9] "The Hoylake Vision community consultation exercises have established that there is strong public support for more activity on the promenade." This point should be clearly made as a main and separate item. It should not be "buried" within the statement about aspirations for a Golf Resort. It must be stressed that the "strong public support" is for the Promenade, not the "out of town" Golf Resort. It is very surprising that the authors give much space over to the proposed "illegal" development of the HGR, but only once mention that Hoylake has Sand Yachting. Hoylake is firmly established as an international Sand Yachting venue that uses both Hoylake and Meols beaches. Similarly Hoylake is established as a national venue for bird watching, especially for the "Winter Waders", that obviously utilises the Promenade, but it does not fall in with the "Golf Fixation" of this "plan" for Hoylake and so is ignored.
153	HNDP 14	Neil Parry	The Wirral Society	[NDP] Page 10. [part of 2nd para on page 10 quoted] "Ahead of the Golf Open Championship of 2014 there was a 74% increase in visitors to the golf section of the Council's tourism website, www.visitwirral.com, which demonstrates the potential for golf related tourism in Hoylake". It is to be expected that there would be interest in the local golf and the area especially by people considering visiting the Open. What is very noticeable by their absence are figures of real increase in business and whether it was sustained after the "Open". If the best figures for growth that can be produced are "hits" on a website there must be grave concern that the reason "real financial figures" are not presented is that they do not exist, or if existing, do not support this assertion.
154	HNDP 14	Neil Parry	The Wirral Society	<u>Special Buildings</u> Page 12 [part of first para p12 quoted] "There are a number of unlisted buildings that have architectural, historical or community value and contribute to Hoylake's special identity (for example the Old Lifeboat Station, the Hoyle Road Community Centre, former Barclays Bank and Jessie's Yard)." Are there two Barclays banks, one is defined as listed in the paragraph above this?

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155	HNDP 14	Neil Parry	The Wirral Society	<u>Homes in Hoylake</u> Page 12 This section seems to focus on only new builds rather than the maximising the occupancy of say the flats above the shops in Market Street, or the potential for conversion of large houses. Such brown field development would obviously be encouraged if there were incentives to offset the cost of brown field over green field development.
156	HNDP 14	Neil Parry	The Wirral Society	<u>Enhancing Carr Lane Estate</u> Page 13 The greatest problem with the Carr Lane Estate is the access across the railway at Hoylake Station. The traffic can now build up backing into and congesting Hoylake Town. There must be consideration that any development around the Estate, e.g. the "out of town" Golf Resort would only increase the traffic and cause greater congestion. What options are there for more flexible timing of the barriers, they seem to be "down" for 5+ out of every 15 minutes. It is strange that the Council and the Planning Inspectorate refused (in 2014) a development of "affordable homes" on Green Belt land at the end of the estate. (Application 12/01377 and appeal PI 2220745). This is land adjacent to the proposed Hoylake Golf Resort and its "illegal" "Enabling Development".
157	HNDP 14	Neil Parry	The Wirral Society	<u>Developing a Consensus</u> Page 15 As above there must be concern that this Neighbourhood Plan is unsound given the lack of Neighbourhood Plan in the neighbouring townships that would challenge and then resolve the boundaries. The consensus, if obtained, is only from residents and businesses, there is no representation from people who use Hoylake as a centre, but live over the boundary. There is obviously no consensus from Meols or West Kirby, as they have not developed Neighbourhood Plans, nor can vote on this one.
158	HNDP 14	Neil Parry	The Wirral Society	<u>The Vision</u> Page 12 [NDP Page 16] Objective 2 is to strengthen the Town Centre. However the only development proposal in this document is the "out of town" Golf Resort, likely to cause congestion and potentially take business from the existing Town Centre. There is no defined proposal for developing Hoylake "Town Centre" only a vague reference to "The Row".
159	HNDP 14	Neil Parry	The Wirral Society	<u>Natura 200 Sites</u> Page 19 Where are these, why are they not defined if they are so important?
