

# WIRRAL LOCAL PLAN 2021 - 2037 SUBMISSION DRAFT



## WIRRAL LOCAL PLAN 2020-2035 ISSUES AND OPTIONS CONSULTATION (Regulation 18)

27th January to 6th April 2020

Consultation Statement  
MARCH 2022



[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

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## Appendices

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- 2-Consultation Media
- 3-Schedule of consultees
- 4-Summary of all comments received and Council response.
- 5-Key issues raised and Council response
- 6-Key issues raised by statutory consultees and Council response



## **Wirral Local Plan Issues and Options Consultation (Regulation 18)**

### **1.0 Introduction**

- 1.1 The Council undertook consultation on the Wirral Local Plan 2020 to 2035 Issues and Options Document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 27th January 2020 and 6th April 2020. This includes an extension of two weeks to take account of difficulties faced by consultees in responding due the unfolding national Covid 19 Pandemic restrictions.
- 1.2 This consultation statement sets out:
  - a. How the Consultation was undertaken; and
  - b. A summary of the Key Issues Raised and the Council's response.

### **2.0 What we consulted on**

- 2.1 Consultation took place on the following documents:
  - Wirral Local Plan 2020 - 2035: Issues and Options 2020;
  - Potential Allocations;
  - Interim Sustainability Appraisal & Habitats Regulations Assessment 2019;
  - Interim Equalities Impact Assessment;
  - Various Local Plan Evidence Base Documents as set out in [Appendix 1.1 of the Issues and Options Document](#).

### **3.0 How we consulted**

- 3.1 The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SCI) adopted in March 2014 -see [Microsoft Word - Final Revised SCI 10 March 2014.doc \(wirral.gov.uk\)](#).
- 3.2 In accordance with the adopted SCI, the Issues and Options Document, the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) were made available for inspection at Council offices and Libraries throughout the borough.
- 3.3 Full details of how to comment on the Local Plan Issues and Options Document were set out on the [Council web page](#). This included a video guide on how to register on and use the online planning portal.

#### [Online Issues and Options Draft Policies Map](#)

- 3.5 Consultees could also view draft proposals and allocations via an online [Issues and Options Proposals Map](#).

#### [Housing and Employment Site Proposals](#)

- 3.6 Notification letters were sent to neighbours of all proposed housing allocations and for those consultees who only wanted to comment on specific sites were able to use an [online mapping tool](#).
- 3.7 This mapping tool showed potential site allocations to meet the Borough's housing, mixed-use and employment needs over the timescale of the emerging Local Plan for Wirral.
- 3.8 Users were able to find a particular site or to view their local neighbourhood by area by entering their address, postcode or an individual site reference number into the search bar above the online map and which then navigated the user directly to the desired site.
- 3.8 By clicking on an individual site, users were able to access the details relating to the site. For housing and employment sites, a link was displayed to the 'Potential Allocations' consultation on the Council's online consultation portal. Users were then able to add their comments about each potential site.

[Simplified version](#)

- 3.10 A 24 page, easy-read and [simplified version of the Issues and Options Local Plan Consultation Summary Document](#) was also published and made available on the Council's website.
- 3.11 The easy read version was also made available at walk in events and at local libraries. A simplified questionnaire was also available at the walk in events and document deposit locations.

[Interim Sustainability Appraisal and Habitats Regulations Assessment](#)

- 3.12 Comments on the Interim Sustainability and Habitat Regulations Assessment could also be made via the Council's online consultation portal: See [Sustainability Appraisal | www.wirral.gov.uk](#)

### Drop In Events

- 3.13 Drop in sessions with display panels for the public to view took place during the consultation period so the public could see the proposals and discuss them with planning staff. Drop in events took place in each constituency – 12 in total (see Table 3.1). The events, which were extensively publicised through posters and media, ran from 12-8pm allowing people to drop in at lunch time or after work. Support was available to show people how to use the online portal.

**Table 3.1: Walk In Event Locations**

Date	Location	No of Visitors
Monday 27 January	Heswall Library	144
Wednesday 29 January	Bromborough Civic Centre	61
Thursday 30 January	West Kirby Concourse	147
Monday 3 February	Birkenhead Town Hall	57
Wednesday 5 February	Wallasey Town Hall	34
Tuesday 11 February	Wirral Change, Birkenhead (11:30am to 3pm)	49
Tuesday 18 February	Bromborough Civic Centre	83
Wednesday 19 February	West Kirby Concourse	111
Thursday 20 February	Heswall Library	134
Tuesday 25 February	Leasowe Millennium Centre	36
Wednesday 26 February	Birkenhead Town Hall	56
Thursday 27 February	Wallasey Town Hall	58

- 3.14 In addition to the display panels explaining the Issues and Options proposals, large format copies of the draft proposals maps were made available. Copies of the Issues and Options Document, SA and HRA were also available. Assistance was provided to attendees to register on the online Planning Portal, to view and to submit comments.
- 3.15 As set out in Table 3.1 the events were well attended with several of the events at full capacity.
- 3.16 A copy of the publicity for the sessions and the presentation is included in Appendix 2.

### Local Plan Focus Groups

- 3.17 In accordance with the adopted SCI, five focus groups (see Table 3.2) were also facilitated to discuss the various options for housing and employment land allocation set out in Options and Issues report. Wirral Council commissioned Ove Arup and Partners Ltd (Arup) to support the Council in their delivery of focus groups during the Local Plan Regulation 18 Issues and Options consultation, which ran from February to April 2020.

**Table 3.2: Focus Groups**

<b>Focus Group</b>	<b>Date</b>	<b>Venue</b>	<b>Number of participants</b>
Youth	17 February 2020	Pilgrim St Arts Centre	24
Disability focus	24 February 2020	The Grange, Wallasey	8
Wallasey	17 March 2020	Microsoft Teams	4
Birkenhead	18 March 2020	Microsoft Teams	5
South & West Wirral	20 March 2020	Microsoft Teams	3

- 3.18 Initially, all the focus groups were planned as face-to-face sessions in different locations across the Wirral. However, with the emergence of Covid-19 and associated Government guidance, the Council and Arup concluded face-to-face meetings presented too high a risk to the health and safety of participants and facilitators. Therefore, on 17<sup>th</sup> March 2020, the decision was taken to hold the remaining focus groups virtually, via the Microsoft Teams platform. Despite changing the approach to focus group delivery, the objectives and content remained the same enabling consistent analysis across all focus groups. The approach to digital engagement is set out in the methodology.
- 3.19 All participants who were expected to attend the face-to-face focus groups were offered invites to the online events. This ranged from 9 (Wallasey & Birkenhead groups) to 19 (the combined Wirral West/South group) participants. However, possibly due to the impact of Covid, only the numbers detailed in Table 3.2 attended each session. The decision was made to run each session if three participants joined – a criteria that was met in each focus group.
- 3.20 Despite the comparatively smaller number of people in attendance, each of the online focus groups was still very successful. The output was of a high standard and, with some adaption of the format, conversations were of a much greater depth than what would have been possible with a larger group. To that end, all virtual groups ran for just under three hours due to the detailed conversations being held, despite the events being anticipated to run for less time due to the change in format.
- 3.21 Details of the focus groups and the full presentation and report are included in Appendix 1.

#### Hard to Reach Groups

- 3.22 The Council made efforts to engage with hard to reach groups as follows:
- A focus group was arranged for those with disabilities (see Table 3.2 above);
  - An additional walk in event was arranged for ethnic minorities; and
  - Copies of the simplified Issues and Options Document and Questionnaires were distributed to homeless persons centres in Birkenhead.

### Frequently Asked Questions

- 3.24 A schedule of [frequently asked questions](#) on the Local Plan and Regulation 18 Consultation was available online on the Council website.

### Consultation Media

- 3.25 Copies of various hard copy media used in the consultation such as leaflets, questionnaires, exhibition panels and adverts are set out in Appendix 2.

### Publicity

- 3.26 A formal [Notice of Consultation](#) was issued on 27 January 2020 and published on the Council website.

- 3.27 In accordance with the adopted Statement of Community Involvement, all persons, agents and organisations as well as statutory organisations were notified by email or, where appropriate, by letter of the consultation, how to find out more information, how to comment, and the deadline for comments to be received. A list of the people and organisations contacted is provided in Appendix 3.

- 3.28 In addition, extensive publicity was given to the consultation via:

- A formal advert in the Wirral Globe on 29<sup>th</sup> January 2020 (see Appendix 2).
- Local media content and paid adverts to encourage sign up to portal and dates/locations of drop in events.
- Social media posts on Twitter and Facebook.
- Consultation explanation leaflet and posters distributed to key locations throughout the borough during Regulation 18 consultation.
- A [user guide](#) for the portal was made available on the Regulation 18 Consultation webpage and respondents were required to register providing name and contact details if they wanted to submit comments. Explanation was provided that comments would be published online anonymously.
- A [Local Plan explainer video](#) was produced for use on social media channels, alongside simple and shareable infographic and visual content. The video was posted on the Council's YouTube page. The video explains what the Local Plan is, why it is needed, the Local Plan production process, the situation for Wirral, and what the Consultation is asking.
- Regular features were posted on the Wirral View website setting out [facts on the Local Plan](#), including regeneration and development, and [encouraging feedback](#) through the Regulation 18 Consultation.
- Additional electronic notifications, containing a link to the consultation documents on the Council's website, were also sent to members of the Council's four Constituency Area Committees; the Wirral Partnership and

Wirral Plan Delivery Group; and the Council's Corporate Mail Chimp database.

- It was also included in the Community Action Wirral monthly e-newsletter to third sector contacts.

#### **4.0 Issues and Options Consultation Outcomes – Key Issues**

- 4.1 To assist consultees and the Council the Issues and Options Document set out a series of questions across each of its sections together with an additional question to give an opportunity for consultees to submit other comments. The Council encouraged comments to be made via its online Planning Consultation Portal but also accepted comments submitted in writing
- 4.2 The consultation generated 25,992 comments from 1396 consultees for the main Issues and Options Document and 482 comments from 161 consultees who responded to the site allocation consultation event. The number of respondents is smaller than the total number of responses received as the majority of the responses submitted made multiple from the same respondents.
- 4.3 The comments received with names and details redacted in accordance with the Council's privacy policy are available on the Council's [Consultation Portal](#) and also in PDF version on the Council's [web site](#).
- 4.3 The comments received and the Council's response including how the Local Plan Submission Draft Plan has responded to them is set out in the following appendices:
- **Appendix 4**-Sets out a **detailed summary of all the comments** received by question together with the Council's response. It should be noted that due to the number of comments received it has not been possible to provide a response to each individual comment received.
  - **Appendix 5**-Sets out a **summary of the Key Issues Raised** and the Council's response.
  - **Appendix 6**-Sets out a **summary of the Key Issues Raised by Statutory Consultees and Bodies** and the Council's response.

#### **5.0 Further consultation undertaken prior to publication of the Local Plan Submission Draft**

##### Evidence Studies

- 5.1 Consultation on the following evidence base documents and updates to existing evidence took place in June and July 2020:
- Agricultural Economy and Land Study Addendum;
  - Wirral Landscape Sensitivity Assessment Addendum;
  - Wirral Local Landscape Designations Review 2020; and
  - Exploring The Computation of Housing Need in Wirral 2020.
- 5.2 During 2021 a number of new evidence base documents and updates to existing evidence were also subject to public consultation:
- Draft Wirral Environmental Sensitivity Study: 6-week consultation ended 29 March 2021;

- Draft Employment Land and Premises Study: 6-week consultation ended 31 March 2021;
- Draft Green and Blue Infrastructure Strategy: 6-week consultation ended 5 April 2021;
- Wirral Housing Density Study 2021: 6-week consultation ended 27 April 2021;
- Birkenhead 2040 Framework: consultation March - June 2021; and
- Local Green Space Designations: Review of Sites: 8-week consultation ended 6 August 2021.

5.3 Comments received on these consultations were passed to the relevant consultants and considered when finalising the studies as appropriate.

**Further consultation with Statutory Consultees**

5.3 The Council undertook further detailed engagement with statutory consultees in September 2021 with a full working draft of the Local Plan Submission Plan circulated for comment. Comments received from this consultation fed into the final version of the Submission Plan.

## **Appendices**

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## Appendix 1-Local Consultation Focus Group Report

# **Wirral Local Plan 2020-35**

**Issues and Options Consultation  
Focus groups**



# Before we begin....



# Agenda

Item	Description	Duration (min)
Welcome & registration	Registration & refreshments	10
Introduction	Purpose of the focus group	5
Local Plan context	The journey so far	15
Your community	What do you like and what do you want to see change?	30
Key topics	Discussion of six key consultation topics	40
Break	Refreshments & voting	10
Reflections so far	Review the session & outcomes so far	20
Introduction to options	Presentation on the options for the Local Plan	15
Thoughts on options	Which option suits your priorities?	30
Close	What happens next	5

# Introduction

- Why are we here?
- The aim of today

*We want to hear your thoughts for the future  
of the Borough*



# What is a Local Plan?

- In England, there is a plan led system
- The Local Plan will provide the framework for day to day decisions on planning applications
- It sets out where future development should go over the next 15 years
- It covers housing, commercial, public and private developments



# What do we need to achieve?



12,000 homes

We need 12,000 new homes  
between 2020 and 2035  
(30% affordable)



5,050 new homes

Of these about 5,050  
new homes to need to  
be delivered by 2025



80ha Employment Land

We need about 80ha  
of land for new jobs



We need to support  
major regeneration  
of brownfield sites  
in and around  
Birkenhead



# How a Local Plan is prepared?

**Step 1**



## Gather Evidence

The Council conducts a range of detailed studies and considers everything a Local Plan needs, like how many new homes and jobs are needed and what supporting infrastructure is required.

**Step 2**



## Consider Options

The Council considers the ways our future development needs could be met and outlines a preferred option.

**Step 3**



## Consultation (Regulation 18)

The options are presented to the public for consultation. Residents are invited to comment on the options and attend drop in sessions to discuss the plans with Council Officers.

We are here

**Step 4**



## Review Comments

The Council reviews comments made during the public consultation and after careful consideration, publishes a draft Local Plan.

**Step 5**



## Representation (Regulation 19)

The draft local plan is published for representations to be submitted on its "soundness".

**Step 6**



## Examination in Public

The Secretary of State appoints an Independent Planning Inspector to examine the draft Local Plan in great detail. Public hearing sessions are held during this stage.

**Step 7**



## Adopt the Local Plan

The Planning Inspector's final report recommends whether the Council can adopt the Plan. Once adopted, the Local Plan will be used to make decisions on all planning applications.

# Six key topics

## *Group activity*

### **Details**

- 'Vote with your feet'
- 40 minutes

### **Objectives**

To understand the six key topics of the Local Plan and share your views and priorities.

### **How?**

1. Go to the topic that matter most to you.
2. Discuss the sub-topics and create your own if needed.
3. Move to the next topic and repeat.



# What is important to you?

*Individual activity & refreshments*

## Details

- Vote on what are the most important elements.
- 10 minutes

## Objectives

To show what are the most important sub-topics.

## How?

1. Bring the cards and place them in the model.
2. Vote using the beads



# Reflections

## *Group discussion*

### Details

Group discussion on progress so far & the outcome of the last activity.

20 minutes

### Objectives

To explore the topics that are most important and the reasons for this.

### How?

Gather around the model

Discuss those topics which were scored highly and those which were not



# Our Options



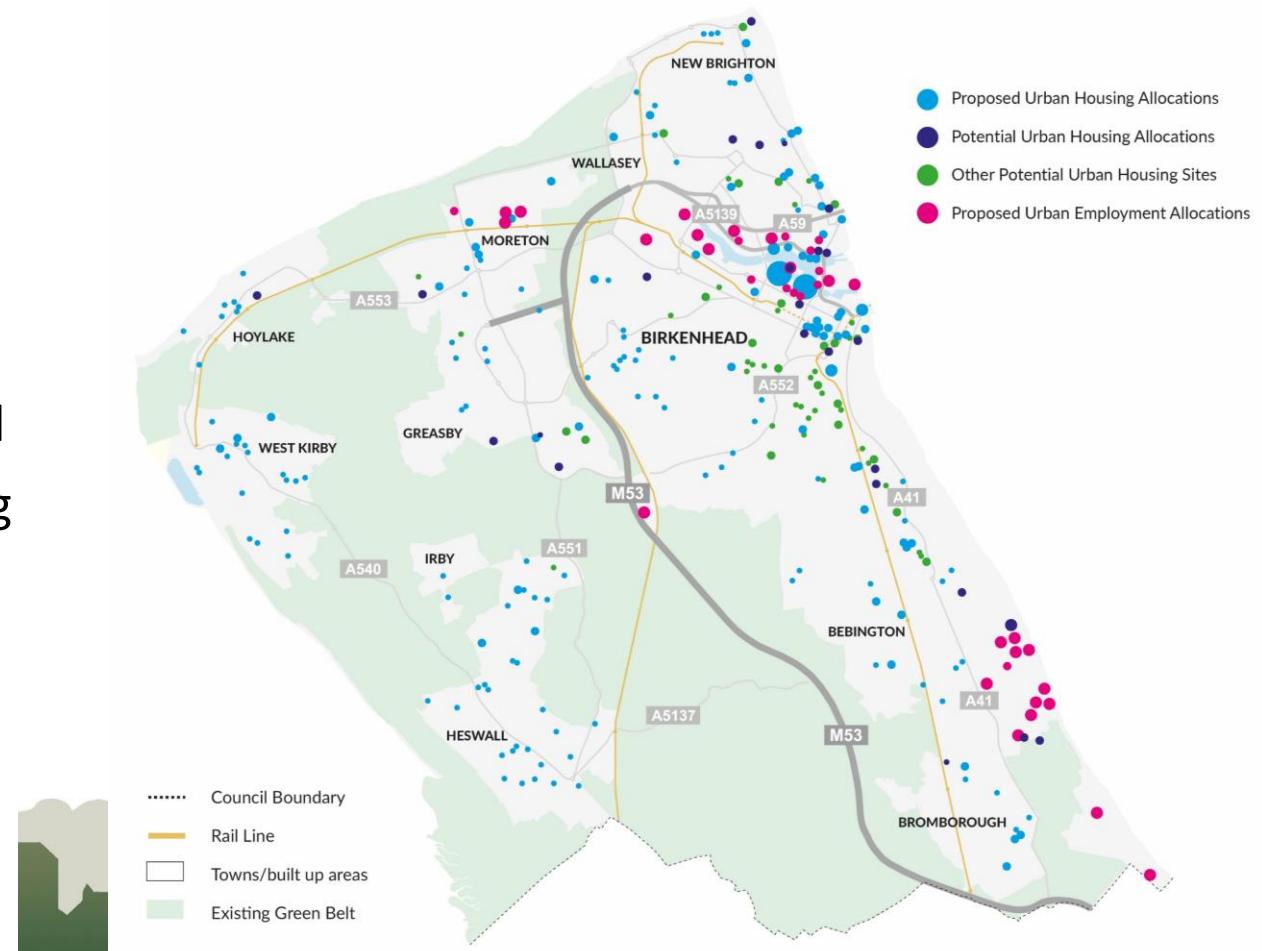
# What will the Local Plan do?

- Ensure that we provide enough homes and employment sites to meet the needs of all our population, young and old
- Set out what types of homes will be built and where they will be located
- Promote the regeneration of Birkenhead, Liscard, New Ferry, New Brighton and other places to provide vibrant, new, mixed-use neighbourhoods
- Ensure that local infrastructure is provided for new development
- Protect our environmental and heritage assets
- Enable all people in Wirral to live longer and healthier lives



# Preferred Option: 1A Urban Intensification

- Deliver our development needs through sustainable regeneration
- Provide 12,000 new homes in urban areas
- Develop on existing urban and brownfield sites
- Protect our Green Belt
- Increase densities across neighbourhoods in Wirral
- Provide 105 hectares of employment land, creating new job opportunities
- Require joint working arrangements with our investment and funding partners
- Not all the potential urban sites currently pass the tests for inclusion in the Local Plan but we hope they will
- We also need to consult on Green Belt options in case we need to meet the shortfall which is currently 2,500 homes



# **Preferred Approach: 1B**

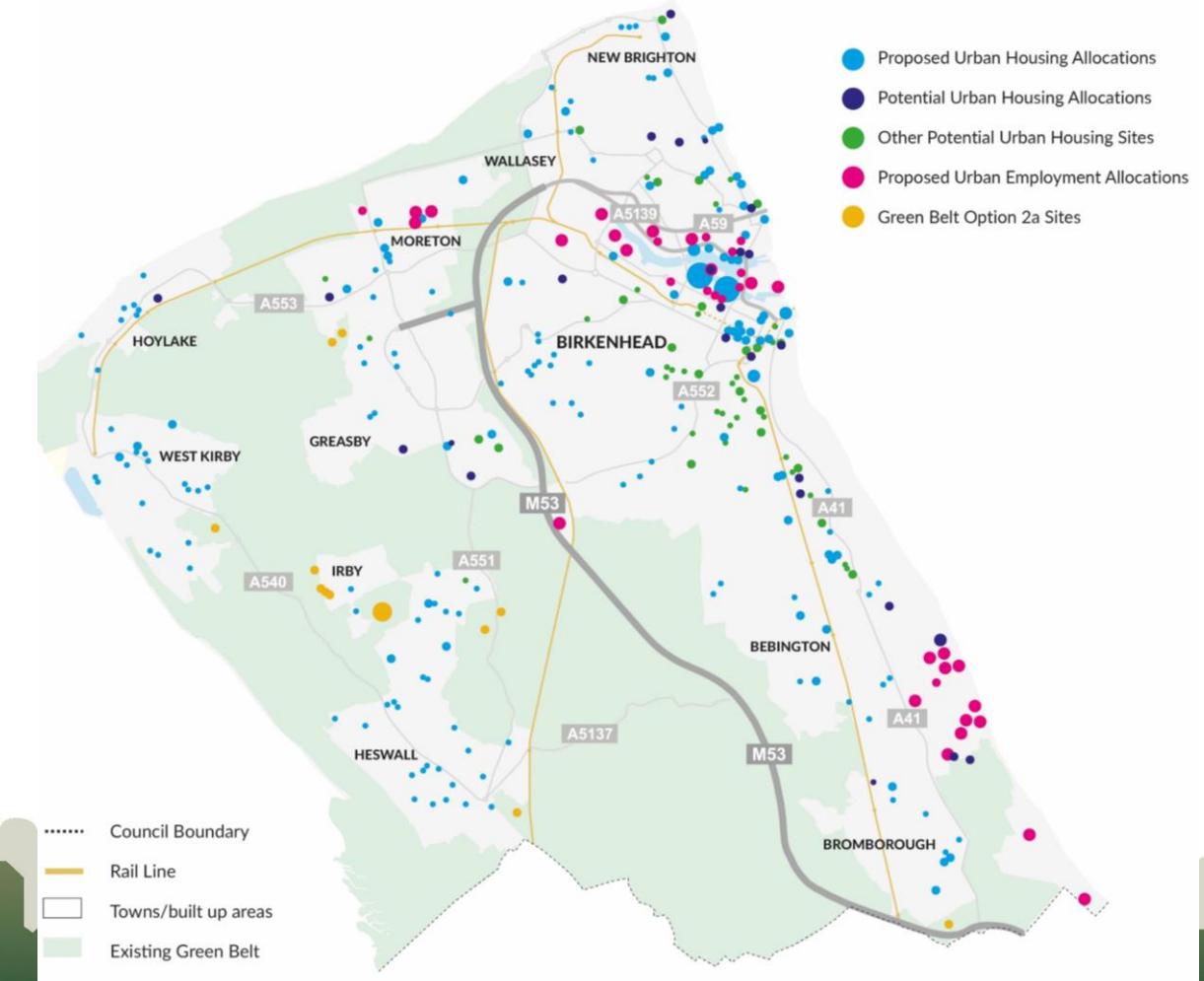
## **Urban Intensification with 'stepped approach'**

- This would mean the same amount of housing and employment would be delivered in the plan period, but with a lower proportion in the first five years.



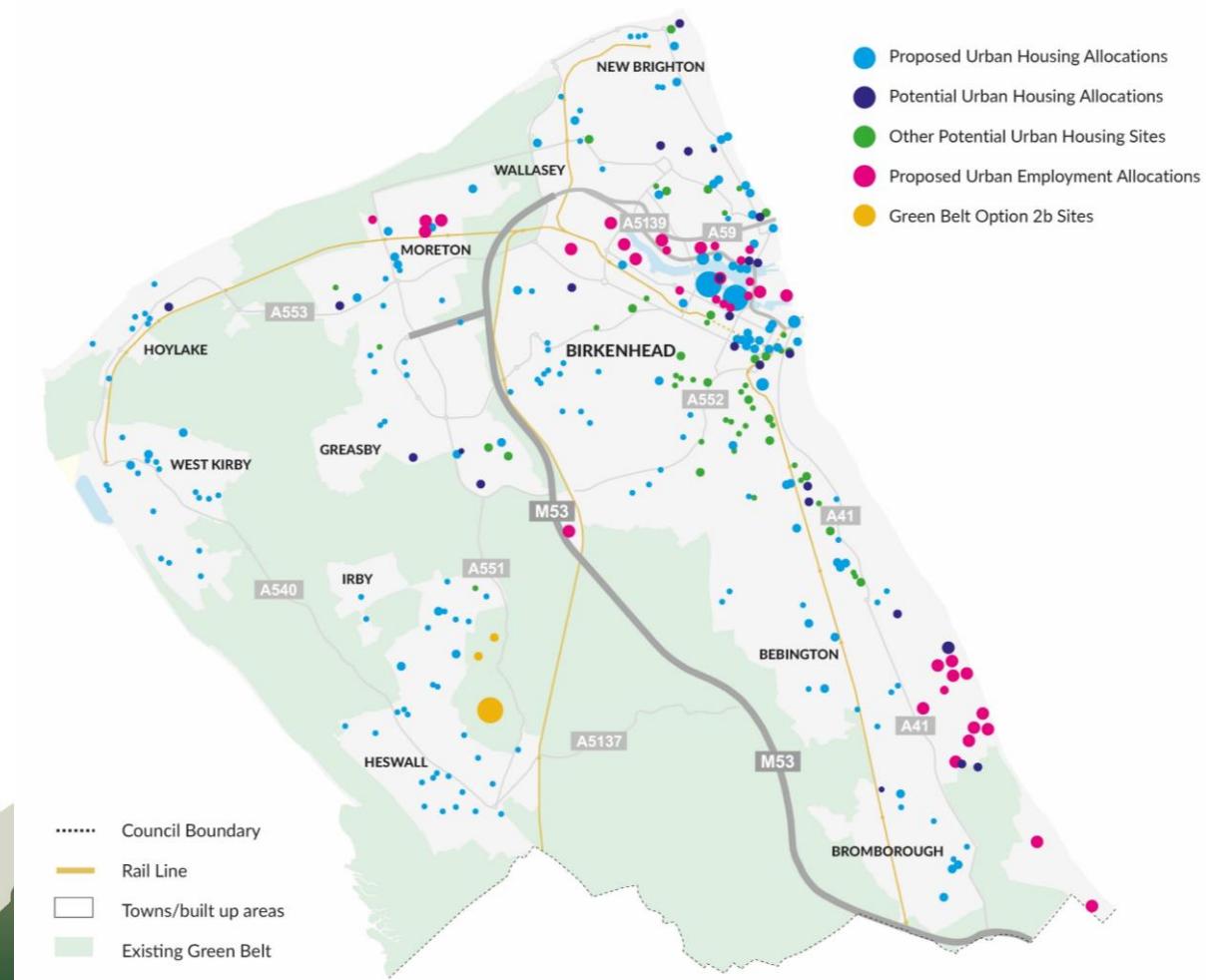
# Option 2A: Dispersed Green Belt Release

- Proposes the release of a series of small to medium sized areas of land, which when added together would allow enough land to be allocated to meet our housing needs
- Spreads development across the Borough, ensuring that single settlements are not impacted disproportionately
- Spreads the impacts of new development on existing infrastructure
- This approach could accommodate approximately 2,900 homes



# Option 2B: Single Urban Extension

- Is a more concentrated approach - any new development required would be focused on a single larger area
- Would be a single larger area around an existing settlement
- This approach could accommodate approximately 2,500 homes



# Which option works for you?

## *Small groups*

### Details

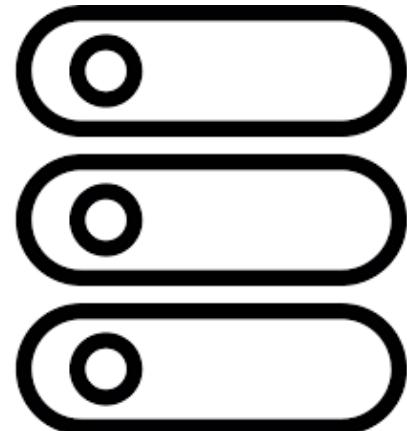
- In three groups, discuss your likes and dislikes of each option in relation to the six topics we have used so far.
- 30 minutes.

### Objectives

Understand which of the options best suits the priorities of the group

### How?

1. Form three groups
2. Start with one of the options
3. Write likes and dislikes on post-it notes and stick them on the topics wallchart
4. Rotate around the remaining options, completing the activity for each
5. Group discussion on which option suits your priorities best



# Next Steps

## 1. Review Comments

- The Council reviews comments made during the focus groups and the public consultation and after careful consideration, publishes a draft Local Plan.

## 2. Representation (Regulation 19)

- The draft Local Plan is published for representations to be submitted on its 'soundness' and legal compliance.

## 3. Examination in public

- The Secretary of State appoints a Planning Inspector to examine the draft Local Plan in great detail. Public hearing sessions are held during this stage.

## 4. Adopt the Local Plan

- The Planning Inspector's final report recommends whether the Council can adopt the plan. Once adopted, the Local Plan will be used to make decisions on all planning applications.



# Further information

Further information can be found on our website:

[www.Wirral.gov.uk/localplan](http://www.Wirral.gov.uk/localplan)



# **Wirral Local Plan 2020-35**

**Issues and Options Consultation  
Focus groups**



# Before we begin....



# Agenda

Item	Description	Duration (min)
Welcome & registration	Registration & refreshments	10
Drop-in session	Make your way around the individual tables/activities	50
Lunch	Refreshments	30
Introduction	Purpose & expectation setting	5
Local Plan context	What is the Local Plan? How does this group fit in?	10
Group discussion	Discussion of the morning session's outcomes	40
Close	What happens next	5

# Introduction

- Why are we here?
- The aim of today

*We want to hear your thoughts for the future  
of the Borough*



# Group activities

## *Interactive activities*

### **Details**

- Make your way around the room, looking at the different exercises and using them to express your thoughts and views on different topics.
- 50 minutes.

### **Objectives**

Understand what is important to you as a resident of Wirral.



# Lunch



# What is a Local Plan?



The Local Plan is the long-term plan for the whole of Wirral until 2035



New housing and jobs



It covers what is going to be built and where new houses and buildings will be allowed



Transport



How we can keep everyone healthy.



Regeneration - which makes places nicer to live and work



Climate change and the environment



Looking after our history



We want to know what you think of the plan and how we can make Wirral a better place to live and work.



## What is Climate Change?

Changes in the world's weather, in particular the fact that it is believed to be getting warmer as a result of people increasing the level of carbon dioxide in the air.

# What do we need to achieve?



12,000 homes

We need 12,000 new homes  
between 2020 and 2035  
(30% affordable)



5,050 new homes

Of these about 5,050  
new homes to need to  
be delivered by 2025



80ha Employment Land

We need about 80ha  
of land for new jobs



# **Our Options: Where will the new houses be?**



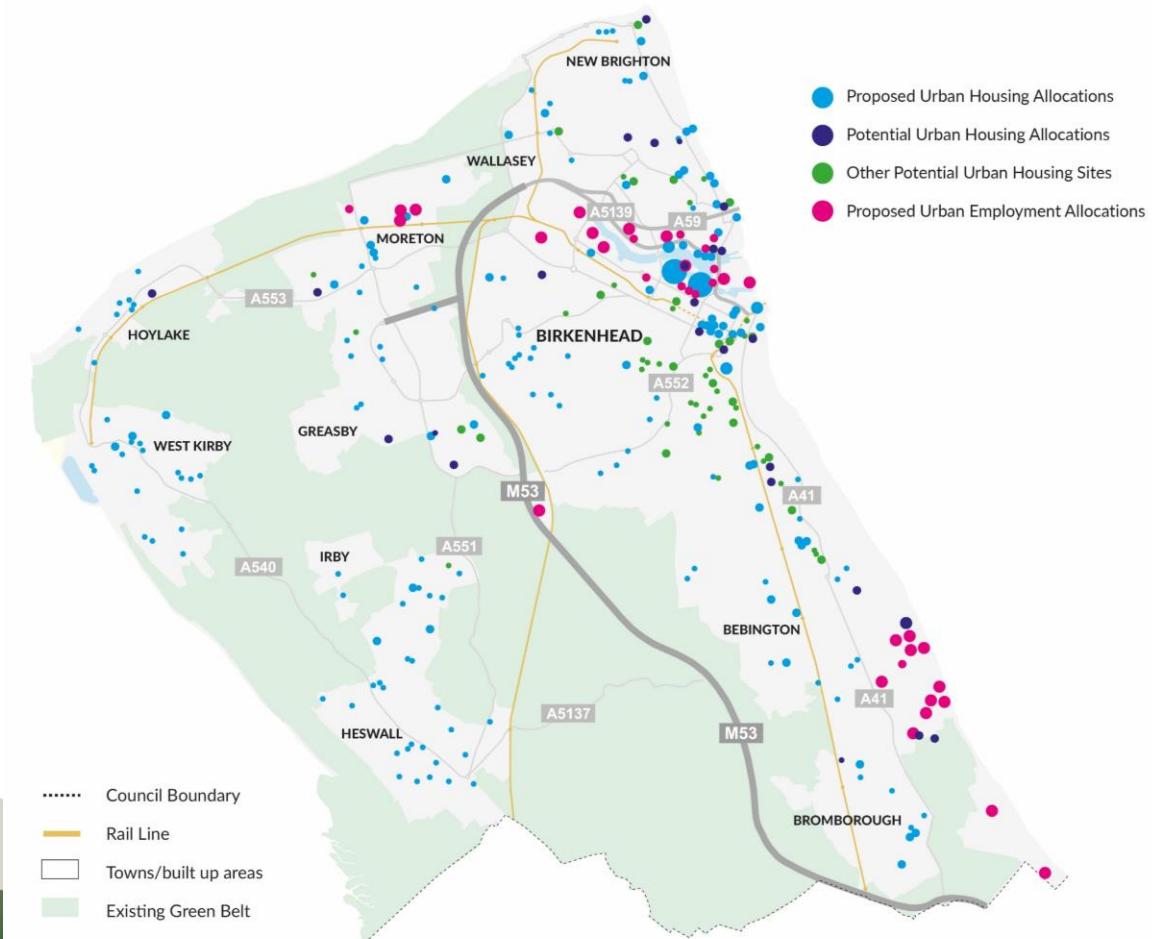
# Preferred Option: 1A Urban Intensification



The Council wants new houses to be built on land that has been used before for housing or jobs. This type of land is sometimes called 'Brownfield'.



We aim to try and build more houses near to where other houses are already.



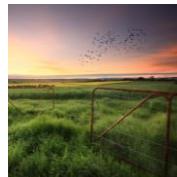
# Green Belt Options



The Council wants to avoid building houses on land in Wirral's countryside. In Wirral this land is called the 'Green Belt'.

**2500  
Houses**

If we can't find room for all the new houses we need, we may have to build up to 2500 houses on 'Green Belt' land.



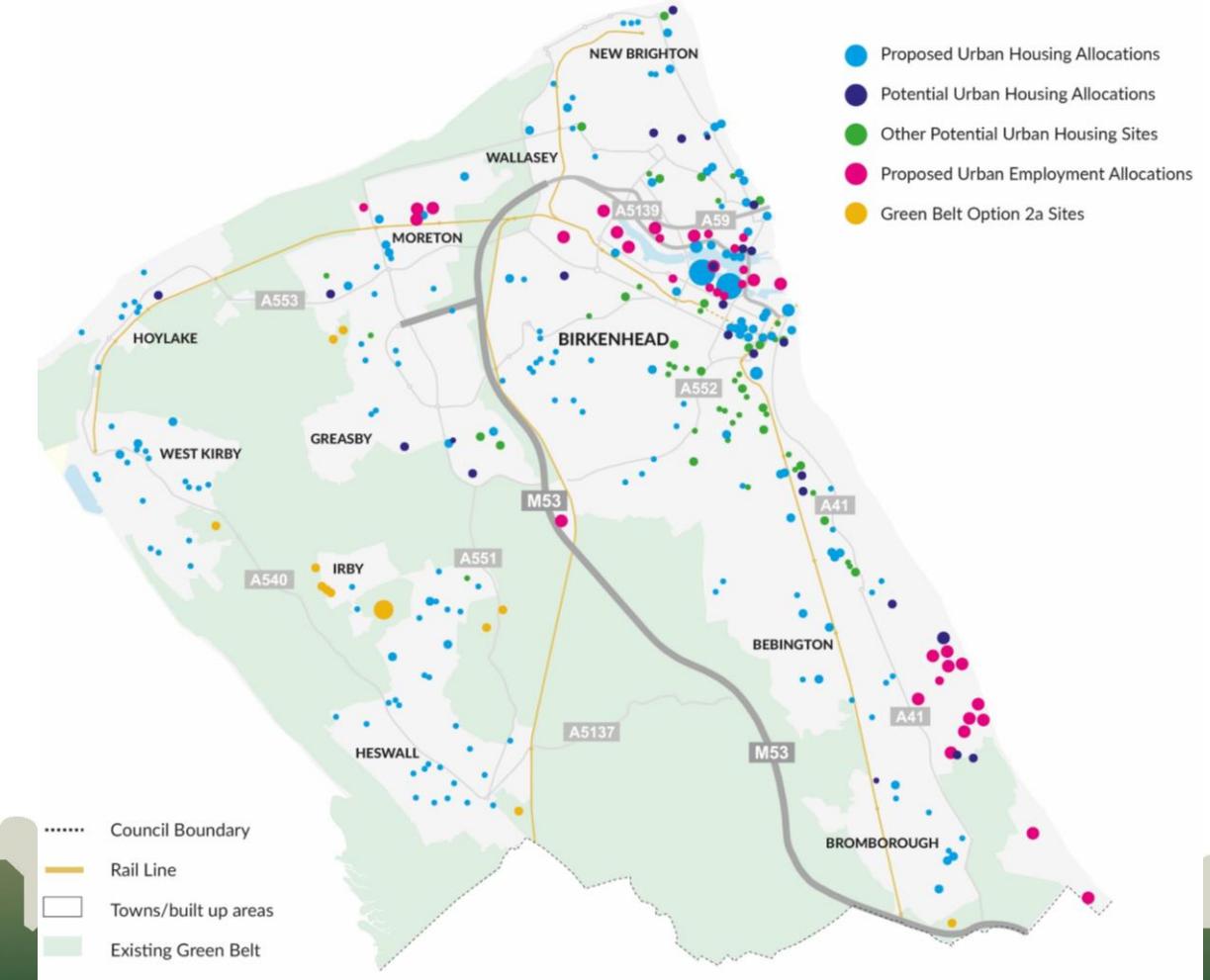
We won't use any land that might flood or which is important for nature or farming.



If we need to use any Green Belt land, a lot of work will need to be done before any permission would be given.

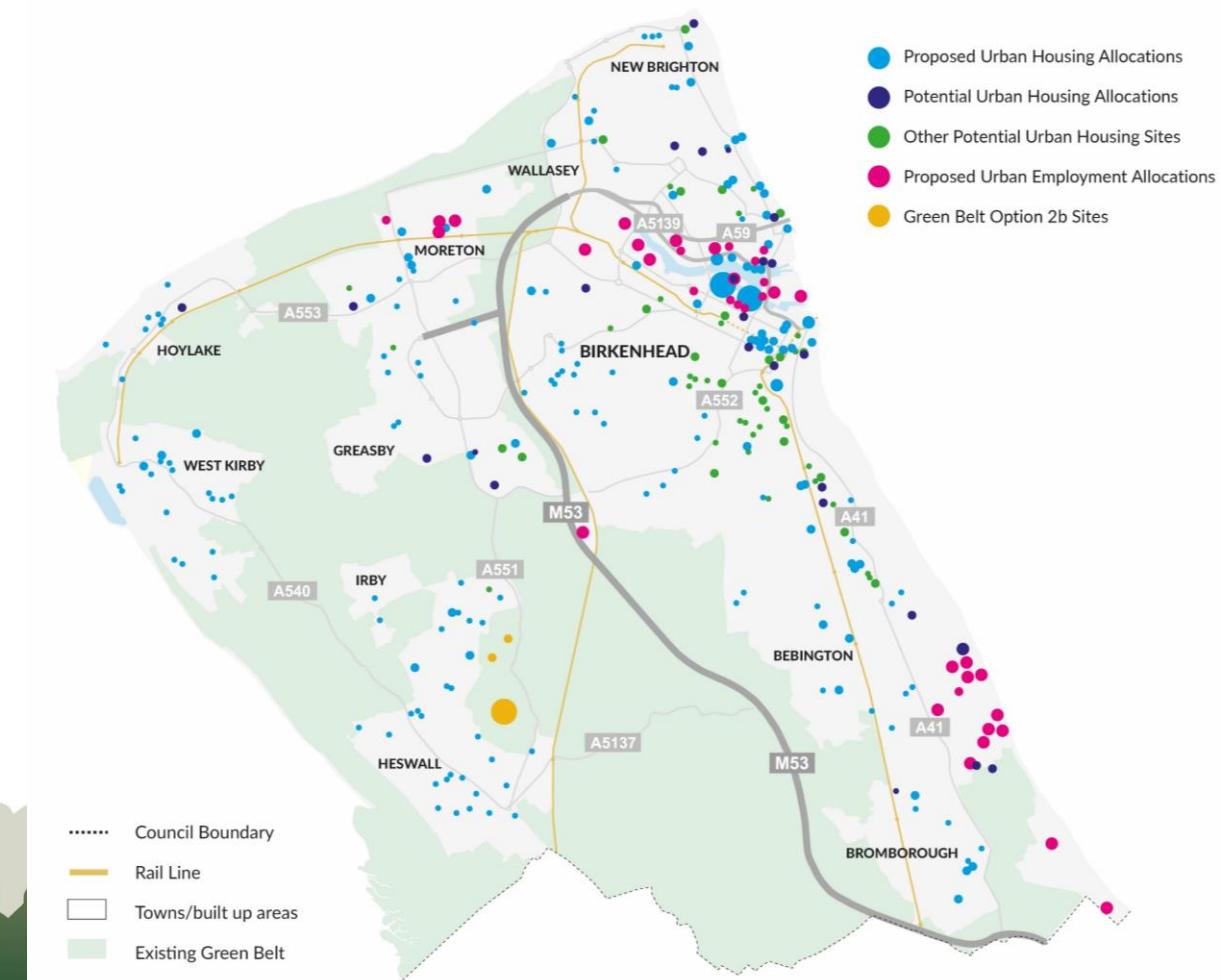
# Option 2A: Dispersed Green Belt Release

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- Spreads development across the Borough.



# Option 2B: Single Urban Extension

- Any new development required would be focused on a single larger area around an existing settlement.



# Which option works for you?

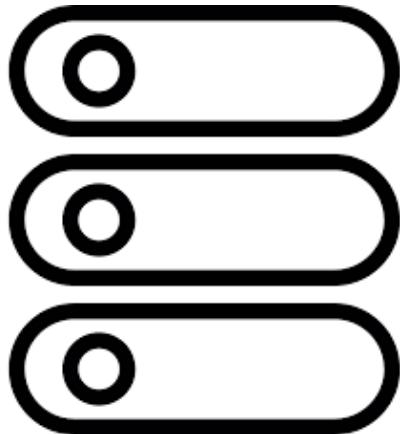
## *Group discussion*

### **Details**

- In a group, discuss the outcomes of the morning session and relate them to the three options
- 40 minutes

### **Objectives**

Understand which of the options best suits the priorities of the group



# Next Steps



**We will look at everyone's comments and then Councillors will decide in Summer 2020 if they agree with the Plan.**



**In November the Plan will have to go back to the Secretary of State (part of the Government in London) to be approved.**



**The Local Plan will start to be used in 2022.**



# Further information

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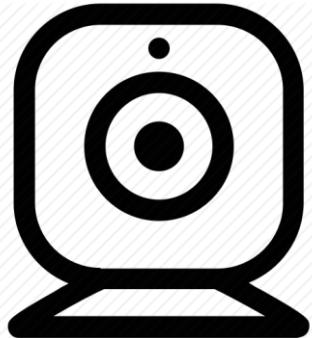


# **Wirral Local Plan 2020-35**

**Issues and Options Consultation  
Focus groups**



# Before we begin....



# Welcome & introductions



# Agenda

Item	Description
Welcome & registration	Registration & refreshments
Introduction	Purpose of the focus group
Local Plan context	The journey so far
Your community	What do you like and what do you want to see change?
Key topics	Discussion of six key consultation topics
Break	Refreshments & voting
Reflections so far	Review the session & outcomes so far
Introduction to options	Presentation on the options for the Local Plan
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- Why are we here?
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of brownfield sites  
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# How a Local Plan is prepared?

**Step 1**



## Gather Evidence

The Council conducts a range of detailed studies and considers everything a Local Plan needs, like how many new homes and jobs are needed and what supporting infrastructure is required.

**Step 2**



## Consider Options

The Council considers the ways our future development needs could be met and outlines a preferred option.

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## Consultation (Regulation 18)

The options are presented to the public for consultation. Residents are invited to comment on the options and attend drop in sessions to discuss the plans with Council Officers.

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**Step 4**



## Review Comments

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**Step 5**



## Representation (Regulation 19)

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**Step 6**



## Examination in Public

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**Step 7**



## Adopt the Local Plan

The Planning Inspector's final report recommends whether the Council can adopt the Plan. Once adopted, the Local Plan will be used to make decisions on all planning applications.

# Your community

## *Break-out activity*

### **Objective**

To discuss and prioritise what is important to you in your community and what you would like to see change.

### **How?**

1. Write down **one or two things** you **value** in your community.
2. Share these with the group – discuss the reasons and thoughts behind them.
3. Write down **one or two things** on that you would like to see **change** in your community.
4. Share these with the group – discuss the **reasons** and **thoughts** behind them.



# Six key topics



OUR HOUSING



OUR COMMUNITY



OUR ECONOMY



OUR ENVIRONMENT



OUR HEALTH & WELLBEING



OUR INFRASTRUCTURE

The way we live and create our homes

The way we access and use our public and community spaces

The way we work, shop and use town centres

The way we protect and enjoy our natural environment

The way we access and use health, wellbeing, sports and community services

The way we are able to use our public transport, roads, cycle and footpaths



# Six key topics

## Details

- c. 40 minutes

## Objectives

To understand the six key topics of the Local Plan and share your views and priorities.

## How?

1. Agree on the topic that matters most to the group.
2. Discuss the sub-topics and create your own if needed.
3. Move to the next topic and repeat.



# Our Housing

How much **affordable housing** do you think there should be in your area? Why?

What **kinds of homes** (e.g. flats, houses, bungalows) would you like to see? Why is this?

How do you feel about **regenerating** empty homes? What do you think about **repurposing** non-residential buildings?

Why do you think buildings should **look like**?

Anything else?



# Our Community

What do you think about **education** facilities in your community? Why?

How do you feel about the current amount of **public space**? Does this need increasing or decreasing?

What **community facilities** would you like the Local Plan to protect and deliver more of?

How do you feel about **regenerating existing facilities**?

Anything else?



OUR COMMUNITY

# Our Economy

How do you currently **use your existing town centre**? What would you like to see **change**?

What can the Local Plan do to **support** and **create local jobs**? What kinds of **employment opportunities** would you like to see?

What **kinds of businesses** are there in your community? What would you like to see? What **opportunities** could the Local Plan develop?

How do you feel we could boost **tourism**? How could we **attract people** to Wirral?

Anything else?



OUR ECONOMY

# Our Environment

How should the Local Plan account for **managing waste**?

Why?

What are your thoughts on balancing the needs of the **Local Plan** and the **landscape**?

What do you think about **flood risk** and **coastal change**?

What are your ideas about balancing the needs of the **Local Plan** with our **natural features**? Why?

Anything else?



OUR ENVIRONMENT



# Our Health and Wellbeing

What do you think about the provision of **sports** and **recreational** activities in your area? Why?

What are your thoughts on the current **pastoral care** provision in your area? Should there be more or less? Why?

How easy is it for you to access **medical care** in your area?

What are your thoughts on **mental healthcare** and provision for those with **disabilities** in your area?

Anything else?



**OUR HEALTH &  
WELLBEING**



# Our Infrastructure

How do you feel about **public transport** in your area? Why is that?

How do you feel about the **volume of traffic** and use of personal vehicles? What could be done to encourage people to be more **environmentally-friendly**?

What are your feelings on **walking** and **cycling** as modes of transport in Wirral? What are the **barriers** to more people doing this?

What do you think of the current provision of **utilities** in your area? What consideration should be given to **renewable energy** or **carbon-neutral** initiatives?

Anything else?



OUR  
INFRASTRUCTURE



# What is important to you?

*Individual activity & break*

## Details

- Vote on what are the most important elements.
- 10 minutes

## Objectives

To show what are the most important sub-topics.

## How?

1. Vote using the chat window – tell us how you would like to distribute your votes.



# Reflections

## *Group discussion*

### **Details**

- Group discussion on progress so far & the outcome of the last activity.
- 10 minutes.

### **Objectives**

To explore the topics that are most important and the reasons for this.

### **How?**

Discuss those topics which were scored highly and those which were not



# Our Options



# What will the Local Plan do?

- Ensure that we provide enough homes and employment sites to meet the needs of all our population, young and old
- Set out what types of homes will be built and where they will be located
- Promote the regeneration of Birkenhead, Liscard, New Ferry, New Brighton and other places to provide vibrant, new, mixed-use neighbourhoods
- Ensure that local infrastructure is provided for new development
- Protect our environmental and heritage assets
- Enable all people in Wirral to live longer and healthier lives



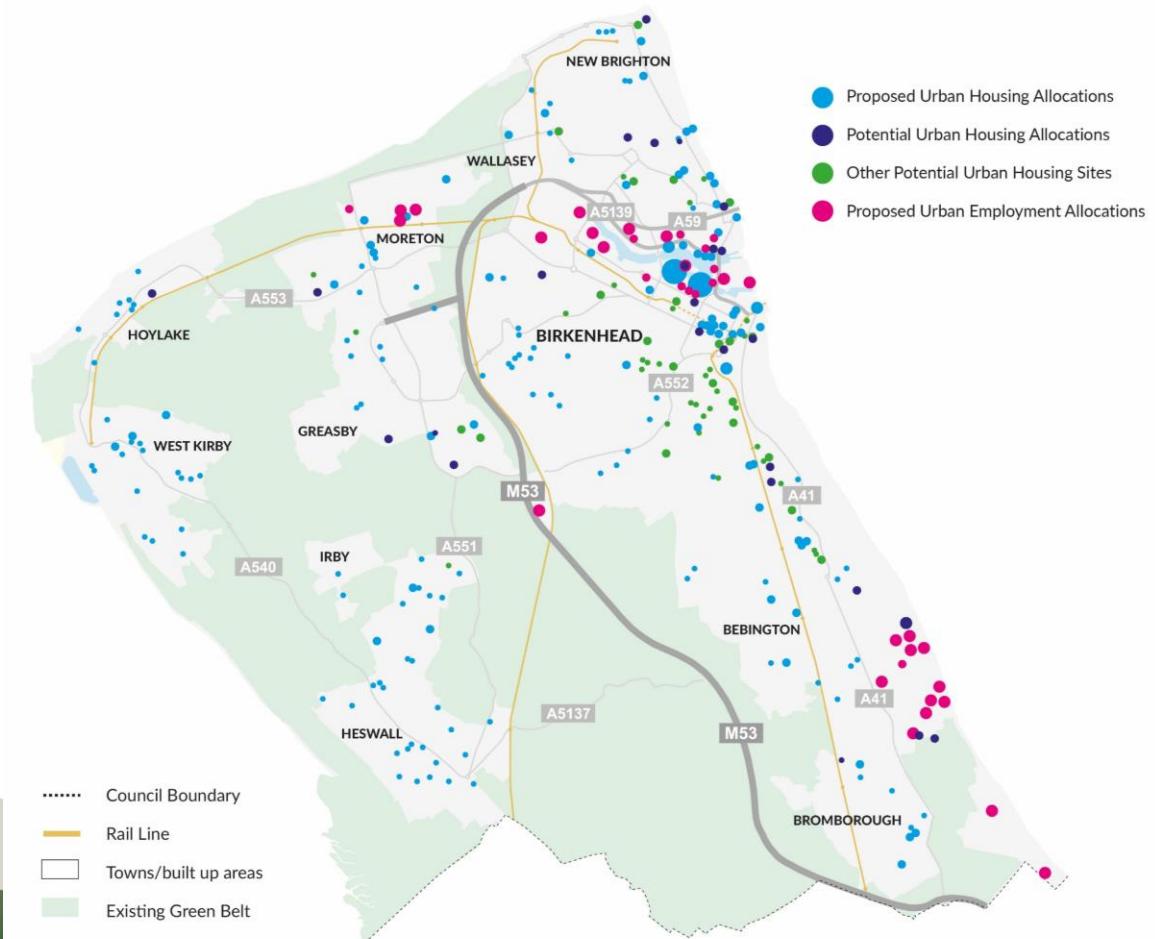
# Preferred Option: 1A Urban Intensification



The Council wants new houses to be built on land that has been used before for housing or jobs. This type of land is sometimes called 'Brownfield'.



We aim to try and build more houses near to where other houses are already.



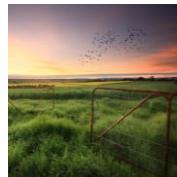
# Green Belt Options



The Council wants to avoid building houses on land in Wirral's countryside. In Wirral this land is called the 'Green Belt'.

**2500  
Houses**

If we can't find room for all the new houses we need, we may have to build up to 2500 houses on 'Green Belt' land.



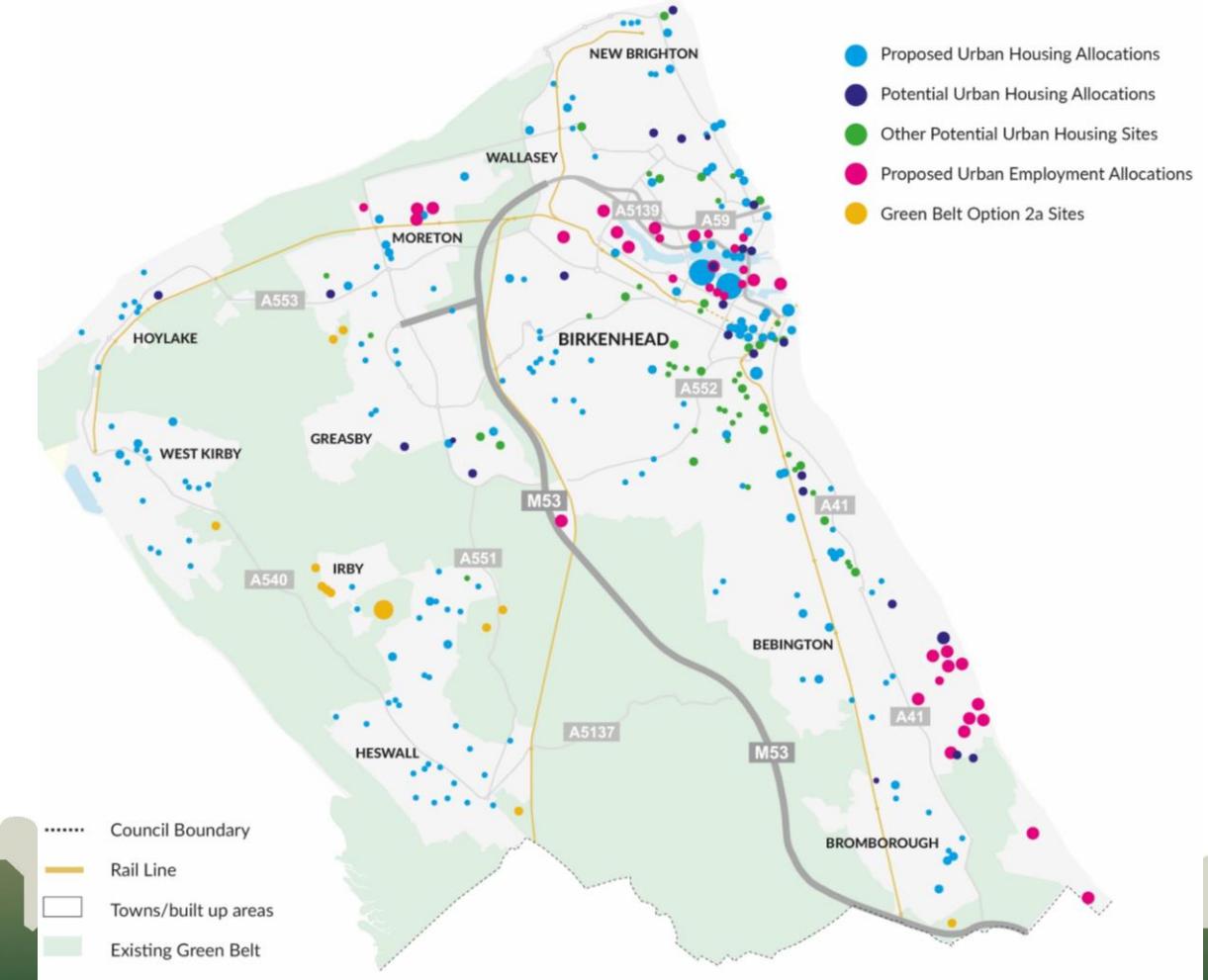
We won't use any land that might flood or which is important for nature or farming.



If we need to use any Green Belt land, a lot of work will need to be done before any permission would be given.

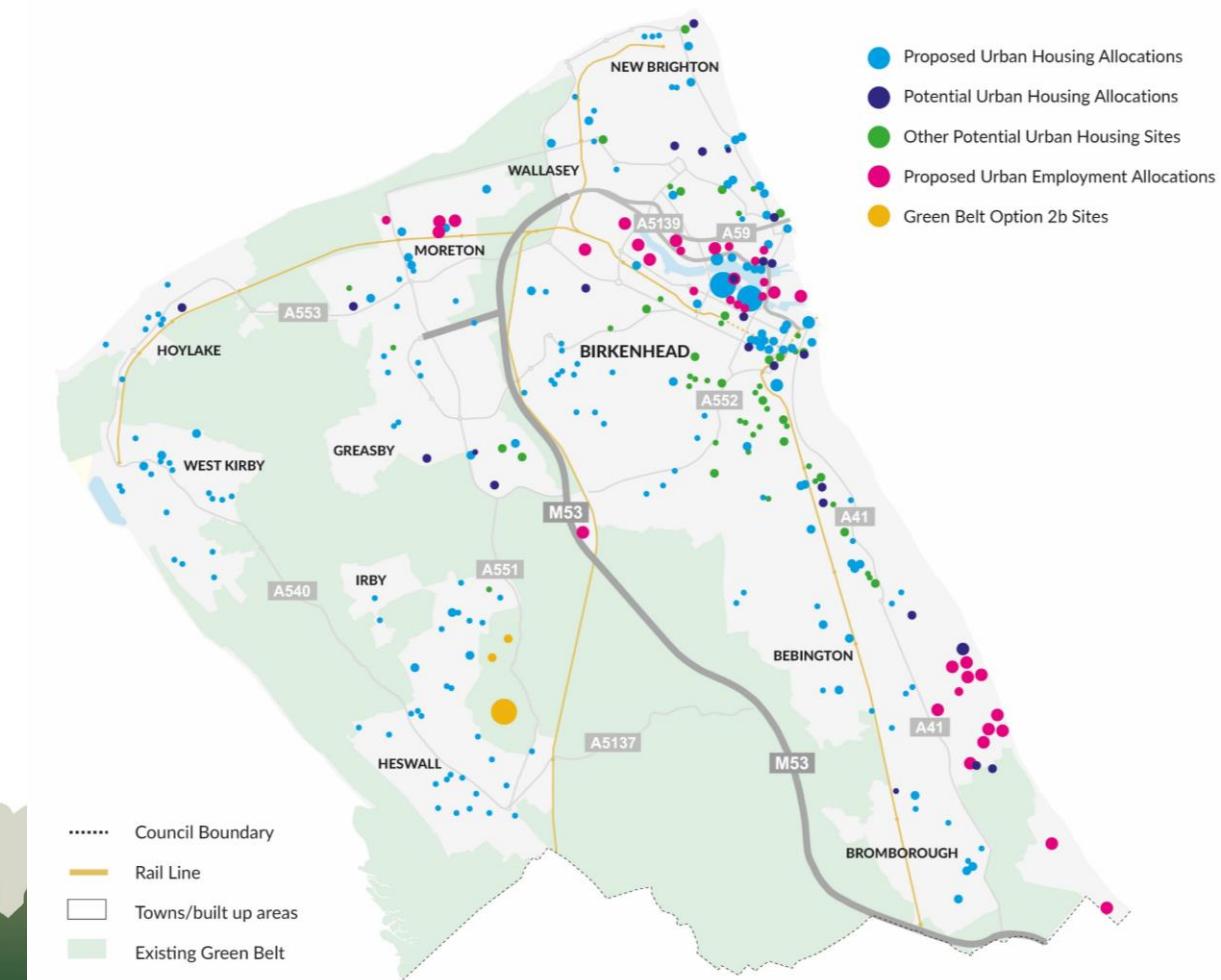
# Option 2A: Dispersed Green Belt Release

- Proposes the release of a series of small to medium sized areas of land, which when added together would allow enough land to be allocated to meet our housing needs.
- Spreads development across the Borough.



# Option 2B: Single Urban Extension

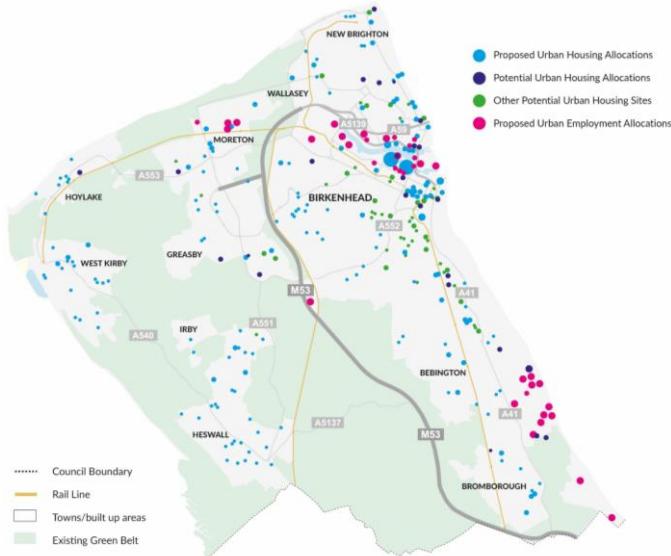
- Any new development required would be focused on a single larger area around an existing settlement.



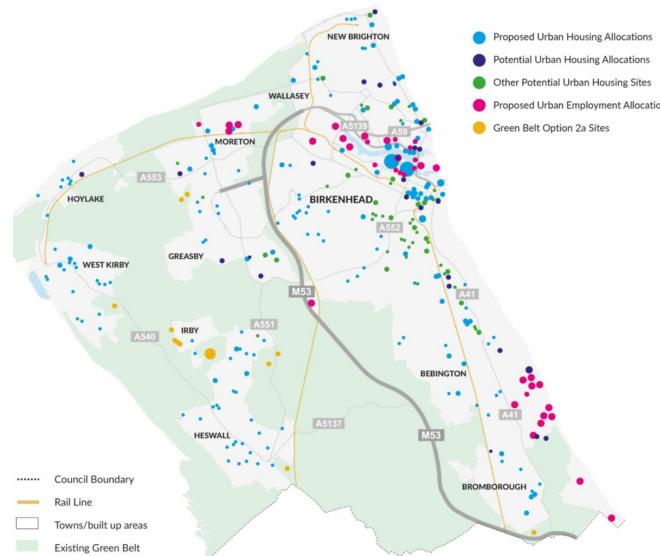
# Which option works for you?

What do you like? What do you dislike?

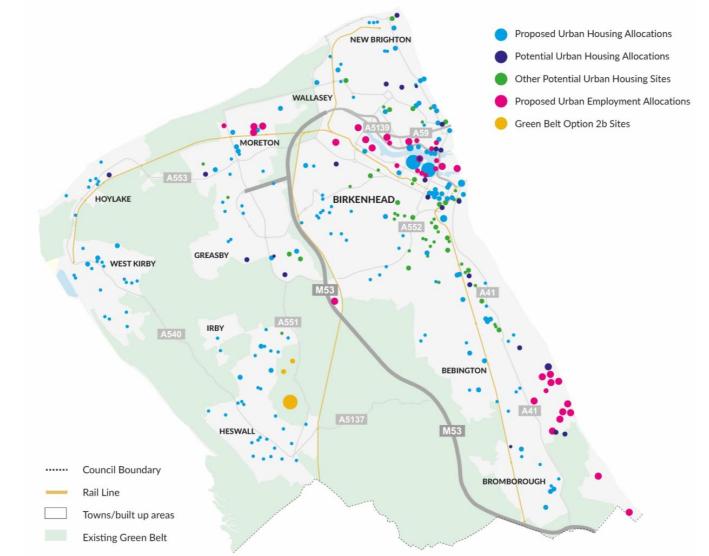
Option 1A: Urban intensification



Option 2A: Dispersed green belt release



Option 2B: Single urban extension



# Next Steps

## 1. Review Comments

- The Council reviews comments made during the focus groups and the public consultation and after careful consideration, publishes a draft Local Plan.

## 2. Representation (Regulation 19)

- The draft Local Plan is published for representations to be submitted on its 'soundness' and legal compliance.

## 3. Examination in public

- The Secretary of State appoints a Planning Inspector to examine the draft Local Plan in great detail. Public hearing sessions are held during this stage.

## 4. Adopt the Local Plan

- The Planning Inspector's final report recommends whether the Council can adopt the plan. Once adopted, the Local Plan will be used to make decisions on all planning applications.



# Further information

Further information can be found on our website:

[www.Wirral.gov.uk/localplan](http://www.Wirral.gov.uk/localplan)



Wirral Council

**Wirral Local Plan Consultation  
Support**

Consultation Analysis

Issue | 15 April 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 273080-00

# Document verification

**ARUP**

<b>Job title</b>		Wirral Local Plan Consultation Support		<b>Job number</b>	
				273080-00	
<b>Document title</b>		Consultation Analysis		<b>File reference</b>	
<b>Document ref</b>					
<b>Revision</b>	<b>Date</b>	<b>Filename</b>	Consultation Report.docx		
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		Name	Emilly Kitching	Sarah Lewis / Michaela Packer	Jane Healey Brown
		Signature			
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		<b>Description</b>	Issue Report		
			Prepared by	Checked by	Approved by
		Name	Emilly Kitching	Sarah Lewis / Michaela Packer	Jane Healey Brown
		Signature			
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			Prepared by	Checked by	Approved by
		Name			
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		Name			
		Signature			

Issue Document verification with document



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## Appendices

### Appendix A

Youth Group Presentation

### Appendix B

Together All Are Able Group Presentation

### Appendix C

Virtual Groups Presentation

# 1 Introduction

---

## 1.1 Introduction

Wirral Council commissioned Ove Arup and Partners Ltd (Arup) to support the council in their delivery of focus groups during the Local Plan Regulation 18 Issues and Options consultation, which ran from February to April 2020. The approach for Local Plan engagement is set out in the Statement of Community Involvement (SCI) 2014 and includes the requirement to conduct focus groups during a consultation.

This report details the approach, format and outputs of these focus groups that were run as part of the SCI. It complements the wider consultation report and informs the how Wirral Council progress their chosen option to the Regulation 19 stage of the Local Plan process.

## 1.2 Objectives of the Focus Group Consultation

The objectives for preparation and delivery of the Local Plan Regulation 18 focus groups were:

- To maximise the public engagement through focus groups; making use of the time available to explore opinion, gather detailed feedback, and discuss issues in response to options considered in the Local Plan Regulation 18 Issues and Options document.
- To engage with members of the community, including those who have not previously been involved in Local Plan consultations to ensure a wide range of views and opinions are captured in each session. This includes hard-to-reach groups, such as youth groups, older people, ethnic groups and those with special needs and disabilities. Alongside this, the requirement to engage third sector, business and community groups.
- To discuss the strategic issues set out in the Local Plan to understand specific local priorities and how these relate back to Local Plan strategic and policy responses.
- To build long-term relationships with constituency communities and demographics by showing the importance of engaging with the process and how their views are valued.
- To improve Council reputation; countering any cynicism that exists within communities.

## 1.3 Focus Groups

Arup and the Council held 5 focus groups from 17<sup>th</sup> February to 20<sup>th</sup> March 2020:

Focus Group	Date	Venue	Number of participants
Youth focus group	17.02.2020	Pilgrim Street Arts Centre, Birkenhead	24
Disability focus group (Together All Are Able)	24.02.2020	The Grange, Wallasey	8
Wallasey	17.03.2020	Microsoft Teams	4
Birkenhead	18.03.2020	Microsoft Teams	5
South and West Wirral	20.03.2020	Microsoft Teams	3

### 1.3.1 Responding to Covid-19

Initially, all the focus groups were planned as face-to-face sessions in different locations across the Wirral. With the emergence of coronavirus and associated Government guidance, the Council and Arup concluded face-to-face meetings presented too high a risk to the health and safety of participants and facilitators.

Therefore, on the 17<sup>th</sup> March the decision was taken to hold the remaining focus groups virtually, via the Microsoft Teams platform. Despite changing the approach to focus group delivery, the objectives and content remained the same enabling consistent analysis across all focus groups. The approach to digital engagement is set out in the methodology.

All participants who were expected to attend the face-to-face focus groups were offered invites to the online events. This ranged from 9 (Wallasey & Birkenhead groups) to 19 (the combined Wirral West/South group). However, possibly due to the impact of Covid-19 and attendees understandably having other concerns, only the numbers detailed above attended each session. The decision was made to run each session if three participants joined – a criteria that was met in each focus group.

Despite the comparatively smaller number of people in attendance, each of the online focus groups was still very successful. The output, detailed later in this report, was of a high standard and, with some adaption of the format, conversations of much greater depth were had than would have been possible with a larger group. To that end, all virtual groups ran for just under three hours due to the detailed conversations being held, despite the events being anticipated to run for less time due to the change in format.

## 2 Methodology

The focus group objectives were used to inform the approach including defining the focus groups, identifying stakeholders and preparing the content and agenda.

### 2.1 Defining the focus groups

One of the early tasks Arup completed was a high-level socio-demographic analysis of Wirral. This informed understanding of community characteristics and profiles across different parts of Wirral and led to the proposal to deliver focus groups in the four constituency areas ensuring coverage across the borough. Wirral has a diverse socio-economic and geographical profile, so regional, constituency-based groups were specified to capture the range of insights across the borough. The constituency groups were:

- Wallasey
- Birkenhead
- South Wirral
- West Wirral

In addition, through discussions with the Council, it was agreed to hold a further two focus groups, engaging those who are traditionally hard-to-reach or often not included in consultations. These were with the following groups:

- Young people (aged 16 – 20)
- Disability & special needs

These focus groups were agreed by Wirral Council following discussions and the socio-demographic analysis of the Wirral.

### 2.2 Identifying and engaging stakeholders

The approach to identifying stakeholder participants for the focus groups was shaped by the objective to engage with a broad range of Wirral's communities. Arup worked with the Council's constituency engagement officers to agree a list of organisations, groups and individuals to invite to each focus group. These invitees would reflect their region or demographic and provide a balance of insight and opinion.

Arup advised inviting up to 20 participants per focus group to allow for a diverse mix of participants and views, to provide an opportunity for engaging debate, and to ensure all attendees would have a chance to share their thoughts.

## 2.3 Constituency Focus Groups

Using the socio-economic analysis, discussions were held with constituency officers at the Council to identify community groups in each constituency representative of the demographics and views of the area or group, ensuring those community groups would contribute to the objectives.

Data privacy and GDPR were considered as the Council maintained data ownership and processing of personal data including sending invites to identified stakeholders. The name and purpose of the community groups were shared with Arup to prioritise groups based on:

- The above objectives – ensuring those selected represented the local demographic of each constituency area
- The maximum number of participants per group

Council constituency officers were also asked to make telephone contact with community groups in their respective areas to raise awareness and interest in the focus groups and their purpose.

## 2.4 Youth Focus Group

Arup worked with the Council's youth officer to deliver a focus group tailored to young people; including participants from Wirral Youth Parliament, the Hive, young carers and young people in care. The youth focus group was hosted at Pilgrim Street Arts Centre in Birkenhead.

## 2.5 Disability and Special Needs Focus Group

Arup worked with the Council and the community interest company (CIC) Together All Are Able to deliver a focus group tailored towards people with disabilities and special needs, hosted at the Grange in Wallasey. Whilst the invitation was extended to other community groups representing people with disabilities, those in attendance at the focus group were solely from Together All Are Able.

## 2.6 Focus group delivery

The approach to focus group delivery was refined between February and March 2020 to take account of the following:

- The low level of interest and take-up by participants invited to the constituency focus groups, particularly those located in South and West Wirral; and
- The emergence of coronavirus; resulting in a change in approach from face-to-face sessions to delivery using a digital platform.

## 2.6.1 Constituency Focus Groups

The number of confirmed participants for the four planned constituency focus groups was much lower than anticipated, this was despite the Council constituency officers attempting to engage with community groups in their local areas. The South and West Wirral focus groups were merged because of the low response rate.

To increase participant numbers, the Council constituency officers were asked to re-contact community groups. This was expanded by the Council contacting community groups registered on the Local Plan consultation database, which saw an increase in participant numbers for the remaining focus groups.

## 2.6.2 Responding to Covid-19

In March, the approach to focus group delivery needed to be revised to minimise the health and safety risks associated with coronavirus. The decision was made to continue with the focus groups, but to conduct them virtually. Participants who had confirmed attendance for constituency focus groups were invited to attend their sessions using Microsoft (MS) Teams. This was platform was used as it is:

- A proven and secure platform to hold live, interactive discussions and share information
- Accessible via a web-based link for all participants who had internet access using a mobile phone, tablet or computer

Wirral Council provided dedicated IT support prior to and during each focus group session to assist participants in accessing and using MS Teams.

Stakeholders who were unfamiliar with computers and using the internet were able to access the MS Teams platform due to the dedicated support offered. This ensured participation, even for those who were not technologically-inclined or were first-time users of MS Teams.

The focus group delivery was adapted and replicated on the digital platform to enable participants to have a similar experience to stakeholders involved in the face to face sessions. The same content and format were used to ensure consistent output was obtained, despite the change in medium. This allowed for effective analysis and comparison across focus groups.

## 2.7 Focus group agenda

Table 1 sets out the agenda used for the constituency focus groups. This was slightly modified for the youth and disability focus groups to tailor it to the needs of the participants, taking account of duration and materials used.

Table 1: Focus Group Agenda

Agenda	Details	Duration (minutes)	Lead
Welcome / confirmation of participant details	Registration / refreshments	10	N/A
Introduction	Purpose and expectation setting	5	Wirral Council
Local Plan context	The journey so far This consultation This focus group	15	Wirral Council
Your community	Interactive break out session: What do you value? What do you want to change?	30	Arup
Introduction to topics	Six topics from the Local Plan consultation. Group discussions using the Arup framework / model exploring the topics and sub-topics.	40	Arup
What is important to you?	Interactive break out session & refreshments – voting using the Arup model.	10	Arup
Group observations and discussion on priorities	Round table discussion on thoughts so far, reflecting on the outcome of the topic session.	20	Arup
Introduction to options	Details of the 3 Local Plan options.	15	Wirral Council
What works best for your community and why?	Break out session on likes and dislikes, inviting views on a preferred option.	30	Arup
Session close out	Next steps and sign posting to Local Plan Regulation 18 consultation.	5	Wirral Council

The focus groups were delivered in a flexible way which could be tailored to the participants' needs where appropriate. The content remained consistent across all focus groups to allow for analysis and comparison across groups. The focus groups combined interactive sessions with presentations on the Local Plan delivered by Wirral Council. The approach for interactive sessions was as follows:

- **Your community** – an ice-breaker session inviting participants to share what aspects they value and are seeking to change in their local area
- **Topic discussion** – the 6 Local Plan topics (our housing; our economy; our community; our environment; our health and wellbeing; and our infrastructure) were introduced to the group. Participants were asked which topics they would like to discuss. Following this discussion, the group were invited to vote on their priorities. The session facilitators then invited comment on high and low priorities
- **Options** – participants were introduced to the Local Plan Regulation 18 options regarding location of development for housing and employment. Views on likes and dislikes of each option were then invited from participants

The agenda and focus group content were tailored for the youth focus group and disability and special needs focus group in the following ways:

- **Youth focus group** – the focus group was reduced to two hours on the advice of the Council youth officer. The discussion on ‘Your Community’ was merged into the topic-based discussions
- **Disability and special needs focus group** – the focus group was reduced to two hours on the advice of Together All Are Able with an EasyRead presentation format made available. The session was also run in a flexible way which was responsive to the needs of the group with a focused discussion on ‘Your Community’ and ‘Topics’ and a brief discussion on ‘Options’

The focus group presentations are appended at the end of this report.

## 2.8 Analysis and Reporting

The focus group facilitators took notes on discussions for each of the focus groups. Comments were anonymised and categorised on a thematic basis, then filtered according to whether comments were related to the Local Plan or were relevant to other council matters. This analysis is summarised in the next section of this report.

## 3 Results

### 3.1 Your Community: Value and Changes

This activity was used as an ice-breaker to get participants to think about their local area and which aspects they value and are seeking to change. The purpose of this activity was to provide some insight into locally-based assets and issues. This activity was merged into the topic based discussions for the youth group and was not included on the agenda at the request of participants in the Wirral West and South group.

#### 3.1.1 Together All Are Able

Participants valued the diverse selection of facilities within their communities including local schools, public houses, bingo halls, train stations, shops, exercise facilities and Storeton Woods. Participants also highlighted the low crime rate, the feeling of safety and the accessibility of places.

Participants highlighted areas they would like to improve being public transport provision and the connections between towns and to Liverpool, the variety of housing stock, increasing the social and leisure facilities (specifically at night) and supported greater emphasis on cycling across Wirral.

#### 3.1.2 Wallasey

Participants valued the local shops and services, which are readily accessible to them, highlighting specifically their community nature and the friendliness of staff. Participants also valued local architecture, historic and local character with the church, green spaces and the seaside. Tourism and local infrastructure were also valued.

Participants highlighted areas they would like to change as improving the current public transport across Wirral, air quality, parking, street lighting and increased facilities for tourists. Additional areas highlighted were the condition of the roads, increasing the amount of renewable energy and providing more care for green spaces and derelict buildings.

#### 3.1.3 Birkenhead

Participants valued the local heritage and the connection to a shared history, public transport, connectivity, local infrastructure, active community groups and a shared community spirit. Cycling routes and local shops were also highlighted as being important.

Participants highlighted areas they would like to change as more support for the homeless, reducing litter, increasing development on brownfield sites and improving local public transport. Improving the West Kirby promenade and active travel provision across the Wirral was also mentioned. Additionally, ensuring there are enough suitable spaces for community uses within town centres was highlighted.

## 3.2 Topic Discussions

The following six topics were designed to be broad enough to cover all elements of Local Plan development, but also to be specific enough to allow facilitated discussions; thus giving the level of insight desired.

During the activity, the six topics were laid out around the room and focus groups attendees were invited to ‘vote with their feet’ i.e. to head to the table/topic that mattered most to them. Following a discussion, the groups then repeated this activity to discuss their second and third priority topics.

For the online focus groups, consensus was taken at the group-level as to which topics the attendees wanted to discuss and in what order. As such, some topics were not discussed in all groups.

This approach meant that participants were able to discuss their priorities and main concerns, without feeling they had to contribute to themes that were not important to them individually.

Each topic was supported by prompts – noted at the top of each section below – which were designed to prompt discussion on a range of sub-topics.

### 3.2.1 Our Housing

	<p><b>The way we live and create our homes:</b></p> <p><b>Subtopics:</b></p> <p style="text-align: center;"><b>Affordable Housing</b></p> <p style="text-align: center;"><b>Mix of Housing</b></p> <p style="text-align: center;"><b>Regenerating Existing Buildings</b></p> <p style="text-align: center;"><b>Housing Design</b></p>
<b>Youth Group</b>	<ul style="list-style-type: none"> <li>• Key points raised were the importance of creating communities within new developments, considering the environment within diverse high-quality housing design, and ensuring housing is provided for everyone in society.</li> <li>• Participants questioned the level of affordable housing currently provided and if the current threshold is affordable for everyone within the Wirral.</li> <li>• They also supported regenerating empty buildings and empty shops to provide residential dwellings.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>• Key points raised were the importance of affordable and accessible homes for everyone, including handrails and wheelchair compliant housing design and support a diverse mix of housing.</li> <li>• Participants questioned the supply and demand of housing for people with disabilities within the Local Plan.</li> <li>• Participants also noted that there are limited housing associations which cater specifically for people with disabilities.</li> <li>• Participants supported bringing empty homes back into use.</li> </ul>
<b>Wallasey</b>	<ul style="list-style-type: none"> <li>• Key points included support for reusing currently vacant buildings for housing, with support from architects. Secondly, that the Local Plan needs to ensure it plans for everyone in the Wirral, specifically highlighted were planning for older people's needs.</li> <li>• People were also supportive of integrating solar panels into housing design and wanting developments between 2 and 4 storeys to avoid high rise buildings.</li> </ul>

<b>Birkenhead</b>	This topic was not one of the chosen topics for an in-depth discussion.
<b>Wirral West and South</b>	<ul style="list-style-type: none"><li>● Key points raised were frustration surrounding the identified housing need figure of 12,000 dwellings over the plan period, the use of Green Belt land, wanting development to be in keeping with an area's character and heritage and support bringing back empty homes into use.</li><li>● Pursuing an exceptional circumstances case for not meeting the identified housing need from government calculations was suggested.</li></ul>

## Summary of Key Points

For those groups which discussed this topic, one of the key points raised was the requirement to meet the housing needs of everyone in the Wirral with consideration for the needs of older people and those with disabilities or special educational needs. The youth focus group also emphasised the importance of housing being affordable for everyone in the Wirral. The groups also reached similar conclusions regarding bringing empty buildings back into use and conversion of empty shops into residential dwellings.

The Wirral West and South focus group emphasised the importance of challenging the current housing requirement position of 12,000 dwellings over the plan period to avoid development within the Green Belt; whilst the Birkenhead focus group felt other topics were of greater interest for discussion and did not choose to discuss the housing topic.

### 3.2.2 Our Economy

	<p><b>The way we work, shop and use town centres:</b></p> <p><b>Subtopics:</b></p> <p style="text-align: center;"><b>Town Centres and Shopping</b></p> <p style="text-align: center;"><b>Employment</b></p> <p style="text-align: center;"><b>Local Business</b></p> <p style="text-align: center;"><b>Tourism</b></p>
<b>Youth Group</b>	<ul style="list-style-type: none"> <li>• Discussions with the participants covered all sub-topics within the wider economy subject with some points overlapping with the supporting healthy communities' topic.</li> <li>• Key points raised included focusing on improving town centres and shopping areas to make towns safer and more accessible, attract more tourists and deliver a more diverse range of shops.</li> <li>• These town centres could then provide part time employment and work experience for people within the Wirral, which was highlighted as being difficult to get locally.</li> <li>• Participants also wanted vacant shops to be reused and to create a unique local offering.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>• Discussions with the participants covered all sub-topics within the wider economy with some points overlapping with open public spaces and supporting healthy communities topics.</li> <li>• A key point raised was that people currently need a reason to come to the Wirral as there are poor shopping facilities which sends people to Liverpool or Cheshire.</li> <li>• Participants supported improving town centres, addressing closing shops and restaurants and suggested a museum within Birkenhead town centre.</li> <li>• Birkenhead park was noted as an important asset with other facilities closing or being demolished, including a theatre and bingo hall.</li> <li>• Participants also stated that the group is trying to create a local economy and job opportunities for members of the group.</li> </ul>

<b>Wallasey</b>	This topic was not one of the chosen topics for an in-depth discussion.
<b>Birkenhead</b>	<ul style="list-style-type: none"> <li>• Discussions with the participants covered multiple sub-topics within the wider economy subject, with some overlap into the community facilities topic.</li> <li>• A key point raised was there is currently a limited tourism offer within Birkenhead and that improving the infrastructure across the Wirral will support Wirral's overall tourism.</li> <li>• Participants noted an important link between homelessness, the economy and education which could be enhanced.</li> <li>• Additionally, participants suggested improvements in shop licencing and surpluses of certain retail uses (such as betting shops and takeaways).</li> <li>• Participants also wanted a more strategic plan for Birkenhead for the future.</li> </ul>
<b>Wirral West and South</b>	<ul style="list-style-type: none"> <li>• Discussions with the participants covered multiple sub-topics within the wider economy overlap into regenerating existing buildings and car travel topics.</li> <li>• Key points raised were that Wirral's current economy is struggling, finance and IT sectors were suggested to grow in Wirral and there was support for utilising currently derelict or unused industrial sites for development.</li> <li>• It was noted that shopping is becoming more online based and will change high streets potentially resulting in high streets diversifying or reducing the number of retail units required.</li> <li>• Participants also stated that were Birkenhead regenerated this will most likely fulfil the local retail demand.</li> </ul>

## Summary of Key Points

Across all focus groups participants felt it was important to improve town centres and local retail areas which are facing challenges in relation to online shopping, and better retail offers elsewhere in Liverpool and Cheshire. Participants in Youth and Birkenhead focus groups made the connection between an improved retail offer and associated benefits for tourism. The Youth focus group also highlighted the local employment opportunities which could be accessed through part-time employment in town centres; this view was also reflected in the Disability and Special Needs discussion which valued the creation of local employment opportunities.

The Wirral West and South focus group highlighted growth opportunities for finance and IT sectors and suggested utilising derelict sites for employment related development, whilst also seeking to diversify the high street offer.

### 3.2.3 Our Community

	<p><b>The way we access and use our public and community spaces and places:</b></p> <p><b>Subtopics:</b></p> <p style="text-align: center;"><b>Schools and Education</b></p> <p style="text-align: center;"><b>Open Public Spaces</b></p> <p style="text-align: center;"><b>Community Facilities</b></p> <p style="text-align: center;"><b>Regenerating Existing Facilities</b></p>
<b>Youth Group</b>	<ul style="list-style-type: none"> <li>Key points raised were the importance of community facilities across the Wirral; that they are highly valued and utilised by the participants.</li> <li>They suggested that these facilities need to improve their publicity, accessibility and communication between each other to support people utilising more than one facility.</li> <li>Participants also raised that they would like more facilities that are currently provided but highlight concerns surrounding safety between rival areas and feel that communities do not look out for younger people.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>Key points included there being no funding for adult learning courses after the age of 25, with gaps in education provision, the need for ramps to community facilities and the importance of maintaining existing facilities.</li> <li>Participants also suggested that there are not many community spaces open at night. Current facilities also underused, therefore increased promotion is needed.</li> </ul>
<b>Wallasey</b>	<p>This topic was not one of the chosen topics for an in-depth discussion.</p>
<b>Birkenhead</b>	<ul style="list-style-type: none"> <li>Key points raised were that participants wanted more promotion about what community services are currently being offered and more influence on how this is done, supported repairing the town hall and increasing its usage and wanting to preserve the current wide group of community centres and organisations.</li> <li>People noted that regenerating existing facilities is the most sustainable option but that these facilities need to be accessible for all users.</li> </ul>

<b>Wirral West and South</b>	This topic was not one of the chosen topics for an in-depth discussion.
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## Summary of Key Points

For the focus groups which discussed this topic, one of the main points highlighted was how much community facilities were valued. Both the youth focus group and disability and special needs focus group highlighted gaps in community provision in terms of availability of facilities in the evenings and provision of support services for young adults requiring educational support.

All focus groups felt community facilities could be better promoted and there were opportunities for facilities to make use of regenerated buildings; however, facilities needed to be accessible to all.

### 3.2.4 Our Environment

	<p><b>The way we protect and enjoy our natural environments</b></p> <p><b>Subtopics:</b></p> <ul style="list-style-type: none"> <li><b>Waste Management</b></li> <li><b>Landscapes</b></li> <li><b>Flood Risk and Coastal Change</b></li> <li><b>Natural Features</b></li> </ul>
<b>Youth Group</b>	<ul style="list-style-type: none"> <li>• Discussions with the participants crossed all sub-topics within the wider environment subject including flood risk and coastal change, landscapes, natural features and waste management within the context of the Local Plan. Some elements crossed over into other topics including open public spaces, schools and education, public transport and housing design.</li> <li>• Key points raised were the importance of climate change, ensuring flood risk is addressed adequately, supporting more natural areas within the urban area and improved waste management within Wirral; including recycling and littering.</li> <li>• Participants also supported more trees, renewable energy, carbon offsetting and improving people's education about the environment.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>• Discussions focused on three of the four sub-topics within the topic – landscapes, natural features and flood risk and coastal change.</li> <li>• A key point raised was that Wirral's environment is an important asset which should be celebrated due to its positive impacts for health, wellbeing and the environment.</li> <li>• Participants stated that having strong flooding infrastructure was vital and did not want development on any floodplains in the Local Plan.</li> <li>• Participants also stated air quality concerns for any development near the M53.</li> </ul>
<b>Wallasey</b>	<p>This topic was not one of the chosen topics for an in-depth discussion.</p>
<b>Birkenhead</b>	<p>This topic was not one of the chosen topics for an in-depth discussion.</p>

<b>Wirral West and South</b>	<ul style="list-style-type: none"><li>● Discussions with the participants crossed all sub-topics within the wider environment subject including landscapes, waste management, flood risk and coastal change and natural features.</li><li>● Key points raised were that there is support for renewable energy and acting on the Climate Emergency, that Wirral can improve tourism by protecting and enhancing the coastline, the importance of strong and effective flood defences, improve Wirral's biodiversity and the need to improve Wirral's current recycling scheme and policies.</li></ul>
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## Summary of Key Points

The focus groups which participated in this discussion were well informed about environmental issues in Wirral. Both Wirral West and South and the Youth focus groups raised the importance of climate change and acting on the climate emergency declaration. All focus groups emphasised the importance of having strong and effective flood defences in place.

The disability and special needs focus group valued the link between the natural environment and health and well-being, they also raised concerns regarding air quality along the M53 corridor. The youth focus group highlighted the need for natural environments within urban areas. In addition, both the youth and Wirral West and South focus groups supported improved waste management including use of recycling facilities.

### 3.2.5 Our Health and Wellbeing

	<p><b>The way we access and use health, wellbeing, sports and community services</b></p> <p><b>Subtopics</b></p> <ul style="list-style-type: none"> <li><b>Sports and Recreation Facilities</b></li> <li><b>Supporting Healthy Communities</b></li> <li><b>Healthcare Provision</b></li> <li><b>Mental Health and Disability Services</b></li> </ul>
<b>Youth Group</b>	<ul style="list-style-type: none"> <li>• Key points raised were concerns about healthcare waiting times, gaps in provision and confusion over age requirements as well as concern surrounding mental health services and provision to meet current and future requirements within Wirral.</li> <li>• Participants supported wider community education and training on health and wellbeing issues, improving the publicity and approachability of services and increased service provision in the future.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>• Key points raised was the importance of more widespread EasyRead material across services, concern surrounding waiting times, poor signage within healthcare facilities and that GP provision can vary between practices.</li> </ul>
<b>Wallasey</b>	<ul style="list-style-type: none"> <li>• Key points raised were the importance of maintaining sports areas and green spaces and not turning them into housing, improving current local healthcare provision, the lack of a central hub for health &amp; wellbeing and increasing the accessibility of places for everyone in the Wirral.</li> </ul>
<b>Birkenhead</b>	<ul style="list-style-type: none"> <li>• Key points raised were that an increased provision of women-only exercise classes would be desirable, suggested that were Birkenhead pool to be redeveloped this could include a temperature-controlled pool and that mental healthcare facilities should be locally based to keep families together.</li> </ul>
<b>Wirral West and South</b>	This topic was not one of the chosen topics for an in-depth discussion.

## Summary of Key Points

Four of the five focus groups chose to discuss this topic and explore it in more detail. All four focus groups placed great importance on health and wellbeing and highlighted the value of locally based mental healthcare facilities for residents in the Wirral. This point was emphasised by the youth focus group and the Birkenhead focus group.

The Wallasey focus group highlighted the lack of a central hub for health and well-being within their area and raised the importance of maintaining accessible sports areas and green spaces to support the health and well-being for residents of the Wirral.

### 3.2.6 Our Infrastructure

	<p><b>The way we are able to use our public transport, roads, cycle and foot paths:</b></p> <p><b>Subtopics:</b></p> <ul style="list-style-type: none"> <li><b>Public Transport</b></li> <li><b>Car Travel</b></li> <li><b>Walking and Cycling</b></li> <li><b>Utilities, Communications and Energy</b></li> </ul>
<b>Youth Group</b>	<ul style="list-style-type: none"> <li>• Discussions with the participants crossed all sub-topics within the wider infrastructure subject including car travel, public transport, walking and cycling and utilities, communications and energy within the context of the Local Plan. Some elements crossed into mental health and disability services.</li> <li>• A key point raised was the concern surrounding current public transport provision and services, with an emphasis on bus travel.</li> <li>• Participants stated concerns surrounding cost, safety, timings, technology integration and accessibility for everyone within the community.</li> <li>• Participants also supported improving cycle tracks and additional training for cycling.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>• Discussions with the participants crossed all sub-topics within the wider infrastructure subject including car travel, public transport and walking and cycling within the context of the Local Plan.</li> <li>• Key points raised were that developments are too focused on cars, pavements are in poor condition and cycle paths can be difficult to use in traffic.</li> <li>• Participants stated that it can be difficult to travel by foot and highlighted safety concerns.</li> </ul>
<b>Wallasey</b>	<ul style="list-style-type: none"> <li>• Discussions with the participants crossed all sub-topics within the wider infrastructure subject including car travel, public transport, walking and cycling and utilities, communications and energy within the context of the Local Plan. Some elements crossed into housing design, landscapes and supporting healthy communities.</li> <li>• Key points raised were the need to improve the local bus network, to improve the superfast broadband accessibility, encouraging renewable energy,</li> </ul>

	improving the condition of the pavements and wanting to have the natural environment linked together.
<b>Birkenhead</b>	<ul style="list-style-type: none"> <li>● Discussions with the participants crossed multiple sub-topics within the wider economy subject including walking and cycling and public transport. Some elements crossed into regenerating existing buildings.</li> <li>● Key points raised were that cycle routes need improving but that the Wirral Way cycle route is well used, and that Wirral has excellent bike storage facilities.</li> <li>● Increasing the cycling services within the Wirral were strongly supported.</li> </ul>
<b>Wirral West and South</b>	This topic was not one of the chosen topics for an in-depth discussion.

## Summary of Key Points

Four out of five of the focus groups chose to discuss the Infrastructure topic in more detail. Focus groups valued public transport and all groups highlighted areas where services had been reduced or cut. The youth focus group raised the point that this could lead to people feeling isolated.

The disability and special needs focus group raised concerns regarding cycling and pedestrian access with pavements in some places in poor condition, lack of clarity over pedestrian and cycle lanes on pavements and developments being too focused on the car.

Participants valued the Wirral's cycling routes and associated cycling provision with the Birkenhead focus group strongly supporting increasing cycling services across the Wirral and the youth focus group supporting additional training for cycling.

## 3.3 Priority of Topics

### 3.3.1 Introduction

For the youth and disability and special needs focus groups, which were held face to face, Arup used the following model to introduce and discuss the topics and then get participants to vote on their priorities. Participants were given 6 beads which could be placed on any topic to select their priorities.



For the focus groups held using Microsoft Teams, this approach was revised to include additional presentation content describing the 6 topics and giving participants the opportunity to vote on their priorities using the meeting chat function in Teams. This enabled participants to contribute directly as they would in a face to face session. The following section provides further details of the participants priorities.

### 3.3.2 Summary of Preferences

Following the Topic Discussions across all five focus groups, collectively the topic which was given the highest priority was ‘Our Health’ and followed by ‘Our Community’ with 24% and 18% of the votes respectively (Figure 1). ‘Our Housing’ and ‘Our Infrastructure’ received the lowest collective priority with 13% each (Figure 1).

There were variations within the focus groups about their priority of topics with ‘Our Environment’ being the priority in the Wirral West and South group (39% of group votes) whereas ‘Our Environment’ was the priority for the Together All Are Able group (21% of the group votes), ‘Our Health and Wellbeing’ was the highest priority for the Youth and Birkenhead focus groups (28% and 27% of the group votes respectively), with the Wallasey focus group placing Infrastructure and

Health and Wellbeing and joint highest topics for priority (29% of the group votes) (Figure 2).