160	HNDP 14	Neil Parry	The Wirral Society	<u>Outdoor Sports</u> Page 26 [second para on NDP p26 quoted] <i>"The CSLP includes within its priorities the need to: "maintain and improve facilities for visitors including provision for leisure, tourism, coastal recreation and water sports, golf and facilities and open spaces associated with the coastal promenades". The Council considers that Hoylake is generally well provided for as far as public open space is concerned, and that the paucity of outdoor sports facilities within the urbanised part of Hoylake is compensated for by less-structured recreational opportunities afforded by the surrounding Green Belt.</i> "The "Paucity of outdoor sports facilities" needs to be considered alongside the facilities available just down the road at West Kirby or Meols- e.g. Football pitches. It is good to note that the recreational activities offered by the undeveloped Green Belt are recognised. Perhaps this should be kept untouched. Again, the international standing of Hoylake as a Sand Yachting venue is ignored by the authors.
161	HNDP 14	Neil Parry	The Wirral Society	<u>Vehicle Access</u> Page 40 [3rd para on NDP p 40 quoted] <i>"If a new Golf Resort is created there would be an opportunity to create a new vehicular access into the Estate from Saughall Massie Road or Heron Road, thereby reducing the need for industrial traffic to travel through Hoylake. A new road would be outside the scope of the NDP to deliver but there is an opportunity to achieve landscape renewal in parts of the Green Belt surrounding the Estate – a need identified in the UDP – perhaps by the creation of a wildlife and wetland centre."</i> If there is a need for a new vehicular access that should be a separate matter and not tied into any proposed Golf Resort. There is the immediate issue of whether the roads "offered up" by HNP are actually suitable for HGV traffic. This is a case (referred to above) of the HNP making plans for the "neighbouring" areas. Surely, this is therefore an inappropriate statement and must be removed. Any HGV traffic using this imagined new road would still have to queue at the Level Crossing to enter Hoylake, so will more likely drive as now, through Meols and Hoylake. The main issue for the estate and any Hoylake Golf Resort would be the dramatic increase in traffic to build and then run the resort resulting in the tail-backs from the level crossing blocking yet more of Hoylake. It will not make working on the estate easier. One must consider whether the "illegal" luxury homes planned by the Council in the Green Belt for the Hoylake Golf Resort would sell given they would be on a busy HGV route. With respect to achieving "landscape renewal" around the (Carr Lane) estate there have been plans to develop Green Belt around the estate and the Council and Planning Inspectors have refused housing development as referred to in our response to the Carr Lane Estate (Page 13 of the HNP).

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162	HNDP 14	Neil Parry	The Wirral Society	<u>Visitor Numbers</u> Page 43 [Final para p43 1st sentence] <i>"Finally, an important part of the vision for Hoylake relies upon increasing visitor numbers."</i> We agree that increasing visitors to Hoylake Town would help the economy of Hoylake Town. However, the only definite plan appears to be the "out of town" Golf Resort. It is not evident how this development will add to the tourist volume for Hoylake Town. As a resort, its function would most likely be to distract visitors from Hoylake Town and Promenade to the resort. Again, the international pastimes of Sand Yachting and Birdwatching are ignored.
163	HNDP 15A	Mike Turpin		Intend to submit comments about this consultation. Seek clarification of the following: The consultation and other Hoylake Vision documents together with the questionnaire were very loose/ambiguous in the use of the evening economy/night-time economy.: Question 1: Is there a clear planning distinction eg evening means 1800-2300 or 2400. Night time means dusk to dawn. This is clearly particularly relevant to opening late at night eg post 2300/2400 particularly for bars serving alcohol. Question 2: Has Wirral Council changed its policy of opposing opening of bars serving alcohol beyond 2400 apart from special extensions Question 3: Presumably this consultation could lead to such changes even if there is currently no change Question 4: Do local Councillor representatives wish to maintain the current Council policy which has been greatly welcomed by local residents You will note that we are opposite the Market St/Albert Rd 'bar' area where there has been considerable pressure to extend beyond midnight. We would appreciate you comments on fact, or indeed any other comment that you think might be helpful in making our submission' I would note that we find much to commend itself in this proposal and do think that change for the better is to be encouraged and agreed through consensus. However on past evidence there has been considerable friction in this area with noise and other anti-social disturbance late at night.