Figure 1: Summary of the Focus Groups Voting Preferences by Topic (in percentages)

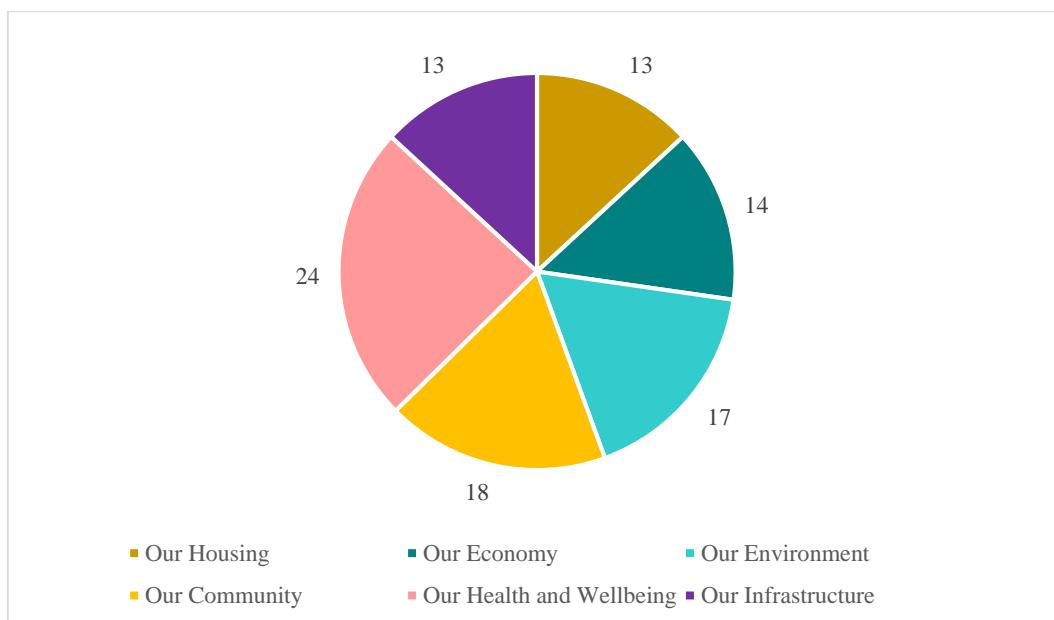
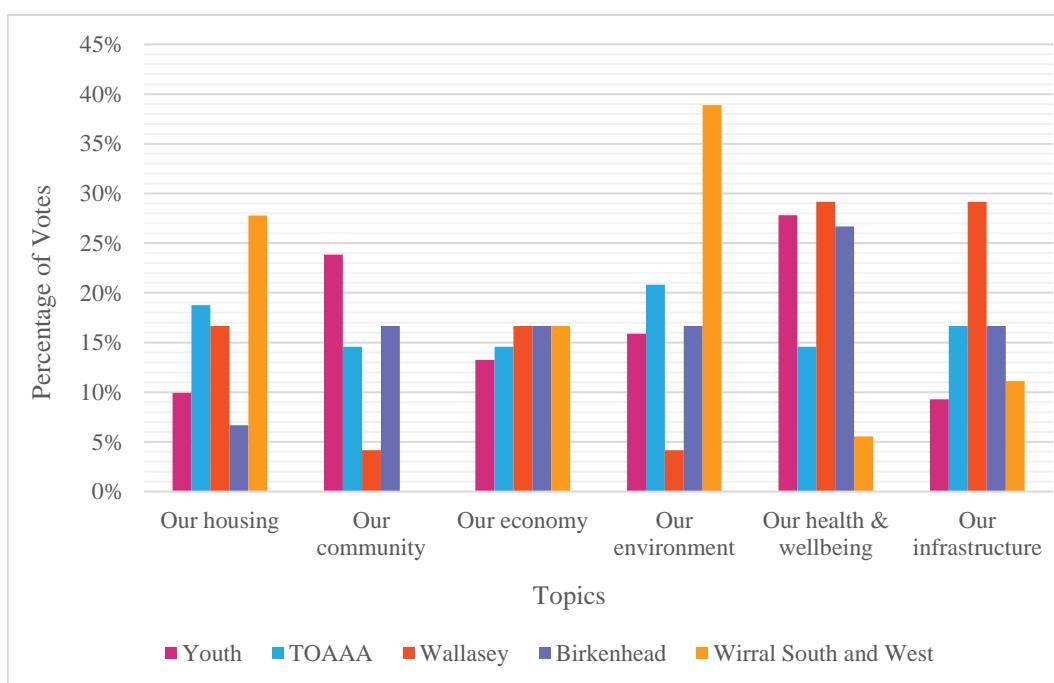


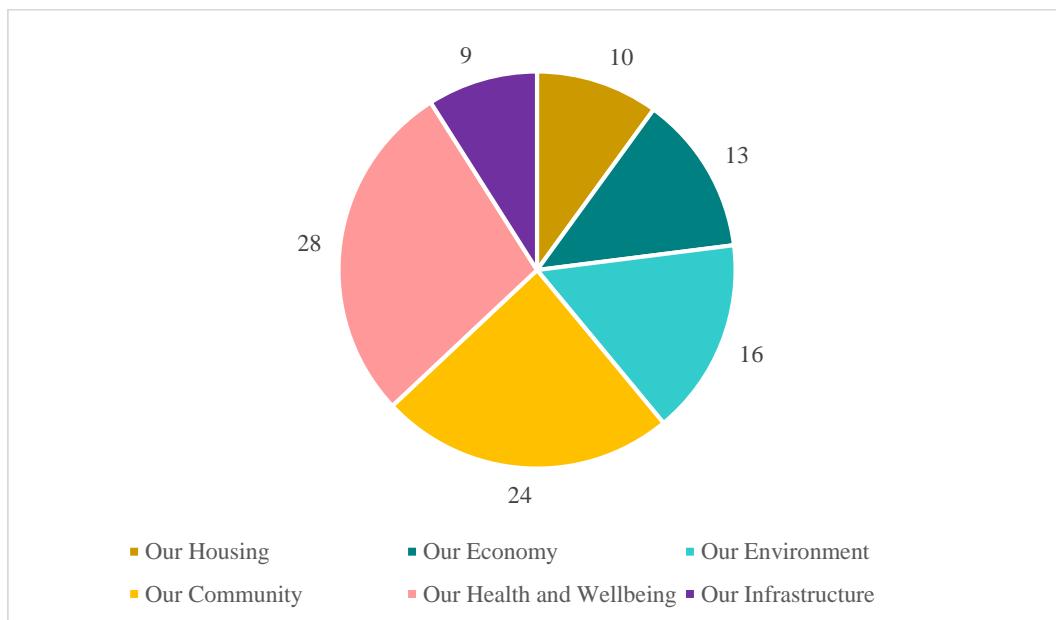
Figure 2: Summary of the Focus Groups Voting Preferences by Percentages



### 3.3.3 Youth

Following the Topic Discussions, the participants voted, using six beads, on the topics they would personally prioritise. The topic which was voted for the highest was ‘Our Health and Wellbeing’ followed by ‘Our Community’ with 28% and 24% of the votes respectively (Figure 3).

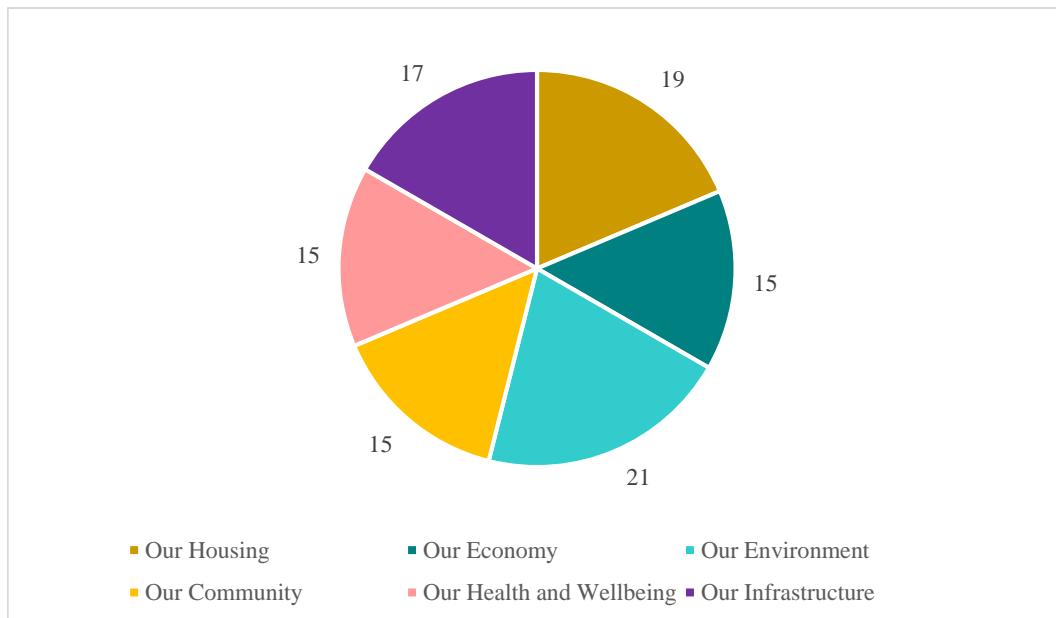
Figure 3: Youth Group’s Voting Preferences (in percentages)



### 3.3.4 Together All Are Able

Following the Topic Discussions, the participants voted, using six beads, on the topics they would personally prioritise. The topic which was voted for the highest was ‘Our Environment’ followed by ‘Our Housing’ with 21% and 19% of the votes respectively (Figure 4).

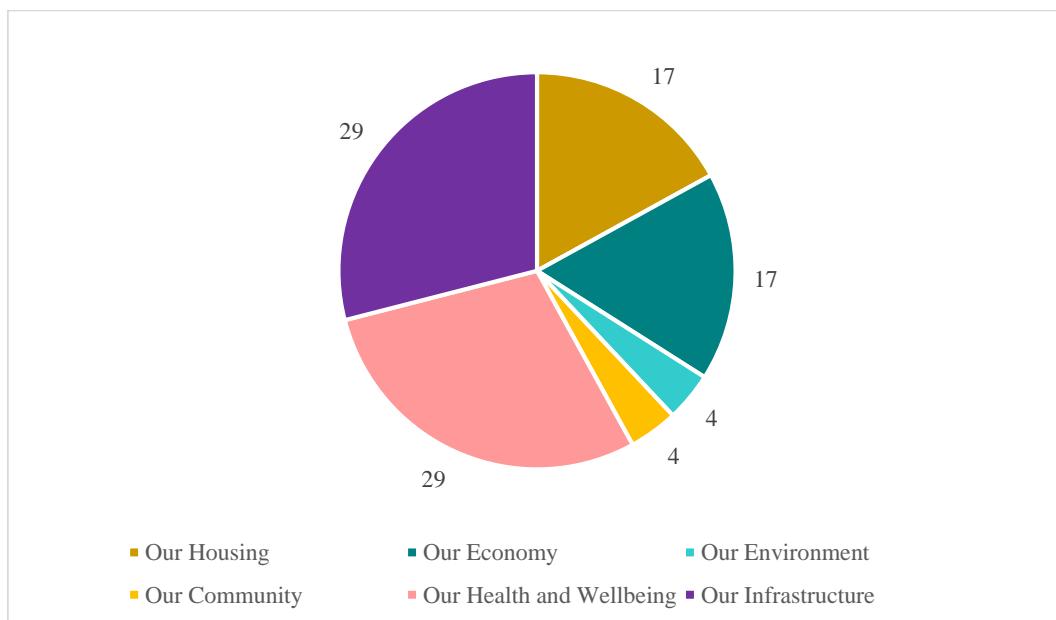
Figure 4: Together All Are Able Community Group's Voting Preferences (in percentages)



### 3.3.5 Wallasey

Following the Topic Discussions, the participants voted, with six beads, on the topics they would personally prioritise. The topics which were voted joint highest was 'Our Health and Wellbeing' followed by 'Our Infrastructure' with 29% each of the votes (Figure 5).

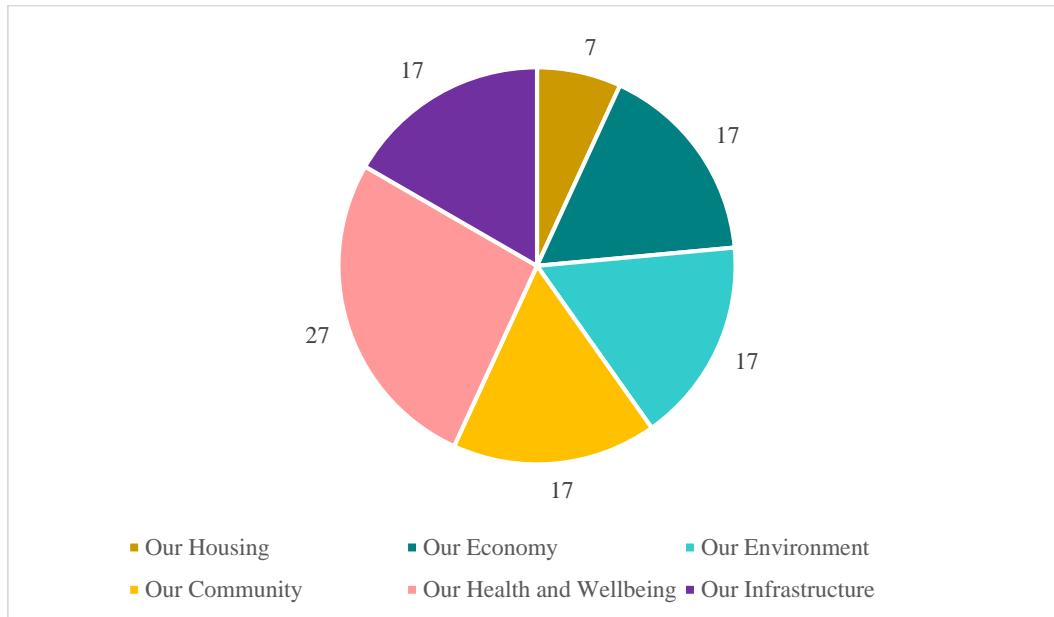
Figure 5: Wallasey Group's Voting Preferences (in percentages)



### 3.3.6 Birkenhead

Following the Topic Discussions, the participants voted, with six beads, on the topics they would personally prioritise. The topic which was voted for the highest was ‘Our Health and Wellbeing’ followed jointly by ‘Our Economy’, ‘Our Environment’, ‘Our Community’ and ‘Our Infrastructure’ with 27% and 17% of the votes respectively (Figure 6Error! Reference source not found.).

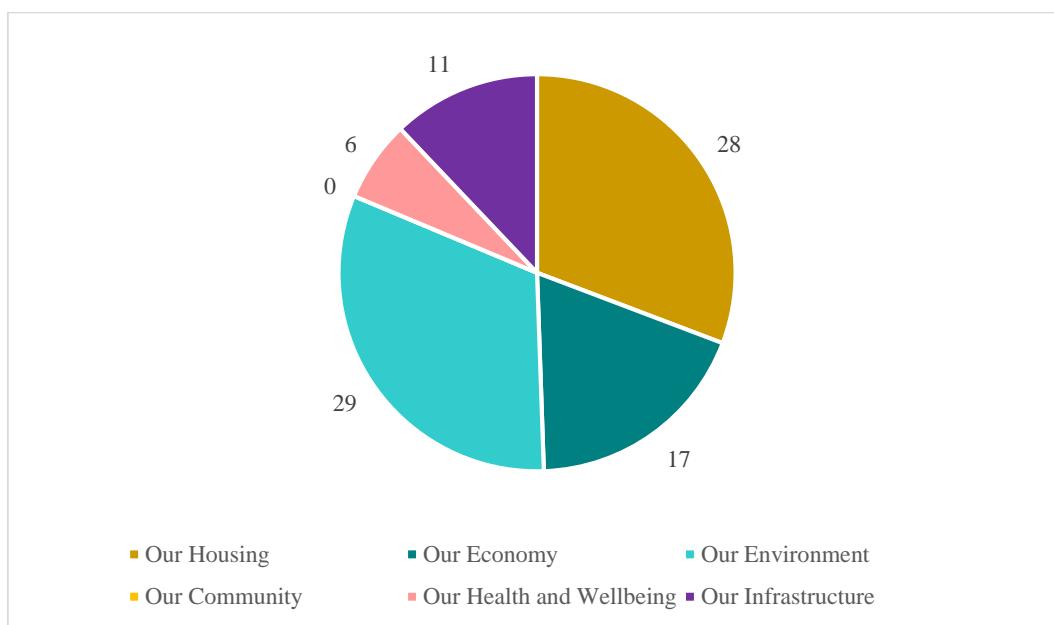
Figure 6: Birkenhead Group’s Voting Preferences (in percentages)



### 3.3.7 Wirral West and South

Following the Topic Discussions, the participants voted, with six beads, on the topics they would personally prioritise. The topic which was voted for the highest was ‘Our Environment’ followed by ‘Our Housing’ with 39% and 28% of the votes respectively (Figure 7).

Figure 7: Wirral West and South Group's Voting Preferences (in percentages)



## 3.4 Options Discussion

Following the Wirral Council officer's presentation to the group, explaining the three options presented in the Regulation 18 Local Plan consultation, attendees were invited to give their thoughts and opinions on each.

For the face-to-face groups, this took the form of a 'likes' and 'dislikes' exercise. Attendees considered the previous topics discussions and their priorities, then were asked to write their likes and dislikes on post-it notes, before sticking them on large-scale printouts of each option.

For the virtual focus groups, this was redesigned as a group discussion. The group was asked to consider and explain their thoughts on the pros and cons of each option.

For both the virtual and the face-to-face groups, attendees were then invited to indicate which option was their preferred choice.

### 3.4.1 Options 1A and 1B – Urban Intensification

<b>Youth Group</b>	<ul style="list-style-type: none"> <li>● Participants predominately supported option 1 due to it being able to reuse existing land, deliver affordable housing and ensure existing facilities and job opportunities are easily accessible.</li> <li>● Positive impacts on nature and the environment were also highlighted.</li> <li>● Negative comments relating to this option highlighted that employment opportunities are mostly in the West of the borough and that there would be too much development within existing areas impacting available green spaces and increasing levels of air pollution within the urban area.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>● Participants stated concern about replacing community and education centre spaces with residential development.</li> <li>● Participants also highlighted that houses are not close enough to shops and services.</li> </ul>
<b>Wallasey</b>	<ul style="list-style-type: none"> <li>● Participants stated that they support building on brownfield land and that this option will allow currently unsightly areas to be improved.</li> <li>● However, participants expressed concern over this option potentially becoming a blanket build</li> </ul>

	<p>policy within towns which could have negative impacts on communities.</p> <ul style="list-style-type: none"> <li>● Overall, this was the most preferred option between the participants.</li> </ul>
<b>Birkenhead</b>	<ul style="list-style-type: none"> <li>● Participants support this option due to development being sustainably located near train stations and not requiring car ownership.</li> <li>● However, this option was supported with the caveat that it comes with density guidelines to mitigate any negative impacts from increasing the density within town centres against the capacity of the local infrastructure.</li> <li>● Overall, this option was supported.</li> </ul>
<b>Wirral West and South</b>	<ul style="list-style-type: none"> <li>● Participants stated that this option was the most preferred option due to protecting the Green Belt and allows communities to protect their heritage.</li> <li>● The participants did not want to build on the Green Belt and strongly supported regenerating Birkenhead.</li> <li>● Option 1B was also supported.</li> </ul>

### 3.4.2 Option 2A – Urban Intensification and Dispersed Green Belt Release

<b>Youth Group</b>	<ul style="list-style-type: none"> <li>Participants felt this option provided a fairer distribution of development, with improved transport options across the borough and the potential to create multiple smaller communities.</li> <li>Participants also highlighted that this option would allow people to live close to where they grew up and spreading the impact on services and facilities.</li> <li>However, concerns were highlighted on this option's impact on the environment and local wildlife and that any new development needs to be fully accessible for everyone in the community.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>Participants did not state any comments on this option.</li> </ul>
<b>Wallasey</b>	<ul style="list-style-type: none"> <li>Participants had concerns about using Green Belt land and therefore did not support this option.</li> </ul>
<b>Birkenhead</b>	<ul style="list-style-type: none"> <li>Participants did not support this option due to sustainability concerns and wanted to understand the connectivity and infrastructure connections.</li> <li>Participants highlighted the difficult balance between distributing development evenly across the borough or focusing development in one location to provide the additional required services.</li> </ul>
<b>Wirral West and South</b>	<ul style="list-style-type: none"> <li>Participants did not support this option and stated that the areas of land were poorly chosen due to potential negative impacts on transport infrastructure, air quality and health for current and future residents.</li> </ul>

### 3.4.3 Option 2B – Urban Intensification and Single Urban Extension

<b>Youth Group</b>	<ul style="list-style-type: none"> <li>Participants liked that this option would allow additional services and facilities to be provided through increased funding and that there is space for this opportunity.</li> <li>However, participants were predominately against this option due to the lack of existing facilities in Heswall, the negative impacts on the environment and green space, concern about the cost of housing built, the scale of new facilities which would be required and poor accessibility potentially causing new residents to feel isolated.</li> </ul>
<b>Together All Are Able</b>	<ul style="list-style-type: none"> <li>Participants did not state any comments on this option.</li> </ul>
<b>Wallasey</b>	<ul style="list-style-type: none"> <li>Participants expressed sadness at seeing a large area of Green Belt being developed.</li> <li>Participants also stated that Heswall currently has traffic concerns making it a poor place for additional development of this scale.</li> <li>Additional services to support the housing was a requirement from the participants. Participants overall did not support this option.</li> </ul>
<b>Birkenhead</b>	<ul style="list-style-type: none"> <li>Participants stated that planning a small town on this scale would be existing for the Wirral. One participant stated that the Woodchurch estate, built in the 1950s, is a similar scale and won an urban design award.</li> <li>However, there were sustainability concerns due the distance to train stations and it was noted that infrastructure requirements would need to be carefully considered but that it was positive that there was potential for additional services to be provided within this option.</li> <li>Participants stated that were Green Belt release required within the Local Plan, this option was preferred as it protects most of the Green Belt, limiting the impact on the openness to a localised area, while allowing development needs to be met.</li> </ul>

<b>Wirral West and South</b>	<ul style="list-style-type: none"><li>Participants did not support this option, stating that it would devastate the Green Belt and result in Heswall and Barnston to merge together.</li></ul>
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## 4 Focus Group Insight

In summary, the five focus groups provided deep and broad-ranging insight into the priorities of the residents of Wirral. This will be essential in helping shape the option the Council takes forward to the Regulation 19 ‘Preferred Option’ stage of the Local Plan process.

The following summary details the concluding points of interest from the focus groups themselves and the focus group as a technique in the consultation process.

### 4.1 Focus group value

The focus groups were a valuable part of the consultation process; allowing for facilitated and in-depth discussion with representatives from each community or demographic. In parallel with the other, broader and more formal consultation events, these provided a depth of insight that demonstrates the value of this approach in the Local Plan process.

Notably, there was a desire to be involved in consultation and local authority changes in Wirral. Several participants expressed an interest in being involved in future consultations and engagement events; whether for the Local Plan process or other local authority initiatives.

Other attendees described how their invite to the focus group was their only awareness of and participation in the Local Plan process i.e. they were not aware of the broader consultation or public events and would attend them if they had known about them.

Participants overall expressed their thanks at being invited to the focus groups; with several stating that they enjoyed the discussion, the opportunity to share their views and be involved in the process both in person and virtually.

### 4.2 Priorities and key points

#### 4.2.1 Your community

The “Your Community” activity highlighted some common themes about what residents of Wirral valued and what they would like to see change. Apart from regional concerns (e.g. improving the promenade at West Kirby), most comments related to a few key themes.

Positive comments focused largely on community spirit, diversity of facilities and the heritage of Wirral and in particular its buildings and urban parks. Residents said they feel welcome in their communities and that people help each other out. Many areas have a range of leisure and retail offerings, something people are proud of and would like to see continue. Finally, the heritage of Wirral, the legacy of the area’s maritime past is something many attendees valued and would like to see developed further.

Similarly, the commentary on what attendees would like to see change was also focused on comparable themes; especially the availability of public transport and the lack availability and types of housing stock. Finally, the need for greater care for and provision of urban and natural environments was important to attendees.

#### **4.2.2 Topics**

The Housing topic yielded several points of note. One overarching topic was the regeneration of empty property (of all type) to increase housing availability. By association, there was a strong feeling that Wirral needs more affordable housing; especially for younger people and those with disabilities. There was the suggestion that the identified figure of 12,000 dwellings and the potential need for green belt release should be revisited.

Regarding the Economy, the most prevalent points made related to improving town centres (both in terms of diverse retail and providing jobs for local people) and increasing Wirral's tourism offering (related to heritage, retail and natural environment). Several groups noted the overlap of economy with both Community and Health and Wellbeing i.e. attendees consider the three to be closely linked and supportive of each other.

Community facilities are highly valued across Wirral. This includes leisure offerings & community spaces, such as halls and centres. There is a definite desire to see these places continue to be maintained, if not increased in number and a want for them to be publicised more. For younger people and those with disabilities, there is a noted lack of evening provision of community facilities.

Discussions around Environment focused on climate change, pollution and the need for retrospective and proactive action to address the climate emergency. This was an issue that was important to groups in Wirral. In addition, there was a desire for more green space in the urban environment and that developments should include provision of this.

Health and Wellbeing, which was the most important topic on average across the five focus groups, according to voting preference, was largely woven throughout the discussion of the other topics. Themes that emerged included greater provision of mental healthcare facilities, especially in the Birkenhead area and for younger people. More pastorally, the need to maintain sports and leisure facilities to support the health and wellbeing of residents was of note too.

Finally, discussions on infrastructure centred largely on public transport. Whilst some groups in urban areas felt that it was acceptable (but not ideal), many people felt stranded or restricted in their movements around Wirral. There is a desire to use public transport for financial and environmental reasons but residents felt the current offering was restricting them doing so. Provision for pedestrians and cyclists is also a concern with residents feeling that cycling networks are limited or non-existent in their areas, or that using them is not practicable due to confusion over rights of way, or safety.

### 4.2.3 Preference regarding options

The most popular option across all focus groups was Option 1. Residents felt that this made use of both undeveloped brownfield land and that in need of regeneration. It would meet the need for housing in the borough without the need for green belt release, as well as regenerating perceived unsightly areas of Wirral.

Concern was raised about the concentration of development in the Birkenhead and Wallasey area under Option 1A especially the environmental impact of increased traffic on air pollution and the limited potential for there to be ample green space in redeveloped areas.

Consideration given to Option 2A showed that residents thought this provided a fairer distribution of development across Wirral; in turn spreading the additional demand on existing services and facilities. However, it was largely ruled out, or declared a ‘second choice’ as there were concerns about connectivity for many smaller developments. Secondly, the requirement of green belt release and the associated impact on the environment was also unpopular.

Participants raised concerns about Option 2B raised about the impact on the environment of one single development, as well as the focused demand on infrastructure in an area that already struggles in this capacity. That said, some residents did draw parallels with the success of the Woodchurch Estate, built in the 1950s, and the smaller impact one development has on the greenbelt versus many smaller ones (Option 2A).

## **Appendix A**

### Youth Group Presentation

## **Appendix B**

**Together All Are Able Group  
Presentation**

## **Appendix C**

### **Virtual Groups Presentation**

## Appendix 2: Consultation Media

1. Have Your Say Consultation and Registration Advert
2. Have Your Say Consultation Advert
3. Consultation Registration Poster
4. Display Panels Content
5. Consultation Leaflet
6. Translated Consultation Posters
7. Local Plan Pop Up Banners
8. Issues and Options Local Plan Summary
9. Issues and Options Local Plan Summary Easy Read
10. Issues and Options Local Plan Summary Easy Read and Comment Form
11. Local Plan Questionnaire
12. Regeneration Planning Process Diagram

# Have your say on your Local Plan

**Wirral Council is developing its Local Plan, and your opinion is needed.**

**We want to hear your views.** Have your say on the options to help shape Wirral's Local Plan:

**Register online** to view and comment.

[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

**Visit us at a drop in session** and chat to our planning officers who will be on hand to discuss the consultation documents and provide advice on how to register your views.

**Consultation begins** 20 January 2020 for 8 weeks.

All comments must be received by:

5pm Monday 16 March 2020.

Date	Time	Venue
Mon 27 January	12:30- 8pm	Heswall Library
Wed 29 January	12:30-8pm	Bromborough Civic Centre
Thurs 30 January	12:30-8pm	West Kirby Concourse
Mon 3 February	12:30-8pm	Birkenhead Town Hall
Wed 5 February	12:30-8pm	Wallasey Town Hall
Tues 18 February	12:30-8pm	Bromborough Civic Centre
Wed 19 February	12:30-8pm	West Kirby Concourse
Thurs 20 February	12:30-8pm	Heswall Library
Wed 26 February	12:30-8pm	Birkenhead Town Hall
Thurs 27 February	12:30-8pm	Wallasey Town Hall



**Not online?** Visit your local library or one stop shop.

Comments can also be submitted by post to: Address here, Wallasey Town Hall

[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 **WIRRAL**

# Register

## to have your say on your Local Plan

The Local Plan sets out the vision and strategy for future development in Wirral to create places where people want to live, work and visit.

Our new Local Plan will cover a 15 year period and will help to meet local housing and economic growth needs whilst also protecting and enhancing our built and natural environment.

**We want to hear your views.** To have your say you need to register at [wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

Once you have registered you will receive notifications to let you know when then consultation starts so you can register your views. You will also receive information on local drop in events where you can view the plans and chat to officers about the Local Plan.



**Not online?** Visit your local library or one stop shop.

Comments can also be submitted by post to: Address here, Wallasey Town Hall

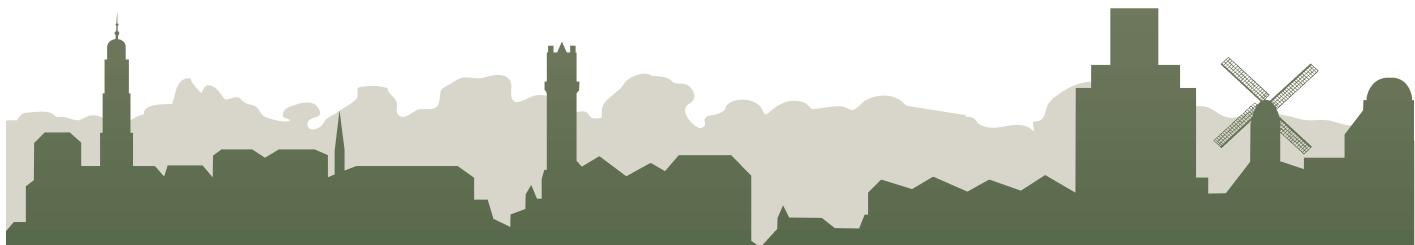
[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 WIRRAL

# Have your say on your Local Plan

**Wirral Council is developing a Local Plan.**

Your opinion is needed to help shape the future of our towns, villages, infrastructure, environment and economy.



Consultation begins  
27 January 2020 for 8 weeks

Visit a drop-in session to discuss  
the consultation documents

Register at [wirral.gov.uk/localplan\\*](http://wirral.gov.uk/localplan)  
to view and comment

All comments must be received by  
5pm Monday 23 March 2020

\*For free internet access visit your local library

[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

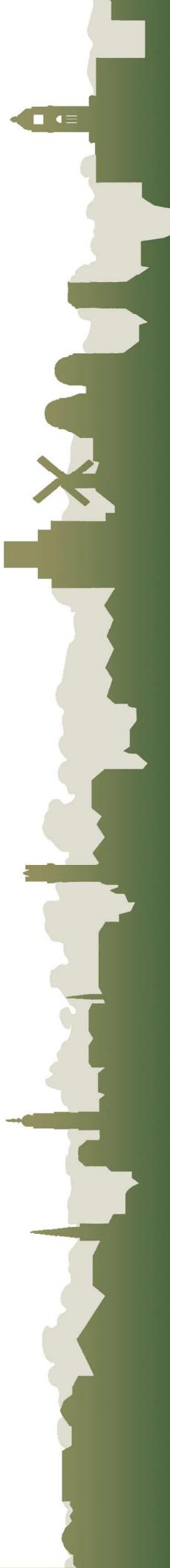
 WIRRAL

# Register to have your say on your Local Plan

**Our Local Plan sets out the vision and strategy for future development in Wirral to create places where people want to live, work and visit.**

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To request the consultation information in a different language or format please email [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk).  
Not online? Visit your local library or one stop shop.  
When the consultation begins comments can be submitted by post to:  
Forward Planning team, PO 290, Brighton Street, Wallasey, CH27 9FQ

[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)



## Wirral Local Plan The vision

Producing a Local Plan is one of the most important duties of the Council.  
It will set out a long-term vision for how Wirral will develop over the next  
10 to 15 years.

### It will:

- Ensure that we provide enough homes and employment sites to meet the needs of all our population, young and old
- Set out what types of homes will be built and where they will be located
- Promote the regeneration of Birkenhead, Liscard, New Ferry, New Brighton and other places to provide vibrant, new, mixed-use neighbourhoods
- Ensure that local infrastructure is provided for new development
- Protect our environmental and heritage assets
- Set out a range of policies which will be used to make decisions on planning applications
- Enable all people in Wirral to live longer and healthier lives

**“It will shape  
the kind of  
place we want  
Wirral to be”**



# Wirral Local Plan The preferred option

This is our preferred option to develop within the existing urban areas, to create communities that people want to live and work in.

## This approach would:

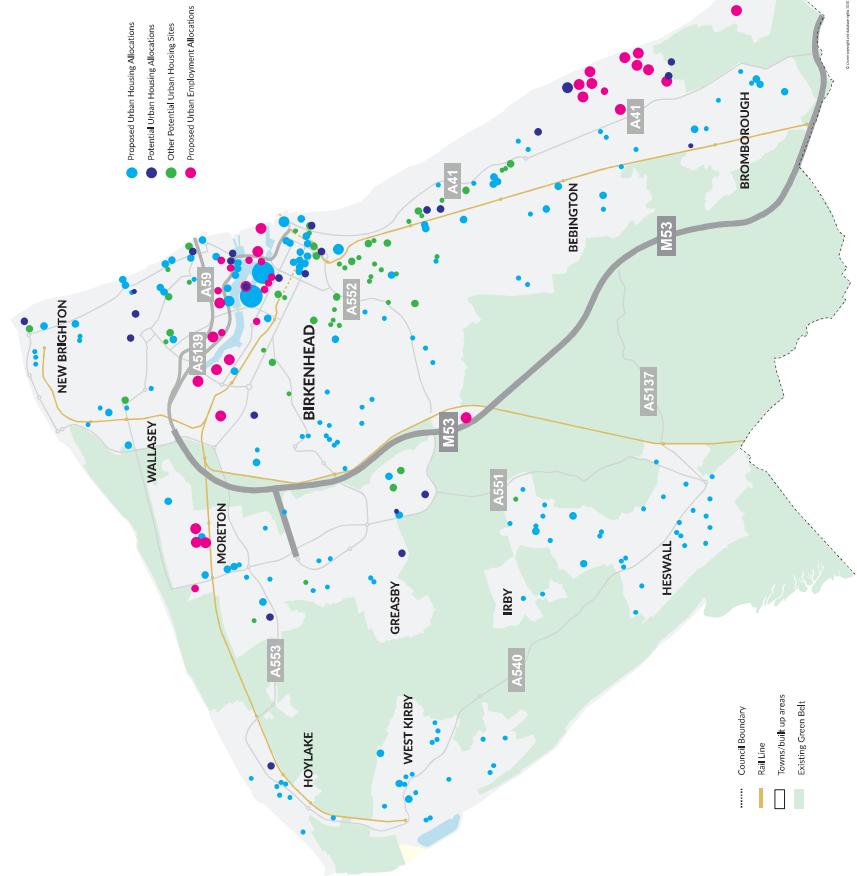
- ✓ Deliver our development needs through sustainable regeneration
- ✓ Provide 12,000 new homes in urban areas
- ✓ Develop on existing urban and brownfield sites
- ✓ Protect our Green Belt
- ✓ Increase densities across neighbourhoods in Wirral
- ✓ Provide 105 hectares of employment land, creating new job opportunities
- ✓ Require joint working arrangements with our investment and funding partners

## No development would take place on previously undeveloped land in the Green Belt using our preferred option.

Government policy sets out the tests which potential housing sites must pass in order to be included in the Local Plan.

At this stage not all of the potential urban sites pass these tests. However, we are determined not to release Green Belt land for development, and we will continue, through this consultation period and beyond, to undertake further intensive work to increase the supply of suitable land in the urban area.

If we are unable to provide evidence of enough land to meet our 15 year housing requirement, we may have to consider proposing Green Belt release through the Local Plan.



# Wirral Local Plan Option 2a and 2b

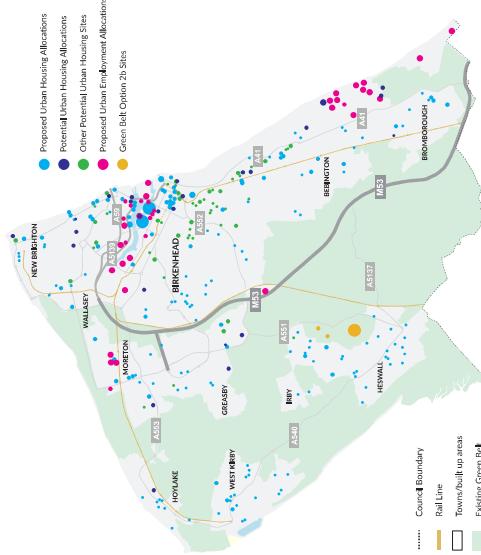
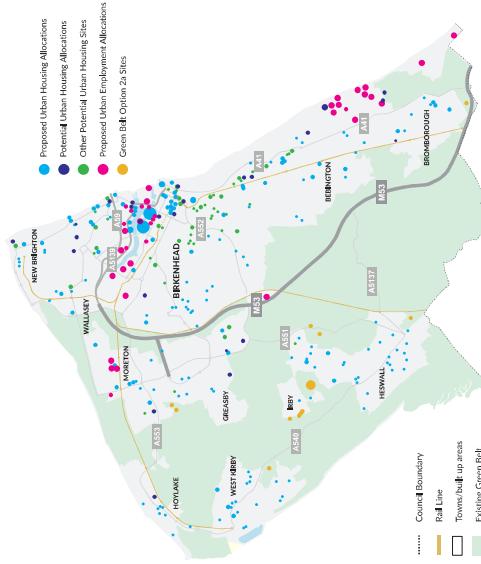
If we are unable to evidence enough available 'deliverable' or 'developable' sites within the urban areas to provide 12,000 new homes, we may have to look at developing areas of Green Belt in addition to sites in the urban areas.

We do not want to develop on Green Belt, but to demonstrate that we have consulted on all available options to meet our development and growth needs we need your views on two Green Belt options, 2a and 2b.

Land would only be proposed for release from the Green Belt following this consultation if there was a shortfall in the supply of 'deliverable' or 'developable' land in the urban area needed to deliver the Council's Preferred Option.

#### This option could:

- ✓ Provide a mix of urban and Green Belt development
- ✓ Be a hybrid of Option 2a and 2b
- ✓ Maintain urban regeneration as a priority



# Wirral Local Plan Have your say



**Tell us  
what you  
think**



**We will  
review all of  
the comments**



**We will publish  
the final draft  
Local Plan**

You can view all of the documents and **submit comments online** using our easy to use web portal. The portal will formally register all comments received. The consultation will run from 27 January for 8 weeks and comments must be received by 5pm on 23 March 2020.  
**Have your say at [wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)** or you can submit comments by post to: Forward Planning team, PO 290, Brighton Street, Wallasey, CH27 9FQ.

Following the consultation period, all comments on the proposed options will be reviewed and will be used to help shape the final scope and content of the final draft Wirral Local Plan.

You will have the opportunity to make formal comments and representations based on the soundness and legal compliance of this plan. This will be published later in the summer. **At this stage you can make representations** which will be included in a formal Consultation Statement and passed to the Inspector undertaking the Independent Examination.



**[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)**

**WIRRAL**

# The Local Plan is our plan for **the future** **of Wirral**

## How to get involved?

To view the plans and comment you can:

- Register online at [wirral.gov.uk/localplan](http://wirral.gov.uk/localplan) to view the documents and have your say
  - Visit us at a drop-in session where you can chat to our planning officers to discuss the consultation documents and receive advice on how to register your views. Details of drop in events are available at [wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)
  - Visit your local library to use our free computer facilities and view electronic and paper copies of the documents. You can also pick up a paper questionnaire to submit your comments by post
  - Send a letter by post to: Forward Planning team, PO Box 290, Brighton Street, Wallasey, CH27 9FQ
- To request the information in a different language or format please email [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk)

# Have your say on your Local Plan

Wirral Council is developing a Local Plan, and your opinion is needed to help shape the future of our towns, villages, infrastructure, environment and economy.

[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)



## What is the Local Plan?

**The Local Plan is our plan for the future of Wirral. It will play an important part in shaping the future of our towns, villages, infrastructure, environment and economy.**

The Council is currently preparing the new Local Plan for Wirral which will set out how the borough should be developed over the next 15 years.

The Plan sets out the Council's priorities for development and gives clear guidance about what can be built, where, how, and why. The plan covers housing, commercial, public and private developments.

## The Local Plan will:

- Protect our environmental and heritage assets and help tackle climate change
- Ensure that we provide enough homes and employment sites to meet the needs of all our population young and old
- Set out what types of homes will be built and where they will be located
- Promote the regeneration of Birkenhead, Liscard, New Ferry, New Brighton and other places to provide vibrant, new, mixed-use neighbourhoods
- Ensure that local infrastructure is provided for new development
- Set out a range of policies which will be used to make decisions on planning applications
- Enable all people in Wirral to live longer and healthier lives

## What does the plan need to include?

- Provide up to 105 hectares of employment land, creating new job opportunities
- Require joint working arrangements with our investment and funding partners
- No development would be planned to take place on previously undeveloped land in the Green Belt under our preferred option. Government policy sets out the tests which potential housing sites must pass in order to be included in the Local Plan. At this stage not all of the potential urban sites pass these tests. However, we are determined not to release Green Belt land for development, and we will continue, through this consultation period and beyond, to undertake further intensive work to increase the supply of suitable land in the urban area. If we are unable to provide evidence of enough 'deliverable' or 'developable' land to meet our 15 year housing requirement, we may have to consider proposing Green Belt release through the Local Plan.

## Consultation on Wirral's Local Plan (Regulation 18)

The Council has developed options on where the new housing and employment areas could be located. Your opinion is needed on these options and your views will help to shape the future of Wirral for you and your family.

An 8 week consultation will run from 27 January 2020 and close at 5pm on Monday 23 March 2020.

The Local Plan will shape the kind of place we want Wirral to be into the 2030s and we encourage everybody to help ensure the Local Plan meets the needs of our communities.

**Details of how to get involved are listed on the back of this leaflet.**

## The Council's preferred option

- The Council's preferred option is to locate all new housing and employment within existing urban areas – wherever possible on brownfield sites – to create communities that people want to live and work in. This approach would:
- Deliver our development needs through sustainable regeneration
    - Provide 12,000 new homes in urban areas
    - Develop on existing urban and brownfield sites
    - Protect our Green Belt
    - Increase densities across neighbourhoods in Wirral

## Why are there green belt options?

We do not want to develop on Green Belt, but to demonstrate that we have consulted on all available options to meet our development and growth needs the Council is also asking for public opinion on two Green Belt options.

Land would only be proposed for release from the Green Belt following this consultation if there was a shortfall in the supply of 'deliverable' or 'developable' land in the urban area needed to deliver the Council's preferred option.

## What happens after the consultation?

Following the consultation period all comments on the proposed options will be reviewed and will be used to help shape the scope and content of the final draft Wirral Local Plan.

The Council's proposed Local Plan is being prepared to be submitted

to the Secretary of State during 2020 and, once adopted, will be used to

make decisions on individual planning applications for the next 15 years.

شارك برأيك في خطةك المحلية

يعمل مجلس منطقة Wirral على تطوير خطةه المحلية ورأيك يهمهم

ستحدد الخطة المحلية الرؤية والاستراتيجية للتطوير المستقبلي في منطقة Wirral، وذلك لإنشاء أماكن يرحب الناس في العيش والعمل بها وزيارتها.

ستغطي خطتنا المحلية الجديدة فترة 15 عاماً وستساعد على تلبية احتياجاتنا من الإسكان والنمو الاقتصادي، وفي الوقت ذاته ستحمي كلٍّ من بيئتنا المعمارية والطبيعية وتحسينها.

نفضل بزيارة جلستنا غير الرسمية في Wirral Change.

يوم الثلاثاء الموافق 11 فبراير من الساعة 11 صباحاً حتى الساعة 3.30 مساءً.

#### Wirral Change

مدرسة سانت لورانس،

سانت لورانس،

بيركينهيد

كود بريد CH41 3JD

سيكون موظفو المجلس والمترجمون الفوريون متاحين لمناقشة وثائق المشاورات وتقديم المشورة بشأن كيفية تسجيل وجهة نظرك.

ستتمكن من توفير المعلومات المعنية بالمشاورات بتنسيقات ولغات مختلفة. ويمكن طلبها عبر الموقع [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk). سنقوم بالرد على أي طلبات للحصول على معلومات بتنسيقات يمكن الوصول إليها وسنوفرها في أقرب وقت ممكن. سيكون الموظفون متاحين أثناء الفعاليات غير الرسمية لتقديم المساعدة إذا كنت ترغب في إكمال النموذج في نفس اليوم.

ستبدأ المشاورات في 27 يناير 2020 وستستمر لمدة 8 أسابيع، ويجب إرسال جميع التعليقات قبل الساعة 5 مساءً في يوم 23 مارس 2020.



[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 WIRRAL

## আপনার স্থানীয় পরিকল্পনা সম্পর্কে আপনার বক্তব্য রাখুন

উইরাল কাউন্সিল নিজের স্থানীয় পরিকল্পনাটির বিকাশ করতে এবং জন্য আপনার মতামতের প্রয়োজন

স্থানীয় পরিকল্পনা উইরালের ভবিষ্যত উন্নয়নের জন্য দৃষ্টিভঙ্গি ও কৌশল নির্ধারণ করে এমন জায়গা তৈরি করবে যেখানে লোকেরা বাস করতে, কাজ করতে এবং বেড়াতে যেতে চাইবে।

আমাদের নতুন স্থানীয় পরিকল্পনাটি ১৫-বছরের সময়কালে এবং আমাদের হাউজিং ও অর্থনৈতিক উন্নয়নের থয়োজনীয়তা পূরণে সহায়তা করবে যা একই সাথে আমাদের নির্মাণ এবং প্রাকৃতিক পরিবেশকে সুরক্ষা এবং বর্ধন করবে।

উইরালের পরিবর্তনে আমাদের ড্রপ-ইন সেশনটি ভিজিট করুন।

মঙ্গলবার ১১ ফেব্রুয়ারি সকাল ১১ টা থেকে বিকেল ৩:৩০ পর্যন্ত।

ওয়াইরালের পরিবর্তন

সেন্ট লরেন্স স্কুল,

সেন্ট লরেন্স ড্রাইভ,

বারকেনহেড,

CH41 3JD

পরামর্শের নথিগুলি নিয়ে আলোচনা করতে এবং আপনার মতামত কিভাবে জানাবেন সে সম্পর্কে পরামর্শ দেওয়ার জন্য কাউন্সিল এর কর্মচারী এবং দোভাসীরা উপস্থিতথাকবেন।

আমরা বিভিন্ন মাধ্যম এবং ভাষায় পরামর্শের তথ্য সরবরাহ করতে পারবো। এগুলি [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk) থেকে অনুরোধ করা যেতে পারে। আমরা সুবিধাজনক মাধ্যমে তথ্যের জন্য যে কোনও অনুরোধে সাড়া দেবো এবং এগুলি যত তাড়াতাড়ি সম্ভব পাওয়া যাবে। আপনি যদি ড্রপ-ইন সেশনে এসে সেদিন ফর্মটি পূরণ করতে চান তবে আপনাকে সহায়তা করার জন্য কর্মীরা উপস্থিত থাকবে।

পরামর্শ অনুষ্ঠান ২৭ শে জানুয়ারী ২০২০ থেকে ৪ সপ্তাহের জন্য শুরু হবে এবং ১৩ শে মার্চ ২০২০ তারিখ সন্ধ্যা ৫ টার মধ্যে সকল মন্তব্য অবশ্যই পেতে হবে।



[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 WIRRAL

您對當地計劃有發言權

Wirral 理事會正在制定當地計劃，需要傾聽您的意見

當地計劃將提出 Wirral 未來發展的願景和戰略，以便打造理想的居住、工作和觀光環境。

我們新的當地計劃將涵蓋 15 年，有助於滿足我們的住房和經濟增長需求，同時保護和改善我們的建築和自然環境。

在以下時段您可隨時拜訪 Wirral Change，無需預約。

**2 月 11 日上午 11.00 - 下午 3.30，星期二**

**Wirral Change**

**St Laurence's School,**

**St Laurence Drive,**

**Birkenhead,**

**CH41 3JD**

本理事會職員和翻譯將到場討論諮詢文檔，並就如何表達您的觀點提供意見。

我們可以用不同的格式和語言提供諮詢訊息。可以傳送郵件至 [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk) 索取。

我們將盡快以便於訪問的方式提供您索取的信息。如果您希望在當天填寫表格，在活動期間工作人員會到場提供幫助。

**WIRRALC\_0687989**

諮詢從 2020 年 1 月 27 日開始，為期 8 周，所有意見必須在 2020 年 3 月 23 日下午 5 點之前收齊。



wirral.gov.uk/localplan

 **WIRRAL**

对本地计划发表意见

**Wirral** 理事会正在制定本地计划，需要您的意见

本地计划将提出 **Wirral** 未来发展的愿景和战略，以便打造理想的居住、工作和观光环境。

我们新的本地计划将涵盖 15 年，有助于满足我们的住房和经济增长需求，同时保护和改善我们的建筑和自然环境。

在一些时段您可随时拜访 **Wirral Change**，无需预约。

**2 月 11 日上午 11.00 - 下午 3.30，星期二**

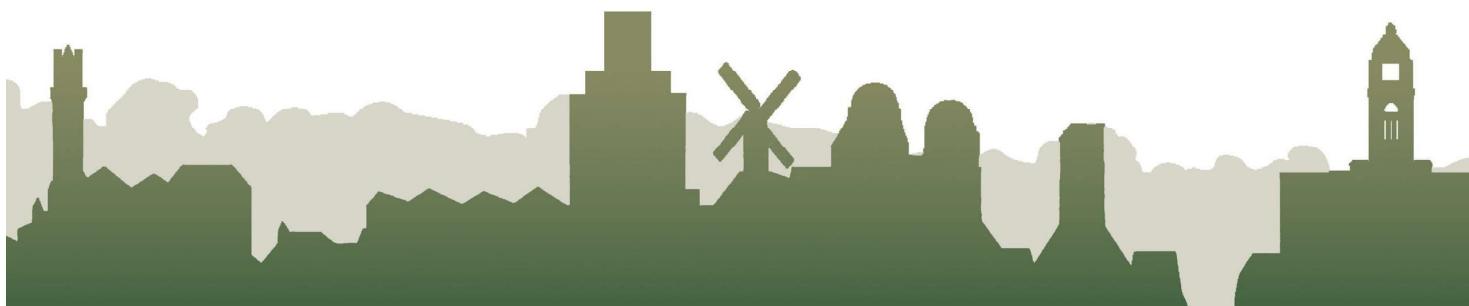
**Wirral Change**

**St Laurence's School,  
St Laurence Drive,  
Birkenhead,  
CH41 3JD**

本理事会职员和翻译将到场讨论咨询文件，并就如何表达您的观点提供意见。

我们可以用不同的格式和语言提供咨询信息。可以发送邮件至 **localplan@wirral.gov.uk** 索取。我们将尽快以便于访问的方式提供您索取的信息。如果您希望在当天填写表格，在活动期间工作人员会到场提供帮助。

咨询从 2020 年 1 月 27 日开始，为期 8 周，所有意见必须在 2020 年 3 月 23 日下午 5 点之前收齐。



**wirral.gov.uk/localplan**

 **WIRRAL**

Weź udział w konsultacjach społecznych dotyczących planu zagospodarowania przestrzennego Twojej okolicy

Wirral Council opracowuje nowy plan zagospodarowania przestrzennego i potrzebna jest Twoja opinia

Plan zagospodarowania będzie uwzględniał wizję i strategie rozwoju Wirral, na obszarze którego powstaną obiekty budowlane, w których mieszkańcy będą chcieli mieszkać, pracować i które będą chętnie odwiedzać.

Plan jest przygotowywany na 15 lat i będzie odpowiedzią na zapotrzebowanie na mieszkania komunalne, jak również przyczyni się do rozwoju ekonomicznego. Jednym z założeń będzie również ochrona i uatrakcyjnienie zabudowy oraz środowiska naturalnego.

Zapraszamy na sesje niewymagające wcześniejszej rezerwacji w Wirral Change.

**Wtorek 11 lutego, w godzinach 11.00-15.30.**

#### **Wirral Change**

**St Laurence's School,  
St Laurence Drive,  
Birkenhead,  
CH41 3JD**

Do Państwa dyspozycji będą pracownicy naszego urzędu oraz tłumacze, którzy pomogą w konsultacjach i poinformują, w jaki sposób mogą Państwo zgłosić swoje uwagi oraz propozycje.

Na spotkaniu dostępne będą informacje na temat prowadzonych konsultacji w różnych formatach i językach. Materiały informacyjne można otrzymać pisząc do nas na adres e-mail **localplan@wirral.gov.uk**. Materiały informacyjne w preferowanym formacie prześlemy w możliwie najkrótszym terminie. Potrzebę otrzymania materiałów będą mogli Państwo zgłosić w czasie trwania konsultacji społecznych jednemu z naszych pracowników.

Konsultacje rozpoczną się 27 stycznia 2008 roku i będą trwać przez 8 tygodni. Wszystkie uwagi oraz propozycje można zgłaszać do 23 marca 2008 r. do godziny 17.00.



**wirral.gov.uk/localplan**

 **WIRRAL**

Spuneți-vă părerea privind planul dvs. local

Consiliul din Wirral își elaborează planul său local și este necesară opinia dvs.

Planul local va indica viziunea și strategia pentru viitoarea dezvoltare din Wirral pentru a crea locuri unde oamenii să dorească să locuiască, să muncească și pe care să le viziteze.

Noul nostru plan local va acoperi o perioadă de 15 ani și va ajuta la respectarea nevoilor noastre în materie de locuințe și creștere economică protejând în același timp și stimulând mediul nostru clădit și natural.

Vizitați ședința noastră de prezentare de la Wirral Change.

**Marți 11 februarie 11:00- 15:30.**

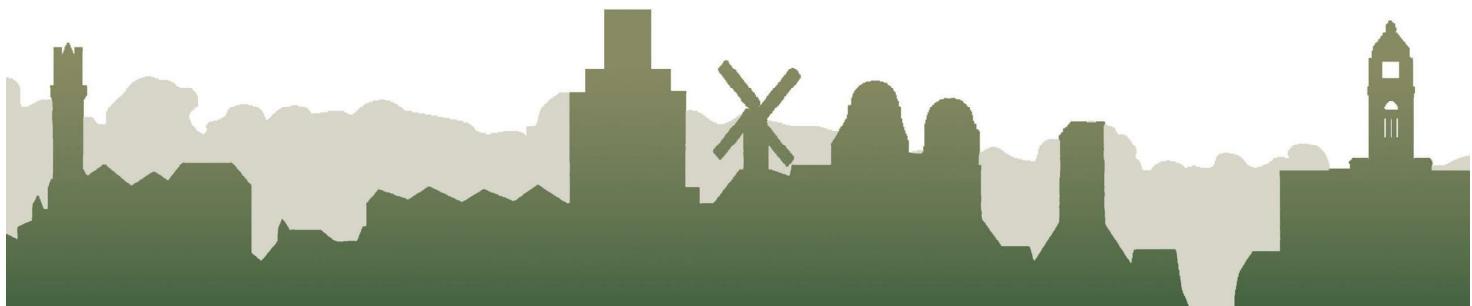
#### **Wirral Change**

**St Laurence's School,  
St Laurence Drive,  
Birkenhead,  
CH41 3JD**

Angajați și traducători ai Consiliului vor fi disponibili pentru a discuta documentele consultative și oferi sfaturi privind modul de înregistrare a punctului dvs. de vedere.

Vom putea oferi informații consultative în diferite formate și limbi. Acestea pot fi solicitate de la [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk). Vom răspunde oricărora cereri de informații în formate accesibile și le vom pune la dispoziție cât de curând posibil. În timpul acestor evenimente de prezentare vor fi disponibili angajați pentru a oferi asistență în cazul în care doriți să completați formularul în ziua respectivă.

Consultarea începe în data de 27 ianuarie 2020; timp de 8 săptămâni toate observațiile trebuie să fie primite înainte de ora 17:00 în data de 23 martie 2020.



[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 **WIRRAL**

# How the Local Plan is prepared

## Step 1



### Gather Evidence

The Council conducts a range of detailed studies and considers everything a Local Plan needs, like how many new homes and jobs are needed and what supporting infrastructure is required.

## Step 2



### Consider Options

The Council considers the ways our future development needs could be met and outlines a preferred option.

## Step 3



### Consultation (Regulation 18)



The options are presented to the public for consultation. Residents are invited to comment on the options and attend drop in sessions to discuss the plans with Council Officers.

## Step 4



### Review Comments

The Council reviews comments made during the public consultation and after careful consideration, publishes a draft Local Plan.

## Step 5



### Representation (Regulation 19)

The draft Local Plan is published for representations to be submitted on its "soundness".

## Step 6



### Examination in Public

The Secretary of State appoints an Independent Planning Inspector to examine the draft Local Plan in great detail. Public hearing sessions are held during this stage.

## Step 7



### Adopt the Local Plan

The Planning Inspector's final report recommends whether the Council can adopt the Plan. Once adopted, the Local Plan will be used to make decisions on all planning applications.



# Have Your Say on your Local Plan

## What is a Local Plan?

The Local Plan sets out the vision and strategy for future development in Wirral to create places where people want to live, work and visit. Our new Local Plan will cover a 15 year period and will help to meet local housing and economic growth needs whilst also protecting and enhancing our built and natural environment.

**Your comments on these themes are needed**

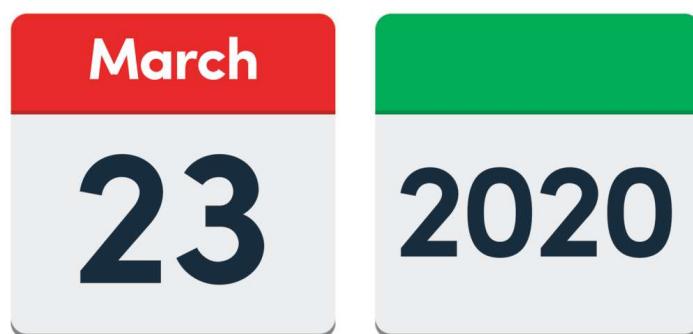


This is a summary of the Issues and Options  
Consultation Document for full version  
go to <https://wirral-consult.objective.co.uk>

# Wirral Local Plan 2020 - 2035

## Issues and Options Local Plan Consultation Summary Document

Consultation ends  
(Regulation 18)



[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 **WIRRAL**

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The full version of the Issues and Options document contains questions which can be answered to give a response to the consultation.

You can find the full version of the Issues and Options document at <https://wirral-consult.objective.co.uk> or at your local public library or at Wallasey Town Hall during their normal opening hours.

You can also visit us at one of the drop-in sessions being held in a number of places in the Borough. To find an event near you go to [www.wirral.gov.uk/localplanevents](http://www.wirral.gov.uk/localplanevents)

# Introduction

- The Local Plan is the long-term plan for Wirral through to 2035.
- It is an important planning document about what can be built, where, how, and why.
- It also covers **climate change and the environment, regeneration**, the amount of **new housing and jobs** and where they should be provided, **transport, heritage and health and wellbeing**.
- The Council has published an important stage of the Local Plan called the '**Issues and Options Consultation**' document. This sets out the draft numbers of new homes and amount of employment land to be provided for in the Local Plan. It also sets out the Council's Preferred Option for where this development should be located.
- We want to know what you think of the Local Plan Issues and Options Document so you can be part of how Wirral will look in the next 15 years. Alongside the Issues and Options Document we are also inviting views on an initial Sustainability Appraisal, which is an independent assessment of how sustainable our different options are (also incorporating health and equalities issues).
- We are also consulting on the Habitats Regulations Assessment which will ensure that the plan does not result in harm to our highest protected environmental sites.
- You can give us your comments by going to  
[www.wirral.gov.uk/localplan](http://www.wirral.gov.uk/localplan)
- Please give us your views by **5pm on Monday 23 March 2020**.
- Your comments will help us make the final draft of the Local Plan that we will share with everyone later this year.
- The final draft Local Plan will then be sent to the Government for independent review and final changes.
- In 2022, the Local Plan will be adopted and Wirral Council will start using it to decide on all planning applications.

# Our Vision

The local plan will be guided by a Vision of what we think we want Wirral to be like in 2035.

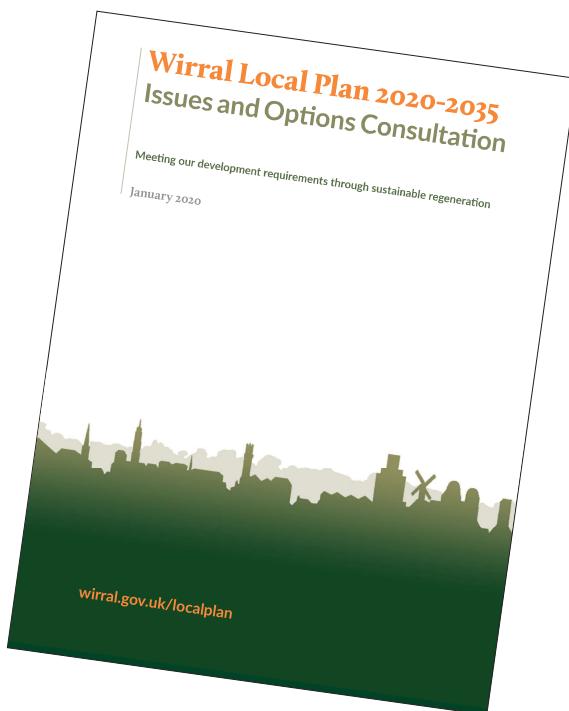
## **The Vision for Wirral: A Healthy, Sustainable and Prosperous Borough**

- Ensure that we provide enough homes and employment sites to meet the needs of all our population, young and old
- Set out what types of homes will be built and where they will be located
- Promote the regeneration of Birkenhead, Liscard, New Ferry, New Brighton and other places to provide vibrant, new, mixed-use neighbourhoods
- Ensure that local infrastructure is provided for new development
- Protect our environmental and heritage assets
- Set out a range of policies which will be used to make decisions on planning applications
- Enable all people in Wirral to live longer and healthier lives

# What is a Local plan and what will it do?

The Local Plan covers the whole of the Borough of Wirral and will:

- Protect our environmental and heritage assets and help tackle climate change
- Make sure that we provide enough homes and employment sites to meet the needs of all our population young and old
- Set out what types of homes and where they will be built.
- Promote the regeneration of Birkenhead, Liscard, New Ferry, New Brighton and other places to provide vibrant new mixed use neighbourhoods
- Ensure that local infrastructure is provided for new development
- Replace old out of date planning policies to be used when making decisions on planning applications



# What about the consultation in late 2018?

We consulted you on the Development Options Review in Autumn 2018. We received over 3,000 responses. We listened to you and decided to make a fresh start on the Local Plan. The comments you made, and our response is set out in a separate Consultation Statement which can be found by going to [www.wirral.gov.uk/localplan](http://www.wirral.gov.uk/localplan).

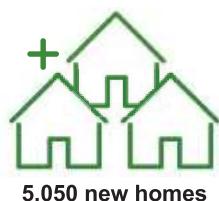
## What are our Development Needs?

The Government requires us to plan to meet our housing and employment needs for the next 10 to 15 years.



12,000 homes

We need 12,000 new homes  
between 2020 and 2035  
(30% affordable)



5,050 new homes

Of these about 5,050 new homes to need to be delivered by 2025



80ha Employment Land

We need about 80ha of land for new jobs



We need to support major regeneration of brownfield sites in and around Birkenhead

# How do we calculate our local housing needs?

The Government require us to use the 'Standard Method' which is a formula set out in national planning guidance.

Based on the standard method, the Council needs to ensure that the Local Plan provides for a minimum requirement of 800 net new homes per year - this equates to 12,000 net new homes over the whole plan period to 2035.

We can only change this if exceptional circumstances justify an alternative approach. So far we have not been able to identify any.



# Objectives

Our objectives are the long term things we aim to do in the next 15 years.

## A Sustainable Wirral

<b>1</b>	To support sustainable approaches to the location, design, construction, operation and impact of new development.
<b>2</b>	Realise the potential of our industrial legacy, and our waterside and heritage assets to deliver comprehensive urban regeneration.
<b>3</b>	Promote sustainable travel, improve accessibility, connectivity, and ease of movement and direct new development to locations which will provide easiest access to existing centres, high-frequency public transport corridors, pedestrian and cycle routes.
<b>4</b>	Ensure the responsible use of land and natural resources to mitigate and adapt to Climate Change and promote the transition to a low carbon Borough.
<b>5</b>	Protect and improve the quality and accessibility of green space, green infrastructure and nature, whilst protecting and enhancing biodiversity and ensuring that development delivers net environmental gains where possible.

## A Special and Healthy Place to Live

<b>6</b>	Manage flood risk through a risk-based approach which directs inappropriate development away from high risk coastal, river or surface flooding areas, makes space for water and uses sustainable urban drainage systems.
<b>7</b>	Provide sufficient housing to meet identified local housing needs and provide a choice of housing for people at all stages of life and incomes.
<b>8</b>	Ensure that high quality new development integrates with and respects our peninsula's distinctive character, natural environment and built heritage, to create vibrant, healthy places and local communities.
<b>9</b>	Provide and promote essential local infrastructure including emergency services, community, cultural, education, transport, health and leisure facilities, shops, and services all within easy reach of local communities.

## A Thriving Wirral

<b>10</b>	Tackle social, economic and environmental deprivation, especially in the eastern part of the peninsula, through housing renewal, reducing unemployment, improving skills, education, community and environmental conditions.
<b>11</b>	Provide a range of employment and mixed-use sites to meet assessed needs, provide work opportunities for our residents and foster an environment where our existing businesses and new, innovative start-ups can prosper. To support a competitive and diverse rural and visitor economy.
<b>12</b>	Ensure that Birkenhead and the Borough's other town, district and local centres adapt to changing shopping patterns to become a vibrant mixed-use focus for each of our peninsula's communities.

## Themes in the Local Plan



# Spatial Options for meeting our Development Needs

In developing the spatial options for the Local Plan the Council is mindful that they must:

- **Be realistic** - this means they must all deliver the quantity of homes and land for employment that has been identified as required for Wirral; and
- **Consider all reasonable alternatives** to ensure that this Local Plan can be considered “sound”

The Local Plan Issues and Options document sets out three main Options for locating our housing and employment needs over the Plan period:

## Preferred Option 1: Urban intensification



Option 1A: Urban Intensification  
Between 10,300 and 14,800 homes  
within the plan period

The Council's Preferred Option is to locate all new housing and employment within existing urban areas and on brownfield sites.

If we can bring forward development of brownfield sites and release some existing employment land for housing we might be able to meet all our housing requirements within the urban area.

But this will mean:

- **Increasing the density of houses** - but maintaining good design, creating high quality housing layouts and living environments such as those achieved in Europe and Scandinavia;
- **Getting financial help** from our partners including the Government, Homes England, and the Liverpool City Region to tackle brownfield sites

# Proposed Urban Housing Allocations

These are sites that we have sufficient information now to include within the urban housing supply - subject to comments received during this consultation (see map below).



Map 1 Proposed Urban Housing Allocations

- Proposed Urban Housing Allocations
- Urban Permissions Not Started in April 2019

## Potential Intensification and Additional Urban Housing Allocations

These include sites where the landowner or developer has indicated that they could develop their site with more homes or at a faster rate. They also include sites which have been identified as potentially suitable for re-designation as part of the latest review of employment land (see map below).



Map 2 Potential Urban Intensification and Additional Urban Housing Allocations

- Proposed Urban Housing Allocations (Red)
- Urban Permissions Not Started in April 2019 (Blue)
- Potential Additional Urban Housing Allocations (Green)

## Other Suitable but Currently Uncertain Sites

These are sites that we are not sure about. They include sites where planning permission has previously been granted but has now lapsed; where the landowner has not recently indicated that they are still willing to take the site forward for development; and sites which have been identified as unviable in the current market (see map below).



Map 3 Other Suitable but Currently Uncertain Sites

Other Suitable but Currently Uncertain Sites

## **Option 1A: Urban Intensification advantages and disadvantages**

<b>Advantages</b>	<b>Disadvantages</b>
<p>It meets all of our development needs within the urban area, predominantly using brownfield land.</p> <p>An urban focus for new development- supports the prioritisation of previously developed land, directing new development to areas of regeneration need and opportunity and need, enabling the creation of attractive new mixed-use communities.</p> <p>Social, convenience, economic, and environmental benefits of living in places of higher density, supporting high quality urban living.</p> <p>More homes would be built close to employment opportunities and existing transport infrastructure.</p> <p>Reduces the potential need for vehicle dependency, supporting active travel with benefits to the environment and climate. Supports investment in existing infrastructure.</p> <p>Will safeguard Green Belt land with benefits for agricultural production, Climate Change, biodiversity, landscape and amenity.</p>	<p>Risk of the plan being found unsound if it relies on an over-optimistic and potentially undeliverable set of circumstances.</p> <p>Challenges with meeting the housing target, due to the dependence on a high proportion of brownfield sites with potentially uncertain viability or land contamination issues.</p> <p>Could lead to some delay in providing new homes whilst more complicated brownfield sites are remediated.</p> <p>Reliance on less viable sites could reduce ‘planning gains’, such as the future provision of affordable housing in market housing development.</p> <p>Over concentration of cars and traffic in intensified areas, with impacts on noise and air pollution.</p>

# **Green Belt Options**

## **Why do we need to consult on Green Belt Options?**

Although our Preferred Option is to locate all new housing and employment development during the Plan period within the urban area we need to consult on other options for meeting any shortfall in housing land in the urban area. This is because not all the potential urban sites currently pass the tests for inclusion in the Local Plan.

If we can't meet our all housing needs in the urban areas and if surrounding Councils can't help us, we will need to release some land from the Green Belt.

## **How many new homes could we need to build on the Green Belt?**

We still hope to be able to avoid any Green Belt development but we have calculated that we may need to release Green Belt sites to build up to 2,500 homes.

The actual amount of land required will not be known until we have exhausted our search for land within the urban area and completed discussions with Government, Homes England and the City Region.

We have therefore set out two options for Green Belt Sites.

The final approach could be a hybrid of Options 2A and 2B.

# How have we identified potential Green Belt options and sites?

Following a review of the comments received on the Development Options Review in Autumn 2018 we asked a specialist to undertake a detailed Green Belt Review which has identified areas that perform strongly, moderately and weakly against the five purposes of the Green Belt set out in national policy.

We have then:

- excluded land most likely to be subject to serious flood risk
- excluded land with statutory environmental designations
- excluded areas which may be used by internationally important bird species
- prioritised weakly performing parcels with a known developer or landowner interest (to ensure evidence of developability)

Further details of how we have identified the sites included in the Green Belt Options is set out in Appendix 4.7 of the full Local Plan Issues and Options Document.

It is important to note that if it was decided that it would be necessary to consider releasing Green Belt land for housing development then the Council would undertake more detailed assessments of the suitability, availability and achievability of the proposed areas of land before the draft Local Plan was finalised. This would include further, more detailed assessments of transport, agricultural land quality, environmental matters, sustainability, heritage and other potential site constraints, which would also be used to inform the amount of development that would be appropriate within each area.

# Option 2A: Dispersed Green Belt Release



Option 2A: Green Belt Dispersed  
Potential for up to 2,900 dwellings within the plan period

This option proposes the release of a series of small to medium sized areas of land, which when added together would allow sufficient land to be allocated to meet any residual housing needs within the Plan period. The final number of sites required will depend on the number of homes that could be provided within the urban area.

This option would see up to 12 different smaller areas of Green Belt released for housing as set out in map below and in Table 1.



## Option 2A: Dispersed Green Belt Release

**Table 1**

Site ref no.	Green Belt Parcel reference	Net Development Area (hectares)	Estimated Capacity (dwellings)
<b>Bromborough and Eastham</b>			
<b>1</b>	Parcel 4.13 (SP049) South of Mill Park Eastham	20.45	368
<b>Saughall Massie</b>			
<b>2</b>	Parcel 5.8 (SP0005, SHLAA 0740) East of Garden Hey Road, Saughall Massie	1.74	47
<b>3</b>	Parcel 5.9 (SP004, SHLAA 0925) North of Saughall Massie Conservation Area	8.56	193
<b>West Kirby</b>			
<b>4</b>	Parcel 6.15 (SP013, SHLAA 4056) West of Column Road, West Kirby	17.38	261
<b>Heswall</b>			
<b>5</b>	Parcel 7.11 (SP071) Land at Chester Road, Gayton	18.71	337
<b>Thingwall</b>			
<b>6</b>	Parcel 7.18 (SP061) North of Gill's Lane, Pensby	18.09	326
<b>7</b>	Parcel 7.19 (SP065) West of Lower Thingwall Lane, Thingwall	6.90	155
<b>Irby</b>			
<b>8</b>	Parcel 7.25 (SP009, SHLAA 1778) West of Sandy Lane, Irby	4.09	92
<b>9</b>	Parcel 7.26 (SP059C, SHLAA 1764) 59 Thurstan Road, Irby	0.58	16
<b>10</b>	Parcel 7.26 (SP059B, SHLAA 1765) 41 Thurstan Road, Irby	0.67	18
<b>11</b>	Parcel 7.26 (SP059D, SHLAA 1766) 61 Thurstan Road, Irby	0.51	14
<b>12</b>	Parcel 7.27 (SP060) South of Thingwall Road, Irby	56.42	1,106

Parcel Reference is the number assigned to parcels of land in the Green Belt identified by consultants Arup in the 2019 Green Belt Review. The SP Reference is the number assigned to parcels of land in the Green Belt consulted on in the 2018 Development Options Review.

## Option 2A: Dispersed Green Belt Release advantages and disadvantages

Advantages	Disadvantages
<p>Only land with weaker Green Belt contribution and value would be used.</p> <p>Development could strengthen the vitality of a number of existing settlements, help to meet localised housing needs, make use of existing local infrastructure and may support other local improvements.</p> <p>Development would only be used to 'round-off' the existing settlement patterns.</p> <p>The impact of development would be spread across the Borough, rather than being concentrated in one single location.</p>	<p>Smaller sites may not be able to support significant improvements to local infrastructure.</p> <p>Green Belt lost across a number of locations in the Borough, albeit smaller sites.</p>



Option 2B: Green Belt Urban Extension  
Potential for 2,500 dwellings  
within the plan period

## Option 2B: Single Urban Extension

The alternative option to dispersed release is to focus development more strategically into a single larger area around an existing settlement. This option still relies on the weakly performing Green Belt areas but groups these together to identify a larger area for urban expansion. The most suitable location would be on land west of Barnston Road, Heswall as set out in map below and in Table 2.



Map 5 Option 2B: Single Urban Extension

Potential Single Urban Extension Sites

## Option 2B: Single Urban Extension

**Table 2**

Green Belt Parcel reference	Net Development Area (hectares)	Estimated Capacity (dwellings)
<b>West of Barnston Road, Heswall</b>		
Parcels 7.15 and 7.16 (SP062)	107.71	1,938
Parcel 7.17 (SP062A, SHLAA 0884)	17.76	320
Parcel 7.18 (SP061)	18.09	326

## Option 2B: Single Urban Extension advantages and disadvantages

Advantages	Disadvantages
<p>Any impacts would be concentrated within only one area of the Borough.</p> <p>A larger site would be better able to plan for and support any necessary improvements to local infrastructure and secure a sustainable pattern of development.</p> <p>Provision would make a major contribution to the overall housing need and supply of housing, including affordable housing.</p> <p>The allocation of a single strategic parcel of land would allow the integrity of the remainder of the Green Belt protected.</p>	<p>It will take longer to develop homes on a larger site.</p> <p>The impact of construction would be prolonged.</p> <p>Comprehensive land assembly may be more difficult to achieve.</p> <p>Significant investment is likely to be required in supporting necessary infrastructure.</p>

The Council will continue, through this consultation period and beyond, to undertake further intensive work to increase the supply of suitable land in the urban area.

# How to view all the documents and make your comments

## We want to know your views.

The Wirral Local Plan Issues and Options Consultation document is available for comment between **Monday 27 January 2020** and **Monday 23 March 2020** - a period of eight weeks.

We are particularly interested to hear views on the options for our future development strategy and would also welcome views on other parts of the document as we move towards the finalisation of our new Local Plan.

Copies of the Issues and Options consultation document and supporting evidence studies are available for viewing and inspection using any of the following options:

- The Council's Local Plan web page: [www.wirral.gov.uk/localplan](http://www.wirral.gov.uk/localplan)
- A direct link to the Council's Consultation Portal is <https://wirral-consult.objective.co.uk>
- Wallasey Town Hall (Monday to Friday between 9:00 and 17:00) [www.wirral.gov.uk/counciloffices](http://www.wirral.gov.uk/counciloffices)
- Public Libraries across Wirral (during their normal opening hours) [www.wirral.gov.uk/libraries](http://www.wirral.gov.uk/libraries)

If you are unable to use the Council's online portal you can request a separate questionnaire via email or telephone.

If you use the questionnaire to make comments please send it to arrive no later than **5pm on Monday 23 March 2020** to:

- Forward Planning Team, PO Box 290, Brighton Street, Wallasey, CH27 9FQ; or email: [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk)

You can find out more about all the sites included in Option 1A, Option 2A and Option 2B and make comments on them by visiting:

<https://wirral-consult.objective.co.uk> please click on the  
**Wirral Local Plan 2020-2035 Potential Allocations**

# What happens next?

The responses received to this consultation will be used to help to finalise our plan.

We will publish all comments received on the online consultation portal (names and contact details will not be shown). We will also in due course publish our response to relevant comments made (at this stage the names of agents, developers or land owners may be published).

Following the completion of the current consultation the Council will consider all comments received. The Council will then consider whether any additional evidence is required (including any further detailed investigations of urban or Green Belt sites) before making a final decision on what sites should be proposed for allocation in the final Draft Local Plan.

We currently anticipate presenting the draft final Local Plan to be considered by elected Members in summer 2020. The draft final Local Plan will then be published under Regulation 19 to enable further formal representations to be made. All representations received will be passed to the independent Inspector appointed to undertake the ‘Local Plan Examination’.

We anticipate submitting the Local Plan to the Secretary of State for examination in November 2020, with the examination hearings likely to take place from Spring 2021.

Subject to the Inspector finding that the final Wirral Local Plan is “sound” and allowing for a period of modification to the submitted plan, we anticipate that the Wirral Local Plan 2020-2035 will be formally adopted in 2022.

# Find out more

The full Local Plan Issues and Option document contains a lot more information on a wide range of issues including:

- Climate change and the environment
- Regeneration
- Local Green Space
- Open Space
- Infrastructure
- Heritage
- Affordable housing
- Housing in multiple occupation

You can find out more by reading the full version of the Issues and Options document at <https://wirral-consult.objective.co.uk> or at your local public library or at Wallasey Town Hall during their normal opening hours.

You can also visit us at one of the drop-in sessions being held in a number of places in the Borough. To find an event near you go to [www.wirral.gov.uk/localplanevents](http://www.wirral.gov.uk/localplanevents)

## Other formats

We will be able to provide the consultation information in different formats and languages.

These can be requested from [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk). We will respond to any requests for information in accessible formats and have these available as soon as practicable.

Staff will be on hand during the drop in events to offer assistance if you wish to complete the form on the day.



# Wirral Local Plan 2020-2035

## Issues and Options Local Plan Consultation Summary Document

Consultation ends



[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 **WIRRAL**

The Wirral Council logo consists of a circular emblem with a stylized design inside, followed by the word 'WIRRAL' in a bold, sans-serif font.

# Introduction



The Local Plan is the long-term plan for the whole of Wirral until 2035.



It covers what is going to be built and where new houses and buildings will be allowed.

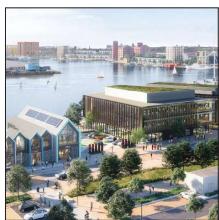
The Local Plan also looks at:

Climate change and the environment.



What is Climate Change?

Changes in the world's weather, in particular the fact that it is believed to be getting warmer as a result of people increasing the level of carbon dioxide in the air.



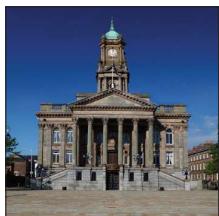
Regeneration - which makes places nicer to live and work.



New housing and jobs.



Transport.



Looking after our history.

**Healthy** Wirral

How we can keep everyone healthy.



We want to know what you think of the plan and how we can make Wirral a better place to live and work.

# What the Local Plan will do.



Help look after our environment by creating better places for people and wildlife.



Help to protect our history.



Make sure we have enough houses and workplaces for everyone in Wirral to live and work.



Make sure that new housing includes enough schools, shops and Doctors, for everyone who needs them.



Make Birkenhead, Liscard, New Ferry and New Brighton even better places to live and visit.



Let you tell us what you think about the plan and how we can make Wirral a better place to live and work.

# How many houses do we need?

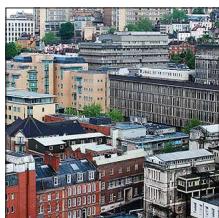


The Government says the Council has to provide at least 800 new homes every year. The Local Plan aims to provide 12,000 new homes in the next 15 years.

## Where will the new houses be?



The Council wants new houses to be built on land that has been used before. This type of land is sometimes called 'Brownfield'.



We aim to try and build more houses near to where other houses are already.

# Options for the Green Belt



The Council wants to avoid building houses on land in Wirral's countryside. In Wirral this land is called the 'Green Belt'.

## 2500 Houses

If we can't find room for all the new houses we need, we may have to build up to 2500 houses on 'Green Belt' land.



We won't use any land that might flood or which is important for nature or farming.



If we need to use any Green Belt land, a lot of work will need to be done before any permission would be given.

# Do you have some ideas about the Local Plan ?

If you have some ideas about the Local Plan you can write them on the comment form that comes with this information.

## What will happen next.



We will look at everyone's comments and then Councillors will decide in Summer 2020 if they agree with the Plan.



In November the Plan will have to go back to the Secretary of State (part of the Government in London) to be approved.



The Local Plan will start to be used in 2022.

# Thank You

**Thank you for taking part in this consultation.**

You can now give us your ideas about the Local Plan by commenting on the comment form that was provided with this information.

Information about how to send us your comments is on the Local Plan comment form.



and [www.istockphoto.com](http://www.istockphoto.com)



# Wirral Local Plan 2020-2035

## Issues and Options Local Plan Consultation Summary Document

Consultation ends



[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 **WIRRAL**

The Wirral Council logo consists of a circular emblem with a stylized design inside, followed by the word 'WIRRAL' in a bold, sans-serif font.

# Introduction

The local plan is the long-term plan for the whole of Wirral until 2035.



It covers what is going to be built and where new houses and buildings will be allowed.



New housing and jobs



Transport



Looking after our history



What is Climate Change?

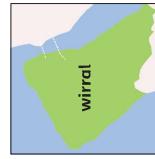
Changes in the world's weather, in particular the fact that it is believed to be getting warmer as a result of people increasing the level of carbon dioxide in the air.

**Healthy Wirral**

How we can keep everyone healthy



Regeneration - which makes places nicer to live and work.



We want to know what you think of the plan and how we can make Wirral a better place to live and work.

## What the Local Plan will do.

## How many houses do we need?



Help look after our environment by creating better places for people and wildlife.



Help to protect our history.



Make sure we have enough houses and workplaces for everyone in Wirral to live and work.



Make sure that new housing includes enough schools, shops and Doctors, for everyone who needs them.



Make Birkenhead, Liscard, New Ferry and New Brighton even better places to live and visit.



Let you tell us what you think about the plan and how we can make Wirral a better place to live and work.



The Council wants new houses to be built on land that has been used before. This type of land is sometimes called 'Brownfield'.



We aim to try and build more houses near to where other houses are already.

# Options for the Green Belt

## Do you have some ideas about the Local Plan?



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**2022**

The Plan will start to be used in 2022.

# Thank You

**Thank you for taking part in this consultation.**

You can now give us your ideas about the local plan by commenting on the Local Plan comment form that was provided with this information.

Information about how to send us your comments is on the Local Plan comment form.



**Wirral Local Plan 2020-2035**

# Comment Form



made with  
photosymbols®  
and www.istockphoto.com

[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

**WIRRAL**

## **What do you think?**

If you would like to tell us what you think about the local plan you can write your comments on this form in the boxes.

Your name and address must be included. This will be used with your comments in the final local plan report.

Name:

Address:

# Thank You

Thank you for giving us your ideas about the local plan.



Please now return this comment form to:

**Your local library**

or



**Wallasey Town Hall**

or



**Forward Planning team**  
**PO Box 290**  
**Brighton Street**  
**Wallasey**  
**Wirral**  
**CH27 9FQ**

or



email your comments to:  
[localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk)  
Please title your email Local Plan Feedback  
and include your name and address.

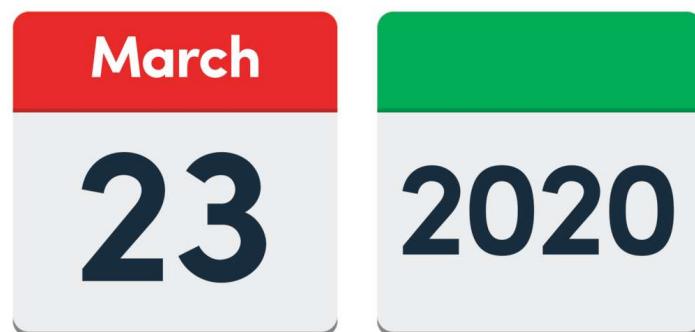
This is a short version of Issues and Options  
Consultation Questionnaire for full version  
go to <https://wirral-consult.objective.co.uk>

HC version

# Wirral Local Plan 2020 - 2035

## Issues and Options Local Plan Consultation Questionnaire

Consultation ends  
(Regulation 18)



[wirral.gov.uk/localplan](http://wirral.gov.uk/localplan)

 **WIRRAL**

# Privacy statement

No personal details are required to complete this form. Your identify or address will not be collected or revealed as part of this consultation. The information collected from this survey may be used to inform the policies of the new Local Plan and may be published as part of the Council's report on Local Plan consultation responses.

## Other formats

We will be able to provide the consultation information in different formats and languages.

These can be requested from [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk). We will respond to any requests for information in accessible formats and have these available as soon as practicable.

Staff will be on hand during the drop in events to offer assistance if you wish to complete the form on the day.

# Have your say



The Council is preparing a Local Plan for Wirral to set out the future planning policies and priorities for the Borough.

The new Wirral Local Plan will eventually replace our Unitary Development Plan from February 2000.

This is the first of two stages of consultation on the Local Plan and seeks to determine your views on the key strategic priorities for the Borough over the next 15 years and how these priorities should be addressed in the new Local Plan.

This consultation follows on from the Council's 2018 consultation on the Development Option Review, with particular focus on the initial review of the Green Belt and potential development sites in urban areas.

The full version of the Issues and Options document contains questions which can be answered to give a response to the consultation.

You can find the full version of the Issues and Options document at <https://wirral-consult.objective.co.uk> or at your local public library or at Wallasey Town Hall during their normal opening hours.

You can also visit us at one of the drop-in sessions being held in a number of places in the Borough. To find an event near you go to [www.wirral.gov.uk/localplanevents](http://www.wirral.gov.uk/localplanevents)

# Introduction

- The Local Plan is the long-term plan for Wirral through to 2035.
- It is an important planning document about what can be built, where, how, and why.
- It also covers **climate change and the environment, regeneration**, the amount of **new housing** and **jobs** and where they should be provided, **transport, heritage** and **health and wellbeing**.
- The Council has published an important stage of the Local Plan called the '**Issues and Options Consultation**' document. This sets out the draft numbers of new homes and amount of employment land to be provided for in the Local Plan. It also sets out the Council's Preferred Option for where this development should be located.
- We want to know what you think of the Local Plan Issues and Options Document so you can be part of how Wirral will look in the next 15 years. Alongside the Issues and Options Document we are also inviting views on an initial Sustainability Appraisal, which is an independent assessment of how sustainable our different options are (also incorporating health and equalities issues).
- We are also consulting on the Habitats Regulations Assessment which will ensure that the plan does not result in harm to our highest protected environmental sites.
- You can give us your comments by going to [www.wirral.gov.uk/localplan](http://www.wirral.gov.uk/localplan)
- Please give us your views by **5pm on Monday 23 March 2020**.
- Your comments will help us make the final draft of the Local Plan that we will share with everyone later this year.
- The final draft Local Plan will then be sent to the Government for independent review and final changes.
- In 2022, the Local Plan will be adopted and Wirral Council will start using it to decide on all planning applications.

# Questionnaire

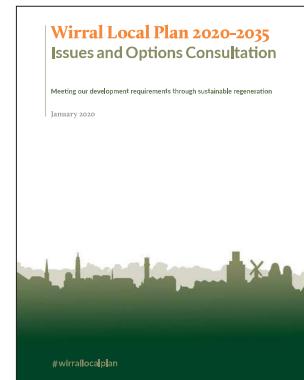
- You do not need to complete all questions
- Question numbers in brackets relate to questions in the full version of the document.
- Continue on an additional comments sheet if needed.
- You can also attach additional supporting information clearly referenced to questions.

## Question 1:

Have you read the **Issues and Options Local Plan Consultation** (full or summary version) document?

Yes

No



## Question 2:

What makes your area a great place to live?



Beaches & Coastline



Parks & Open Spaces



Countryside



Leisure, Walking & Cycling



Town Centres

Other

# Housing

See page 7 of the Issues and Options Local Plan Consultation Summary document version.



## Question 3 [2.1]:

Do you agree with the Council's calculations using the 'standard method' set out in national guidance?

Yes

No

If No, please say why.

## Question 4 [2.2]:

Do you think there are exceptional local circumstances to depart from the 'standard method' for calculating local housing need?

Yes

No

If you believe there are exceptional local circumstances, please let us know what they are.

# Our Vision

**The local plan will be guided by a Vision of what we think we want Wirral to be like in 2035.**

**The Vision for Wirral:  
A Healthy, Sustainable and Prosperous Borough**



- Ensure that we provide enough homes and employment sites to meet the needs of all our population, young and old
- Set out what types of homes will be built and where they will be located
- Promote the regeneration of Birkenhead, Liscard, New Ferry, New Brighton and other places to provide vibrant, new, mixed-use neighbourhoods
- Ensure that local infrastructure is provided for new development
- Protect our environmental and heritage assets
- Set out a range of policies which will be used to make decisions on planning applications
- Enable all people in Wirral to live longer and healthier lives

**Question 5 [3.1]:**

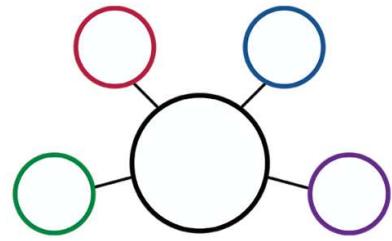
Do you agree with our proposed Vision?

Yes

No

# Objectives

See pages 8 & 9 of the Issues and Options Local Plan Consultation Summary document version.



## Question 6 [3.2]:

Do you agree with our proposed objectives?

Yes       No

Are there any objectives you would want to change or remove?

Yes       No

## Question 7 [3.3]:

Are there any additional objectives you would want to include?

Yes       No

Please state your reasons.

# Preferred Option 1: Urban intensification



Option 1A: Urban Intensification  
Between 10,300 and 14,800 homes  
within the plan period

The Council's preferred Option is to locate all new housing and employment within existing urban areas and on brownfield sites.

## Proposed Urban Housing Allocations

These are sites that we have sufficient information now to include within the urban housing supply - subject to comments received during this consultation (see map 1, 2 & 3 in Issues and Options Local Plan Consultation Summary document version).

### Question 8 [4.2]:

Do you have any comments on the proposed urban housing allocations? (see Map 1).

Yes

No

### Question 9 [4.3]:

Do you have any comments on the potential additional urban housing allocations? (see Map 2).

Yes

No

### Question 10 [4.4]:

Do you have any comments on the other suitable but currently uncertain sites? (see Map 3).

Yes

No

**Question 11 [4.10]:**

Do you agree with our assessment of the advantages and disadvantages of the Urban Intensification Option? (see page 14 in Issues and Options Local Plan Consultation Summary document version).

Yes

No

Are there any other advantages or disadvantages that you believe we should take into account?

Yes

No

**Question 12 [4.18]:**

Do you agree with our preferred approach to meeting demands in Wirral through Urban Intensification?

Yes

No

*Please note that when viewing this document on the consultation portal you can use the separate Wirral Local Plan 2020-2035 Potential Allocation consultation to view more information about individual sites identified under Option 1A and make comments there.*

# Green Belt Options

Although our Preferred Option is to locate all new housing and employment development during the plan period within the urban area we need to consult on other options for meeting any shortfall in housing land in the urban area. This is because not all the potential urban sites currently pass the tests for inclusion in the Local Plan.

If we can't meet our all housing needs in the urban areas and if surrounding Councils can't help us, we will need to release some land from the Green Belt.

## Option 2A: Dispersed Green Belt Release



Option 2A: Green Belt Dispersed  
Potential for up to 2,900 dwellings within the plan period

**See pages 17, 18 & 19 of the Issues and Options Local Plan Consultation Summary document version.**

### Question 13 [4.12]:

Do you have any views on the sites that have been currently identified under the Dispersed Green Belt Release option (see Map 4 and Table 1).

Yes

No

**Question 14 [4.14]:**

Do you agree with our assessment of the advantages and disadvantages of a dispersed approach to releasing sites from the Green Belt under Option 2A? (see page 19 in Issues and Options Local Plan Consultation Summary document version).

Yes

No

Are there any other advantages or disadvantages that you believe we should take into account?

Yes

No

*Please note that when viewing this document on the consultation portal you can use the separate Wirral Local Plan 2020-2035 Potential Allocation consultation to view more information about individual sites identified under Option 2A and make comments there.*

## Option 2B: Single Urban Extension



Option 2B: Green Belt Urban Extension  
Potential for 2,500 dwellings  
within the plan period

See pages 20 & 21 of the Issues and Options Local Plan Consultation Summary document version.

### Question 15 [4.15]:

Do you have any views on the areas that have been currently identified for the single large scale urban extension (see Map 5 and Table 2).

Yes

No

*Please note that when viewing this document on the consultation portal you can use the separate Wirral Local Plan 2020-2035 Potential Allocation consultation to view more information about individual sites identified under Option 2B and make comments there.*

### Question 16 [4.17]:

Do you agree with our assessment of the advantages and disadvantages of a more concentrated approach to releasing a single urban extension from the Green Belt under Option 2B? (see page 21 in Issues and Options Local Plan Consultation Summary document version).

Yes

No

Are there any other advantages or disadvantages that you believe we should take into account?

Yes

No

**Question 17 [4.19]:**

If it was necessary to supplement urban intensification by releasing land from the Green Belt, would you prefer to see a dispersed release of land, a single larger urban extension, or a hybrid of the two options, and why?

**Question 18 [4.20]:**

Do you have an alternative option you would like to propose that would also meet the housing and employment land requirements for Wirral over the plan period?

Yes

No

**Question 19:**

What changes would you like to see in the Borough over the next 15 years?

**Question 20:**

How do you think we should plan for the new homes we need in your area?

Please tick one of the following:

Higher densities

Green Belt release

A mixture of higher densities and Green Belt

**Question 21 [5.8]:**

Do you agree with the Draft Policy for Houses in Multiple Occupation which Council proposes to use in the determination of planning applications as set out in Appendix 5.1? (see full version)

Yes

No

**Question 22:**

Are you aware of any planning issues that need to be addressed in our detailed day-to-day planning policies?

Yes

No

If 'Yes' please describe:

**Question 23:**

Do you have any comments to make in relation to this Issues and Options consultation?

Yes

No

**Question 24:**

Did you respond to the previous development options consultation in 2018?

Yes

No

## **Additional comments sheet for overflow comments**

## **Additional comments sheet for overflow comments**

Which site are you commenting on? \_\_\_\_\_

Site Reference Number: \_\_\_\_\_

Type of comment you can make (please write in the comment box):



1 General Comment



2 Objection



3 Support

Topic Areas on which you can comment (please write in the comment box):

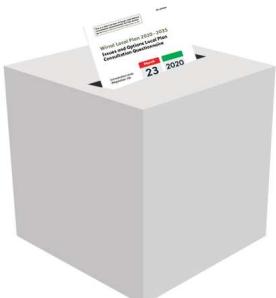
- |   |   |
|---|---|
| A Environmental reasons                                       | I Flood risk  |
| B Transport and highway reasons                               | J Housing density   |
| C Loss of agricultural land                                   | K The site boundary is wrong  |
| D Amenity reasons<br>(e.g. overlooking, noise, visual impact) | L Development should take place<br>elsewhere in the Borough (using<br>Green Belt land / brownfield land / both) |
| E Impact on the character of the area                         | M Development viability   |
| F Impact on / availability of local services                  | N Other reason<br>(if you have any other reasons please describe).  |
| G Impact on heritage  |   |
| H Infrastructure and utilities                                |   |

The type of comment you are making:	The topic area you are commenting on:
Your summary comment: (up to 300 words - you can attach additional supporting information clearly referenced to this question)	

Please attach additional comments sheets if needed.