164	HNDP 15B	Mike Turpin		[email paras 1-2] As long term residents of Hoylake we very much welcome the hard work that has gone into these proposals by all concerned in Wirral Council, Hoylake Vision, residents and businesses. We do agree with the vast majority of the proposals and the general approach taken to improve the town to the benefit of all.
165	HNDP 15B	Mike Turpin		[email paras 3-6] We do think it important that their [sic] are a sufficient range of businesses in the town and commend the attempts to find consensus and balance. We also think it is important to maintain those historic and heritage features which also contribute to a well balanced town. Our own house is part of that being part of the development around 1868-70 after the extension of the railway line to Hoylake. This was linked part of the same development of the Stanley Hotel and bowling green that was re-developed some years ago. The parade of houses opposite the shops is a major feature in old postcards and is still an attractive component of modern Hoylake and Market St in particular. At the same time we would like to emphasise that this is so because the balance has been struck between the needs of residents and good businesses in this area. This balance has over the past decade come under considerable pressure primarily because of problems of noise and anti-social behaviors stemming from some of the bars serving alcohol and loud music. We as residents have welcomed Elwira [sic] Council (Officers and Councillors) support in maintaining a sensible balance. We wish this to continue and not to be changed by any proposal in this consultation.
166	HNDP 15B	Mike Turpin		[email paras 7- 9] In particular we note that there is NOT consensus in the town for extending the late night economy. This is shown in the questionnaire made recently and in many views expressed over recent years by local residents. There is no clear definition of 'evening' or 'night' time economy which is ambiguous and confusing in many circumstances. This is reflected in the statement in this proposal which is repeated many times throughout the document. To be more specific we would could continue to oppose attempts to extend late night opening with alcohol beyond 1130-midnight period because of the proven disruption it causes to residents opposite the Albert rd / Market St area. We would not want Wirral Council to change its stance on this. This does not preclude special licenses on particular occasions - but not throughout the year. Nor are we oppose [sic] to restaurants, coffee house, bars etc making a good business and enhancing the amenities throughout all normal hours.
167	HNDP 15B	Mike Turpin		We would like to be advised of the next steps in this process. Is the proposal accepted in its entirety or subject to comments made in the next planning meeting?

	A	B	C	D
1	ID	Name	Organisation	Comments
168	HNDP 16	Mark Cunningham		<p>As a resident of North Parade I wish to comment upon section 5:3 (BR1 and BR2).</p> <p>Whilst I agree that the provision of public toilets should be a priority to enable visitors to enjoy the beautiful coastline, I am concerned at the presumption that the promenade needs to be developed to have a greater impact on the local economy. The attraction to residents and visitors alike is that the promenade is a tranquil place, unspoilt by the proliferation of tourist and other commercial facilities. This gives Hoylake its uniqueness. It is this peacefulness that attracted many residents to Hoylake in the first place and continues to attract many visitors. West Kirby and New Brighton provide greater facilities (cafes, etc) for those seeking a different experience and it would be detrimental to the area to seek to take it in this direction. I consider the phrase 'Focal Point for Seafront Recreation' NDP BR1' (outlined in orange on map 2) as too broad in it's definition and therefore do not support this. I hope that my comments do not come across as 'nimbyism'. as I make them as someone who spent many years as a visitor to Hoylake Promenade and contributor to its local economy before moving here. No other part of Wirral can provide this unique offer and to seek to alter this would be an irreversible loss to the residents, community and the Wirral.</p>