# Thank You

Thank you for completing this questionnaire.  
Please now return to:



**The consultation return box  
at your accommodation**

or



**Your local library**

or



**Wallasey Town Hall**

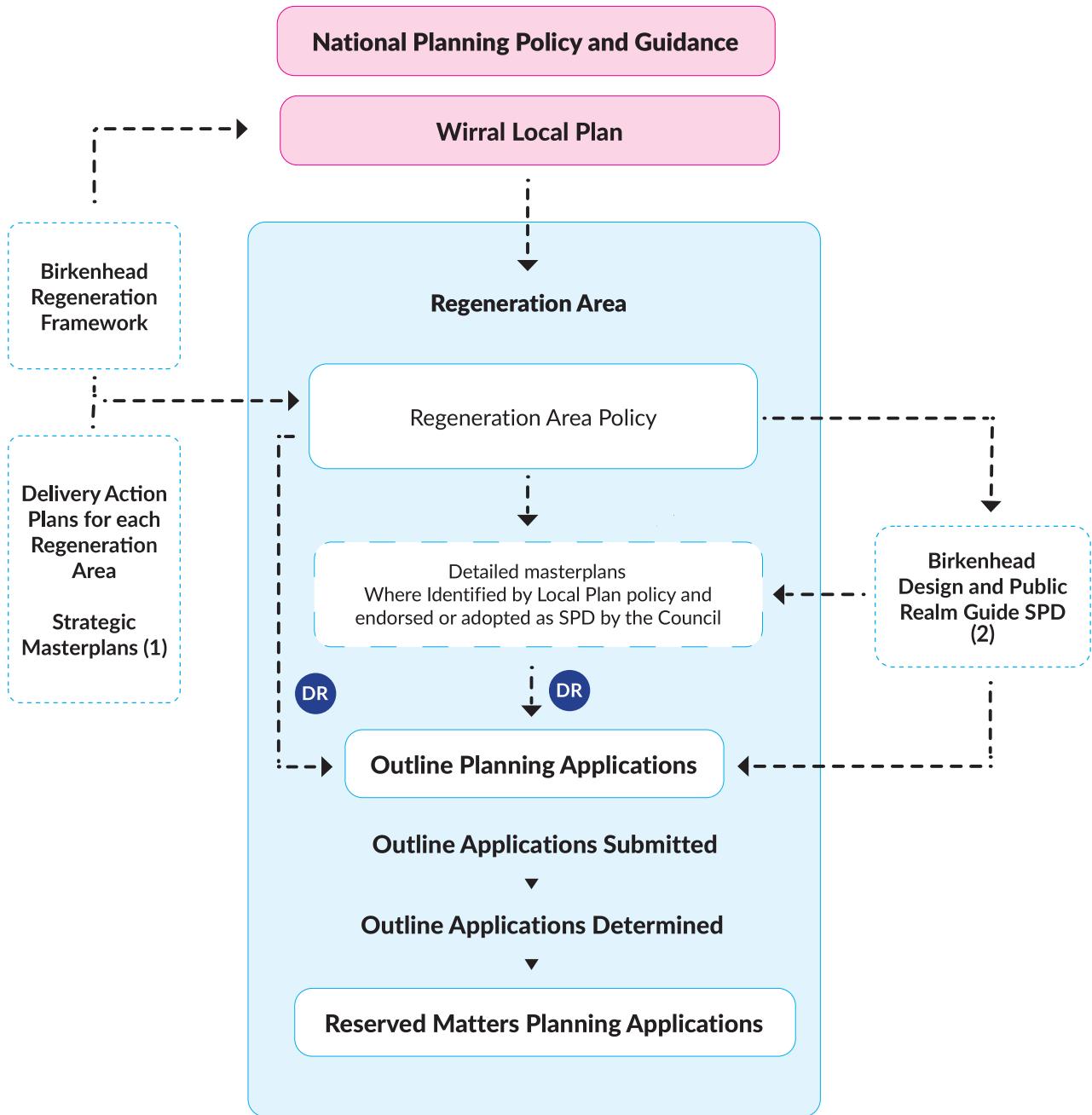
or



**Forward Planning team  
PO Box 290  
Brighton Street  
Wallasey  
Wirral  
CH27 9FQ**

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**photosymbols®**

and [www.istockphoto.com](http://www.istockphoto.com)



1: Strategic Masterplans for Regeneration Areas outside of Birkenhead

2: For development proposals within Birkenhead Regeneration Areas

DR - Design Review Panel

## **Appendix 3-Schedule of Consultees**

### **A-Statutory Consultees and Organisations**

Birkenhead North Neighbourhood Forum
Cadent Gas
Canal and River Trust
Cheshire Highways
Cheshire West & Chester (CWAC) Council
Cheshire Wildlife Trust
Civil Aviation Authority
Coal Authority
Crown Estates
Devonshire Park Neighbourhood Forum
EE
Environment Agency
Flintshire Council
Forestry Commission
Halton Council
Health and Safety Executive
Highways England
Historic England
Homes England
Hoylake Neighbourhood Forum
Knowsley Council
Leasowe Neighbourhood Forum
Liverpool Airport
Liverpool City Council
Liverpool City Region Combined Authority
Liverpool Enterprise Partnership
Liverpool City Council Highways
Marine Management Organisation
Merseyside Environmental Advisory Service
Mersey Forest
Merseyside Fire & Rescue Service
Merseyside Police and Crime Commissioner
Merseytravel
Merseyside Recycling & Waste Authority
National Grid
National Air traffic Services Safeguarding
Natural England
National Trust
Natural Resources Wales
Network Rail
NHS Improvement
NHS Property Services Limited
NHS Wirral Clinical Commissioning Group

Office of Rail Regulation  
Openreach  
Sefton Council  
SPEN (Scottish Power)  
Sport England  
St Helens Council  
Statutory Body/Local Planning Authority  
Three  
United Utilities  
Virgin Media  
Vodafone and O2 (Telefonica)  
Welsh Water  
West Lancashire Council  
Wirral Community NHS Trust  
Wirral Highways  
Wirral University Teaching Hospital NHS Foundation Trust  
Wirral Wildlife

## **B: Organisations**

Ainsley Gommon Architects Merseyside  
Airbus Broughton  
AMEC Foster Wheeler E&I UK  
Ancient Monuments Society  
Asylum Link Merseyside  
Atelier A2 Architects Ltd.  
Athertons  
Atticus Land and Development  
Autism Together  
Avison Young  
Barnston Conservation Area Advisory Committee  
Barnston Conservation Society  
Barnston Womens Institute  
Barratt Homes (Manchester)  
Barton Willmore  
Beech Developments  
Bell Developments  
Bell Ingram  
Bellway Homes NW Division  
Bidwells LLP  
Biffa Waste Services  
Birkenhead Building & Roofing Supplies Ltd  
Birkenhead North Neighbourhood Alliance  
Bloor Homes  
BNP Paribas Real Estate

Bovis  
Bride Hall Holdings  
Broadway Malyan Planning  
Brookhouse Group  
Burton Property  
Caldy Conservation Area Advisory Committee  
Caldy Golf Club Ltd  
Caldy Society  
Cammell Laird Ship Repairs, Head Office  
Carr Farm Garden Centre  
Carrig & Baxter Ltd.  
Carter Jonas  
Cass Associates  
Cassidy + Ashton  
CBRE Planning and Development  
Cherish The Bride  
Cheshire Association of Local Councils  
Cheshire RIGS Group  
CLA  
Claire House Children's Hospice  
Clatterbridge Oncology NHS Trust  
CLM Services Ltd  
Colliers International  
Community Action Wirral  
Concept Mortgages Ltd  
Countryside Properties PLC  
Countrywide Property Management  
CPG Property Developments Ltd  
Cushman & Wakefield  
D. Morgan  
D2 Planning Ltd.  
Dee Estuary Conservation Group  
Deloitte LLP  
Deloitte Real Estate, Deloitte LLP  
Denton Clark  
Design Planning Developments  
DevPlan  
Dickman Associates Ltd.  
Diocese of Chester  
DPDS Consulting Group  
DPP Planning (Manchester)  
Eastham Village Preservation Association  
Eden Planning

Edge Analytics Limited  
Edward Landor Associates  
Elan Homes Ltd  
Elite Estate Developments  
Emerson Group (Jones Homes (Northwest) Ltd)  
Emery Planning  
Energy Projects Plus  
Equifund (IPS) Ltd  
Fairhurst  
Family Housing Association (Birkenhead and Wirral) Ltd  
Fisher German LLP  
Footprint Property Services Ltd  
Fort Perch Rock  
Francis Garner Architects  
Frankby Conservation Area Advisory Committee  
Free Schools Capital Education & Skills Funding Agency  
Freeths LLP  
Friends Family and Travellers (FFT) Planning  
Friends of Arno and Oxton Fields  
Friends of Coronation Gardens  
Friends of North Wirral Coastal Park  
Friends of Tam O Shanter Urban Farm  
General Aviation Awareness Council  
Georgian Group  
Gerald Eve  
GL Hearn Limited  
Go Direct Lettings (North Wirral)  
Goodwin Planning Services  
Grimster Planning  
Halsall Lloyd Partnership  
Hamilton Squares Estates Ltd.  
Hawksmoor Property Services  
Heaton Planning Ltd  
Henry Boot Developments Limited  
Home Builders Federation  
Hourigan Connolly  
HOW Planning  
Huw Evans Planning  
Hyatt Property  
Hylgar Properties  
IBI Group  
Iceni Projects  
ID Planning

[Index Property Information \(Index Merseyside\)](#)

[Indigo Planning](#)

[Innospec Inc](#)

[Inspire Community Services \(Northwest\) Ltd.](#)

[Interprime Ltd.](#)

[Involve Northwest](#)

[Ion Developments](#)

[Irish Community Care Merseyside](#)

[Irwin Mitchell LLP](#)

[ITPAS](#)

[J10 Planning](#)

[Jackson Lees Group](#)

[Jones Lang LaSalle](#)

[JWPC Ltd](#)

[Knight Frank](#)

[Landmark Information Group](#)

[Landor Planning](#)

[Law Distribution Ltd](#)

[Legal Brokers Ltd.](#)

[Leith Planning](#)

[Leverhulme Estates](#)

[Lichfields](#)

[Liverpool Investments](#)

[Long Meadow Project Management Limited](#)

[Longview Estates Limited](#)

[Maddox & Associates](#)

[Magenta Living](#)

[Malcolm Scott Consultants](#)

[Marine Management Organisation](#)

[Marriott Motorcycles](#)

[Marrons Planning](#)

[Marshall CDP Limited](#)

[Mason Owen Property Consultants](#)

[McCormick Architecture Ltd](#)

[McDonald's Wirral](#)

[McDyre & Company](#)

[Meller Speakman](#)

[Member of Wirral Society](#)

[Merepark Project Management](#)

[Mersey Regeneration Ltd](#)

[Mersey Rivers Trust](#)

[Merseyside & West Lancs Bat Group](#)

[Merseyside Environmental Trust](#)

Methodist Church Property Division  
Montagu Evans  
Morecroft Solicitors  
Morris Homes (North) Ltd  
Muse Developments  
Myles Parry Estates Ltd.  
Nathaniel Litchfield & Partners  
National Farmers Union  
National Federation of Gypsy Liaison Groups  
National Grid  
Neil Braithwaite Architect  
Neptunium Ltd.  
New Brighton Community Association  
New Brighton Football Club  
New Ferry Residents Association  
Nexus Planning  
NJL Consulting  
North West Coastal Forum  
North Western Inshore Fisheries and Conservation Authority  
Nutexa Frictions LTD  
NW Baptist Association  
NW Confederation of Passenger Transport  
Openreach  
Paddock Johnson Partnership  
Paisleys Emporium  
Pali Ltd  
Paul Butler Associates  
Peacock and Smith  
Pegasus Group  
Pennington Williams  
Persimmon Homes (North West)  
Persimmon PLC  
Pete Brett Associates LLP  
Philip Seddon Associates Ltd  
Pindar Creative  
Pitchford Partnerships  
Plainview Planning Ltd  
Planning Potential  
Planware Ltd  
Port Sunlight Village Trust  
Poulton & District Residents Association  
Prenton Tenants and Residents Association  
Prima Group

Programme Officer Solutions Ltd  
Property and Development, Signature Living  
PWA Planning  
Rainier Developments Ltd  
Ramblers Association (Wirral Group)  
Rapleys LLP  
Redrow Homes  
Redsun Developments  
Regenda Housing Group  
Rg + P Ltd  
Richborough Estates  
Rider Levett Bucknall  
Riverside Housing Association  
Rowland Homes  
Royal National Lifeboat Institution  
RPS Consulting Services Ltd  
RPS Planning Transport & Environment  
Russells Limited  
Salisbury Management Services Ltd.  
Sanderson Weatherall  
Satplan Planning and Development  
Savills  
Scout Legal Services  
Seddon Homes  
Shopmobility Centre  
Showmen's Guild of Great Britain  
Sirius Planning  
Sky Telecommunications Services Ltd.  
Smith & Sons Property Consultants  
Snelsons Properties  
Society for the Protection of Ancient Buildings  
SP Energy Networks  
SSA Planning  
Steven Abbott Associates  
Story Homes Ltd  
Strutt & Parker LLP  
Sustrans  
Talk Talk Communications  
Tangent Properties  
Taylor Wimpey Strategic Land  
Taylor Wimpey Strategic Land (North)  
Terence O'Rourke  
Tesni Properties Limited

Tetlow King Planning
The Derwent Group
The Gardens Trust
The National Waterways Museum
The Wirral Society
The Wirral Society CPRE Wirral
Theatres Trust
Thornton Hough Community Trust Ltd
Tilney Investment Management Services Ltd
Turley
Twentieth Century Society
Unilever Research Port Sunlight Laboratory
Upton Cricket Club
Vernon & Co.
Virgin Media
Virgin Media
Wallace Land Investments
Wallasey Central Park Partnership
Wallasey Civic Society
Walton & Co (Planning Lawyers) Ltd
Ward Hadaway
Watershed Chartered Architect
WIRED
Wirral & Cheshire Badger Group
Wirral Community NHS Trust
Wirral Footpaths & Open Spaces Preservation
Wirral History and Heritage Association
Wirral Magistrates
Wirral Methodist Housing Association
Wirral Multicultural Organisation
Wirral Society
Wirral Transport Users Association
Wood PLC
Woodland Trust
White Young Green
Your Housing Group

**C: Private individual on the Council's LDS database**

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## 2. Context and Evidence

### Housing Need

#### **Q2.1: Do you agree with the Council's housing need calculations using the standard method set out in national Guidance?**

- 1. Summary of responses** - A housing requirement based on the standard method is too low (34 out of 883)

The Council has rightly not applied the 2016-based household projections but the absence of any further assessment of housing need and the simple application of the standard method is contrary to the Framework and the PPG. Paragraph 2a-010 of the PPG is clear that the assessment of housing need, including whether a higher housing need figure than the standard method is appropriate, should be carried out. The standard method is a minimum and will not significantly boost the supply of homes in line with national policy.

The issues raised in the Council's SHMA 2016 and SHMA 2020 can only be addressed through a higher number. The standard method does not take into account growth strategies, such as Wirral Waters, affordable housing needs or the impact of strategic level infrastructure, which should be explored in detail with neighbouring authorities to ensure the needs of the City Region are met in full. The 2016 SHMA indicated a need for between 875 and 1235 new dwellings every year, to support economic growth within the City Region. The figure should be increased to 960 per annum because of previous under-delivery.

**Council response:** The Council has applied the standard method in accordance with national policy and guidance. The Strategic Housing Market Assessment (SHMA, 2021) assesses the components of local housing need and has been updated to take account of relevant Regulation 18 responses. The proposed housing requirement has been increased to take account of economic growth. There is no strategic level infrastructure that would indicate a need for additional housing.

The Government's standard method maintains the use of the older, higher 2014-based household projections and includes an uplift to support delivery to meet the national target of 300,000 new homes per annum and to respond to local affordability. The proposed housing supply includes the buffer required in national policy, allowance for slippage and an additional allowance for flexibility.

- 2. Summary of Responses** - A housing requirement based on the standard method is too high (784 out of 883)

The standard method is flawed, is not mandatory and is only a starting point. Wirral is not an area of high housing pressure and the need for 12,000 new homes is unproven. The figures are based on old data. The Queen's speech has lowered the national target. Local evidence is being ignored. The approach should be based on homelessness. Population growth is slow or static and the economy is declining. Only 2,500, 3,000, 5,000, 5,300, 5,400, 6,000 or 7,000 new homes are needed. The figures do not take Brexit, Covid-19 or climate change into account and there are 5,000 empty properties.

**Council response:** The Council has applied the standard method in accordance with national policy and guidance, which requires the continued use of the older 2014-based household projections.

The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021.

The appropriateness of an alternative calculation, has been addressed in two reports by Liverpool University:

- Exploring the Computation Of Housing Need In Wirral 2020, shows no exceptional local circumstances to justify deviating from the standard method, including the most recently released 2018-based sub-national population projections.
- The review of consultation submissions regarding the above study (September 2020), shows that there is nothing unusual about the period following 2014 that would make the substitution of the 2014-projection for a more up-to-date projection preferable.

Policies to limit the impact on climate change have been included in the Local Plan and an allowance for empty properties has been included in the calculation of the future land supply.

**Q2.2: Do you think there are exceptional local circumstances to deviate from the standard method for calculating local housing need? If you believe there are exceptional local circumstances, please let us know what they are.**

**Summary of responses** - Of 444 responses, 362 said 'yes' and 20 said 'no' (not everyone answered this question directly). The exceptional circumstances stated included:

1. Potential exceptional circumstances, which would indicate that a lower figure should be included:

Suggested exceptional local circumstance	Summary of issues raised
Housing need (281)	There is no local need for 12,000 new homes. Studies and data show that significantly fewer new homes will be needed. The Queen's Speech has reduced the national target. A 9% growth in housing stock is not needed if the population will only grow by 1.6% by 2039. The standard method is too generic and Wirral needs a lower, more tailored, locally-specific target.
Population (281)	Local trends are different to elsewhere. Wirral is already densely populated. The population is ageing. Young people are moving away. Birth rates, population growth and migration are low. The standard method result is three to four times higher than recent trends. The data being used is out-of-date. Where will all these people come from?
Green Belt (137)	Wirral is already largely urban. Green Belt should not be built on. It is one of the Borough's finest assets and should be protected to retain the character of the Borough. It is needed for heritage, food supply, fresh air, flood water storage, biodiversity, carbon capture, tourism and recreation and was deliberately tightly drawn to promote urban regeneration and prevent urban sprawl. The standard method figure will lead to the unnecessary release of Green Belt land and will divert development away from brownfield land. If urban land is not available, targets should be reduced.
Economy (136)	Economic potential is being exaggerated. Economic growth is low. There is little industry, not many job opportunities and businesses are closing. There are too many houses for sale and they are not selling quickly. There are not enough jobs and most people have to commute to Liverpool, Manchester and Chester.

Suggested exceptional local circumstance	Summary of issues raised
Social deprivation (91)	Wirral has some of the worst poverty and deprivation in the country. Priority should be given to addressing high and increasing deprivation in the north and east of the Borough.
Geography (47)	Wirral is a small area supporting a large population. The peninsula coastal location limits future growth. Self-contained coastal and rural authorities, with areas of special significance for wildlife, should be treated differently.
Empty property (24)	Urban brownfield regeneration should be the priority. There is unused and underused land and 4,000, 5,000 or 6,000 empty properties. Areas in the north and east of the Borough need regenerating without using greenfield land.
Environmental (23)	The environmental impact will be unacceptable. Wirral has uniquely significant biodiversity, heritage and beauty, with areas of international importance for wildlife, which would be affected by noise, light, pollution and recreation. Sustainability should be the priority. Additional development and traffic will spoil the area and harm air quality, health and well-being and quality of life.
Infrastructure (22)	More than just housing is needed. The area needs community facilities, many of which have closed. 12,000 extra cars could not be accommodated and will cause congestion and pollution. Most residents out-commute every morning using either the M53 or A41 both of which are already overburdened. Schools, hospitals, doctors and dentists are already full and parking and public transport is limited. Existing infrastructure is limited and is not sufficient to accommodate that level of growth. While east Wirral is well-located, transport links to west Wirral would be difficult to improve.
Climate change (11)	The climate emergency needs to take equal weight with social and economic factors. The number of new houses should be reduced to minimise the impact on CO2.
Covid-19 (8)	Coronavirus will reduce housing needs and none of the data will be valid afterwards.
Brexit (5)	Brexit will reduce housing needs, by affecting economic growth and migration and through the loss of EU monies.
Affordable housing (3)	The significant difference in affordability across the Borough should be treated as exceptional local circumstances.
Flood risk (1)	The Green Belt has flood prevention capacity.

58 comments from answers to Question 2.1 have also been included.

2. Potential exceptional circumstances, which would indicate that a higher figure should be included:

Suggested exceptional local circumstance	Summary of issues raised
Housing need (32)	The standard method only results in the minimum amount of housing needed. There is a history of under-delivery in Wirral. The SHMA 2016 showed a higher need. Up to 1,300 dwellings per annum are needed to address negative market signals, provide affordable housing, support economic growth and promote sustainable development. Additional housing is also required to

Suggested exceptional local circumstance	Summary of issues raised
	meet the needs of the wider City Region and to address the lack of suitable sites for family housing in Liverpool.
Economy (31)	Economic growth is low and needs to be supported. The need for additional housing to support economic growth within the City Region has not been properly considered. There is significant market demand. The housing figure should match the Council's economic aspirations. The current figure would only support 100 new jobs each year, below previous growth and existing forecasts. 1,539 additional dwellings would be needed each year to meet the employment needs identified in the City Region SHELMA 2016.
Affordable housing (30)	Housing is unaffordable and more is needed. The standard method will not support the delivery of enough affordable housing.
Population (15)	Greater working-age in-migration is needed to support the local economy. The increase in migration to the City Region since 2015 is not included in existing projections.

**Council response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021, including the latest economic forecasts for the City Region.

The appropriateness of alternative calculations has been addressed in the reports by Liverpool University.

Environmental constraints have been taken into account in line with the [evidence base](#) for environment and climate change and a strategic overview is set out in the Environmental Sensitivity Study 2021.

The Local Plan Submission Draft does not promote development in the Green Belt and seeks to maximise the re-use of vacant and under-utilised brownfield land, to promote urban regeneration and renewal and avoid the most environmentally sensitive areas.

Policies to limit the impact on climate change have been included in the Local Plan.

Infrastructure requirements have been assessed and appropriate proposals have been included in the accompanying Infrastructure Delivery Plan.

**Q2.3: Can you suggest an alternative approach that would also comply with national policy?**

**Summary** - Out of 330 responses, 21 said no and 309 said yes.

1. Further granularity is required with regards to the methodology (2). Population growth should be based on extrapolations of the last five year's figures (1). ONS migration projection methods are unreliable and provide differing figures (2), and estimates have changed since they were used (2016 household projections lower than 2014 household projections) (2). More recent / 2018 and 2019 ONS data should be used (8).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

2. Independent modelling suggests housing need between 1045dpa and 1300dpa would be appropriate (6). A higher LHN than currently proposed is required, with a minimum higher than the 800dpa currently (3). Wirral's housing numbers should be increased above the SM figure (one suggested 19,500 homes) (21) to support economic growth aspirations of the [city] region (17). The current and previous [brownfield] housing strategies have failed to deliver (11) – as a result, Wirral is facing an affordability crisis/ affordable housing need is extremely high (10) which may require increased housing numbers (at least 705dpa was suggested). The additional houses should be made of affordable housing in areas of need (east of peninsula) (2). Regeneration should be focussed on the east of the peninsula with a brownfield first approach (86).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

3. Only brownfield land should be developed/intensified (6) and where this is not possible, exceptional status should apply to prevent green belt release (3). Green belt should not be released (8) and this boundary should be tightly drawn (86). The Buffer penalty in the housing delivery test threatens green belt areas (1).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

4. Employment prospects will need to improve as there is a declining working age population with employment deprivation in the borough which will lower the household growth rate calculation (2). Wirral's population growth is declining/steady (93) with an ageing population (2) which would not support the 12,000 figure.

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

5. There are large numbers of derelict and vacant properties / brownfield and underutilised land (4) in Wirral which could be brought back into use to meet housing needs (13). Only the number of houses Wirral actually needs should be built (1), and there should be a limit on properties over a size threshold (1)

**Council Response:** A separate allowance for the return of empty homes has been included in the Local Plan Submission Draft, based on the performance of a funded programme which has operated since April 2011 and a tapered delivery under Option 3. Further information is available in the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.

6. The housing delivery test should be revisited (1) perhaps through a SHMA (2). The plan must reflect locally assessed needs (6). Wirral is an area of low housing need (1) with land availability constraints (1). The housing need numbers (12,000) are not realistic (5) and are inflated/above actual need (98) and need to be revisited/recalculated/audited as SM and needs/population data have changed (18). There is no evidence to support this level of growth (1). The exceptional and local circumstances that cause (a lower figure than)/ deviation from the SM should be identified (104) and locally assessed needs should be justified (9) – this approach is consistent with national policy (10). An independent study by experts should be / was commissioned for

this reflecting lower housing figures and should be referred to (108). A one size fits all/nationally averaged approach is not appropriate (3), and the SM figure must be challenged (8). An alternative approach should be used (86). The council should use its own [Compendium of] Statistics to assess future demand which is more locally relevant than the Standard Methodology (105).

**Council Response:** The Council has applied the standard method in accordance with national policy and guidance, which requires the continued use of the older 2014-based household projections. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021.

Exploring The Computation Of Housing Need In Wirral 2020 shows no exceptional local circumstances to justify deviating from the standard method, including the most recently released 2018-based sub-national population projections.

The review of consultation submissions regarding the above study (September 2020), shows that there is nothing unusual about the period following 2014 that would make the substitution of the 2014-projection for a more up-to-date projection preferable.

#### **Settlement Hierarchy**

**Q2.4: Do you agree with the proposed settlement hierarchy set out in Table 2.2 and an approach based towards focusing investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway? If not, what alternative approach would you consider and why?**

**Summary of responses** - Out of 473 responses, 207 responded yes, 48 responded no and 1 provided a mixed response.

1. There is support for the approach of investment and regeneration of the urban conurbations 1-4 to the east of the M53 (193) which will create new business (2). Regeneration is long overdue (77) with potential for development on underutilised land in the area (2). People and communities will benefit economically (1) and environmentally (2). Areas such as Birkenhead and New Ferry require focus as they suffer from 'broken window' syndrome, which are economically and socially underdeveloped and are in most need of investment (3), and there is support for their identification at the top of the hierarchy (1). However, the urban conurbation strategy is similar to the strategy of over reliance on urban sites in previous plans (2) which has not delivered housing requirements historically (3).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

2. However, a number of policies (design and build quality, green infrastructure and net zero standards, cultural and marine heritage) must be considered (6) – there are Ramsar and SPA sites along the Mersey Estuary (1). The underlying local character should be taken into account for development within the urban conurbation locations and reflected in the Settlement Hierarchy (96). The regeneration should not spread into other urban settlements (2).

**Council Response:** Policies for the settlement areas, including those of the Urban Conurbation (now SA 1, SA 2, SA 3, SA 4, SA 5, SA 6, SA 7 and SA 8) contain requirements of development to conserve

and enhance the special character of the Conservation Areas that lie within the settlement areas. The nature and character of Conservation Areas is outlined in the Local Plan.

3. This should include and improve employment prospects (90), which would reduce the need to travel large distances between home and work and therefore reduce emissions and contribute to climate emergency actions (89), however not all job creation requires additional land (1) and retail land requirements are overly optimistic (1).

There is a high car reliance in the commuter-based west of the borough, and prioritising development at the urban conurbation would reduce travel to work (2). Transport systems are stronger in the east of the Borough with greater walkability within urban conurbations (1), and any development should avail of the existing transport networks (9) as the area acts as a transport gateway to the rest of the region (1). Transport infrastructure should be improved (2) with the prioritisation of active travel (1) and the inclusion of rapid transport systems (1). Merseytravel would work to improve and include active travel and public transport links (1).

**Council Response:** Securing sustainable travel and reducing the need to travel and reliance on private cars is a Strategic Objective of the Local Plan. Under the Council's Strategy for Transport, Policy WS 9.2, development proposals should provide access to existing or planned sustainable travel options and infrastructure projects to reduce private car usage. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

4. This regeneration would prevent other Green Belt sites from being released/developed (2) – green belt land should not be built on or changed (13), as it prevents sprawl in other areas (4) and brings benefits in terms of the environment (3) and amenity (1). Regeneration should be prioritised around areas of underutilised brownfield land which will contribute to sustainable development (16) however there is a lack of deliverable and suitable urban sites to meet needs (4). This will reduce the need for green belt development.

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

5. There is concern with the use and definition of 'Settlement areas' which is artificial (1) not recognised in the NPPF as a geography and has no standing in a planning context (86) and is an overly simplistic method (1). The approach fails to properly understand locally identified needs (3). The use of settlement areas, especially the Urban Settlement Area classification, 'artificially' groups individual (areas 5-7) settlements which should be viewed as discrete entities (12). Urban settlements should be defined as suburban settlements given their function (1). The approach is unclear whether townships should be considered as separate settlements (3), and it is not clear how the groupings of settlement areas has been decided (5). In the west of Wirral, these urban settlement areas are separate entities should be reviewed/reclassified/ranked lower as [large] villages (e.g. Caldy, Irby, Frankby, Barnston) to afford these areas protection against loss of identity and the green belt (7).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

6. The existing settlement areas should be kept (1). The proposed hierarchy will not deliver housing across Wirral (1), and affordable housing should not be confined the east (1). No one area should be prioritised for regeneration through the settlement hierarchy classifications and urban conurbation approach - this should be dispersed proportionately across the borough to ensure delivery of housing (10) and appropriate amounts of development should be identified at each

level of the hierarchy (4). This may include a sensitive, sustainable, and balanced dispersed green belt release to support this approach (10). Prioritisation in this way will reduce the levels of needed regeneration elsewhere (3) (e.g., Moreton, Leasowe and Woodchurch) and could create division (2).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway. No green belt sites have been promoted for development. New housing development will need to meet the requirements for affordable housing as set out in Policy WS 3.3 Affordable Housing Requirements.

7. The proposed regrouping does not bring any additional value to Birkenhead (1), which should have its own special category to attract regeneration (1) and the focus should be on the most deprived areas of most need such as Birkenhead, New Ferry and Seacombe (5), providing affordable housing for first time buyers (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

8. The use of the M53 as a dividing line is fundamentally flawed (5). Development east of the M53 requires local infrastructure improvements before further large-scale urbanisation occurs (7). Development should occur across smaller sites (1). Further urbanisation east of M53 should not occur (2) as local infrastructure is at capacity (2).

**Council Response:** The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of strategic brownfield sites.

9. Eastham village has been arbitrarily removed from its previous categorisation in SA 8 (Rural areas) should be put into the small village category (1) and is fundamentally different to other urban conurbation areas (1).

**Council Response:** Eastham Village Conservation Area is designated under SA 8 Rural areas as a rural settlement under Policy WP 8 of the Local Plan.

10. Moreton / Upton / Hoylake could be classed as an urban settlement and should be prioritised for regeneration (1).

**Council Response:** Moreton and Upton are designated under Settlement Area 5 in Policy WP 5 and Hoylake is designated under Settlement Area 6 in Policy WP 6 in the Local Plan Submission Draft.

11. Development should be directed towards commuter towns of Eastham, Bromborough and Bebington. (1)

**Council Response:** A number of housing allocations have been made in the Bebington, Bromborough and Eastham Settlement Area as well as employment use allocations at Eastham Dock and Wirral International Business Park.

12. Port Sunlight should not be classed as an urban conurbation given constraints which make development unsuitable (1).

**Council Response:** Policy WP 4 Clause A Port Sunlight Conservation Area.

13. Spital should be removed from urbanised zone. (1)

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

14. Barnston would be more accurately described as a hamlet. (1) SHLAA4010/4075/4076 should be viewed as standalone and not part of the settlement hierarchy (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

**Q2.5: Do you agree with the settlement definitions and groupings, and if not, what changes would you wish to see and why?**

**Summary of responses** - Of 336 responses, 55 responded yes and 169 responded no.

1. Agree with settlement definitions and groupings (5). Support designation of Moreton, Hoylake and Upton as urban (1).

**Council Response:** Support noted.

2. Cannot answer this question as yes/no and would prefer to comment on individual designations (1).

**Council Response:** Noted.

3. WMBC should publish evidence supporting the settlement hierarchy (1). The Local Plan Submission Draft consultation should include a question regarding the settlement hierarchy (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

4. Do not support the settlement area approach (10), this enables unnecessary development (10), there is no basis in the NPPF (187), it fails to recognise local character (8) and should distinguish between rural/Green Belt and urban areas (96).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

5. The approach will not enable the Council to meet its housing requirement (1).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

6. It is unclear whether townships are grouped or separate due to different approaches in the evidence base, such as the Sustainability Appraisal (6). The designations are unclear (3), small village designation is inaccurate and does not recognise actual small villages (1), the distinction between hamlet and village is unclear (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

7. The township boundaries should be represented on a map (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

8. Areas like Port Sunlight, Oxton, Mountwood and Bebington should not be grouped with Regeneration Areas (1). Settlement Areas 4, 5, 6, 7 and 8 should not be grouped under urban settlement (1). Wirral Waters and strategic Regeneration Areas should be in a separate grouping in the settlement hierarchy (2). The townships grouped under 'urban settlements' should be designated individually as villages (11). Do not support urban settlement (86) and small village (1) groupings. Designate Caldy as a large or small village (1), designate Eastham Village as a small village (4), designate Irby as a village (3), as a large village (3), designate Irby, Greasby, Pensby and Thingwall as large villages (1). Designate Eastham Village Conservation Area and land adjacent to the east of the A41 as a rural area/village (2). Include Saughall Massie under urban settlement (1). Combine urban settlement and urban conurbation designations (2). Group West Wirral with large villages (1). Group land west and east of the M53 (1). Include land within Eastham Village (1) and Storeton (1) in the urban conurbation.

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

9. Do not support the designation of Hoylake as a district centre (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been included for development.

10. Enhance train infrastructure along settlement areas 5 to 7 and the Bidston Wrexham line (1).

**Council Response:** Transport for Wales are implementing plans to increase weekday service frequency on the Bidston – Wrexham line to two trains per hour during 2022, and by the end of 2023, the frequency of Sunday services will increase to one train per hour. Heswall and Upton Stations on the Bidston – Wrexham line are not fully accessible and this is recognised in the Infrastructure Delivery Plan.

11. Protect green areas surrounding suburban settlements/villages (3) and avoid coalescence (2).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

12. Support brownfield development (4). Reduce reliance on urban intensification in the spatial strategy (1). Represent urban intensification approach using a map (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway. The spatial strategy will be represented on the Policies Map.

13. Support Green Belt development (2). Do not support Green Belt development (107). Do not support urbanisation east of the M53 (1). Do not support the development of new villages (1). Do not support development of Parcel 7.27 (1), Parcel 6.15 (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

14. Assess flood risk when determining planning applications (1).

**Council Response:** Flooding is addressed in strategic Policy WS 1.4 Flooding and Drainage and detailed Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management.

**15.** Consider the impact of development in East Wirral on designated sites (1).

**Council Response:** The Local Plan Submission Draft is accompanied by the relevant Habitats Regulations Assessment and provision for appropriate mitigation is now set out in Policy WS 5.5 of the Local Plan Submission Draft.

#### Economic Need

**Q2.6: Do you agree that the Council should calculate the need for employment land based on the Past Completions approach? If not please provide your reasons.**

**Summary of responses** - Of 190 responses, 33 said yes and 62 said no.

1. Reasons for responding no to the past completions approach were as follows: market conditions (37), Brexit (24), lack of investment opportunity (20), unattractive to invest (20) and lack of uptake business premises (27).

**Council Response:** The Wirral Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.

The Wirral Employment Land and Premises Study 2021 uses three scenarios to calculate the need for employment land: Market Capacity Scenario, Workforce Capacity Scenario and the Economic Capacity Impact Scenario. The Local Plan Submission Draft discounts all but the Economic Capacity Impact Scenario.

2. Other reasons for responding no were as follows: COVID-19 (7), exaggerated growth (6), limited space for growth (2), public sector cuts (1), a changing economy: digital economy (3), rising automation (1), homeworking (3), and local production and distribution (1), employment opportunities offered in other local authorities (1), the climate emergency (2), economic recession (1), no vision from the Council (1), existing disused employment land (1), the loss of potential residential land with employment land designation (1).

**Council Response:** See responses Q2.6(1).

3. Basing employment land need off the growth scenario risks a relaxed approach to uses in Primarily Industrial Areas (1).

**Council Response:** The Wirral Employment Land and Premises Study 2021 uses three scenarios to calculate the need for employment land: Market Capacity Scenario, Workforce Capacity Scenario and the Economic Capacity Impact Scenario. The Local Plan Submission Draft discounts all but the Economic Capacity Impact Scenario. The Economic Capacity Impact scenario is considered to represent the best estimate of employment space requirement for Wirral as it builds upon the baseline position using Oxford Economics employment forecasts to add new layers of data which are not included in this baseline position.

4. Response cannot be explained in layman's terms (1).

**Council Response:** Noted.

5. Support the past completions approach (10).

**Council Response:** Support noted.

6. There is insufficient employment locally (1). Wirral has poor transport connections, discouraging investment (1). Businesses in the Wirral do not have longevity (1). The Council is attracting insufficient investment in the Wirral (1).

**Council Response:** The Local Plan aims to attract new business, start-ups and support growing businesses and as well as creating employment opportunities through guiding investment in the Borough. The emerging Wirral Economic Strategy supports the local plan in creating more employment opportunities and the recruitment of local labour. Employment opportunities will also be created from development through the social value policy (Policy WS 2). The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

7. The employment strategy should also focus on attracting employment opportunities (1).

**Council Response:** The Local Plan aims to attract new business, start-ups and support growing businesses and as well as creating employment opportunities through guiding investment in the Borough. The emerging Wirral Economic Strategy supports the local plan in creating more employment opportunities and the recruitment of local labour. Employment opportunities will also be created from development through the social value policy (Policy WS 2).

8. Wirral Council should leave the LCR (1).

**Council Response:** This is a matter beyond the scope of the Local Plan. The Duty to Co-operate, which requires local planning authorities to engage and work with neighbouring authorities in the preparation of their local plans, would still apply even if Wirral Council were not a member of the Liverpool City Region Combined Authority.

9. Growth is inaccurate/exaggerated (103) and should be recalculated (2). Calculate the level of vacant employment land and buildings (1). Determine employment land need using projected growth targets (4). Consider both past completions and employment forecasting based on future take up (1). Consider public sector funding cuts (1), the post-industrial, digital economy (1), social care (1), Birkenhead's decline (1) and COVID-19 (2) and Brexit (1). Test alternate scenarios in an economic downturn (1).

**Council Response:** The Wirral Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.

10. Clarify how the take-up calculation considers B8 uses, consistency in the use of net and gross figures, for example the comparison of the net SHELMA (e.g. Table 2.4) forecasts and then the calculation of historic take-up as gross (e.g. paragraph 2.41), whether the employment requirement of 80ha over the plan period is gross or net (e.g. paragraph 2.48) and where the historic take-up approach considers corresponding jobs growth, or how this links to the housing change (1).

**Council Response:** Based on the conclusions of the City Region Strategic Housing Market and Employment Land Assessment large scale B8 (warehousing) study, no additional provision for large scale B8 is made within Wirral in the Local Plan due to the Borough's position relative to logistics demand.

The Local Plan Submission Draft proposes to allocate 65.50ha net employment land. The Wirral Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous

consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance. Levels of growth in the Plan are based off of the Economic Capacity Impact scenario from the 2021 study, since it is considered to represent the best estimate of employment space requirement for Wirral as it builds upon the baseline position (Oxford Economics employment forecasts) to add new layers of data which are not included in this baseline position, such as major investments.

- 11.** The Council should regularly review land allocated for development and land availability (2).

**Council Response:** Policy WS 12 requires the Council to monitor the implementation of the Local Plan policies and Infrastructure provision which includes indicators such as the five-year housing land supply position and employment land supply, and other indicators such as vacancy rates. Local Plans are required by law to be reviewed at least every five years.

- 12.** Plan for modest growth (4), for aspirational levels of growth (1). The economy is shifting to a digital economy, high levels of growth are therefore unlikely (2). The Local Plan is allocating a surplus of employment land (1).

**Council Response:** The Local Plan Submission Draft proposes to allocate 65.50ha net employment land. The Wirral Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance. Levels of growth in the Plan are based off of the Economic Capacity Impact scenario from the 2021 study, since it is considered to represent the best estimate of employment space requirement for Wirral as it builds upon the baseline position (Oxford Economics employment forecasts) to add new layers of data which are not included in this baseline position, such as major investments.

- 13.** Support brownfield development (93). Employment land should be brownfield (3), B8 sites should be brownfield (1). Some brownfield land harbours wildlife (1).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

- 14.** Support small businesses/co-ops (1). Invest in green energy and jobs (1). Support a range of employment land use opportunities (1). Designate sites for flexible commercial uses in Primarily Industrial Areas (1). Support homeworking (1). Promote a circular economy (1).

**Council Response:** The transition to a circular economy is a Strategic Objective of the Local Plan (SO4).

- 15.** Provide infrastructure for existing residents (1). Invest in improving transport infrastructure (1). Ensure development allocations are in sustainable locations (1).

**Council Response:** The Infrastructure Delivery Plan (IDP) will set out all appropriate infrastructure required to current and future needs. The IDP sits along the Local Plan, which sets out policy requirements for infrastructure in development proposals and the protection of infrastructure in Policy WS 10 Infrastructure Delivery.

- 16.** Retain green space (1).

**Council Response:** Existing open space is also protected by Policy WS 10.6 Open Space. Policy WS 5.1 protects existing green infrastructure.

**17.** Do not support Green Belt development (4).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

**18.** Sefton Council is not in a position to meet any of Wirral's employment needs (2).

**Council Response:** Noted.

**Q2.7: If the Council were to calculate the need for employment land based on the lower Baseline or Growth scenarios, do you believe that potentially surplus employment land should be re-designated for alternative uses, including, where suitable, new housing development?**

**Summary of responses** - Of 202 respondents 31 said no and 91 said yes.

1. Support redesignating surplus brownfield employment land for alternative uses (36), where residential development is built to a high design standard (1), green space is provided (1), the Council would obtain Council Tax from these sites (1), provided this is capped at 20 hectares (2). Redesignate surplus retail land for alternative uses (3). Do not support redesignating surplus brownfield employment land for alternative uses (3), the land should be assessed for the appropriateness of residential development (1), it should be retained for employment use (1).

**Council Response:** The Council support appropriate alternative uses within employment areas.

2. Rewild surplus employment land (1). Plant trees on surplus employment land (2).

**Council Response:** Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection which includes provision for biodiversity net gain for all new development. Tree planting will be addressed as part of the Council's tree planting strategy and emerging open space improvement strategy.

3. There will be no need to use surplus employment land since there are sufficient sites for residential development (2). There will be no surplus employment land if brownfield development is maximised (1). There will be no surplus employment land since the housing and employment land figures are exaggerated (89). The housing and employment land figures are inaccurate/exaggerated (9). Recalculate employment land need taking into account Brexit, Covid-19 and the climate emergency (1).

**Council Response:** This has been addressed through the Wirral Employment Land and Premises Study 2021 and the Strategic Housing Market Assessment 2021.

4. Better engagement with brownfield landowners will ensure sufficient brownfield land availability (1).

**Council Response:** The Council's Strategic Housing Land Availability Assessment (SHLAA) has been updated to April 2021 and is kept under constant review. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.

5. Support brownfield development (87). Land between Dock Road and the A59 can be used to meet Wirral Council's employment land need (1).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

**6.** Safeguard land for development instead of using surplus employment land (1).

**Council Response:** National policy requires the Council to consider, in line with para 122 of the NPPF, whether there is a reasonable prospect of a planning application coming forward on those sites which have formed part of the employment land supply for many years, including those allocated for employment use in the Wirral UDP (adopted in 2000) which have remained undeveloped. If land is not required for employment development, then the Council should consider through the Local Plan process whether it has potential for alternative uses.

**7.** Support the past completions approach for the employment strategy (6).

**Council Response:** Noted.

**8.** Recognise the importance of key local employers for mixed use development (2).

**Council Response:** Noted, Policy WS 4 Strategy for Economy and Employment seeks to support and maintain local employment.

**9.** Do not support Green Belt development (7).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

**10.** WMBC should leave the Liverpool City Region (1).

**Council Response:** This is a matter beyond the scope of the Local Plan. The Duty to Co-operate – which requires local planning authorities to engage and work with neighbouring authorities in the preparation of their local plans would still apply even if Wirral Council were not a member of the Liverpool City Region Combined Authority.

**11.** All new development should have access to green space (1).

**Council Response:** Policy WS 5.2 Open Space Provision – all new residential development will be required to contribute to the improvement and enhancement of open space, which may be secured through a mix of on-site provision and/or financial contributions.

### **Increasing Residential Development Density**

**Q2.8: Do you agree that densities should be increased whilst maintaining good design to ensure the maximum use of suitable urban land?**

**1. Summary of responses** - of 503 responses, 179 said 'yes' and 34 said 'no'.

Some respondents were concerned the preferred approach had not yet been set out in detail (1). More information was needed (1) especially about how mix, type and tenure will be addressed (5). Higher densities would not be appropriate in all areas (7), one size would not fit all (100) and standard densities should be used with caution, especially in planning for infrastructure (7) and should not be used to ignore the need for additional housing sites to be identified (5). There was no track-record of delivery (5) and surrounding councils had not taken this approach (5).

Density was not the only consideration (2). Optimal capacity involved a wide range of factors (3), more than merely maximising the number of units on each piece of land (5).

Densities should only be increased where appropriate (90) based on site-specific circumstances (8) and should be sensitive to the character of the location (18) and the type of occupant (1). They must also be viable (9) and realistic and achievable (9) in each location and located in areas with clear demand (5) and marketability (6) and capable of meeting assessed needs (6). Consideration should begin with an appraisal of local character, not the assumption that higher densities will always be appropriate (100).

There was no evidence that higher densities would be viable or deliverable while still maintaining good design (6). A recent CPRE audit indicated that 75% of newer higher density developments were mediocre and led to over-development and loss of character, with 20% so bad that they should have been refused (100). Higher densities tended to provide less open space (3) and smaller properties (5); squeeze out the environment (1) and family homes with gardens (1); led to the loss of trees (1) and parking (1); will harm local character (4) and make Wirral less attractive (8).

Others indicated that all land, urban as well as rural, should be efficiently used (3).

Positively, higher densities would only be acceptable if they:

- are within existing urban areas (1)
- take account of all site-specific sensitivities or constraints (2), from infrastructure capacity to land drainage (1)
- protect the Green Belt (14)
- protect heritage (13), conservation areas (34) the countryside, agricultural land and open space (6), the coast (2) and larger properties (3)
- reduced the risk of green field development (1) and maintained rather than merged distinctive communities (2)
- addressed or avoided any environmental sensitivities and climate change (13)
- were well-designed (110) based on best practice (85) that reflects local character (11)
- built to a high quality (16), using sustainable materials (2)
- maintained good living space (2) and liveability (8) and provided for inclusive design (3)
- were affordable (1) and community led (1)
- retained trees and landscaping (15) and provided open space for the community (20)
- did not sacrifice children's play (20) and included field-type space for older children (8)
- had good access to active travel, walking and cycling (18), public transport (87) including railways (1), and other supporting infrastructure (12)
- were part of a comprehensively planned area (3)
- Were energy saving (3), passivhaus (1) or zero carbon (8), with solar panels (90), enhanced insulation (88), sustainable drainage (11) green roofs (1) rainwater harvesting (1) ground source heating (1), do not harm air quality (1) and support water efficiency (1)
- support wildlife and biodiversity net gain (4)
- provide for electric vehicle charging (88)
- minimise the land take for car parking (9) (others indicated that they needed adequate off-street parking, to prevent parking on neighbouring roads (4))
- remained flexible, to allow for choice (5), different types of housing (12) and housing need (13), family homes (7) and mixed-use development (1)
- are not inappropriately tall (7) or 'high rise' (6)

Negatively, some respondents felt that higher densities and extra homes were not needed (1), particularly if the Council addressed land-banking (1) reviewed population growth (1) reduced the housing requirement (1) and re-used empty homes (1); were best avoided (1); will lead to social unrest (1); should maintain existing densities (1) or be no higher than the upper range of existing levels (1); and would affect the M53 Motorway (1) and health and wellbeing (1).

Others felt that only densities up to 37dph would be appropriate for most volume builders (2)

**Comments on the areas that would be most or least appropriate for higher densities and the Council's response are reported under Q2.9 below.**

**Q2.9: Are there any particular sites or areas where you believe that this would be most or least appropriate? Please give your reasons.**

1. **Summary of responses** - Of 376 responses, 170 said 'yes' and 7 said 'no'.

Negatively, higher densities were not considered to be appropriate in (268) or adjacent to (1) the Green Belt or in rural areas (1); on parks or open spaces (229), recreation areas (11), protected sites (5), greenfield sites (4) or gardens (2); on sites suitable for larger homes (2); on major routes where air quality could be compromised (1); flood risk areas (2); in existing suburban (1) or residential areas (20) or where existing densities were low (98).

Named areas where higher densities should not be promoted included:

- west of the M53 Motorway, to protect distinctive character (3)
- Caldy (3), West Kirby (1) and Hoylake (1)
- Greasby (4)
- Irby (5), Thingwall (3) and Pensby (1)
- Heswall (3), Lower Heswall (1) and Barnston (1), where they were 'ugly'
- Bebington (1) and Port Sunlight (1) because of its historic importance
- Raby Mere (1) and Poulton-Spital (1)
- Rural villages or hamlets (2)
- A playing field site at Noctorum (OS140, 92)
- A grassed area that already had permission for housing at Liscard (HLA698300)
- A site in the Green Belt at Sandy Lane, Irby (1)

Higher densities would only be acceptable in the most sustainable locations (1), near to active travel, rail and public transport (12); in urban areas (4), in existing higher density areas (2), close to jobs (8) and where supporting facilities such as shops, schools, leisure and medical services already exist (7) or can cope (6) or will be provided (2); in areas where character can be improved (6), such as 'regeneration areas' (107) town and district centres (58) or urban brownfield (7) or former industrial sites (1) or where there were empty homes (1); in 'urban living' environments (1); and along main roads (1).

Named areas where higher densities should be promoted included:

- to the east of the M53 and in north or east Wirral (4)
- Wallasey (1) including around the Town Hall (1)
- Birkenhead and Wallasey Docks and the surrounding area (1)
- Wirral Waters (10), especially if supported by light rail (1)

- Birkenhead (6) and its Town Centre (4) including around the leisure centre and cinema (1)
- other waterfront locations (7) including Woodside (2) and Rose Brae (1)
- Bromborough (2)
- Moreton (1)
- areas where topography may allow for more height without any skyline impacts, like Caldy, Heswall, Oxton, West Kirby and Bidston (1)
- A site at Civic Way, Bebington (1)
- A woodland site adjacent to Upton By-Pass at Moreton (OS254, 1)
- An industrial site at Bebington (1)
- Around (the ugly) West Kirby Concourse and abandoned Fire Station (1)
- A site at Eastham (in the Green Belt) (1)
- Clatterbridge Hospital (in the Green Belt) would be suitable for 2 to 4 storey flats and townhouses (1)

Where figures were specified:

- 15-20dph would be appropriate adjacent to the countryside (1)
- 30dph would be appropriate in most edge of town locations (7)
- Land at Hind Street, which is close to Birkenhead Central railway station and Birkenhead Town Centre, would be suitable for 50 to 120dph, to support the re-population of the town centre (3)
- a maximum of 15dph would be appropriate around Noctorum Ridge (1)

However, not all sites in regeneration areas, town centres or near public transport (1) or sites without any special designation for protection (1) or where important heritage assets were in central locations (1) would be appropriate.

Responses that were not geographically based are reported under Q2.8 above.

**Council Response:** Paragraph 125 the National Planning Policy Framework states: *Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:*

*a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*

*b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*

*c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance*

*relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).*

The final Wirral Density Study can now be viewed on the Council's website. Areas where higher densities are likely to be appropriate, based on their character, location and access to services are shown on the Local Plan Submission Draft Policies Map. The densities set out in Local Plan Policy WS 3.2 are a starting point and will allow site-specific circumstances and local character to be taken into consideration.

The historic environment in Regeneration Areas is considered in individual Conservation Area policies in Part 5 of the Local Plan Submission Draft and heritage Policy WD 2.

In accordance with the NPPF guidance and the findings of the Wirral Density Study Policy WS3.2 of the Local Plan Submission Draft sets out minimum densities for different density zones across the Borough.

### **Development Viability**

#### **Q2.10: Do you agree with the findings of the Economic Viability Study Baseline Assessment? If not, please give your reasons.**

**Summary of responses** - Out of 283 responses, 32 said yes and 135 said no.

1. Do not agree with the findings of the Economic Viability Baseline Update 2018, it is insufficient to convince developers to build in Zones 1 and 2 (177), the study should determine the funding required for the delivery of brownfield sites (83), the viability evidence is flawed/inadequately tested (12), the study uses a 40% affordable housing requirement while the Issues and Options Local Plan indicates a 30% requirement (6), the study is based on the Unitary Development Plan, not the Issues and Options Local Plan (1).

**Council Response:** The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy and the Local Plan Viability Assessment which accompanies the Local Plan Submission Draft.

2. Developer contributions should not be required for Zone 1 development (1).

**Council Response:** The Local Plan Viability Assessment considers the impact of policies which may require developer contributions in both the generic and site-specific appraisals it undertakes with a particular focus on the delivery of affordable housing. Residential development is currently unviable in value zone 1 (covering Birkenhead and Wirral Waters) without grant support and the Council will demonstrate that this support is in place to enable development to go ahead in this area. Viability is expected to improve over the plan period as the housing market becomes more established. It is always the case that developer contributions necessary to make a development acceptable in planning terms may be required on a case-by-case basis aside from the provision of affordable housing.

Policy WS 3.3 Affordable Housing Requirements of the Local Plan Submission Draft requires proposals for new-build market housing of 10 or more dwellings in Zone 1 to provide 10% affordable housing.

**Q2.11: Are you aware of any other ways that potential gaps in viability could be addressed in the Local Plan, to bring more urban brownfield sites forward for development?**

**Summary of responses** - Out of 230 responses, 85 said yes and 11 said no.

1. Proposed strategies to address viability gaps for urban brownfield sites include:

- channelling CIL funding from Zones 3 and 4 to brownfield sites in Zones 1 and 2 (6);
- pursue all available grant funding sources (83);
- re-examine viability with new studies (69);
- redesignate brownfield employment sites to residential (2);
- avoid restrictive policy wording (2) and allow for flexibility with S106 requirements (2);
- reduce the housing requirement figure to 3,000 dwellings (2);
- prohibit Green Belt development (1);
- take forward spatial option 1B (3);
- use CPO/force developers to bring land forward for development (4);
- bring forward the Wirral Waters development (2);
- develop a strong and attractive vision for brownfield development (1); and
- work with experts, developers and Registered Providers (1).

**Council Response:** A Local Plan Viability Assessment has been completed of the Local Plan Submission Draft. The Local Plan is based on the council's preferred urban intensification option, no green belt release is proposed. Detailed neighbourhood frameworks or masterplans have been completed for a number of brownfield sites and the Draft Birkenhead 2040 Framework sets out a comprehensive strategy for the regeneration of Birkenhead.

### **Delivering Growth Through Regeneration**

**Q2.12: Do you agree with our proposed approach to enable the positive regeneration and development of Birkenhead to maximise its potential to accommodate a significant proportion of the borough's development needs?**

1. **Summary of responses** – Responses supporting the proposed approach to regeneration (421 out of 450) In addition there were 76 responses to Q2.14 which supported the regeneration of Birkenhead.

Comments in support of the regeneration approach included a number common themes that the Regeneration of Birkenhead was much needed after many decades of decline, that Birkenhead had significant potential in particular due to its world class waterfront. The regeneration strategy was in accordance with the NPPF to bring forward development of brownfield sites. The vision for a 'garden city' was supported and the scale of Council's aspirations were welcomed. Several comments made the point that this was a once in a generation opportunity, that Birkenhead should emulate the Regeneration of Liverpool City Centre a short distance away on the opposite bank of the Mersey and that Birkenhead should not seek to compete with Liverpool but to complement its offer. The 'LeftBank' programme should act as an engine for economic and social growth.

A number of respondents commented that the Council had no choice but to seek to regenerate Birkenhead in order to tackle the severe deprivation which exists in Birkenhead.

Requests to include the regeneration of other areas including New Brighton, Liscard and New Ferry were also received.

A number of comments whilst supporting the regeneration strategy stated that this should include a commitment to high quality design, mixed uses and social areas with sufficient open space, spaces for growing food, lower reliance on cars with reduced car parking, active travel and improved public transport. The need to protect valuable habitats within the East and West Float Dock system was also raised. Some comments requested that priority should also be given to the reuse and improvement of existing buildings and homes.

One comment pointed out that the contribution of the Wirral Growth Company's proposals for the regeneration of the Town Centre including housing delivery should be recognised. A number of comments stated that the Council should be bold with its regeneration strategy and more radical about the number of homes which could be delivered within the plan period at Wirral Waters

A common theme in the supporting comments was that the regeneration of Birkenhead would help safeguard valuable agricultural land, and habitats within the Green Belt.

**Council response:** The Council welcomes the support for the proposed regeneration of Birkenhead which is at the heart of the Local Plan spatial strategy. Since the Issues and Options consultation in early 2020 the Council has published the draft Birkenhead 2040 framework which sets out a comprehensive strategy for the regeneration of the town. The Council accepts that is an important once in a generation or lifetime opportunity to deliver the regeneration of Birkenhead indeed that there is no alternative available if the social, economic and environmental deprivation and issues of the town are to be addressed.

The 'LeftBank programme' is intended to be a comprehensive strategy for the regeneration of the eastern part of the Borough from New Brighton in the north to New Ferry in the South. It will encompass economic as well as housing, environment, social and cultural components to deliver sustainable communities.

The Council recognises the importance of place making and high quality design in the successful regeneration of Birkenhead and has commissioned the Anglo Dutch design practice Macreannor Lavington in June 2021 to prepare the Birkenhead Design Guide and Public Realm Strategy. This document will be adopted as Supplementary Planning Document. The Council has also invested in a modern 3D digital model for the Birkenhead area which is being used to ensure that design is considered at all stages of the development planning process from concept through to determination of planning permissions for major development.

In Regeneration areas with good access to public transport there will be a flexible approach to car parking provision as set out in Policy WS9 and Appendix 7. A Mass Transit system will be developed alongside an active travel network to reduce the need to travel by car.

Important Habitats in east float have been safeguarded through measures proposed as part of the reserved matters application for residential development on Northbank West in 2018. These measures addressed issues of both direct habitat loss and potential recreational disturbance from residents, including a financial contribution per unit towards the Ranger service to cover management of nearby greenspaces and coastal Natura 2000 sites. A similar approach will be adopted Borough-wide as part of the Liverpool City Region Recreation Management Strategy (RMS) as outlined in Policy WS5 which will be an "opt-in" mechanism by which developers can address recreational disturbance through an optional levy on schemes of 10 or more dwellings to fund management measures at the European sites or enhancement of alternative inland destinations.

**2. Summary of responses** - Responses not supporting the proposed approach to regeneration (29 out of 450)

There was an overreliance on Wirral Waters, Woodside and Hind Street to deliver a substantial proportion of the Borough's housing needs. Yet these were brownfield sites with significant viability issues.

No development has taken place on Wirral waters since the granting of outline planning permission in 2012. The evidence base submitted with the outline planning application was now out of date and should be updated with a robust housing delivery.

No timescale for the preparation of the Birkenhead Regeneration Framework has been provided by the Council.

Strategic brownfield sites were not deliverable and would require significant public sector funding which may be insufficient to address viability gaps. In particular delivery rates for Wirral Waters for the initial 5 year plan period are unrealistic as planning permission for the Legacy project has still not been approved and Council's assumption of 1,000 dwellings [on North Bank] over a five-year period is overly optimistic and appears to be based on very limited evidence.

Significant public realm investment is required to support the delivery of Urban Splash and Legacy in years 0-5.

The Council are reliant on delivery from Wirral Waters across the entire plan period with a further 1,000 dwellings expected in years 11-15. These are primarily proposed to be delivered through land parcels known as Marina View and Vittoria Studios. It is more likely 500 dwellings will be delivered within the plan period during years 11-15 rather than 1,000 quoted by the Council. There is serious doubt whether the infrastructure required will be in place during the plan period.

**Council response:** Since the publication of the Issues and Options Consultation document in January 2020, significant progress has been made on the development of a comprehensive regeneration framework for Birkenhead. The Draft Birkenhead 2040 Framework was subject to consultation between 24th March and 19th May 2021. The Framework sets out a comprehensive strategy for the regeneration of Birkenhead. Four detailed Neighbourhood Frameworks or masterplans have been completed and a further three are under preparation to provide further detailed planning and investment context for the regeneration of Birkenhead's new neighbourhoods.

Following a £6m Housing Infrastructure Fund allocation in 2020 remediation works have now been completed on the Wirral Waters Northbank, and the first phase of the Urban Splash Housing project (a partnership project between Urban Splash, Peel Land and Property and Homes England) has commenced with the first homes expected to be completed by early 2022. The first phase of the 'Legacy' build to rent housing development by Peel Land and Property supported by the Council will commence on site in early 2022.

The Council was successful in securing £24M funding through the Future High Streets Fund (FHSF) for Birkenhead Town Centre 2020 and a further £25M through the Town Deal in January 2021. The Wirral Growth Company received planning permission in August 2021 for the development of a new Town Centre Commercial District and mixed use area including 650 homes. The delivery of the first phase of housing will be supported through £4.6M Gap funding as part of the FHSF.

The Government has recognised the national significance of the regeneration opportunities in Birkenhead by awarding the Council significant funding to explore the establishment of an Urban

Development Corporation or other bespoke delivery vehicle. Deloitte were appointed in May 2021 to undertake a detailed study to set out a business case for the establishment of a bespoke delivery vehicle to undertake the comprehensive regeneration of Birkenhead.

A Land Owners Group has been established to bring forward the comprehensive development of Hind Street as a Low Carbon Urban Garden Village. Funding has been secured from the Liverpool City Region Combined Authority for the removal of the flyovers which separate Hind Street from the Town Centre and a detailed highway realignment scheme has been agreed which will also provide access to early phases of the scheme. Intrusive Ground Investigations are in process and a phasing plan for the site has been established. Agreement around the delivery route has been confirmed and the Land Owners Group are establishing a funding strategy with Homes England to fund Phases 2 onwards.

In terms of Wirral Waters the Legacy project the planning application has been approved and development on the first phase is due to commence in early 2022. Work is now well advanced on the first phase of the Urban Splash Modular project with completions expected by early 2022. Given the progress of these projects the delivery of c1,000 homes on Northbank is entirely feasible by 2026.

The delivery of the Mass Transit system is not essential for the delivery of Northbank or Vittoria Studios.

Peel Land and Property have an agreed strategy to relocate existing businesses from the Vittoria Dock to sites at MEA park in West float. The Council is working with Homes England and the Combined Authority to secure funding to enable the delivery of Hind Street and Wirral Waters Vittoria Studios within the Plan period.

See Housing Delivery Statement Topic Paper for further information.

(Please note no housing development on Marina Views within the Plan period is allowed for in the Local Plan housing trajectory)

3. The Infrastructure Delivery Plan should set out clearly the costs of all necessary infrastructure to enable the delivery of strategic brownfield sites including timescale and funding.

**Council response:** The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of strategic brownfield sites.

4. The proposed development of brownfield sites would not deliver the type of housing needed in the borough as set out in the SHMA in particular it would not deliver larger family housing.

**Council response:** The Strategic Housing Market Assessment 2021 identifies that approximately 60% of new housing should be provided in 3 bedroom plus dwellings. The Council considers that in order to bring about the successful a regeneration of Birkenhead in particular that there must be a significant element of larger 3 bedroom (family homes) delivered to ensure that sustainable, balanced communities and neighbourhoods are delivered. The Council recognise that given the current nature of the Birkenhead housing market and the need to deliver development at a higher density delivering larger dwellings in regeneration areas at least initially will be a challenge.

Through work undertaken in the Birkenhead High Density Homes Study 2021, the Council is confident that high quality, higher density 'family' homes can be delivered in Birkenhead, that there are numerous examples across the Country where similar housing typologies are being successful delivered, and that developers will be willing to deliver them.

Recognising the challenges to providing larger family homes in regeneration areas Policy WS 3.4 of the Local Plan which deals with Housing Mix will require sites within Regeneration Areas to provide where capable and suitable a minimum of 30% of housing larger dwellings of three or more bedrooms. For sites outside of regeneration areas this will be a minimum 70% of dwellings will be developed for larger dwellings of three or more bedrooms.

To help achieve this the Council recognises and supports the development of appropriate high quality innovative housing designs within and outside regeneration areas.

The Council also recognises that Birkenhead needs to be an attractive place for families to live. The Birkenhead 2040 Framework sets out a comprehensive regeneration strategy for the town and recognises the importance of place making. The Framework sets out a series of catalyst projects including the creation of a new world class Dock Branch Park which will complement the existing Birkenhead Park. Birkenhead's already high level of accessibility will be further improved by the delivery of a mass transit system providing 'last mile' linkages between new neighbourhoods and the Mersey rail network. The Town Centre will be restructured and revitalised as a new community focus, the 'concrete collar' of the Borough Road Flyovers will be removed to improve connectivity between the Town Centre and new Hind Street community and existing communities to the west of the Town Centre. The Birkenhead Design Guide and Public Realm Strategy will set out design standards which will help give Birkenhead a unique identity.

5. The housing market in Birkenhead is poor and cannot absorb the scale of housing envisaged. The regeneration of inner areas of Birkenhead and Wallasey must be regarded as an important priority for the Local Plan, and the Council has obviously undertaken useful work in identifying and appraising development opportunities. The rate of housing delivery assumed to come from locations with no track record of delivery, known issues over viability and no strong established housing market is unrealistic. These are highly complex and uncertain projects which will make only a limited contribution up to 2035 and will stretch well beyond the plan period.

The Council's approach is reliant upon aspirational delivery rates and assumes significant increases in dwelling capacity. Critical tests of soundness for a Local Plan are that it should be justified and effective.

It is apparent in Wirral that the only realistic approach to achieving the scale, affordability and mix of housing that is required is to plan for significant urban extensions and choice of housing outlets to complement long term regeneration initiatives.

**Council response:** The Housing market in Birkenhead is improving as evidenced by the sale values achieved on the new Urban Splash Modular development on North Bank Wirral Waters. The Birkenhead Housing Market Study 2021 has identified examples of similar areas of poor market conditions across the Country which have delivered significant housing growth as part of a comprehensive regeneration strategy such as that being developed by the Council for Birkenhead.

Housing delivery in Birkenhead is expected to include a range of types, locations, tenures and designs which will appeal to a range of prospective purchasers and renters. Significant progress has been made in delivering strategic brownfield sites over the last 2 years. Following the award of £6M Housing Investment Fund grant by Homes England in 2020 full remediation of Wirral Waters Northbank has been completed and the first phase of the Urban Splash modular housing scheme will be completed in 2022. In addition, work on the first phase of the 500 dwellings built to rent 'Legacy' scheme will commence in early 2022. Work on progressing the delivery of the Hind Street strategic site has progressed significantly with detailed delivery masterplan work now underway, and funding secured to address essential infrastructure provision.

Regeneration policies set out in Part 4 of the Local Plan identifies both strategic housing sites and mixed use areas within the latter the Council expect smaller sites to be brought forward.

6. A more balanced approach whereby proposed housing delivery in Birkenhead should be reduced with the release of green belt sites.

**Council response:** The Council's preferred strategy is for urban intensification and the comprehensive regeneration of Birkenhead. This strategic approach is fully consistent with the National Planning Policy Framework (NPPF) in respect to priority to be given to brownfield development as set out in paragraph 119 of the NPPF. The scale of potential brownfield development in Birkenhead as evidenced in the Birkenhead 2040 Framework and supporting Neighbourhood Frameworks and the overriding need for the regeneration of the town mean that the exceptional circumstances for releasing green belt land as set out in para 140 of the NNPF have not been identified.

7. The housing numbers should be increased

**Council response:** See response to Q2.1.

**Q2.13: Do you agree with the preferred approach for delivering the strategic sites/development areas through the Local Plan as set out in Appendix 2.1?**

*Because of inconsistent responses in terms of indicating whether they agreed with the approach for delivering the strategic sites/ development areas it is not possible to give an accurate number of yes/no answers for all sites and areas.*

**Summary of responses** - Responses supporting the proposed approach for delivering strategic sites/development areas through the Local Plan.

1. An individual comment supported the regeneration of New Ferry and queried whether the LeftBank concept was cultural/ Arts Led or commercial Led. This same response also stated that Birkenhead should be regenerated in a different way than Liverpool with emphasis on creating a Green Birkenhead.

**Council response:** The Council is pursuing the regeneration of New Ferry and is currently seeking a development partner to deliver the key sites as identified in Policy RA10. The 'Leftbank' concept is a residential led, whole place regeneration concept. The Council agrees that the regeneration approach for Birkenhead should not seek to copy that of Liverpool City Centre but should, as set out in the Birkenhead 2040 Framework, complement it with a different approach creating high quality greenspace and emphasising the creation of new family orientated neighbourhoods.

2. Support for the development of Hind Street as part of a comprehensive regeneration strategy for Birkenhead by a developer (1). Support the regeneration of Birkenhead, Hind Street strategic development area, is a key gateway to the Urban Conurbation from Liverpool and presents a strategic opportunity of national significance to realise the regeneration of Birkenhead as an exemplar 'Urban Garden City' or Left Bank Regeneration Zone (1).

**Council response:** The Council welcomes this support and recognises the importance of this major gateway development at Hind Street. The development of a new exemplar low carbon residential led mixed use urban garden village is set out in Policy RA 5 of the Local Plan.

3. A request for Birkenhead Town Centre Masterplan area to be identified as a specific strategic site was also received (1).

**Council response:** Noted. Policy RA4 of the Local Plan identifies the Birkenhead Town Centre Masterplan area as Birkenhead Commercial and Mixed Use Quarter (MA5)

4. One comment was received stating that the Council needs to do a lot more work to justify the development of brownfield land to avoid the release of Green Belt land. Another stated that the plan is not providing, the government, developers or people of Wirral with evidence that WBC has any confidence in its own regeneration plans, and that the proposed release of Green Belt sites underlines that assertion.

**Council response:** Since the publication of the Issues and Options Report in January 2020 the Council has published the Birkenhead 2040 Framework which sets out a comprehensive strategy for the regeneration of Birkenhead. No green belt release is being proposed as part of the Local plan strategy.

5. Highways England advised that part of the M53 including Junction 1 lay within the Birkenhead Regeneration Framework Area.

**Council response:** The Council and their transport consultants have been working alongside National Highways (formerly Highways England) and their consultants to undertake strategic and junction modelling to understand the impact of Wirral Local Plan on the M53 motorway and its junctions. A Statement of Common Ground has been prepared between the two parties and engagement and assessment will continue as the plan is implemented.

6. These are the areas with the highest need for regeneration. (3)

**Council response:** The Council notes the recognition of the areas identified as requiring regeneration interventions

**Summary of responses - Responses not supporting the proposed approach for delivering strategic sites/ development areas through the Local Plan.**

7. Of the 306 comments received, 178 stated that the Council should be more proactive and positive in seeking the regeneration of Birkenhead and or be seeking additional public funding to accelerate housing delivery in areas in need of Regeneration.

**Council response:** The Council welcomes the support for the proposed approach to regeneration. The Council is working with Homes England, the LCR CA and developers including Peel Land and Property to bring forward development on brownfield sites as quickly as possible as part of the comprehensive strategy set out in the Birkenhead 2040 Framework.

8. Eleven (11) submissions were received challenging an over reliance on large brownfield sites in particular Wirral Waters, and Hind Street to deliver housing to meet the Borough's objectively assessed need whilst supporting a regeneration approach generally. Specific points raised included:
  - Poor track record of delivery at Wirral Waters (over optimistic delivery rates)
  - Challenged delivery rates at Wirral Waters and Hind Street in particular first 5 years

**Council response:** See response to Q2.12 (8) above.

- disconnect with the mix and tenure requirements outlined in the Council's evidence base; the majority of the units envisaged comprise smaller apartment-type developments misaligned with the Council's stated need for predominantly larger homes.

**Council response:** See response to Q2.12 (7) above.

- Challenged whether 20% affordable housing at the Proposed Wirral Waters 'Legacy' scheme can be delivered

**Council response:** The project will deliver 20% affordable housing as set out in the approved planning permission and separate legal agreements with the Council who are supporting the scheme.

- Viability and reliance on significant public sector funding for infrastructure and remediation costs

**Council response:** See response to Q2.12 (7) above.

- Poor market conditions and market capacity

**Council response:** See response to Q2.12 (8) above.

- The evidence presented to demonstrate Woodside's developability is negligible and there are considerable issues regarding its availability, viability and infrastructure constraints.

**Council response:** The Council has prepared a Neighbourhood Framework (NF) for the Waterfront which sets out a spatial planning framework and investment strategy for the redevelopment of the Woodside area as a mixed use residential, culture and commercial area. This has informed Policy R3 of the Local Plan which seeks the comprehensive redevelopment of the area during the plan period. The NF has identified that the realignment of the Woodside Gyratory and improvements to the public realm outside Hamilton Station will be a catalyst for the redevelopment of the waterfront, as well as an enhanced visitor destination experience with an International Battle of the Atlantic Centre replacing the U-Boat experience, a replacement of the Ferry Landing Stage and upgrades to the Woodside Ferry Village Listed Building. The Council has made a bid for Levelling Up funding in 2021 to undertake these works.

In summer 2021 the Council received approval for £25 Towns Deal Fund which includes significant public realm and connectivity works for the Woodside area which will improve the attractiveness and vitality of the Waterfront area for further development.

Other than the Rose Brae site the Local Plan housing trajectory does not include housing delivery in the Woodside area within the first 5 years of the plan period.

See Housing Delivery Statement Topic Paper for further information.

- The Council seeks to more than double the SHLAA capacity of the Hind Street site without justifying how ownership, access, contamination and ground work constraints will be resolved.

**Council response:** See response to Q12.5 above.

Since the publication of the Issues and Options Report in January 2020 significant progress has been made on the delivery of Hind Street. A decision by the LCR CA to fund the removal of the Borough

Road and Queensway Tunnel Flyovers and the realignment of the local highway network to facilitate has enable the site area to be significantly extended to approximately 1400 homes.

- Green Belt sites are required as part of a balanced approach to meeting the Borough's objectively assessed housing need.

**Council response:** See response to Q2.12 (9) above.

- Birkenhead Regeneration Framework still under preparation and shouldn't determine policy until available.

**Council response:** The Council Published the draft Birkenhead 2040 Framework for consultation in March 2021.

**9.** As a resident of Priory Wharf, Rose Brae must not intrude into Priory Wharf with traffic access.  
(1)

**Council response:** Vehicular access to the Rose Brae site will not impact upon Priory Wharf.

**10.** Greenfield sites should not be included (2).

**Council response:** There are no greenfield sites within the regeneration areas impacted by proposed development in the Local Plan. It may be necessary to restructure existing open spaces to facilitate the proper planning of new residential neighbourhoods consistent with Policy WS 5.1 Open space provision of the Local Plan.

**11.** The Council should go bigger, go better, go bolder and Birkenhead is the key to that. Address severe deprivation in Birkenhead and avoid green belt release (3)

**Council response:** The Council published the Birkenhead 2040 Framework in March 2021. This sets out an ambitious and national significant comprehensive strategy for Birkenhead. The Council wishes to apply lessons learned from the regeneration of other UK cities and towns. In recognition of the Council's ambitions, it has commissioned with support from Government a detailed business case for the establishment of an appropriate bespoke delivery vehicle which is due for completion in early 2022.

**12.** These areas should be developed to include high density housing, leisure facilities, tourism and hotels. These areas must be developed and not green belt/field sites. (1)

**Council response:** See response to Q2.13 (9) above

**13.** One comment stated that the plan should increase proposed housing numbers for regeneration areas and that the proposed development of just 2500 homes at Wirral Waters was not 'maximising the potential of the site and of Birkenhead'.

**Council response:** The Council applies the Government's standard method of calculation in accordance with national planning policy and guidance to determine the number of dwellings needed. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021.

**14.** Option 1 a is committing 2500 home on Wirral Waters brownfields site and committing 2500 home on Green Belt. This is completely at odds with the stated approach.

**Council response:** Option 1A as set out in the Issues and Options Report is the Council's preferred option which is to meet the Borough's development needs within existing urban areas with no green belt release.

**15.** A future Wirral Waters policy must avoid being over-prescriptive in its approach. The East Float Outline Permission (EFOP) is inherently flexible and should not be curtailed by overly rigid policy. The Wirral Waters policy should form part of a suite of policies dealing with the approach to the Birkenhead area including the surrounding areas and the wider Urban Conurbation. The relationship between the various areas should be represented by a Key Diagram. The importance of the regeneration of areas adjacent to Wirral Waters, such as Hamilton Park and Northside, to the future delivery of new homes and employment should be reflected through emerging policy, to provide a supportive framework. (1)

**Council response:** Policy RA6 of the Local Plan sets out the regeneration policy for Wirral waters and fully reflects the extant Outline Planning permission provisions. Policy RA6 is one of a suite of policies for adjoining neighbourhoods in Birkenhead. The Birkenhead 2040 Framework has identified a series of Neighbourhoods including Hamilton Park and Northside which adjoin Wirral Waters. The Council has been proactive in developing proposals for the regeneration of Hamilton Park as also set out in the Hamilton Park Neighbourhood Framework and Local Plan Policy RA7.

**16.** Green Infrastructure is specifically referred to with regards to Wirral Waters in the Local Plan (1).

**Council response:** The Wirral Green and Blue Infrastructure Strategy (2021) identifies a Wirral Waters Landscape Renewal Area as a Priority Opportunity. Policy WS 5.2 Green and Blue Infrastructure networks will require the protection and enhancement of green and blue infrastructure for all development.

**17.** Supports but without prejudice to future employment opportunities and potential (yet unknown) changes in industry and associated spatial demands. Those sites of unique benefit (eg portside) should be given careful consideration against potential future demand.

**Council response:** Land within the operational port is safeguarded from non-port related development in Local Plan Submission Draft Policy WS 4.3 The Port and Maritime Zone.

**18.** Land intended for office and other uses at Wirral waters should be used for housing (1)

**Council response:** The outline planning permission for Wirral Waters includes a range of uses which will help create a unique and sustainable residential and mixed use neighbourhoods. The outline application also includes provision for some 13,000 dwellings. The Local Plan housing trajectory will set out housing numbers which Peel Land and Property and the Council consider realistic to be delivered during the Plan period.

**19.** Traffic issues are a menace in these areas/adjacent roads (1). Regeneration is good but prioritise less use of cars in the areas and more use of public transport (1).

**Council response:** A key proposal of the Birkenhead 2040 Framework and the Local Plan Policy WS 1.3 Infrastructure is the provision of a new mass transit system to link new and existing neighbourhoods in Birkenhead to existing Merseyrail stations and key facilities. Policy WS 7.3 Car Parking-sets out a flexible approach to parking in accessible regeneration areas where lower levels of car parking will be appropriate.

**20.** Proposed Designations / Allocations at Wirral Waters (1): The vast majority of Wirral Waters is proposed to be subject to site-specific allocations. Notes that the proposed approach of

residential and employment designations does not reflect the approach of the EFOP to deliver mixed-use neighbourhoods and risks limiting the flexibility that the EFOP allows in terms of specific uses within each Quarter.

The proposed employment allocations at West Float do not cover the entirety of the area subject to the WFOP, as it excludes a small area to the south-western corner which is within the application site.

The draft Proposals Map shows the widespread designation of the area surrounding Wirral Waters as Primarily Industrial Area (including Partnership Neighbourhoods) (extract below – PIA shown light blue). This approach runs counter to the principles of driving the regeneration of these areas and of the consented Wirral Waters Vision and Design & Access Statement.

Extending the existing PIA designation in these areas suggests that the plan seeks to preserve the status quo rather than providing the policy basis to manage change in these areas and facilitate their positive contribution to the WLPO strategy of urban intensification and re-populating Birkenhead.

This tension should be resolved through the suite of policies for Wirral Waters and the Partnership Neighbourhoods. A more appropriate terminology than PIA for the Partnership Neighbourhoods would be ‘area of anticipated change’ or equivalent and a policy developed which makes clear the Council’s intended approach to the design principles, density and quantums of development, acceptable uses (being unambiguous around housing, innovative and family in these areas), delivery mechanism (including required infrastructure and CPO needs), and timescales for delivery.

**Council response:** Policy RA6 of the Local Plan deals with Wirral Waters and fully incorporate both the East Float and West Float Outline Planning permissions. Policy RA7 of the Local Plan deals with the Hamilton Park area which lies to the immediate South of Wirral Waters and provides for a mixed use regeneration approach.

**21. Wirral Waters Policy:** A future Wirral Waters policy must avoid being over-prescriptive in its approach. The EFOP is inherently flexible, subject to compliance with parameters and guiding documents, enabling future development to respond to contextual and market changes. This flexibility must not be undermined or curtailed by overly rigid policy. (1)

**Council response:** See response to Q2.12 (20) above.

**22. The Wirral Waters policy should form part of a suite of policies dealing with the approach to the Birkenhead area (including the Partnership Neighbourhood Areas) and the wider Urban Conurbation Area.** This suite of policies / the relationship between the various areas should be represented by a Key Diagram. The importance of the regeneration of areas adjacent to Wirral Waters, such as Hamilton Park and Northside to the future delivery of new homes and employment respectively is recognised through the WLP in Appendix 2.126. This is a long-standing underlying principle of Wirral Waters and the approach agreed with the Council through the SRF and Vision for Wirral Waters. It is therefore entirely appropriate that it is reflected through emerging policy which should provide a supportive framework. (1)

**Council response:** The Wirral Waters ‘Partnership Neighbourhoods’ have been reviewed through the Birkenhead 2040 Framework and reflected in the Regeneration approach in the Local Plan through the identification of a series of regeneration Areas (Policies RA1 to RA8 refer). (1)

**23. It is essential that the approach to the regeneration of Birkenhead is enshrined in the WLP or another development plan document, with sound policies dealing with the regeneration of the**

Birkenhead area. at present it is unclear precisely what relationship the BRF would have with the WLP. (1)

**Council response:** The Birkenhead 2040 Framework has been prepared as an evidence document to inform the Local plan. Relevant principles and proposals of the Framework have been embedded into the policies of the Local Plan.

**Q2.14: Do you support the establishment of a dedicated delivery model for the Regeneration of Birkenhead?**

1. A small, dedicated team can produce results but only if it is adequately resourced (1)

**Council response:** Noted.

2. Do not disagree that careful consideration of the future of inner Wirral and the potential of strategic sites to deliver change is maximised. However, it is essential that the approach is enshrined in the WLP or another development plan document, with sound policies dealing with the regeneration of the Birkenhead area. Proper co-ordination of development across the BRF area is essential. The BRF needs to build on the Wirral Waters Vision Statement (2010), the Wirral Waters Design & Access Statement and the Birkenhead Integrated Regeneration Strategy (2010), with a focus on the ‘Partnership Neighbourhood Areas’. The BRF must be aspirational and visionary, set out benchmarks in sustainability levels, smart technologies, on community creation and inclusive growth, on transport and mobility, in density, design quality and design execution as well as in measuring impacts on people. It also needs to set out the necessary commitments and benchmarks from the Council alongside delivery roles and responsibilities (1).

**Council response:** The Birkenhead 2040 Framework (previously called Birkenhead Regeneration Framework) was published in March 2021 for consultation. It sets an ambitious vision for the comprehensive regeneration of Birkenhead and identifies the key role of Wirral Waters as a catalyst for the regeneration of Birkenhead and builds on the Wirral Waters Vision Statement (2010, Document PP4), the Wirral Waters Design & Access Statement and the Birkenhead Integrated Regeneration Strategy (2010, Document PP5). It identifies a series of neighbourhoods for which more detailed Neighbourhood Frameworks (NFs) will be prepared. The framework sets out the importance of design quality and recommends the preparation of a Design Guide for Birkenhead which the Council has subsequently commissioned and will be adopted as a supplementary planning document following adoption of the Local Plan. The Framework and these NFs will inform the regeneration policies in the Local Plan such as RA6 Wirral Waters.

See also Q2.13 (14)

3. Supports a bespoke delivery vehicle if it prioritises Birkenhead development in the shortest time scale without releasing Green Belt support it. (1)

**Council response:** Noted.

4. No particular comments to make about a dedicated delivery model for the regeneration of Birkenhead, but some sort of radical intervention is required, if the strategic development sites identified are going to deliver the number of homes envisaged. (10)

**Council response:** Noted.

5. Supports the establishment of a dedicated delivery model for the Regeneration of Birkenhead, particularly where this will unlock the full potential of Hind Street. (1)

**Council response:** Noted.

6. Support any actions that would aid the regeneration of Birkenhead. (78)

**Council response:** Noted.

7. The regeneration of Birkenhead should include the views of local residents directly, including localised residential workshops to address local issues. (1)

**Council response:** It is expected that any bespoke regeneration delivery vehicle will have consultation with residents as a key requirement of its governance.

8. There should be greater public scrutiny / overseeing regarding the regeneration of Birkenhead. (1)

**Council response:** Public scrutiny is provided through elected Members via particular committees in particular the Economy, Regeneration and Development Committee, Policy and Resources Committee and Scrutiny Committee. Any bespoke delivery vehicle established for Birkenhead will have due regard to the need for public scrutiny and accountability.

9. Support but needs to focus on delivery of affordable and social housing, and one that maximises the potential for public transport use (1)

**Council response:** The delivery of a balanced housing offer including affordable housing will be a key requirement of any new delivery vehicle. New housing development will need to meet the requirements for affordable housing as set out in Policy WS 3.3 Affordable Housing Requirements.

10. Support this approach, particularly as a potential Public-Private Partnership

**Council response:** Noted.

11. Supports as without targeted focussed action regeneration will not be successful (1)

**Council response:** Noted.

12. The establishment of a dedicated delivery model will help support expedient, efficient ad quality delivery, but should not be exclusive to Birkenhead. Establish models elsewhere in the Borough. (1)

**Council response:** Noted.

13. Support but in partnership with other local authorities in the Liverpool City Region, not in competition.

**Council response:** Noted. The Birkenhead 2040 Framework emphasises that the regeneration of Birkenhead should be complementary to Liverpool City Centre.

**Summary of responses:** Comments not supporting the establishment of a dedicated delivery model for the Regeneration of Birkenhead.

14. Broadly support the establishment of a dedicated delivery model for the appropriate regeneration of Birkenhead but concerned about the deliverability of the strategy outlined in the Issues and Options document.

**Council response:** See response to Q12 (2-5)

15. A dedicated delivery model would be too expensive. (2)

**Council response:** The costs of operation will need to be carefully considered as part the detailed Business Case for a new bespoke delivery vehicle.

#### **Q2.15: Do you have any alternative ideas for the regeneration of Birkenhead?**

1. Birkenhead had the first trams. A new system would assist regeneration to provide last mile links to existing rail system (89). 'Streetcar' tram service should be provided to serve Wirral Waters and Birkenhead (7).

**Council response:** The provision of a new 'last mile' tram system to link Wirral waters and other new and existing neighbourhoods to the excellent Merseyrail system is identified a catalyst project in the Birkenhead 2040 Framework. The Local Plan Policy WS1.3 Infrastructure provides for the provision of a new Mass Transit system to serve Birkenhead.

2. We have no alternative idea for the regeneration of Birkenhead but this should not be at the expense of discounting other deliverable and viable sites that would secure the Council's required mix of family and affordable homes. The Council cannot and should not rely on the strategic development sites to deliver such a large proportion of their housing requirement. Build more semi-detached housing in suburban areas (14)

**Council response:** See response to Q2.12 (5). The Local Plan housing trajectory includes delivery of housing on a range of site sizes and locations outside of the regeneration areas.

3. A well-designed 500-600 hundred seat concert hall, with a full range of facilities, would prove attractive to various groups and, if well managed, should generate significant revenue. (1) Add a buzzing arts quarter. (1)

**Council response:** There are no specific proposals for a large conference or concert hall in the Local Plan. However, the Council would consider on its merits similar cultural development within the Woodside Masterplan Area (Policy RA3-MA4). The Council is promoting Argyle Street and other areas of central Birkenhead will become a focus for the arts and creative sectors.

4. Build social/ affordable housing (2) including along the waterfront (1).

**Council response:** The provision of affordable housing is a key requirement for creating sustainable and balanced communities. The Local Plan Policy WS 3.3 deals with Affordable Housing Requirements.

5. Support the idea of the Garden City. All types of housing are needed. Incorporate parks and green communal areas, access to the riverbank, and plentiful public transport such as tramway, and cycle lanes. There should be more parks and children's play areas (2). Incorporate green and blue infrastructure (1).

**Council response:** Local Plan Policy WS 5.1 sets out the requirements for open space and children's play provision for new development. The Council expects that innovative solutions for open space provision should be explored for new development within Regeneration areas. The Birkenhead 2040 Framework sets out a Vision of an Urban Garden 'City' with proposals for the creation of a new 'world class' linear park in central Birkenhead and these proposals are included in the Local Plan

Policy RA4 - Dock Branch Park (Phase 1) (MA6). Proposals for a new public park to serve the proposed new Hind Street Urban Garden Village are also set out in Policy RA5- Hind Street Urban Garden Village (MA7).

6. Do not regenerate in isolation. The whole community needs to be uplifted to avoid regression.  
(2)

**Council response:** Noted.

7. Three comments (3) were submitted relating to design quality and heritage stating that high quality design and exploiting the town's heritage were important. There is a need for innovation in use of density and small open space. Support design competitions and champions.

**Council response:** The Birkenhead 2040 Framework sets out the importance of place making and high quality design for the successful regeneration of Birkenhead. Local Plan Policies WS 6 Placemaking for Wirral and WS 7 Principles of Design will ensure that high quality of development is considered at the planning application stage. Where appropriate the Council will make available to applicants, the use of its 3D model of the Borough to enable wider assessments of design and impact. A Design Review Panel may be appointed to assist with the consideration of larger applications to inform early iterations of design proposals for major developments. The Council is preparing the Birkenhead Design Guide and Public Strategy which will be adopted as a Supplementary Planning Document following the adoption of the Local Plan. This document will set out design guidance for new development across Birkenhead.

8. With the Council's proposal for major residential building programme, the Council should promote the transfer of skills of local people towards construction and related ancillary services.  
(1) The Council should promote and attract high tech industries; AR, VR, AI, Gaming, pharma etc.  
(2)

**Council response:** The Council does recognise this as an issue and will address the need to improve relevant construction skills and promote growth sector through its economic development strategy and in through working with partners in particular the Wirral Chamber of Commerce and Wirral Met College.

9. Ensure empty housing is allocated as a priority in this area. (1)

**Council response:** The Council has a strong programme for bringing empty homes back into use across the Borough.

10. The role of faiths and churches in regeneration and the community should be included.

**Council response:** Noted

11. This is the kind of area that should be used for high density housing for single people and couples who do not desire to have a traditional house but wish to be close to transport links to Liverpool, Wirral and beyond. (1)

**Council response**

This is consistent with the Council's Preferred Urban Intensification Strategy for the Local plan.

12. Further development of traditional high street shops in the Pyramids, Grange Road and Birkenhead market should be discouraged as it will lead to more empty units and decline. This area should be also partly developed as a tourist/leisure/hotel destination (1).

**Council response:** Policy RA4 of the Local Plan sets out proposals for a revised and more concentrated Birkenhead Primary Retail area and for the development of mixed use residential areas to bring vitality to the Town Centre.

**13.** Birkenhead has great tourism potential including which has never been exploited by WBC including leisure, attractions, hotels. This could be a very lucrative source of income. This area would then mirror developments on the opposite side of the river. Woodside and Hamilton Square are key attractions and heritage assets (4).

**Council response:** These views are reflected in the Birkenhead 2040 Framework. Birkenhead's waterfront and central and commercial areas are preferred locations for tourism development under Policy WS 4.4.

**14.** WBC has to commit higher housing numbers within the regeneration areas. WBC needs to provide opportunity for substantial attractive landmark schemes to make a strong case for public funding. (1) There should be acceleration of the development of brownfield sites through Housing Zones status. Council needs to secure more funding from the Housing Infrastructure Funds and Homes England (1)

**Council response:** The Local Plan Preferred Intensification Strategy does seek to maximise the development of brownfield sites within regeneration areas. The Council is working with Homes England and the LCR CA to win additional public funding to deliver regeneration.

**15.** The market at Shrewsbury could be a model on which to draw for Birkenhead. (1)

**Council response:** The Council is working with the Wirral Growth Company to deliver a new market for Birkenhead, assisted by funding secured from the Future High Street Fund. The Market will be in a highly accessible location within Birkenhead Town Centre well served by public transport. Policy R4 of the Local Plan will promote mixed use development within the Central Birkenhead area.

**16.** Make Birkenhead an attractive, zero carbon, well landscaped, mini Holland model which is not held to ransom by motor traffic, and designed by designers known for their design excellence. Reconnect the Priory to the town, and make the very most of the river frontage and Park as design generators. (1) Regenerate Birkenhead to return it to its former glory and improve the lives and economic prospects of those that live there and across the borough. (1) The proposed regeneration of Birkenhead should establish Wirral as a regional hub for sustainable living consistent with the Climate Emergency. (1) Work closer with Wirral Waters and use all the dock land. (2)

**Council response:** Wirral waters is identified as a key Regeneration Area in the Local plan (Policy R6) and will deliver a significant supply of housing during the Local Plan period as agreed with Peel Land and Property.

#### **Green Belt Assessment**

**Q2.16 Do you agree with the classification of sites set out within the 2019 Green Belt Review? If not, please state your reasons.**

**Summary of responses** - Out of 446 responses, 225 said no and 27 said yes.

**1.** Green Belt site specific comments include:

- Arable land adjacent to Barnston Road – Development will compromise traffic safety (1). Site is too far from major employment centres (1)
- Parcel 4.1 – Storeton does not have an open character (1). Storeton lack connectivity to open countryside (1). SHLAA 1819 should have been assessed in isolation (1).
- Parcel 4.1 North of Lever Causeway (SPO30) – Wirral Wildlife objects due to presence of Prenton Dell LWS (1). Parts of site identified as Core Biodiversity Area in Wirral (1). Parts of land are high quality agricultural land (1). Development would impact on Prenton Brook (1). Development may impact wildlife corridors (1).
- Parcel 4.1 West of Landican Lane Storeton (SP031) – No specific wildlife concerns (1). Development would impact wildlife corridor (1).
- Parcel 4.1 Little Storeton (SP032) – Development must take into account presence of bats in the village and Storeton Hall (1). SHLAA1880 is suitable for Green Belt release due to land constraints and separation (1).
- SHLAA4010/4075/4076 (The Storeton Garden Village) – An inconsistent approach has been applied through the Green Belt Review (2). The land covered by Storeton Garden Village makes a moderate contribution to the green belt (2). M53 is a stronger, more defensible boundary than the current urban edge boundary (2). The site makes no contribution to purposes 1 2 and 3 of the green belt (1). Development would not cause coalescence (1).
- Parcel 4.2 North of Rest Hill Road (SP033) – Wirral Wildlife objects due to presence of Storeton Woods LWS (1). Parts of land form high quality agricultural land (1). Land forms part of a green corridor (1). Development would detriment tranquillity / amenity of the area (1). Development presents risk of pollution and run off for Dibbin river / Dibbinsdale SSSI (1). SHLAA 40400 should have been assessed independently (1) as it makes a weak contribution to the green belt (1). Part of site suitable for green belt release due to weak contribution (1).
- Parcel 4.3 North of Red Hill Road (SP036) – Wirral Wildlife objects due to presence of Storeton Woods LWS (1). Parts of land form high quality agricultural land (1). Land forms part of a green corridor (1). Development would detriment tranquillity / amenity of the area (1). Development presents risk of pollution and run off for Dibbin river / Dibbinsdale SSSI (1). Site makes a weak contribution to green belt, not moderate (1).
- East of Brimstage Lane (SP037) – No major wildlife issues with site (1). Object to development as parts of land form high quality agricultural land (1). Development presents risk of pollution and run off for Dibbin river / Dibbinsdale SSSI (1). Site makes a weak contribution to green belt, not moderate (1).
- West of Brimstage Lane (SP041) – No major wildlife issues with site (1). Development would detriment tranquillity / amenity of the area (1). Parts of land form high quality agricultural land (1). Site makes a weak contribution to green belt, not moderate (1).
- SHLAA1942 Parcel 4.6 – Parcel makes a weak overall contribution to the green belt (1) using good practice methodology (1).
- Parcel 4.13 (SHLAA 0891) – Site makes a weak contribution to green belt (1). Site provides some purpose in preventing coalescence (1). Parcel benefits from clear boundaries (1).
- Parcel 4.14 West of Rivacre Road (SP050) – Parcel forms part of a wildlife corridor (1). Parcel classified as high quality farmland (1). Site makes no/weak contribution to green belt (1).
- Parcel 4.16 East of Rivacre Road (SP051) – Parcel forms part of a wildlife corridor (1). Parcel classified as high quality farmland (1). Parcel makes a moderate contribution to the green belt purposes (1). Sensitively designed development required to ensure no adverse impact on character of Saughall Massie CA (1). Development would not result in coalescence (1).

- Parcel 5.7 East of Garden Hey Road, Saughall Massie (SP005A) – Further study on bird population required (1). SHLAA0638 development has reasonable access to facilities (1) and good transport linkages (1).
- Parcel 5.8 – Site makes a weak contribution to green belt purposes (1). Development would not result in coalescence (1). Sensitively designed development required to ensure no adverse impact on character of Saughall Massie CA (1). Parcel is not weakly performing (1), prevents coalescence (1) and provides agricultural employment use (1)
- Parcel 5.9 North of Saughall Massie Conservation Area (SP004A,4B) - Further study on bird population required (1). Objection due to proximity / risk of development to Arrowe Brooke (1). Parts of land form high quality agricultural land (2). Site makes a weak contribution to green belt purposes (2). Development would not result in coalescence (2). Sensitively designed development required to ensure no adverse impact on character of Saughall Massie CA (2). Parcel is not weakly performing (1), prevents coalescence (1).
- Parcel 5.11 (SHLAA 3003) – Parcel is a weak performing parcel in terms of green belt (4). Site has limited sense of being in open countryside (3). Site does not contribute to green belt purpose 1 (3), purpose 4 (1) and weak contribution to purpose 2 (3).
- Parcel 5.12 – Parcel is a weak performing parcel in terms of green belt (4).
- 5.13 – Site provides a buffer between Greasby and Frankby (1). Site contributes strongly to green belt (1).
- Parcel 5.14 east of Rigby Drive, Greasby (SP010) – Wirral Wildlife objects due to presence of bats on site (1). Development would negatively impact Arrowe Brooke corridor (1). Presence of best and most versatile agricultural land on site (1). Development would detriment tranquillity / amenity of the area (1). Site makes a weak contribution to green belt, not moderate (1).
- SP043 – Site contributes strongly to the green belt (1).
- Parcel 6.9 West of Meols Drive – Wirral wildlife objects due to land being functionally linked to Dee Estuary SPA and presence of Red Rocks SSSI (1). LWS present on Liverpool Golf course (1). Presence of foraging areas for legally protected species (1).
- Parcel 6.10 (SHLAA 1943) – Site does not make a strong contribution to green belt purposes (1). Site is not a sensitive part of open countryside (1).
- Parcel 6.15 (SP013) – no exceptional circumstances have been evidenced or justified (16+12). Development would adversely impact character of area and amenities of Caldy CA (16+12). Land makes a strong contribution to green belt purposes (15). Location lacks access to local services (2). Development may exacerbate traffic and parking issues (2). Site provides strong contribution in preventing coalescence (9) and countryside encroachment (4). Site provides openness (8). Site is currently in agricultural use and should be retained (5).
- Parcel 7.5 – Functionally liked to Dee Estuary SSSI and Ramsar. Parcel should be removed from consideration for release (1). Release would contradict LP Strategic Objectives (1).
- Parcel 7.11 (SHLAA1549/0878/3050/1817) – Parcels make a weak overall contribution to the green belt purposes (1). Site has no strategic separation function (1). Parcel provides a moderate-strong degree of openness (1).
- Parcel 7.14 – Site makes a weak overall contribution to the green belt purposes (1). Site SHLAA1982 should have been assessed in isolation (1). Development would not cause coalescence (1).
- Parcel 7.15/SP062 and SP061 – Development would cause coalescence (3). Site lacks local infrastructure to support large-scale development (1). Site comprises high quality

agricultural land (1) and agricultural land should not be included in SHLAA (2). Core Biodiversity Areas would be negatively impacted by development (1).

- 7.16 (SP059) (West of Irby Road) – Land parcel should not be classed as weakly performing (1) (should be classed as highly performing) (1). Land prevents sprawl (Irby from joining Heswall, Pensby and Thingwall) (1).
- Parcel 7.20 Landican infill village (SP065, SP066) – Risk to wildlife from development (populations of bats, badgers, hares, newts) (1).
- Parcel 7.22 East of Glenwood Drive Irby (SP019B) – Wirral Wildlife objects due to presence of Limbo Lane Pond LWS and a number of other ponds (1). Presence of bats, toads, and newts in the area (1) – development would risk significant impact on their population (1). Parcel may be functionally linked to Dee Estuary SPA (1). Wildlife corridors should be retained in event of development (1). Land in use for food production (1). Development would negatively impact the Arrowe Brooke river corridor (1). Site makes a weak contribution to green belt, not moderate (1).
- Parcel 7.23 – Site makes a weak contribution to green belt purposes (2). Development would not result in coalescence (2).
- Parcel 7.24 – Site makes a weak contribution to green belt purposes (2). Development would not result in coalescence (2).
- Site 7.25 (SPO09 part) West of Sandy Lane – Land contains historic characteristics with heritage assets (Battle of Brunanburh, ancient road) (2). Fragile wildlife/ecology on site (3) with protected trees (1). Development would damage character (2) and identity (1), the amenity of Greasby Brook (2) and the atmosphere of the area (1). Road infrastructure would not accommodate development / high traffic in area (2). Site Area of Special Landscape (1). Smaller parcels should be reviewed in isolation (1). Parcel makes a strong contribution to green belt purposes (2).
- SHLAA1778 Sandy Lane – Site is of Special Landscape Value (1). Site contributes to character of area (Irby) (1).
- Site 7.26 (SPO59E) Rear of Irby Hall – Land makes a high contribution (should be classified as high) (3). Fragile ecology on site (great crested newts) (2). Land contains historic characteristics with heritage assets (Battle of Brunanburh, Ancient Monument) (2). Development would damage character (2) and amenity (2). Agricultural land should not be included (1). Site is well contained by a defensible urban boundary (1).
- 7.27 (SP060) Land between Irby and Pensby – Land makes a high contribution (should be classified as high) (5). Land prevents sprawl (Irby from joining Heswall, Pensby and Thingwall) (3). Land acts as a green corridor with ancient woodland (Harrock Wood) (3). Land contains historic characteristics with heritage assets (Battle of Brunanburh) (2). Lack of local infrastructure to support development (1). Site makes a weak contribution to green belt purposes (1). Development would not result in coalescence (1). Development would not result in adverse impact to character of area (2).
- Parcel 7.28 East and West of Pipers Lane (SP058 C, D, E) – Badger activity on site historically (1). Small fields in wider area have not been adequately survey (1). Part of site forms high-quality low-environmental impact grazing pasture (1). Functional link between site and neighbouring LWSs and SSSIs (1). Land to the North of Fern Close, Heswall should have been assessed as a smaller site (1) and methodology has not been followed correctly (1).
- Column Road Caldy – Site makes a high contribution to green belt purposes (1) and should be retained (1)

- Land to the South of Clatterbridge Hospital – does not reflect the characteristics of Green Belt General Area 8 (1) and is brownfield in nature / previously developed (1)

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

2. Comments on the Green Belt review stated: the Green Belt review and site and parcel classifications are flawed and 'unsound' (136). Local knowledge should be given credence (1). Impacts of other considerations such as pollution (1), transport (3), development (2), flood-risk (1) and accessibility (2) should also be considered in the review of green belt sites. Green belt boundaries are out of date (1) and should be reviewed (1) due to changes in policy and evidence (3). Green Belt Review 2019 has taken a different approach to 2018 Interim Review (3) without justification (2). This new approach is welcomed (1). Agree with the assessment of the weakly contributing sites (11). Methodology is rigorous/credible (4). Green belt released is required to meet housing need (5). There are further green belt sites that have been overlooked (6). Calculation of housing need is flawed (6). Further, granular investigation of site specific SHLAA site evidence (over strategic parcels) is required (10). No green belt sites should qualify for release or development (20) or be classed as weakly performing (129). This is against national policy (6). Exceptional circumstances must be identified to justify this (4). Green belt prevents unrestricted sprawl (9), and its removal would damage sensitive character and identity (5). Green belt brings environmental (17) and economic (7) and amenity (2) and wellbeing/recreation (7) benefits. Biodiversity has been underestimated in the review (1) and green belt release contradicts legal duties to protect wildlife (1) and mitigate climate change (2). M53 corridor land release should be considered (1). Development should not be restricted in Eastham Village as it makes a weak contribution to the Green Belt (3). Ellerman Lines green belt site is suitable for development (1). Brownfield regeneration should be prioritised (9). Affordable housing should be prioritised (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

3. Agricultural land should not be developed [WBC motion 2019 – agricultural land should not be included in SHLAA] (117). Not enough weight has been provided to Local Wildlife Sites (3). LWSs should have buffers provided (1). Protection given to wildlife rich areas in Local Plan policies should be increased (1).

**Council Response:** No green belt release is proposed. Policy WP 8.2 Agricultural Land of the Local Plan requires proposals to safeguard the productive use of best and most versatile land for food production. Local Wildlife Sites are provided protection in the Local Plan, referenced in Policy WD 3, and are recognised as Sites of Local Importance. Habitat buffer zones are a potential mitigation measure where development cannot be avoided and could form part of a suitable mitigation strategy where appropriate. In addition, under the Environment Act 2021 all development will legally require a minimum of a 10% increase in biodiversity net gain and Policy WD 3 covers biodiversity and geodiversity further.

#### Evidence base conclusions

**Q2.17: Do you agree with our analysis of the key messages from the evidence we have collected so far? If not, please state what you disagree with and why.**

**Summary of responses** - Out of 315 responses, 108 disagree and 35 agree with the analysis of key issues.

1. The Local Plan is based on flawed data/is difficult to understand (84). Statistics predate Brexit (2).

**Council Response:** Many of the evidence base documents have been updated to take account of the latest data, forecasts, policy and guidance including the Wirral and Employment Land Premises Study 2021, Infrastructure Delivery Plan and Viability Assessment.

2. The housing requirement figure should be increased (5) by a minimum of 1,200 dwellings per annum (4) or 1,300 dwellings per annum (1). The housing requirement is too high/flawed (48), the housing requirement should be 4,000 dwellings (2). The employment land requirement is too high (10). The Local Plan should plan for a 20 year period (1).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021, including the latest economic forecasts for the City Region.

3. Support Green Belt release (12), including SP043 (1). Do not support Green Belt release (111), Green Belt release should only be considered as a last resort (1). The Green Belt Review is flawed (6), it includes agricultural land (1), does not correctly interpret the five purposes of the Green Belt (2). Support urban intensification (93).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

4. Do not support urban intensification (1), there are viability issues (7). Identify all available brownfield land (1). Increase the density of development at Wirral Waters (1). The Density Study has not identified broad locations suitable for higher density (1). Allow for higher densities in appropriate locations (1). Improve old housing/bring empty homes back into use (3). Duty to Cooperate discussions with neighbouring authorities have not determined whether any of Wirral's housing need can be met beyond its boundaries (1).

**Council Response:** In some of the regeneration areas where values may currently be very low, viability is a challenge that will be overcome by public investment and market stimulation through new development.

5. There is insufficient qualitative data on retail centres (1). Reduce the employment floorspace requirement (1). Out of centre retail facilities have been wrongly designated as 'Primarily Industrial Areas' (1).

**Council Response:** The Wirral Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and considers more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.

6. Improve health infrastructure (1). Ensure there is sufficient infrastructure to support the number of projected homes (2), infrastructure evidence is insufficient/flawed (1).

**Council Response:** The Infrastructure Delivery Plan sets out all appropriate infrastructure required to meet development needs, produced in consultation with NHS Wirral and NHS Property Services. NHS Wirral and WUTH are updating their Estates Strategy which will account for the planned levels of

growth. While it is expected that existing GP practices will accommodate the overall level of growth planned, Regeneration Areas within Birkenhead delivering high numbers of residential units towards the end of the Local Plan period are likely to require additional GP capacity to serve the increased numbers of patients in those areas where there does not appear to be existing capacity.

**7.** List changes made to the Local Plan based on consultation feedback (1).

**Council Response:** The Regulation 18 Consultation Statement and Appendices set out the Regulation 18 Consultation responses and Council responses, including any corresponding actions and amendments to the Local Plan.

**8.** Land at Paulsfield Drive Woodland is not appropriate for Local Wildlife Site designation (1). Draw on work produced by Nature Connected through the Liverpool City Region Natural Capital Group to identify the Natural Capital assets of the City Region (1). The Local Plan fails to address environmental issues/climate emergency (3).

**Council Response:** Local Wildlife Sites are selected by the Wirral LWSP through the Cheshire LWS criteria. Sites that no longer meet the criteria and have low restoration potential will be deselected, and all sites are reviewed at least once every 10 years. The Local Plan recognises Wirral Council Environment and Climate Emergency Policy Statement 2021 and measures to mitigate and adapt to climate change are threaded throughout the plan, addressed at a range of geographical scales and policy actions.

The site is designated in the Local Plan Submission Draft as open space (OS-SA5.9) and as Local Wildlife Site (LWS-SA5.1) and is not suitable for development.

### 3. Our Vision and Objectives for Wirral

#### Wirral Local Plan Strategic Objectives - Wirral

##### **Q3.1: Do you agree with our proposed Vision?**

**Summary of responses:** 155 out of 492 responses do not agree with the proposed vision. Comments disagreeing with the proposed Vision included the following:

1. Include the conservation and enhancement of the historic environment in the Vision.
2. Include the climate emergency, the reduction in carbon emissions, and the conservation and enhancement of the natural environment in the Vision. The Plan should do more to reduce flood risk.
3. Include social and economic aspirations, including achieving a circular economy, in the Vision.
4. The housing figure is too high, the methodology is flawed and is based on population projections which are too high. The evidence base is insufficient.
5. Disagree with Green Belt release and support brownfield development instead.
6. Disagree with the site allocations.
7. The plan for regeneration is very ambitious and will be difficult to realise.
8. The Vision should include reference to the environmental and historical character of the Wirral.
9. Support Green Belt release. Include housing delivery and meeting affordable housing need in the Vision. Increase the housing figure.
10. Invest in housing, infrastructure and services for all of the Wirral. The focus is too much on East Wirral.

#### **Council response:**

1. The Vision references the Borough's track record of conserving and enhancing the historic environment.
2. The second paragraph of the Vision addresses the Wirral's engagement in addressing the climate emergency with carbon emission reduction, the protection and enhancement of the natural environment, energy efficient homes, clean power, heat and travel, and Green Belt land.
3. Flooding is addressed in strategic Policy WS 1.4 Flooding and Drainage and detailed Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management.
4. The Vision includes social and economic aspirations in terms of the Birkenhead regeneration strategy for employment and housing, investment in the Liverpool City Region and its competitiveness at regional, national and international levels, Wirral's visitor economy, and reducing inequality in the Borough. Achieving a circular economy is addressed in Strategic Objective 4.
5. The Council applies the Government's standard method of calculation in accordance with national planning policy and guidance to determine the number of dwellings needed. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021. It has been concluded that there is no evidence to justify the changing the boundaries of the Green Belt to meet the need for housing. The Council welcomes the support for the proposed regeneration of Birkenhead which is at the heart of the Local Plan spatial strategy.
6. The Vision references the historical and environment character of the Wirral.
7. The Vision references the delivery of thousands of homes to meet housing needs of the Borough, including affordable housing.

8. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

**Summary of responses:** 337 out of 492 responses agree with the proposed vision. Comments agreeing with the proposed Vision included the following:

1. Mention the climate emergency in the Vision.
2. Disagree with Green Belt release.
3. Extend the Plan period beyond 2035.
4. Reference housing delivery and meeting housing needs in the Vision.
5. Increase the housing figure.
6. Invest in housing, infrastructure and services for all of the Wirral. The focus is too much on East Wirral.
7. Support for brownfield development should be recognised in the Vision.
8. Maintain engagement with Highways England to ensure the delivery of transport infrastructure.

**Council response:**

1. The climate emergency is directly referenced in the concluding section of the Vision.
2. Agreed, the Plan period has been extended to 2037.
3. The Vision references the delivery of thousands of homes to meet housing needs of the Borough.
4. The Council applies the Government's standard method of calculation in accordance with national planning policy and guidance to determine the number of dwellings needed. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021. It has been concluded that there is no evidence to justify the changing the boundaries of the Green Belt to meet the need for housing. The Council welcomes the support for the proposed regeneration of Birkenhead which is at the heart of the Local Plan spatial strategy and is referenced in the Vision.
5. The focus for development and investment towards the east of the Borough addresses the need for regeneration in Birkenhead and its surroundings, and recognises the environmental constraints which exist on the Peninsula outside of existing developed areas.
6. The Council is engaged with Highways England to meet transport infrastructure needs.

**Q3.2: Do you agree with our proposed objectives?**

**Summary of responses:** 106 out of 448 responses agreed with the objectives and provided no suggested changes. Individual responses indicated:

- The objectives are too long and wordy (2), the objectives are unrealistic (1).
- The objectives will not help meet housing need. (1)
- Include an objective for the identification of brownfield land in the Borough (1), reference the role of Wirral Waters in the supporting text to each Strategic Objective. (1)
- Change the plan period to 2022-2037. (1)

**Strategic Objective 1**

1. Include sustainable design features, accessible design and energy efficiency in new development. Promote green roofs and solar panels.

2. The focus of this objective should be the climate emergency. Sustainable development and responding to climate change should be the first objective.
3. Add net zero carbon targets to Strategic Objective 1.
4. Define “sustainable”.

**Council response Strategic Objective 1:**

1. Strategic Objective 1 supports sustainable design in new development.
2. The focus of Strategic Objective 1 is to meet international climate agreement and nationally legally binding targets to reach net zero carbon before 2041.
3. The Vision and policy requirements throughout the Local Plan provide a vision and parameters for ‘sustainable’.

**Strategic Objective 2**

1. The focus of this objective should be retaining the Green Belt.
2. Promote tourism in the Borough.
3. Conduct wildlife surveys on brownfield site allocations.
4. Replace realise with “*Ensure* the potential of our industrial legacy”.
5. Focus regeneration around the Birkenhead dockland areas. Ensure regeneration covers East and West Wirral.
6. Include the protection of coastal wildlife.

**Council response Strategic Objective 2:**

1. It has been concluded that there is no evidence to justify changing the boundaries of the Green Belt to meet the need for housing.
2. The Vision seeks to achieve a thriving visitor economy.
3. The Council welcomes support for the proposed regeneration of Birkenhead which is at the heart of the Local Plan spatial strategy. The focus for development and investment towards the east of the Borough addresses the need for regeneration in Birkenhead and its surroundings, and recognises the environmental constraints which exist on the Peninsula outside of existing developed areas.
4. The protection of wildlife is covered in Strategic Objective 5. Ecological appraisals are required under Policy WD 3 E for protected sites.

**Strategic Objective 3**

1. The focus of Strategic Objective 3 should be building housing to meet housing need. Achieve Strategic Objective 3 with brownfield development.
2. Strategic Objective 3 will place too much pressure on infrastructure in existing communities. Focus development away from existing centres, excluding Birkenhead.
3. Reduce the need to travel, and car and freight use. Halt road building. Replace the fifth bullet point with “To support the construction of new road infrastructure *by exception* to achieving environmental enhancement, public transport or road safety benefits”.
4. Provide public transport between rural and small communities.

**Council response Strategic Objective 3:**

1. Strategic Objective 7 seeks the provision of sufficient housing to meet identified local needs. The Council welcomes support for the proposed regeneration of Birkenhead which is at the heart of the Local Plan spatial strategy.

2. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of strategic brownfield sites.
3. Strategic Objective 3 promotes sustainable transport and a reduced reliance on private cars.
4. Public transport between rural and small communities will be provided when necessary to meet assessed need.

**Strategic Objective 4**

1. Include the protection of Green Belt land, parks and open space.
2. Retain agricultural land. Conserve soils.
3. Expand on how climate change mitigation and adaptation can be achieved and how a low carbon economy can be delivered.

**Council response Strategic Objective 4:**

1. Strategic Objective 5 seeks the protection of urban and rural green space, and green and blue infrastructure.
2. The safeguarding of agricultural land is identified as a priority for the Rural Area in Part 5 of the Local Plan.
3. Supporting text to Policies WS 1, WS 5 and WS 8 expand on the Local Plan's approach to climate change mitigation and adaptation, and achieving a low carbon economy.

**Strategic Objective 5**

1. Strategic Objective 5 can only be achieved if the Green Belt is protected. Strategic Objective 5 should state "To not reduce Green Belt and to protect and improve...".
2. Protect all natural habitats, playing fields and open space. Protect and recognise Local Wildlife Sites. Include blue infrastructure.
3. Prioritise landscape design.
4. Clarify how development can deliver BNG. Encourage all new development to achieve BNG. Remove "where possible" from "ensuring that development delivers net environmental gains where possible".
5. Split Strategic Objective 5 into Objective 5a for the protection of green space, green infrastructure and natural landscapes, and Objective 5b for the protection of biodiversity and delivery of BNG with a focus on wildlife recovery.
6. Strategic Objective 5 is contradictory in increasing accessibility and managing development pressures.

**Council response Strategic Objective 5:**

1. For the number of dwellings needed, the Council applies the Government's standard method of calculation in accordance with national planning policy and guidance. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021. It has been concluded that there is no evidence to justify the changing the boundaries of the Green Belt to meet the need for housing.
2. Strategic Objective 5 seeks the protection of urban and rural green space, and green and blue infrastructure.
3. Policy WD 1 Landscaping of the Local Plan Submission Draft sets out policy requirements for landscaping proposals.
4. Policy WS 5 clarifies the delivery of biodiversity net gain and addresses wildlife recovery. The protection of Local Wildlife Sites is covered in Policy WD 3.

5. Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection which includes provision for biodiversity net gain for all new development.

**Strategic Objective 6**

1. Invest in flood defences.
2. Do not build on flood risk land.
3. Encourage SuDS in new development.
4. Support a masterplanning approach to water management.

**Council response Strategic Objective 6:**

1. Policy WD 4 sets out where flood defence works will be permitted.
2. Strategic Objective 6 encourages the sustainable drainage systems in new development and directs incompatible development away from flood risk areas.
3. Policy WD 4 requires a master plan for SuDS design where appropriate.

**Strategic Objective 7**

1. Reassess local housing need and provide evidence behind the housing need figure. Recalculate the housing figure to reflect economic trends. Reduce the housing figure. Deliver 327 dwellings per annum/250-400 dwellings per annum/around 300 dwellings per annum/1,300 dwellings per annum. Only deliver affordable housing. Meet the housing requirement. Make explicit reference to the delivery of new homes.
2. This objective is unachievable and undeliverable.
3. Support brownfield development. Compile list of contamination issues with brownfield sites.
4. Do not support Green Belt development. Support Green Belt development. Amend the second bullet point under Objective 7: "To manage the release of sufficient land for housing to meet the Borough's locally assessed housing needs including the release of Green Belt land in the most suitable and sustainable locations".
5. The scale of growth in the Local Plan should be adequately met by the proposed objectives.
6. All new development should be zero carbon.
7. Engage with the LCR and Cheshire West and Chester for strategic housing issues. Align the housing strategy with the LCR spatial vision.
8. Replace provide with "To manage the housing supply to help meet identified local need".

**Council response Strategic Objective 7:**

1. The Council applies the Government's standard method of calculation in accordance with national planning policy and guidance to determine the number of dwellings needed. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021. Strategic Objective 7 references the provision of sufficient housing to meet identified need.
2. Sites have only been included in the land supply where they can be shown to be 'deliverable' or 'developable' in terms of the definitions set out in national planning policy and guidance, which includes information provided by relevant developers and landowners. Further information is set out in the SHLAA 2021 and the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.

3. The Council welcomes the support for the proposed regeneration of Birkenhead which is at the heart of the Local Plan spatial strategy. Policy WD 15 Contamination and Instability sets out policy requirements for contaminated land.
4. It has been concluded that there is no evidence to justify changing the boundaries of the Green Belt to meet the need for housing.
5. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of strategic brownfield sites.
6. Strategic Objective 1 seeks to achieve net zero carbon by 2041 and Strategic Objective 3 promotes a transition to a low carbon Borough. Policy WS8 sets out energy hierarchy, sustainable construction, and renewable and low carbon energy requirements to achieve net zero carbon development.
7. The Council is engaging with the Liverpool City Region, and Cheshire West and Chester for strategic issues, including housing as part of the Duty to Cooperate process. The Local Plan and its evidence base has been developed in co-operation with partner authorities from across the Liverpool City Region.

### **Strategic Objective 8**

1. Strategic Objective 8 should include the conservation and enhancement of the historic environment. Refer to Conservation Areas. Replace significant with all: “To conserve and enhance *all* elements of our cultural heritage”.
2. Include reference to valued landscapes in the first bullet point.
3. Acknowledge the contribution of Green Belt land to the character and setting of the Borough.
4. Strategic Objective 8 should state “Ensure that high quality new development complements and does not encroach on Wirral’s distinctive character” and “Any development on Green Belt will not integrate only destroy”.
5. All new development should be zero carbon.
6. Do not develop sites SP040 and SP042 which are the possible location of the Battle of Brunanburh.
7. Include the sub objective “To facilitate provision of accessible, good quality, sustainably managed open space, sport, physical activity, leisure and entertainment and community facilities” to acknowledge the delivery of multifunctional space with SuDS.

### **Council response Strategic Objective 8:**

1. Strategic Objective 8 seeks to ensure new development respects the Borough’s distinctive character, and the protection and enhancement of the historic character of places and buildings.
2. Strategic Objective 8 refers to the protection of valued landscapes.
3. The Green Belt’s contribution to the character of the Borough is acknowledged in the Vision.
4. The Council applies the Government’s standard method of calculation in accordance with national planning policy and guidance to determine the number of dwellings needed. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021. It has been concluded that there is no evidence to justify the changing the boundaries of the Green Belt to meet the need for housing.
5. Strategic Objective 1 seeks to achieve net zero carbon by 2041 and Strategic Objective 3 promotes a transition to a low carbon Borough. Policy WS8 sets out energy hierarchy, sustainable construction, and renewable and low carbon energy requirements to achieve net zero carbon development.

6. No Green Belt release is being proposed as part of the Local Plan strategy, accordingly Sites SP040 and SP042 are not being carried forward in the Local Plan.
7. Sustainable drainage systems are covered in Strategic Objective 6. Policy WD 4 encourages a masterplan approach to SuDS in order to ensure its integration with neighbouring property.

**Strategic Objective 9**

1. Include the protection and provision of healthcare services.
2. Provide sufficient infrastructure to meet current needs.
3. Provide more detail on the assessment and provision of infrastructure to meet needs.

**Council response Strategic Objective 9:**

1. Strategic Objective 9 seeks the provision and promotion of emergency services and health infrastructure, and other essential infrastructure for local communities.
2. More detail is provided on the assessment and provision of infrastructure to meet needs in Policy WS 10 Infrastructure Delivery.

**Strategic Objective 10**

1. Strategic Objective 10 should be the 1<sup>st</sup> Strategic Objective.
2. Attract low paid workers to the Wirral.

**Council response Strategic Objective 10:**

1. Strategic Objective 1 addresses the climate emergency, a priority for the Local Plan.
2. Employment and skills are covered in Policies WS 1.2 Employment, WS 2 Social Value and WS 4 Strategy for Economy and Employment.

**Strategic Objective 11**

1. Reassess employment need. Employment land allocations should reflect economic trends and shifts.
2. Include achieving a circular economy.
3. The objective to support the rural economy is not addressed elsewhere in the Issues and Options Plan. Support rural communities.
4. Do not land bank.
5. Identify sites for flexible commercial use.
6. Remove the local business levy on small businesses.
7. Support existing businesses.
8. Support business with low cost and accessible car parking, improving public transport and implementing a sustainable and integrated transport strategy.

**Council response Strategic Objective 11:**

1. The 2021 Wirral Employment Land and Premises study models a Workforce Capacity impact scenario using the same population, household and workforce data used for the preparation of the Strategic Housing Market Assessment.
2. Strategic Objective 4 supports a transition to a circular economy.
3. Strategic Objective 11 seeks to support a competitive and diverse rural economy.
4. The Council does not have control over any arrangements such as option agreements which may be entered into between private landowners and developers relating to the possible future development of land

5. Recent changes to planning legislation have greatly increased the flexibility, particularly in town centres, to change between different commercial uses and also to change use to residential without the need for planning permission. The Local Plan reflects these changes.
6. The business levy is beyond the scope of the Local Plan.
7. Strategic Objective 11 supports fostering an environment for existing and new businesses to prosper.
8. Strategic Objective 3 supports the provision of sustainable, accessible and connected transport. Non-residential car parking standards are set out in Appendix 7 Parking Standards and Transport Assessment.

**Strategic Objective 12**

1. The vision for Birkenhead should focus on jobs and quality of life.
2. Strategic Objective 12 should be only for Birkenhead.
3. Encourage Change of Use to increase residential dwellings on High Streets. Convert empty office space to residential dwellings.
4. Ensure the regeneration of all towns, including Liscard and Moreton.
5. The scale of retail development should reflect economic trends. Reduce consumption.

**Council response Strategic Objective 12:**

1. The vision for Birkenhead seeks to attract investment into the area, and improve quality of life with regeneration.
2. The Local Plan seeks to maintain and improve the vitality of the centres in all of the Borough.
3. Recent changes to planning legislation have greatly increased the flexibility, particularly in town centres, to change between different commercial uses (including offices) and also to change use to residential, without the need for planning permission. The Local Plan reflects these changes.
4. Throughout the development of the Local Plan the Council has received strong representations about the need to protect the special character and environment of the Peninsula by focussing and delivering growth on the regeneration of the eastern part of the Borough. The focus for development and investment towards the east of the Borough addresses the need for regeneration in Birkenhead and its surroundings, and recognises the environmental constraints which exist on the Peninsula outside of existing developed areas.
5. The Wirral Retail & Centres Study – 2021 Retail Capacity Update assessment for comparison shopping floorspace indicates that there is no capacity for additional floorspace in any of the centres across Wirral. Therefore, net growth in the quantity of retail floorspace is expected to be very low up to 2034. Consumption is beyond the scope of the Local Plan.

**Q3.3: Are there any additional objectives you would want to include? Please state your reasons.**

**Summary of responses:** 34 out of 151 responses had no additional objectives to include.

1. Reduce the housing figure, most comments suggested delivering 327 dwellings per annum. (31)

**Council response:** The Council applies the Government's standard method of calculation in accordance with national planning policy and guidance to determine the number of dwellings needed. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021.

2. Support brownfield development (16), add an objective for brownfield development (2), for Wirral Waters (1), bring empty homes back into use (1) and redevelop the Grange Road shopping precinct (1). Regulate Housing Associations (1), leaseholds are unaffordable (1), add a delivery objective (2).

**Council response:** Strategic Objective 2 supports the delivery of comprehensive urban regeneration using previously developed land.

The Local Plan housing supply includes an empty dwellings allowance.

To ensure the long-term resilience and sustainability of the high street within Birkenhead, the Council will work in partnership with the major asset owner and individual landlords across the Grange Road Primary Retail. Initial public realm improvements will be delivered through the Future High Street Fund programme, with the Council working in partnership to maximise any future funding opportunities to enable ongoing support for this key area.

3. Support Green Belt release (3), Green Belt sites will need to be released to meet housing need (1) and add an objective supporting Green Belt release (1). Do not support Green Belt release/protect the Green Belt (29), add an objective opposing Green Belt release (2), add Green Belt protection to Strategic Objective 5 (2), disagree with the conclusions of the Green Belt Review (1).

**Council response:** The Council applies the Government's standard method of calculation in accordance with national planning policy and guidance to determine the number of dwellings needed. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021. It has been concluded that there is no evidence to justify the changing the boundaries of the Green Belt to meet the need for housing.

4. Protect and enhance the natural environment (10), retain agricultural land (1), increase biodiversity (1), increase biodiversity over the plan period by 5-10% (1), separate Strategic Objective 5 into two objectives, one for biodiversity, and one for green infrastructure and green space (1), carry out an EIA for all proposed development (1), protect trees and offset their loss (1), improve the maintenance of Council owned green space (1), plant trees and hedges (1) Increase tree coverage by 50% (1), include increasing tree cover in the vision (1), give green spaces and corridors special protections and buffer zones to prevent development within 200m of any designated Green Belt or green zone (1), Add a rural tranquillity objective (1) and protect rural tranquillity (1).

**Council response:** Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection which includes provision for biodiversity net gain for all new development. Tree planting will be addressed as part of the Council's tree planting strategy and emerging open space improvement strategy.

5. The objectives and new Local Plan should align with the Council's climate emergency declaration (25), reduce air pollution and carbon emissions (2), achieve carbon neutrality (1), add an objective on the Council's climate emergency strategy (1), dredge and clean rivers and clean grids (1). Prioritise active travel (1), provide separate infrastructure for bikes and cars (1), support car free town centres (1), planning applications should assess parking and car use (1).

**Council response:** The Local Plan recognises Wirral Council Environment and Climate Emergency Policy Statement 2021 and measures to mitigate and adapt to climate change are threaded throughout the plan, addressed at a range of geographical scales and policy actions.

6. Enhance coastal landscapes (1), develop the visitor economy by promoting the character and assets of the Borough's town, village and rural areas (2), develop a tourism department in Wirral Borough Council (1), develop tourist hotels and implement a tourist tax (1).

**Council response:** Policy WD 4.1 Coastal Defence and Erosion of the Local Plan Submission Draft sets out policy requirements for coastal protection and Policy WS 4 Strategy for Economy and Employment seeks to promote and protect the visitor economy in the Borough.

7. Avoid the coalescence of villages and the loss of their distinct identities (1), maintain the character of the Wirral and its settlements (4), retain historic character from high density development (1)

**Council response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed. The Local Plan Submission Draft seeks to protect and enhance the historic environment.

8. Ensure schools are of good quality (1), protect libraries and other cultural centres (1), higher housing delivery will increase pressure on infrastructure (2). The strategy should be coordinated with all of Merseyside (1), encourage localism and Neighbourhood Planning (1), work with faith communities (1). Promote health and wellbeing (1).

**Council response:** The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of strategic brownfield sites. The Local Plan Submission Draft contains a range of policies regarding infrastructure, design and the environment which seek to promote health and wellbeing in the Borough.

9. Encourage sustainable design in new development proposals (2), set the highest environmental building standards (1), retrofit heritage assets to support climate change adaptation (1), use design guides to guide development (1).

**Council response:** Zero carbon and sustainable design requirements are set out in Policy WS 3.1 Housing Design Standards. The Local Plan Submission Draft will require masterplans to be prepared for all key regeneration areas and sites (see Part 3 and 4).

10. Remove parking charges in Birkenhead town centre to promote the retail economy (1), ensure a stable economy (1), invest in West Wirral (2), attract businesses and support employment (1), amend the objectives based on changing social and economic conditions (1)

**Council response:** Parking charges are beyond the scope of the Local Plan.

Throughout the development of the Local Plan the Council has received strong representations about the need to protect the special character and environment of the Peninsula by focussing and delivering growth on the regeneration of the eastern part of the Borough. The focus for development and investment towards the east of the Borough addresses the need for regeneration in Birkenhead and its surroundings and recognises the environmental constraints which exist on the Peninsula outside of existing developed areas.

11. Objectively assess the conclusions of outsourced studies (1). Publicise information on large-scale developments in the Wirral Globe (1).



**Council response:** For major development applications, it is a statutory requirement for the Council to publicise this through a Press Notice in a local newspaper. [Publicity for Planning Applications 2019 \(wirral.gov.uk\)](#)

## 4. Strategic Spatial Options

### Option 1A: Urban Intensification

**Q4.1: Is there anything else that you think the Council could do to ensure that a sufficient urban land supply capable of meeting the Borough's development needs is identified?**

1. Support brownfield development (77), support spatial option 1B (26). The identified brownfield sites are undeliverable/undevelopable (6). Do not support Green Belt development (27). Support Green Belt release (9).

**Council response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

2. Ensure that a sufficient urban land supply is identified using the following methods:

- Ensure the brownfield land register is up to date (94)
- Subdivide existing housing (1)
- Exploit all available funding sources (6)
- Ensure the status of planning approvals and development progress is recorded (2)
- Densify (3)
- Provide financial incentives for brownfield development (1), provide grants to fund brownfield remediation (1)
- Consider all available brownfield land (1)
- Redesignate unused land for residential purposes (1) including empty retail units (2), golf courses (1), car parks (1), disused railway tracks (1) and employment land (3)
- Encourage landlords to improve their properties (1)
- Identify and compulsory purchase vacant land/properties, bring empty homes into use (15)
- Remove planning obligations/infrastructure contributions (1)
- Develop underused green space (1)
- Wirral Waters should be used for residential development (1)
- Assess remediation costs of brownfield sites (1)
- Identify sites for flexible commercial use (1)
- Promote shared ownership (1)

**Council response:** The Council has considered most of these options to maximise the supply of brownfield supply in the Local Plan Submission Draft. Whilst the Council consider the use of its CPO powers including vacant religious land and properties where appropriate to enable the delivery of brownfield development. The Council has no powers to abolish leaseholds.

3. The Regulation 18 Local Plan does not mention the Hoylake Golf Course and Wirral Waters developments (2).

**Council response:** The Hoylake Golf Resort proposals are not being pursued. Wirral Waters is covered in Policy RA 6 of the Local Plan Submission Draft.

4. The housing requirement figure is inaccurate (2)/too high (104). Windfalls have been undercounted (85).

**Council response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region. The windfall allowance in the Local Plan Submission Draft is based on the continuous delivery of new build dwellings on new sites that have not previously obtained permission for housing or been

identified in a previous Strategic Housing Land Availability Assessment, with no duplication or double counting. The proposed allowance represents 3.5 percent of the Plan's housing requirement and 2.9 percent of the identified land supply. Further information is set out within the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.

5. Support the production of Neighbourhood Plans (1). Consult/support local action groups (2)

**Council response:** In accordance with national planning policy and regulations, the Council will support the production of Neighbourhood Plans. The Council will consult with local action groups where necessary.

6. Provide adequate infrastructure (5). Address potential highways pressure from urban intensification (3).

**Council response:** The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

7. Site allocations should be supported by an assessment of the historic environment (1).

**Council response:** A heritage impact assessment has been commissioned to assess the impact of proposed allocations on heritage assets.

8. Build net zero carbon homes (5).

**Council response:** Zero carbon design requirements are set out in Policy WS 3.1 Housing Design Standards.

9. Identify Local Green Spaces (1). Provide green spaces for new development (5).

**Council response:** The Local Plan Submission Draft designates local green spaces for protection in Appendix 13 and seeks to protect green infrastructure in Policy WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection.

#### **Q4.2: Do you have any comments on the proposed urban housing allocations set out in Appendix 4.1?**

Site Reference: All sites		# comments	Council Response
Key Issues			
1	Supports dispersed Green Belt release	5	Noted but the Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft does not involve the release of land from the Green Belt.
2	Support-enhancing the built environment	1	Support Noted
3	Support-improving amenity	1	Support Noted
4	Support-capacity for infrastructure improvements	1	Support Noted

5	Support-capacity to improve local services	1	Support Noted
6	Support-low flood risk	1	Support Noted
7	General comment – brownfield development protects Green Belt/space and agricultural land	2	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
8	Allocations should be made on brownfield only/Council should consider brownfield only	78	Noted. See response to comment 7 above
9	Deliverable supply overstated / incorrect	5	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
10	Improve standards/deliverability of brownfield sites (viability issues)	16	Noted. See response to comment 7 above
11	Would like urban intensification for regeneration (support living above shops)	1	Support Noted. See response to comment 7 above
12	Objection – loss of greenery / green area / agricultural land	4	Noted. Given lack of detail no detailed response can be given. The Local Plan Submission Draft includes policies for the protection and provision of open space and green infrastructure and agricultural land is subject to national policy controls.
13	Objection to housing figures	14	See responses to Q2.1
14	Objection to proposed urban housing allocation(s) (no reason given)	5	Noted. Given lack of detail no detailed response can be given
15	Support proposed urban housing allocation(s) (no reasons given)	4	Support noted.
16	Need for (more) affordable/social housing	3	The Council has updated its housing needs assessment and relevant policies are now included in the Local Plan Submission Draft (Policy WS3.3 Affordable Housing refers).

17	General comment – Poor map quality / access	3	Noted. The Council has revised the mapping made available alongside the Local Plan Submission Draft.
18	General comment – document too technical	1	Noted. The Issues and Options document was by its nature a technical document because of the nature of the Local Plan and the need to meet the requirements of national policy and guidance. We made efforts to make the document as accessible as possible and also provided a summary document. We also arranged an extensive series of walk-in exhibitions across the Borough where information was available and Council officers able to provide further details. We have tried to make the Local Plan Submission Draft as clear and simple as possible with much of the more technical information now set out in supporting documentation.
19	Change preferred option to Option 1B	1	Noted. The Council has taken the preferred spatial Option 1A of Urban Intensification forward into the Local Plan Submission Draft. The Council now considers that the future land supply will be sufficient to provide for the early years of the plan period in full but Option 1B may need to be reconsidered subject to the evidence submitted to the public examination and the views of the Planning Inspector(s) appointed to examine the soundness of the Local Plan.
20	Support Option 1	1	Support noted.
21	Option 1A has a housing shortfall	1	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
22	Proposed allocation is not an accurate representation of housing land available/Additional housing land identification required	5	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the

			Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
23	Objection – Lack of services to support houses	1	An infrastructure assessment has been undertaken as part of the development of the Local Plan in consultation with key stakeholders. This incorporates community, transport, utilities and green infrastructure.
24	Objection – Lack of road transport infrastructure (congestion)	2	Using transport modelling software, a cumulative traffic impact assessment has been undertaken that accounts for changes associated with planned Local Plan housing and employment together with any committed network updates across the borough.
25	Lack of infrastructure to support building	5	The Council has produced a detailed Infrastructure Delivery Plan which sits alongside this Local Plan. It contains information in respect of the infrastructure required to support the development contained in the Local Plan; the costs; the period over which it needs to be delivered in relation to the development it supports; which organisation is responsible for it and how it will be funded.
26	Intensification respects right to light / privacy	1	Controls over privacy and amenity are now set out in Policy WS7.2 Privacy and Amenity of the Local Plan Submission Draft.
27	Objection – Flood risk	1	The relevant flood risk assessments have now been prepared at both Level 1 and Level 2, including, where necessary, a sequential test and exception test assessment.
28	Local market failure – failure to secure investment	2	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy and the Local Plan Viability Assessment which accompanies the Local Plan Submission Draft.

29	Keep register of sites up to date / accurate	81	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. The Council's Strategic Housing Land Availability Assessment (SHLAA) has been updated to April 2021 and is kept under constant review.
30	General – proposed allocations in flood zones should be subject to sequential test	2	Level 1 and Level 2 Flood Risk Assessments have been published to accompany the Local Plan Submission Draft. Further information is now set out in the Housing Delivery Strategy
31	Lack of range of sites / (too) concentrated allocation (to commercial core and Wirral waters)	4	The Council's spatial strategy is based on its preferred spatial option of Urban Intensification, based on the location of need and opportunity within the Borough. Further information on the Council's site selection process is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
32	Allocations should consider recreational disturbance impacts on coastal designated sites	1	The Local Plan Submission Draft is accompanied by the relevant Habitats Regulations Assessment and provision for appropriate mitigation is now set out in Policy WS 5.5 of the Local Plan Submission Draft.
33	Incomplete evidence base (five year housing supply)	2	The updated five-year housing land supply position is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
34	Objection – pressure on green and open space	1	The Local Plan Submission Draft Policy WS5 seeks to protect and enhance green space whilst Policy WS 10.6 protects existing open space.

Site: HLA 103100 – Former La Banque Public House, Seacombe		
Key Issues	# comments	Council response
Granted planning permission and is below capacity referenced in proposed allocation (needs updating)	7	Noted. The site is now under construction for 19 flats and is no longer included as a proposed allocation in the Local Plan Submission Draft.

Site: HLA 610600 - Darlington Street, Liscard		
Key Issues	# comments	Council response
Planning application approved – potential to be delivered	6	Noted. The site is now under construction for 10 dwellings and is no longer included as a proposed allocation in the Local Plan Submission Draft.

Site: HLA 612000 - Former Seacombe Ferry Hotel		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	Noted. The site has planning permission for 28 flats. The trajectory has been updated to take account of the most recent available evidence.
Site is in close proximity to SSSIs and SPAs (Mersey Narrows and North Wirral Foreshore SPA & Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA)	1	
Planning application approved – potential to be delivered	6	

HLA 632800 - 1 Rocky Lane, Heswall		
Key Issues	# comments	Council response
Welsh Water are statutory sewerage undertaker	1	Noted. A development of 6 flats has now been completed.

HLA 661200 - Love Lane, Liscard		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	Noted. Permission for 23 dwellings has now lapsed. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan Submission Draft. The trajectory has been updated to take account of the most recent available evidence.
Planning application approved – further assessment required (permission expires Jan 2021 w/ conditions not yet discharged)	6	
Permission no longer valid and should not be counted – deliverable supply overstated	1	

HLA 664300 - Ashbourne House, Heswall		
Key Issues	# comments	Council response

Welsh Water are statutory sewerage undertaker	1	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA7.4) and the trajectory has been updated to take account of the latest evidence.
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HLA 665400 – 31-33 Palm Grove, Oxton		
Key Issues	# comments	Council response
Permission expired and cannot be considered deliverable..	6	Noted. Permission to demolish the bungalow and industrial building and erect 10 apartments has now lapsed. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan Submission Draft.

HLA 667900 – Moonshine, The Akbar, Heswall		
Key Issues	# comments	Council response
Permission expired and cannot be considered deliverable – deliverable supply overstated	1	Noted. Permission for an additional dwelling has lapsed. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan Submission Draft. The trajectory has been updated to take account of the most recent available evidence.

HLA 670900 - 5 Uplands Road, Bromborough		
Key Issues	# comments	Council response
Development allegedly commenced, unsure of why they were consulted	1	Noted. Site is registered as under construction. The trajectory has been updated to take account of the most recent available evidence.

HLA 671500 - 5 Birchmere, Heswall		
Key Issues	# comments	Council response
Covenant on land that prevents development	1	Noted. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan
Sewage (blocked)	1	
Flood risk (surface run off	1	

Expired planning permission	1	Submission Draft. The trajectory has been updated to take account of the most recent available evidence.
Council cannot guarantee delivery	1	

HLA 671800 – Grazing Land, Leasowe Road		
Key Issues	# comments	Council response
Permission expired and cannot be considered deliverable – deliverable supply overstated	6	Noted. Permission for 10 dwellings has now lapsed. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan Submission Draft. The trajectory has been updated to take account of the most recent available evidence.

HLA 674900 - Rosebrae Nursing Home, Bromborough		
Key Issues	# comments	Council response
Application approved, conditions to be discharged – potential to be delivered	6	Noted. The site has permission for 12 flats. The trajectory has been updated to take account of the most recent available evidence.

HLA 678100 - Co Operative Pharmacy, Lower Heswall		
Key Issues	# comments	Council response
Welsh Water are statutory sewerage undertaker	1	Noted. The site has been cleared and now has permission 3 flats. The trajectory has been updated to take account of the most recent available evidence.

HLA 682100 - Beechfield Close, Gayton		
Key Issues	# comments	Council response
Welsh Water are statutory sewerage undertaker	1	Noted. Permission for a single dwelling has now lapsed. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan Submission Draft. The trajectory has been updated to take account of the most recent available evidence.

HLA 679400 - 3 Dale Gardens, Heswall		
Key Issues	# comments	Council response
Welsh Water are statutory sewerage undertaker	1	Noted. The site has permission for a single new dwelling. Access has been provided but the building has not yet commenced. The trajectory has been updated to take account of the most recent available evidence.

HLA 689300 – 20 Parklands Drive, Gayton		
Key Issues	# comments	Council response
Welsh Water are statutory sewerage undertaker	1	Noted. The site has permission for a dormer bungalow. Conditions are being discharged. The trajectory has been updated to take account of the most recent available evidence.

HLA 690300 - Old Tavern Club, New Brighton		
Key Issues	# comments	Council response
Planning Application approved. Some conditions discharged – Potential to be delivered	2	Noted. A development of 14 flats has now been completed.
Application awaiting decision - Site does not have permission for housing and cannot be considered to be deliverable	2	
Planning Application approved. Discharge of conditions application awaiting decision – Potential to be delivered	4	

HLA 693500 – Woodcote, North Drive, Gayton		
Key Issues	# comments	Council response
Welsh Water are the statutory sewerage undertaker	1	Noted. The development of a single new dwelling has now been completed.

HLA 693000 - 165 Bedford Road, Rock Ferry		
Key Issues	# comments	Council response

Application awaiting decision - Site does not have permission for housing and cannot be considered to be deliverable.	3	The site now has permission for 14 flats. The trajectory has been updated to take account of the most recent available evidence.
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HLA 694700 – Grangewood, Anthony's Way, Gayton		
Key Issues	# comments	Council response
Welsh Water are the statutory sewerage undertaker	1	Noted. The site is now under construction for a single dwelling. The trajectory has been updated to take account of the most recent available evidence.

HLA 695900 - 71 Dawstone Road, Gayton		
Key Issues	# comments	Council response
Welsh Water are the statutory sewerage undertaker	1	Noted. Permission for a single dwelling has now lapsed. The trajectory has been updated to take account of the most recent available evidence.

HLA 698300 - Church Street / Liscard Road, Liscard		
Key Issues	# comments	Council response
Planning Application approved. Discharge of conditions application registered – Potential to be delivered.	6	Noted. The site has permission for 10 flats for affordable rent. The trajectory has been updated to take account of the most recent available evidence.

HLA 699300 - Acre Lane, Bromborough		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	Noted. The site is under construction for 217 dwellings. The trajectory has been updated to take account of the most recent available evidence.
Planning Application approved - Potential to be delivered dependent on housing delivery rates.	6	

HLA 701500 - Former Riverside Day Centre, Duke Street, Birkenhead		
Key Issues	# comments	Council response

Planning Application approved. Conditions to be discharged – Potential to be delivered.	6	Noted. The site is now under construction for 13 affordable dwellings. The trajectory has been updated to take account of the most recent available evidence.
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HLA 702000 - Ferny Brow Road, Woodchurch		
Key Issues	# comments	Council response
Planning Application approved. Some conditions discharged – Potential to be delivered.	5	Noted. The site is now under construction for 18 affordable dwellings. The trajectory has been updated to take account of the most recent available evidence.

HLA 702900 - 26 Cornelius Drive, Irby		
Key Issues	# comments	Council response
Objection – Development would increase traffic and road parking	1	Noted but the site is now under construction for 7 dwellings. The trajectory has been updated to take account of the most recent available evidence.
Planning Application approved. Conditions yet to be discharged – Potential to be delivered	6	

HLA 703100 - Adj. St Peters Primary School, Heswall		
Key Issues	# comments	Council response
Welsh Water are statutory sewerage undertaker	1	Noted. The development of a single dwelling has now been completed.

HLA 703800 - Fishers Lane, Pensby		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	
Allocations should be brownfield only, not green space	2	
Objection – traffic issues in area/adjacent road	1	
Planning Application approved. All conditions discharged – Potential to be delivered.	6	

SHLAA 0218 - Woodchurch Road (65-67)		
Key Issues	# comments	Council response

Undetermined application – deliverability as part of 5 year housing land supply not certain	1	Noted. An application for 5 flats has still not been determined and the site has been reused for vehicle storage. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan Submission Draft. The trajectory has been updated to take account of the most recent evidence.
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SHLAA 0424 - Europa Boulevard Car Park, Birkenhead		
Key Issues	# comments	Council response
No application or sign of development - deliverability as part of 5 year housing land supply not certain	1	Noted. The site is allocated for residential development in the Local Plan Submission Draft (RES-RA4.3) within Master Plan Area MPA-RA4.1 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Move delivery of units to longer term	1	
SHLAA 0424 – Europa Car Park; SHLAA 4082 – Vue Cinema; SHLAA 0956 – Europa North; SHLAA 0957 – Europa South rolled into one allocation	1	
Public consultation has altered number of homes that can be provided	1	
Support – site is developable and deliverable	1	
No application submitted. SHLAA indicates delivery of 50 units in years 1-5 – Very unlikely to be delivered.	6	

SHLAA 0475 - New Street, Seacombe		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	Noted. The site is now under construction for 32 dwellings. The trajectory has been updated to take account of the most recent available evidence.

SHLAA 0478 - Rose Brae, Woodside		
Key Issues	# comments	Council response
Historical riverside location	1	

Restriction of access	2	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA3.4). The trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Units not currently developable because of ground conditions	2	
Adjacent to Liverpool Bay SPA – impacts should be considered	1	
Site deleted from Wirral Growth Company trajectory	1	
Remove from housing trajectory	1	

SHLAA 0557 - Beaufort Road, Birkenhead		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	Noted. The site is now under construction for 178 new dwellings. The trajectory has been updated to take account of the most recent available evidence.
Does not reflect approach of East Float Outline Permission (EFOP)	1	
Planning Application approved. Developers on site – Potential to be delivered in 5 years depending on housing delivery rates.	1	

SHLAA 0689 – Former Gladstone Liberal Club, Tranmere		
Key Issues	# comments	Council response
Site not deliverable under 5 year time frame	1	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA3.1). The trajectory has been updated to take account of the most recent available evidence.
Adjacent to plant hire depot – amenity issues	1	
Site currently in recreational use – must demonstrate site is surplus to recreational requirements	1	

SHLAA 0752 – Woodside Approach		
Key Issues	# comments	Council response
Units not currently developable on this site	2	Noted. The site has not been allocated for residential development in the Local Plan Submission Draft but is included in the Birkenhead Waterfront Regeneration Area within Master Plan Area MPA-RA3.1.
Adjacent to Liverpool Bay SPA – direct and indirect impacts need considered	1	
Delivery rate overstated	2	
Flood zone consideration required upon potential application submission	1	Heritage and flood risk will be addressed under proposed Local Plan Policy RA3. A clause to address flood risk has been included in Policy RA3. Further information is set out in the
Heritage asset consideration required upon potential application submission	1	

Significant remediation required	1	Housing Delivery Strategy which accompanies the Local Plan Submission Draft
Major transport infrastructure challenges (bus and roads)	1	

SHLAA 0753 - Wirral Waters, Marina View		
Key Issues	# comments	Council response
Allocations should be made on brownfield only/Council should consider brownfield only (Green Belt does not need to be used)	2	The site is previously developed and subject to existing port-related uses.
Supports development of Wirral Waters and Wirral waterfront	13	Noted.
Option 1b should be used	1	The site was only identified for potential development in the longer term, so option 1b would not be appropriate.
Higher intensification / allocation to strategic regeneration sites needed	1	The site is not proposed to be allocated for residential development in the Local Plan Submission Draft but is included within Master Plan Area MPA-RA6.1. The trajectory has been updated to take account of the most recent available evidence.
Flood risk	1	
Site can provide for enough/greater housing than planned	2	
Considerable infrastructure required – current poor pedestrian access	2	
Considerable infrastructure required – current very limited public transport	2	
Considerable infrastructure required – highways upgrades	2	
Realistic deliverability/figures overstated	2	
Units are not currently developable on this site – no developer/programme yet identified	4	
Proximity and close proximity to designated sites – strategic mitigation and protection required	1	
Market constraints	1	
Reduce density for more realistic capacity	1	

SHLAA 0753 - Wirral Waters, Vittoria Studios		
Key Issues	# comments	Council response

Allocations should be made on brownfield only/Council should consider brownfield only (Green Belt does not need to be used)	1	The site is previously developed and subject to existing port-related uses.
Supports development/allocation of Wirral Waters and Wirral waterfront	16	Noted
Option 1b should be used	1	
Higher intensification / allocation to strategic regeneration sites needed	1	
Site can provide for enough/greater housing than planned	2	
Considerable infrastructure required – current poor pedestrian access	2	
Considerable infrastructure required – current very limited public transport	2	
Considerable infrastructure required – highways upgrades	2	
Realistic deliverability/figures overstated	2	
Units are not currently developable on this site – no developer/programme yet identified	1	
Proximity and close proximity to designated sites – strategic mitigation and protection required	1	
Market constraints	1	
Flood risk	1	
Extant planning permission establishes principle of development	1	

SHLAA 0916 - Grange Hill Farm, West Kirby		
Key Issues	# comments	Council response
Development would increase existing high traffic and parking issues on a dangerous road in proximity to schools	5	The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA6.4 refers). The accompanying transport assessment indicates that any highway issues will be capable of appropriate resolution.
3009 and 0916 are separate and distinct sites	1	Planning permission has already been granted on SHLAA 3009. Joining the sites together will allow a more

		comprehensive development to take place.
Approval of lifting of restrictive covenants on site is in breach of Council procedure	5	Restrictive covenants are subject to separate legal procedures and can be lifted by agreement or by application to the Upper Tribunal. The principle of lifting the Council's covenants on this site has already been agreed as part of a formally approved report.
Site is of biological, geological and environmental importance (birds, bats, foxes) (Dee Estuary SPA Ramsar and SSSI linked land). The site should be designated green belt protections	4	The site is not currently subject to any environmental designations and is not identified as a supporting habitat for an international site. The site is in the urban area and is not in the Green Belt.
Development would be unsightly and out of character with area	2	Any future proposals will need to meet the requirements for design set out in proposed Local Plan Policy WS7.1 and Policy WP6.3 in the Local Plan Submission Draft.
Development would reduce green space – allocation should not be on greenfield space	1	The site is not designated as Urban Greenspace and is not part of the surrounding recreational land at Grange Hill or Greenbank Cemetery, which will continue to be protected under other policies in the Local Plan Submission Draft.
Units are not currently developable on this site – no developer/programme yet identified	1	The future development of this site is now being actively promoted by the landowner. The trajectory has been updated to take account of the most recent available evidence.
Council have not consulted with brownfield landowners (allocation should not be on greenfield land)	1	The Council's Strategic Housing Land Availability Assessment (SHLAA) has been updated to April 2021 and is kept under constant review. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
No mention of EIA	1	Any future planning application(s) will need to comply with any necessary statutory requirements.

SHLAA 0956 - Europa Boulevard Frontage North, Birkenhead		
Key Issues	# comments	Council response

Proposed density too high	1	Noted. The site is now proposed to be allocated for residential development as part of a larger site in the Local Plan Submission Draft (RES-RA4.2) within Master Plan Area MPA-RA4.1 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Timeframe / deliverability unrealistic – no developer	1	
Sites at SHLAA 0424 – Europa Car Park; SHLAA 4082 – Vue Cinema; SHLAA 0956 – Europa North; SHLAA 0957 – Europa South should be rolled into one allocation	1	
Support – site is developable and deliverable over plan period	1	

SHLAA 0957 – Europa Boulevard Frontage South, Birkenhead		
Key Issues	# comments	Council response
Proposed density too high	1	Noted. The site is now proposed to be allocated for residential development as part of a larger site in the Local Plan Submission Draft (RES-RA4.2) within Master Plan Area MPA-RA4.1 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Timeframe / deliverability unrealistic – no developer	1	
Sites at SHLAA 0424 – Europa Car Park; SHLAA 4082 – Vue Cinema; SHLAA 0956 – Europa North; SHLAA 0957 – Europa South should be rolled into one allocation	1	
Support – site is developable and deliverable over plan period	1	

SHLAA 1171 - Egerton Street Play Area, New Brighton		
Key Issues	# comments	Council response
No certainty of deliverability under 5 year housing land supply – undetermined application	1	The site is now under construction for 7 houses and 5 flats. The trajectory has been updated to take account of the most recent available evidence.

SHLAA 1472 – Former Fernleigh, Leasowe		
Key Issues	# comments	Council response
Capacity and trajectory feasible	1	Noted. The site now has permission for 30 dwellings over a larger site area and the trajectory has been updated to take account of the most recent available evidence.
No obvious constraints	1	
Movement of unit completion to years 6-10	1	
No application yet submitted	1	

SHLAA 1610 - Civic Way, Bebington		
Key Issues	# comments	Council response
Capacity and trajectory feasible	1	
No obvious constraints	1	
Movement of unit completion to years 6-10	1	
No application yet submitted	1	
Support – site is developable and deliverable over plan period	1	
Planning application approved	1	
Site adjacent to Lower Bebington CA with Grade II listed to the south of the site	1	
Site designated as Primary Commercial Area	1	
Realistic deliverability / figures / timeframe overstated	6	

SHLAA 1620 - Lorn Street, Birkenhead		
Key Issues	# comments	Council response
Realistic deliverability / figures / timeframe overstated	1	
Neighbouring industrial uses may give rise to noise and amenity issues	1	
Heavily constrained by industrial uses	1	
Heavily constrained by Queensway Mersey Tunnel	1	
Support – site is developable and deliverable over plan period	1	
No principle of residential development established	1	
Grade II listed building setting needs considered	1	
Site designated as Primary Commercial Area	1	

SHLAA 1665 – Former Rock Ferry High School		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	

Support – site is developable and deliverable over plan period	1	Noted. The site is now under construction for 178 dwellings, including 102 extra care units for independent living.
Planning Application approved. Pre commencement conditions to be discharged – Extra care apartments should not be included in housing trajectory	6	

SHLAA 1827 – Former Foxfield School, Moreton		
Key Issues	# comments	Council response
Support – site is developable and deliverable over plan period	1	The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA5.4 refers). The site is being brought forward by the Wirral Growth Company following pre-application public consultation. The trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Objection – construction access	1	
Objection – design is not in keeping with the area	1	
Objection – need for off street parking	1	
Objection – increased traffic volume nearby	1	
No known infrastructure constraints	1	
Capacity and trajectory feasible	1	
No further application submitted. SHLAA indicates 69 units to be delivered in years 1-5 – Very unlikely to be delivered		

SHLAA 1832 - Rock Station Hotel, Rock Ferry		
Key Issues	# comments	Council response
Capacity and trajectory feasible	1	Noted. The site now has permission for 25 flats. The trajectory has been updated to take account of the most recent available evidence.

SHLAA 1850 – Former Lyndale School, Eastham		
Key Issues	# comments	Council response
Capacity and trajectory feasible	1	Noted. The site is now under construction for 28 dwellings. The trajectory has been updated to take account of the most recent available evidence.
Objection – green space being developed	80	
Objection – no need to release any Green Belt Land	1	

Objection – Unnecessary allocation	1	
More sites to be added to brownfield register	1	

SHLAA 1974 - Eastham Youth Centre		
Key Issues	# comments	Council response
Support – site is developable and deliverable over plan period	1	The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA4.5). Proposals for the re-location of the youth centre are currently underway on another site. The trajectory has been updated to take account of the most recent available evidence.
Capacity and trajectory appropriate	1	

SHLAA 2002 - Duncan Street Car Park, Birkenhead		
Key Issues	# comments	Council response
Support – site is developable and deliverable over plan period	1	
Proximity to heritage assets and CA	1	
Primary Commercial Area	1	
Capacity and trajectory feasible	1	
Site is not deliverable	1	Noted. The site is not allocated for residential development but is included within a proposed Mixed Use Area in the Local Plan Submission Draft (MUA-RA4.1 refers). The trajectory has been updated to take account of the most recent available evidence. Heritage issues will be addressed under proposed Local Plan Policy RA4. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.

SHLAA 2005 - Gibson House, Egremont		
Key Issues	# comments	Council response
Site in close proximity to Mersey Narrows and North Wirral Foreshore SPA & Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA	1	The site now has planning permission for 11 new-build flats and four houses and the conversion of Gibson House. The conversion is now underway but construction has not yet started on the new-build elements of the approved proposals. The trajectory has been updated to take account of the most recent available evidence.

SHLAA 2006 - Rear of Gibson House, Egremont		
Key Issues	# comments	Council response
Not developable over 5 years	1	The site now has planning permission for 87 new-build flats. The conversion of the adjacent existing mariner's home is now underway but construction had not yet started on the new-build elements of the approved proposals. The trajectory has been updated to take account of the most recent available evidence.
Allocation in close proximity to Mersey Narrows and North Wirral Foreshore SPA & Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA	1	
Deliverable over plan period	1	

SHLAA 2008 - Moreton Family Centre		
Key Issues	# comments	Council response
Support – site is developable and deliverable in line with current schedule	1	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA5.1 refers). The site is being brought forward by the Wirral Growth Company following pre-application public consultation. The trajectory has been updated to take account of the most recent available evidence.
(Suggested) movement of delivery to years 6-10	1	
Not deliverable under years 1-5 / current timescale	1	Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.

SHLAA 2007 - Pasture Road, Moreton		
Key Issues	# comments	Council response
Site is not policy compliant	1	The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA5.7 refers). The site is being brought forward by the Wirral Growth Company following pre-application public consultation. The trajectory has been updated to take account of the most recent available evidence.
Not developable	1	
Site is not deliverable	1	
Site is developable and deliverable in line with schedule	1	
Planning Application approved. No application for remaining units – Only part of the allocation likely to be delivered.	6	The site is within 720m of Lingham Park and on-site open space may be required subject to the number and
Lack of supporting infrastructure - highways	1	

Site is allocated as urban greenspace	1	layout of the units eventually brought forward, in line with Policy WS5.2 of the Local Plan Submission Draft. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Sports facility presence could cause delay	1	

SHLAA 2014 - Conway Building, Birkenhead		
Key Issues	# comments	Council response
Objection – impact on heritage (Grade II listed building)	1	The site is not proposed to be allocated for residential development but is included in the Birkenhead Central Regeneration Area within Master Plan Area MPA-RA4.1 in the Local Plan Submission Draft. Heritage issues will be addressed under proposed Local Plan Policy RA4. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Objection – should be considered for cultural use	1	
Capacity and trajectory appropriate	1	
Support – site is developable and deliverable under current schedule	1	

SHLAA 2022 - Wallasey Town Hall North Annexe, Egremont		
Key Issues	# comments	Council response
Allocation in close proximity to Mersey Narrows and North Wirral Foreshore SPA & Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA	1	The site is not allocated for residential development but is included in the Seacombe Corridor Regeneration Area within Master Plan Area MPA-RA1.1 in the Local Plan Submission Draft. The trajectory has been updated to take account of the most recent available evidence. Heritage issues will be addressed under proposed Local Plan Policy RA1. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Grade II listed buildings in proximity require consideration	1	
Delivery highly unlikely years 1-5	2	
Support – site is developable and deliverable under current schedule	1	

SHLAA 2023 - Wallasey Town Hall South Annexe, Egremont		
Key Issues	# comments	Council response

Allocation in close proximity to Mersey Narrows and North Wirral Foreshore SPA & Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA	1	The site is not allocated for residential development but is included in the Seacombe Corridor Regeneration Area within Master Plan Area MPA-RA1.1 in the Local Plan Submission Draft. The trajectory has been updated to take account of the most recent available evidence. Heritage issues will be addressed under proposed Local Plan Policy RA1. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Relocation strategy required for current site use	1	
Delivery highly unlikely years 1-5	2	
Support – site is developable and deliverable under current schedule	1	

SHLAA 2026 - Treasury Building, Birkenhead		
Key Issues	# comments	Council response
Site is not suitable for development	1	Noted. The site is not allocated for residential development but is included within a proposed Mixed Use Area in the Local Plan Submission Draft (MUA-RA4.1 refers). Heritage issues will be addressed under proposed Local Plan Policy RA4.
Proposed density inappropriate (Hamilton Square CA)	1	
Support – site is developable and deliverable under current schedule	1	

SHLAA 2035 - Paton Close, West Kirby		
Key Issues	# comments	Council response
Objection – traffic impact of intensification (school proximity)	1	A development for 11 dwellings has now been completed.

SHLAA 2036 - Elgin Way Car Park, Birkenhead		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	Noted but the site is not allocated for residential development but has been included within a proposed Mixed Use Area in the Local Plan Submission Draft (MUA-RA4.1 refers).
Support – site is developable and deliverable under current schedule	1	

SHLAA 2042 - Ashton Court, West Kirby		
Key Issues	# comments	Council response
Empty flats could be renovated for occupation (Object to demolition)	2	The site now has permission for 14 townhouses, which were allowed on appeal. The trajectory has been

		updated to take account of the most recent available evidence.
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SHLAA 2068 – Typhoo, Reeds Lane, Leasowe		
Key Issues	# comments	Council response
Site requires sequential and exception test (flood zone 3a)	1	Part of the site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA5.3). The site is being actively promoted and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy and in the sequential and exception test background paper which accompany the Local Plan Submission Draft.
No developer interest	2	
Delivery uncertain / overstated during current timescales	2	
Allocation has the potential to cause disturbance to functionally linked land for bird species associated with the Mersey Narrows and North Wirral Foreshore SPA, Ramsar and North Wirral foreshore SSSI.	1	
Application dismissed at an appeal. No developer on board – Very unlikely to be delivered	6	

SHLAA 2069 - Hinson Street Car Park, Birkenhead		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	Noted but the site is not allocated for residential development and is included within a proposed Mixed Use Area in the Local Plan Submission Draft (MUA-RA4.1 refers).
Support – site is developable and deliverable under current schedule	1	

SHLAA 2078 - Wirral Waters, Urban Splash 1, Seacombe		
Key Issues	# comments	Council response
Allocations should be made on brownfield only/Council should consider brownfield only (Green Belt does not need to be used)	1	The site is cleared, previously developed dockland and is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA6.3) within Master Plan Area MPA-RA6.1. As the site is expected to be completed within the early years of the Plan period, option 1b (a stepped trajectory) would not be relevant.
Supports development/allocation of Wirral Waters and Wirral waterfront	14	
Option 1b should be used	1	

Higher intensification / allocation to strategic regeneration sites needed	1	The first phase of the site now has permission for 30 townhouses and is already under construction. The developer expects to submit proposals for at least further 90 dwellings on this site. The trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Capacity and trajectory feasible	1	
Site can provide for enough/greater housing than planned	2	
Realistic schedule deliverability/figures overstated	2	
Proximity and close proximity to designated sites – strategic mitigation and protection required	1	
Flood risk	1	
Planning Application approved. Discharge of Conditions and remediation required, no application for remaining units – Unlikely to deliver all units allocated in 5 years	6	

SHLAA 2079 - Wirral Waters, Belong, Seacombe		
Key Issues	# comments	Council response
Allocations should be made on brownfield only/Council should consider brownfield only (Green Belt does not need to be used)	1	The site is cleared, previously developed dockland and is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA6.7) within Master Plan Area MPA-RA6.1. The site is expected to be completed within the early years of the Plan period and so option 1b (a steeped trajectory) would not be relevant.
Supports development/allocation of Wirral Waters and Wirral waterfront	14	
Option 1b should be used	1	
Higher intensification / allocation to strategic regeneration sites needed	1	The site now has planning permission for a specialist care village including 34 flats for independent living. The trajectory has been updated to take account of the most recent available evidence. Have specialist care unit have not been included.
Site can provide for enough/greater housing than planned	2	
Capacity and trajectory feasible	1	
Realistic schedule deliverability/figures overstated	1	
Proximity and close proximity to designated sites – strategic mitigation and protection required	1	
Flood risk	1	
Extra care apartments should not be included in housing trajectory	6	

Planning Application approved. Discharge of conditions and remediation required – Potential for delivery within 5 years	6	
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SHLAA 2080 - Wirral Waters, Tower Road, Seacombe		
Key Issues	# comments	Council response
Allocations should be made on brownfield only/Council should consider brownfield only (Green Belt does not need to be used)	1	The site is cleared, previously developed dockland and is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA6.5) within Master Plan Area MPA-RA6.1.
Supports development/allocation of Wirral Waters and Wirral waterfront	13	
Option 1b should be used	1	
Higher intensification / allocation to strategic regeneration sites needed	1	
Site can provide for enough/greater housing than planned	2	
Realistic schedule deliverability/figures overstated	2	
Proximity and close proximity to designated sites – strategic mitigation and protection required	1	
Flood risk	1	
Planning Application approved. No application for housing – Unlikely to deliver all, if any, units allocated in 5 years	4	

SHLAA 2081 - Wirral Waters, Legacy, Seacombe		
Key Issues	# comments	Council response
Allocations should be made on brownfield only/Council should consider brownfield only (Green Belt does not need to be used)	1	The site is cleared, previously developed dockland and is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA6.6) within Master Plan Area MPA-RA6.1. As the site is expected to be completed within the early years of the Plan period, option 1b (a stepped trajectory) would not be relevant.
Supports development/allocation of Wirral Waters and Wirral waterfront	15	
Option 1b should be used	1	
Higher intensification / allocation to strategic regeneration sites needed	1	A development of 500 flats in six blocks commenced in February 2022.

Site can provide for enough/greater housing than planned	2	The trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Realistic schedule deliverability/figures overstated	2	
Proximity and close proximity to designated sites – strategic mitigation and protection required	1	
Flood risk	1	
Planning Application approved. Site remediation and demolition works required – Additional evidence of deliverability and build rates required - Unlikely to deliver all 500 units.	6	

SHLAA 2082 - Wirral Waters, Urban Splash 2, Seacombe		
Key Issues	# comments	Council response
Allocations should be made on brownfield only/Council should consider brownfield only (Green Belt does not need to be used)	2	The site is cleared, previously developed dockland and is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA6.4) within Master Plan Area MPA-RA6.1. As the site is expected to be completed within the early years of the Plan period, option 1b (a stepped trajectory) would not be relevant.
Supports development/allocation of Wirral Waters and Wirral waterfront	15	
Option 1b should be used	2	
Higher intensification / allocation to strategic regeneration sites needed	3	
Site can provide for enough/greater housing than planned	2	
Realistic schedule deliverability/figures overstated	2	
Proximity and close proximity to designated sites – strategic mitigation and protection required	1	
Flood risk	1	
No application submitted. SHLAA indicates no developer on board – Very unlikely to be delivered.	6	
Site can be delivered in years 6-10 of the Plan period.	1	

SHLAA 3029 - Silverdale Medical, Heswall
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Key Issues	# comments	Council response
Welsh Water are statutory sewerage undertaker – no comment	1	The site is now under construction to provide a ground floor commercial unit and 9 flats. The trajectory has been updated to take account of the most recent available evidence.

SHLAA 3095 - Greenfield Estate, West Kirby		
Key Issues	# comments	Council response
Objection – increased housing will cause traffic issues	25	The site is proposed to be designated as a Local Green Space under paragraphs 101 to 103 of the NPPF in the Local Plan Submission Draft (LGS-SA6.3 refers). Further information is set out in Policy WS10.6 and within the Review of Local Green Space Applications.
Objection – increase /impact pollution	4	
Objection – potential loss of (protected) trees	7	
Objection – loss of green space	25	
Objection – adverse visual impact	21	
Objection – site exchange of west kirby fire station with adjacent car park	2	
Objection – loss of biodiversity / wildlife habitat	21	
Objection – loss of character	10	
Objection – impact on heritage	12	
Objection – increased public service demand	5	
Objection – access/pedestrian issues	8	
Objection – prone to flooding	2	
Realistic schedule deliverability/figures overstated – no developer	2	
No application submitted - Very unlikely to be delivered.	6	
Support – If boundary sandstone walls locally listed	1	
Support – Good amenities	1	
Support – achievable	1	

SHLAA 4072 - Trafalgar Garage, Bebington		
Key Issues	# comments	Council response
Pedestrian access issues	1	

Realistic schedule deliverability/figures overstated – undetermined application	3	Noted. An application for 26 flats has still not been determined and the site is still in use as a petrol filling station. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan Submission Draft. The trajectory has been updated to take account of the most recent evidence.
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SHLAA 4078 - Hind Street, Tranmere		
Key Issues	# comments	Council response
Support – Site developable and deliverable	4	Noted. The site is now proposed to be allocated for residential development as part of a larger site in the Local Plan Submission Draft (RES-RA5.1) within Master Plan Area MPA-RA5.1. The trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Support - Site allocation should be extended	4	
Support – good transport links	4	
Support – good amenity for potential residents	1	
Realistic schedule deliverability/figures overstated	3	

SHLAA 4079 - Woodhead Street CP, New Ferry		
Key Issues	# comments	Council response
Loss of car parking provision	1	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA11.2) within Master Plan Area MPA-RA11.1. The trajectory has been updated to take account of the most recent available evidence.
Site located in CA	2	
Capacity and trajectory appropriate	1	

SHLAA 4080 - Olinda Street Car Park, New Ferry		
Key Issues	# comments	Council response
Capacity and trajectory appropriate	1	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA11.2) within Master Plan Area MPA-RA11.3. The trajectory has been updated to take account of the most recent available evidence.

SHLAA 4081 - Europa Pools, Birkenhead		
Key Issues	# comments	Council response
Realistic schedule deliverability/figures overstated – longer term needed	1	Noted. The site has not been allocated for residential development in the Local Plan Submission Draft but is included in the Central Birkenhead Regeneration Area wthin Master Plan Area MPA-RA4.1. The trajectory has been updated to take account of the most recent available evidence.
No longer being redeveloped as part of emerging masterplan	1	

SHLAA 4082 - Vue Cinema		
Key Issues	# comments	Council response
Support – developable and deliverable over plan period	1	Noted. The site is now proposed to be allocated for residential development as part of a larger site in the Local Plan Submission Draft (RES-RA4.2) within Master Plan Area MPA-RA4.1 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Realistic schedule deliverability/figures overstated – site not currently available	1	
Sites at SHLAA 0424 – Europa Car Park; SHLAA 4082 – Vue Cinema; SHLAA 0956 – Europa North; SHLAA 0957 – Europa South should be rolled into one allocation	1	

Site: SHLAA 4014 - The Stirrup Public House		
Key Issues	# comments	Council response
Objection - Loss of habitat	1	The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA5.5 refers). Permission has been granted for 15 dwellings but applications have been submitted to provide up to 46 affordable extra care apartments for independent living.
Objection - Loss of open view	1	
Objection - Adverse Visual Impact	1	
Realistic schedule deliverability/figures overstated	1	
Supports – should have more units	1	The trajectory has been updated to take account of the most recent available evidence.

Site: HLA 685200 Former Burtons Foods, Moreton		
Key Issues	# comments	Council response

Granted planning permission is below capacity referenced in proposed allocation	1	Noted. The site is now under construction for 259 new dwellings and the trajectory has been updated to take account of the most recent available evidence.
Planning permission approved – Potential to be delivered dependent on housing delivery rates	5	

**Q4.3: Do you have any comments on the potential additional urban housing allocations set out in Appendix 4.2? Will they also be deliverable or developable?**

Site: All Potential Additional Urban Housing Allocation Sites		
Key Issues	# comments	Council Response
Need for council to consult with all landowners of brownfield sites who wish to sell	92	The Council's Strategic Housing Land Availability Assessment (SHLAA) has been updated to April 2021 and is kept under constant review. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Ensure register of urban sites is comprehensive and up to date	84	
Site selection criteria / methods questions	2	
Housing supply necessity and figures questioned	6	
Table 4.2 sites are not developable or deliverable in line with NPPF	3	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Option 1A sites against national policy on developability and deliverability (NPPF para 67)	1	
Option 1B should be used	1	Noted. The Council has taken the preferred spatial Option 1A of Urban Intensification forward into the Local Plan Submission Draft. The Council now considers that the future land supply will be sufficient to provide for the early years of the plan period in full but Option 1b may need to be reconsidered subject to the evidence submitted to the public examination and the views of the Planning Inspector(s) appointed to examine the soundness of the Local Plan.
Option 2A dispersed green belt release would support (de-risk) urban intensification	1	Noted but the Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft does not involve the release of land from the Green Belt.
General support for the additional housing allocations	2	Support noted.
Allocation of sites west of M53 not required / Allocation East of M53 preferred (Birkenhead and Wirral Waters)	3	Support noted.
Need for development / intensification on brownfield sites over green belt release	6	Support noted.
Ensure transport links for new development	1	The Council has produced a detailed Infrastructure Delivery Plan which sits alongside this Local Plan. It contains
Need for new development to have adequate infrastructure	1	

Development could overwhelm local / public services	1	information in respect of: the infrastructure required to support the development contained in the Local Plan; the costs; the period over which it needs to be delivered in relation to the development it supports; which organisation is responsible for it and how it will be funded.
Need for new development to have adequate / integrated green space	2	The provision of green space is set out in Policy WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection.
Need for new development to be carbon zero	1	Zero carbon design requirements are set out in Policy WS 3.1 Housing Design Standards.
Amount of development / intensification proposed not viable or achievable / overstated	8	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Greater dispersal of sites required (too concentrated on commercial core)	2	
Intensification options that are not proven to be deliverable or developable have been included (additional evidence required)	10	
Additional allocations required to ensure housing needs met	2	
Sites that fail flood risk sequential and exception test should not be allocated	1	The relevant flood risk assessments have now been prepared at both Level 1 and Level 2, including, where necessary, a sequential test and exception test assessment.
Flood risk (Moreton)	1	
Green Belt sites not required to meet housing needs	1	Noted, no Green Belt release is proposed.
Maps unclear	1	Noted. The Council has revised the mapping made available alongside the Local Plan Submission Draft.
Green belt release would impact environment	1	Noted, no Green Belt release is proposed.
New development should retain trees	1	Local Plan Submission Draft Policy WD 1.2 sets out how the protection and replacement of trees affected by development will be dealt with.
New development should retain / protect access	1	Controls over amenity and access are set out in Policy WS7 Principles of Design of the Local Plan Submission Draft.
New development should respect rights to light	1	
Green belt release would impact character of villages and towns	1	Noted, no Green Belt release is proposed.
Development would impact environment / contribute to climate change	1	Climate change mitigation and adaptation design requirements are set out in Policy WS 8.2 Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage and housing space standards in Policy WS 3.1 Housing Design Standards.

Site: SHLAA 0756 - Northern Case		
Key Issues	# comments	Council Response
Units are not currently developable / deliverable on site	1	Noted but the site is now proposed to be allocated for residential development as part of a larger site in the Local Plan Submission Draft (RES-RA2.2 refers) within Master Plan Area MPA-RA2.2. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
No developer has brought site forward	2	
Currently designated as employment land (Primary Industrial Area)	1	
Additional evidence required to demonstrate deliverability, delivery figure overstated	2	
PDL – costly remedial works required for viability	1	
Remove from housing trajectory	1	

Site: SHLAA 0769 - Kelvin Road		
Key Issues	# comments	Council Response
Units are not currently developable / deliverable on site and should be removed from supply	1	Noted. The site has not been allocated for residential development but has been included within a proposed Mixed Use Area in the Local Plan Submission Draft (MUA-RA2.1 refers).
No developer has brought site forward	2	
Remedial works (access) required	1	
Delivery figure overstated	1	
Site in flood risk zone 3	1	
PDL – costly remedial works required for viability	1	
Additional evidence required to demonstrate deliverability	1	
Remove from housing trajectory	1	

Site: SHLAA 1715 - Old Hall Road		
Key Issues	# comments	Council Response
Units are not currently developable / deliverable on site	3	The site is now proposed to be allocated for residential development as part of a larger site in the Local Plan Submission Draft (RES-SA4.2 refers) within Master Plan Area MPA-SA4.2 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Appropriate amenities and facilities in location for residential development (Leverhulme Sports Ground and Eastham Country Park)	6	
Delivery very unlikely	6	
Concerns around viability and market appeal (due to location in WIBP)	3	
No planning applications submitted	6	
Additional evidence required to demonstrate deliverability	2	
Suitable for residential development	7	
PDL – remedial works required	1	
Site distant from public / services	2	
Site requires infrastructure works and highways input for residential development	1	
Constrained by biodiversity action plan habitat on site / impact on biodiversity (bats and ancient woodland) No development on wildlife habitats.	4	
Proximity / functional link to designated sites (Eastham County Park LWS, Old Hall Road Copse LWS)	3	

Currently designated as and constrained by employment land (Wirral International Business Park)	2	
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Design development to be bat-friendly	1	
Green corridors should be provided	1	
Transport infrastructure cannot cope with increased traffic	1	
Development should be sensitive to Eastham Country Park	1	

Site: SHLAA 1864 - Liscard Municipal		
Key Issues	# comments	Council Response
Current use (Council office) requires relocation prior to development	1	Noted. The site is now proposed to be allocated for residential development as part of a larger site in the Local Plan Submission Draft (RES-RA9.1) within Master Plan Area MPA-RA9.1 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Support and agreement with capacity	1	
Delivery timescales unlikely	2	
Additional evidence required to demonstrate deliverability	1	
Site is not deliverable and should be removed from 5-year supply	1	

Site: SHLAA 1908 - Arrowe Hill Primary		
Key Issues	# comments	Council Response
Site access and scale constraints	1	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA5.9 refers) but with a smaller capacity and the trajectory has been updated to take account of the most recent available evidence.
Agreement with capacity	1	
Delivery timescales unlikely	1	
Site is not deliverable and should be removed from 5-year supply	2	

Site: SHLAA 2013 - Hamilton Building		
Key Issues	# comments	Council Response
Sensitive design required	1	Noted. The site has not been allocated for residential development in the Local Plan Submission Draft but is included in the Central Birkenhead Regeneration Area, within Master Plan Area MPA-RA4-1.
Lies within designated Key Town Centre zone and Employment Development Site	1	
Agreement with capacity	2	
Delivery timescales unlikely and should be removed from 5-year supply	1	
Agreement with trajectory	1	

Site: SHLAA 2016 - Wilbraham Street CP		
Key Issues	# comments	Council Response
Lies within designated Primary Commercial Area zone	1	Noted. The site is now proposed to be allocated for residential development as part of a larger site in the Local Plan
Agreement with capacity	1	

Delivery timescales unlikely and should be removed from 5-year supply	1	Submission Draft (RES-RA5.1 refers) within Master Plan Area MPA-RA5.1. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Site should not be brought forward in isolation	1	

Site: SHLAA 2072 - Prices Way		
Key Issues	# comments	Council Response
Site lies within designated Employment Development Site (WIBP)	2	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA4.6 refers) and the trajectory has been updated to take account of the most recent available evidence.
Agreement with capacity	2	
No planning application submitted	7	
Suitable for residential use	1	
Delivery highly unlikely	6	
Adjacent Bromborough Pool site is developable and deliverable	1	
Agreement with trajectory	1	
PDL – risk of remediation issues	1	
Site is not deliverable and should be removed from 5-year housing supply	1	
Delivery figure overstated	1	
Flood risk constraints	1	
Site requires infrastructure works and highways input for residential development	1	

Site: SHLAA 3039 – Crossways		
Key Issues	# comments	Council Response
Delivery highly unlikely / uncertain	7	Noted. The site has not been allocated for residential development but is shown as part of a Primarily Residential Area in the Local Plan Submission Draft.
No planning application submitted	6	
Delivery timescales unlikely and units should be removed from 5-year supply	2	
Viability concerns	1	
No developer has come forward	2	

Site: SHLAA 4012 - Southwood Road		
Key Issues	# comments	Council Response
Appropriate amenities and facilities in location for residential development (Leverhulme Sports Ground and Eastham Country Park)	6	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA4.3 refers) within Master Plan Area MPA-SA4.2 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Allocations too concentrated on commercial core	1	
Shortfall in deliverable housing trajectory	1	
Site requires infrastructure works (only one access road) and highways input for residential development	1	
Moderate to likely deliver (developer interest)	5	
Viable for residential development	1	
Deliverable under 5-year supply	1	
4.2 potential intensification numbers are not achievable	1	

Site lies within designated Employment Development Site (WIBP)	2	
No planning application submitted	1	
PDL – risk of remediation issues	1	
Delivery timescales unlikely / not deliverable and units should be removed from 5-year supply	3	
Concerns around viability and market appeal (due to location in WIBP)	2	
Additional evidence required to demonstrate deliverability and developability	4	
Presence TPOs on site	1	
Site should be designated as open green space	2	
Light and noise pollution and general disturbance impact on LWS	2	
Constrained by biodiversity action plan habitat on site / impact on biodiversity (bats and ancient woodland)	3	
Proximity / functional link to designated site (LWS Eastham County Park)	4	
Development would be car dependent (distant from public / local services)	2	

Site: SHLAA 4021 - Dock Road South		
Key Issues	# comments	Council Response
Support proposed additional urban housing site	2	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA4.7 refers) within Masterplan Area MPA-SA4.1 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Site is deliverable in line with para 67 NPPF	2	
Development would protect environment and biodiversity through mitigation	2	
Development would create new pedestrian and cycle routes	2	
Development would enhance the quality of the area	2	
Trajectory overstated	2	
Site in proximity to industrial operations / amenity impacts on residential development	2	
Proposals should not result in adverse impact or restrictions on neighbouring industrial uses	1	
PDL – radiation issues (site is former chemical factory)	1	
Access constraints – no road on site	1	
Additional evidence required to demonstrate deliverability and developability as a residential site	1	
Conflict with local policy (2017 Employment Land and Premises Study)	1	
Concerns around viability and market appeal (due to location in WIBP)	1	
Site lies within designated Employment Development Site (WIBP)	1	
Site only deliverable in conjunction with release of neighbouring sites for	1	

residential development as part of a longer-term strategic regeneration area		
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Site: SHLAA 4071 - Kingsmead School		
Key Issues	# comments	Council Response
Loss of recreational facility (school playing field)	1	The site now has permission for 25 dwellings. The trajectory has been updated to take account of the most recent available evidence.
Development resulting in loss of trees	1	
Planning permission now granted	1	
Trajectory appropriate	1	

Site: SHLAA 4083 - Pilgrim Street Arts Centre		
Key Issues	# comments	Council Response
Capacity appropriate	1	Noted. The site has not been allocated for residential development but has been included within a proposed Mixed Use Area in the Local Plan Submission Draft (MUA-RA3.2 refers).
Site lies in Primary Industrial Area designation	1	
Delivery timescales unlikely / not deliverable and units should be removed from 5 year supply	1	

Site: SHLAA 4084 - Wirral Business Park		
Key Issues	# comments	Council Response
Site now has planning permission	1	Noted. The site now has permission for 127 dwellings. The trajectory has been updated to take account of the most recent available evidence.
Trajectory appropriate	1	

Site: SHLAA 4085 - Sevenoaks Extra Care, Chatham Road		
Key Issues	# comments	Council Response
No application submitted	7	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA3.3) and the trajectory has been updated to take account of the most recent available evidence.
Delivery very unlikely	7	
Homes England funding required for certainty of delivery under 5 year housing supply	1	
Delivery timescales unlikely / not deliverable and units should be removed from 5 year supply	1	
Additional evidence required to demonstrate deliverability and developability under 5 year supply	1	

Site: SHLAA 4086 - New Palace Amusements		
Key Issues	# comments	Council Response
Oppose on basis of environmental (traffic pollution) impacts	4	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA10.3) within Master Plan Area MPA-RA10.1 and the trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Adverse impact on character / identity of area	5	
Adverse strain on local / public services	4	
Traffic and parking concerns (parking capacity)	6	
Capacity appropriate	1	
Units are unnecessary / concern of overdevelopment	1	
Trajectory appropriate	1	

Development should be in keeping with "Victorian" facades of existing buildings	1	
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Site: SHLAA 4087 - Dodds Builders Merchants		
Key Issues	# comments	Council Response
Planning application submitted – awaiting determination	1	
Demolition and remediation works required	1	
Delivery timescales unlikely / not deliverable and units should be removed from 5-year supply	1	Noted. The site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-SA5.8) and the trajectory has been updated to take account of the most recent available evidence.

Site: SHLAA 4089 - Wallasey RBL		
Key Issues	# comments	Council Response
Pavements in poor condition	1	
Development should be environmentally friendly (insulation and solar panels)	1	
Construction pollution concerns (dust, site traffic, asbestos, contaminates and burning) given proximity to children's nursery	1	
Traffic safety concerns (accidents Manor Road, Withen's Lane crossroad)	1	
Parking concerns	1	

**Q4.4: Do you have any comments on the other suitable but currently uncertain sites set out in Appendix 4.3? Are they also deliverable or developable within the Plan period?**

All sites		
Key Issues	# comments	Council Response
Insufficient evidence published to comment on question 4.4/further evidence required	11	Noted
Only the Council can answer question 4.4	2	
Objection to care home application on Glebe land, Rectory Road	1	Noted. This site is now proposed to be designated as Local Green Space in the Local Plan Submission Draft (LGS-SA6.2 refers).
Support allocation/consideration of sites in Appendix 4.3	4	Noted
There are urban sites available in the north of the town	81	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
There are urban sites available in the east of the Wirral	1	
Support brownfield development only, including in Birkenhead and Tranmere	4	
Use CPO to avoid Green Belt release	1	
Support Option 2A	1	
Developer/landowner declarations of unviable sites should be ignored	1	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy and the Local Plan Viability Assessment which
Consider sites with planning applications submitted in last 10 years	1	
Suitable but uncertain sites are undevelopable/undeliverable and should not be allocated	9	

Sites with lapsed planning permission, uninterested landowners or that are identified as unviable should not be allocated	2	accompanies the Local Plan Submission Draft.
Encourage development of sites with planning permission	1	
The housing requirement should be higher	1	The Borough's housing needs have been assessed in the Strategic Housing Market Assessment.
The housing requirement is wrong	1	
Reference affordable housing	1	Affordable housing is addressed in Policy WS 3.3 Affordable Housing Requirements.
Infill development should respect amenity of existing development	1	Controls over amenity are set out in Policy WS7.2 Privacy and Amenity of the Local Plan Submission Draft.
Ensure uncongested access to development	1	Using transport modelling software a cumulative traffic impact assessment has been undertaken that accounts for changes associated with planned Local Plan housing and employment together with any committed network updates across the borough.
Retain trees	1	Proposed Local Plan Policy WD 1.2 sets out how the protection and replacement of trees affected by development will be dealt with.
Maps are unclear, cannot comment on question 4.4	1	Noted. The Council has revised the mapping made available alongside the Local Plan Submission Draft.
Subject all proposed allocations to the flood risk Sequential Test and Exception Test where applicable	1	The relevant flood risk assessments have now been prepared at both Level 1 and Level 2, including, where necessary, a sequential test and exception test assessment.
Include suitable but uncertain sites in windfall allowance	6	This would not be in accordance with national planning policy or guidance.

OS254 - Paulsfield Drive Woodland		
Key Issues	# comments	Council Response
Include Paulsfield Drive Woodland in the SHLAA	1	The site is not suitable for development and is proposed to be designated as Urban Open Space (OS-SA5.9 refers) and as Local Wildlife Site (LWS-SA5.1) in the Local Plan Submission Draft.

SHLAA 1267 – Mill Road, Thingwall		
Key Issues	# comments	Council Response
Renew planning consent	1	
Objection-impact on character	1	
Objection-flood risk	1	
Object to allocation of site	1	
Not all brownfield landowners have been consulted	1	
Objection-overlooking	1	

SHLAA 1571 – Duncan Street		
Key Issues	# comments	Council Response
Site cannot be included in 5 year housing land supply due to sensitivities of site	1	The site has not been allocated for residential development but is included within a proposed Mixed Use Area in the Local Plan Submission Draft (MUA-RA4.1 refers). Any future development will need to meet the requirements of proposed Local Plan Policy RA4 as well as any other relevant policy within the Local Plan Submission Draft.

**Q4.5: Do you agree with the Preferred Approach to identify Broad Locations for growth based on regeneration opportunities and priorities in the Local Plan?**

**Summary of responses** - There were 2014 responses to this question. Because of the inconsistent answers it is not possible to give an accurate number of those which supported the Broad Location approach but they were overwhelmingly in favour.

1. More work by the Council is required to validate the 1,100 additional capacity of Hind Street/Woodside over the SHLAA. The importance of 'Partnership Neighbourhoods' to the successful and timely progress of 'Wirral Waters' should not be underplayed against the Council's landmark schemes. Peel and not the Council have a track record of delivery as opposed to aspirational paper plans. The Council should involve the right parties to realise its regeneration aspirations. (1)  
There is no justification for the 12,000 figure. The Local Plan should address the need for Regeneration and Wirral's high level of 'substandard housing' and should deliver 3,000 dwellings instead.

**Council Response:** With regard to housing numbers please see response to Q2.1.

With regard to Hind Street since the publication of the Issues and Options Document in January 2020 the Council has worked to establish a Land Owners Group which is working on the a detailed masterplan and delivery plan. The Housing capacity for Hind Street as set out in the Local Plan Housing Trajectory and Policy RA5 is based on further detailed analysis through this masterplan process.

2. Consider the whole of the Hind Street strategic mixed site to create an Urban Garden City or Left Bank-Regeneration Zone. (3) Agree with identifying Wirral Waters, Hind Street and Birkenhead for regeneration (86). Support major regeneration in East Wirral/support the Preferred Option. (3) Through negotiation, WBC should bring forward the deliverance of these growth locations to years 1/5. (1) The Council should fund the development of Wirral Waters and Hind Street and infrastructure. (1) We agree with the designation of Wirral Waters, Hind Street and Birkenhead regeneration provided it is done with sustainability as a main priority. (1)

**Council Response:** Noted. The Hind Street site is allocated for mixed use residential led development in Policy RA5 of the Local Plan Submission Draft and Policy RA6 allocates brownfield land at Wirral Waters for residential development. Regeneration and the creation of new neighbourhoods will be expected to follow sustainable design and green principles as set out in the Local Plan Submission Draft and the Birkenhead Design Guide and Public Realm Strategy.

3. All effort should be made to develop only brown field sites with no development on green belt/field sites (6). Broad locations should only be brown field sites and should not precipitate coalescence (1). Prioritise the regeneration and delivery of Wirral Waters, Hind Street, New Brighton and Birkenhead. (2) Support urban intensification and a sequential approach to development to ensure sustainable sites are developed before those with a heritage value with no green belt release (2).

**Council Response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

4. Support the preferred approach provided design is of high standard with access to green space. (3) Assess the suitability of broad locations, including landscape impacts and heritage conservation and local landscape, heritage and environmental assets must be valued properly. (1) There should be no loss of public parks or other greenspace from this approach (2).

**Council Response:** The Regeneration of Birkenhead as set out in the Draft Birkenhead 2040 Framework includes the provision of a new strategic Dock Branch Park which together with Birkenhead Park will provide the main open space for the new residential and mixed use neighbourhoods. The Council is also preparing the Birkenhead Design Guide and Public Realm Strategy which will be adopted as SPD and will provide guidance on the creation of green streets and pocket parks in new residential areas. The Wirral Green and Blue Infrastructure Strategy has also informed the plan and regeneration policies.

5. Support higher housing allocations in these locations (1).

**Council response:** The Local Plan Submission Draft has identified significant housing growth in Birkenhead through specific site allocations and broad locations. The Housing Trajectory and Policy RA6 sets out proposed housing delivery in Wirral Waters significantly in excess of the figure stated in the Issues and Options document.

6. No issue with the principle of identifying broad locations for growth, however, a number of sites in these areas have viability issues and are not deliverable or developable and local needs will not be met. (6), the sites will not deliver the identified tenure and mix of housing needed (5) and will require significant funding and long lead-in times (4). Support Option 1B: Urban Intensification with stepped delivery. (4)

**Council Response:** The Local Plan Submission Draft Housing Trajectory sets out the expected realistic delivery timescales for brownfield sites as advised by developers. The Council is working with Homes England and The LCR Combined Authority to identify viability gap funding to ensure that strategic brownfield sites can be delivered in accordance with the trajectory and where possible to accelerate delivery (see Housing Delivery Strategy).

Since the publication of the Issues and Options document in January 2021 the Council has made significant progress in enabling significant brownfield development in Central Birkenhead. The Local Plan is based on the overriding need to regenerate Birkenhead to address long seated social and economic issues and to take advantage of the significant brownfield resource but also the town's accessibility, suitability for sustainable higher density development and riverside location. The Housing Delivery Strategy which accompanies the Local plan provides full details. Development on the Northbank of Wirral Waters commenced in 2021 with the first phase of the Urban Splash development which will include town houses and apartments. The 500 unit 'Legacy' build to rent

development is due to commence in early 2022. The Local Plan Submission Draft policy WS 3.4 deals with Housing Mix and requires the provision of family 3 bedroom plus accommodation within Regeneration Areas.

The Council believes that it has no choice but to focus new development within Birkenhead if its significant and long term issues are to be addressed through a comprehensive regeneration programme. The Council is confident that with the commencement of residential delivery on Northbank Wirral Waters, the recent approval of the Wirral Growth Company's mixed use planning application for Birkenhead Town Centre, the award of significant public funding for place making and housing delivery, the ongoing collaboration with and support of Homes England and the LCR City Region, and the development of a bespoke delivery vehicle that the scale of housing development set out in the Local Plan Submission Draft in Birkenhead can be delivered during the life of the Plan.

7. In response to Q4.5 the particular site of Paulsfield Drive Woodland should be considered as a site location that is suitable to provide residential development when considered against the relevant constraints of the site and the potential to mitigate any constraints that may arise. The emerging plan in their assessment of the site should accept the location suitability by re-allocating the site for residential development so that the site can come forward.

**Council response:** The site is proposed to be designated in the Local Plan Submission Draft as open space (OS-SA5.9) and as Local Wildlife Site (LWS-SA5.1) and is not suitable for development.

8. All sites should be subject to the flood risk Sequential Test, and where applicable the flood risk Exception Test prior to any allocation. (1)

**Council response:** Noted. All proposed allocation sites have been considered through the Exception Test.

9. The Seacombe-New Brighton Riverside Corridor area is identified as having the potential for between 500 and 700 homes, subject to a Detailed Regeneration Framework. New homes should reflect the design and character of existing homes. (1).

**Council response:** The Housing Trajectory and Policies RA1 and RA2 of the Local Plan Submission Draft set out the current anticipated housing delivery for these Regeneration areas. Seacombe corridor will be included within the Birkenhead Design Guide SPD area which will set out design guidance for new development. The Council is also preparing a Neighbourhood Framework for New Brighton which will set out design guidance which will be incorporated into a Design Guide SPD for the wider Borough.

10. The Council should manage the potential risks of its dependence on private sector transport companies, and private sector land owners and developers. (1)

**Council response:** The Council is working with the Liverpool City Region Combined Authority to develop a new mass transit system for central Birkenhead and LeftBank which will contribute to the sustainable development objectives set out in the Birkenhead 2040 Framework and the Local Plan Submission Draft.

11. Do not support the approach because it is based on an understated baseline of housing need and a flawed Green Belt Study that understates the amount of Green Belt land that only performs a weak function. (1) The housing land supply is inflated and there is insufficient evidence to demonstrate that such an approach is suitable, viable and capable of meeting identified housing needs, Green Belt land is required and must be released and the scale of that

release for development should revert to the position proposed by the council in 2018. (1) The council should focus on the locations in Table 4.3 that will provide 6,000 homes. (2)

**Council response:** With regard to housing need please see response to Q2.1. It is assumed that these comments are arguing that the brownfield sites within existing urban areas and Birkenhead in particular are not developable or deliverable and that green belt land should be released. The Council considers that it has identified sufficient brownfield land with significant housing delivery as set out in the Local Plan Submission Draft and No Green Belt release is proposed.

**12.** Produce development briefs for each broad location (1).

**Council response:** Noted. The Local Plan Submission Draft will require masterplans to be prepared for all key regeneration areas and sites (see Part 3 and 4).

**13.** The list at Table 4.3 seems to extend regeneration to a wider part of north east Wirral. No sites are given. (1)

**Council response:** The information has been superseded by the housing trajectory set out within the Local Plan Submission Draft.

**14.** The potential of Woodside to make a significant impact on housing delivery (likely in years 6 – 15 of the plan period) is supported. (1)

**Council response:** Noted.

**15.** The work described in 4.8 seems like a comprehensive approach to identifying a sufficient land supply capable of meeting the Borough's development needs. The focused nature of the proposed allocations will need to be considered alongside the need for additional healthcare facilities, availability of green outdoor space and appropriate leisure facilities. Any additional sites must clearly meet the test for being deliverable or developable, WUTH would welcome more information to understand this for these sites. It is helpful to understand the intended timescales to deliver the priorities described in Table 4.3. WUTH would request a comprehensive Population Health Needs assessment to sit alongside this, to understand how this phased approach will impact the demand upon secondary healthcare services, as well as the impact upon primary care.

**Council response:** The Council has consulted the Wirral University Teaching Hospital NHS Foundation Trust in the preparation of the Local Plan Submission Draft and the Infrastructure Delivery Plan.

**16.** There are limited sites in New Brighton area for building on so I don't see where any new housing will be built. No building should happen in front of already existing buildings. (1)

**Council response:** The Council is preparing a Neighbourhood Framework which will be consulted on with the Local Community. The masterplan will identify suitable areas for residential development within the town.

**17.** Where is Hamilton Park? (1)

**Council response:** 'Hamilton Park' is the name given in the Draft Birkenhead 2040 Framework to the area or neighbourhood lying within Corporation Road, Park Road, Duke Street and Rendell Street. The name of this neighbourhood may change following further public consultation.

- 18.** Wirral Waters is simply listed as one of a number of Broad Locations for Growth. A hierarchy of broad locations should be considered, with Wirral Waters at the highest level. (1)

**Council response:** Wirral Waters is recognised because of its scale and capacity for residential and mixed use development as a catalyst project in the Birkenhead 2040 Framework which has informed the Local Plan Submission Draft. Wirral Waters is identified as a single Regeneration Area RA6 in the Plan.

- 19.** Apply the mitigation hierarchy to sites with wildlife importance (1).

**Council response:** Noted.

#### **Q4.6: Are there any other areas which should be identified as Broad Locations for Growth?**

**Summary** - There were 128 comments received.

- Existing urban areas with a significant gap in their green spaces should have new green spaces introduced to 'de-urbanise' the immediate aesthetic impact (1)

**Council response:** Policy WS 5 requires new development to contribute to the enhancement and improvement of publicly accessible open spaces and green infrastructure.

- Suggested areas to be identified as broad locations:

<b>Suggested Broad Location</b>	<b>Council response</b>
Any areas of the coastal strip of the River Mersey waterfront within existing urban areas (84), including Wirral Waters/Dockland (2)	Coastal areas of the Borough have been considered where they may be suitable for new housing development. The Local Plan Submission Draft includes a number of Regeneration Areas within these areas, including land at Wirral Waters, where significant allocations and broad locations for growth have been identified along the eastern coastal strip.
Any unused Brownfield Land (1)	All suitable and available brownfield land have been identified for development in the Local Plan Submission Draft.
The urban area of Moreton, Upton and Hoylake (1)	These areas are not considered to have the potential for new development of the scale considered appropriate for designation as Broad Location for Growth.
New Ferry brownfield land (2)	
The derelict land surrounding Clatterbridge Hospital (1)	The hospital lies within the Green Belt and national Green Belt policies would apply.

- There are no other known sites within the urban area that could be considered for future housing development, albeit we recognise that the Council is concurrently carrying out a further 'call for sites' exercise. However, if any additional urban sites are identified during the call for sites process these will likely be small sites and within the Urban Conurbation and as such there will still be a need for the Draft Local Plan to identify sites within the Urban Settlements.

**Council response:** The Council has been able to identify significant areas of brownfield land within Birkenhead and the Seacombe River Corridor where there is potential for new housing development to come forward during the latter part of the Local Plan period.

4. Support the identification of Hind Street as a broad location for growth (1).

**Council response:** Noted. Hind Street is identified as a Regeneration Area (RA5) in the Local Plan.

5. Plan for proportionate and dispersed growth throughout the other Urban Settlements, to meet local needs. (1)

**Council response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

6. Sites that are potential infill sites, and sites adjacent to existing settlements, with minimum visual impact and where any Green Belt contribution is weak. (1)

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

7. Build more residential, village style properties with supported living facilities for elderly residents, freeing up more brownfield land for redevelopment (1).

**Council response:** The Council would support housing development for elderly persons in suitable locations.

**Q4.7: Are there any other sites within the urban area that you think should be considered for future housing development?**

**Please identify each site and say why you think they would be suitable. Please also submit these sites through the separate 'Call for Sites' Consultation event and tell us how many homes these sites will deliver and when.**

**Summary of responses** - Out of 215 responses, 30 said no and 22 said yes.

1. Sites within the urban area which should be considered for future housing development are as follows:

Proposed Site	Council Response
Champions Business Park, Arrowebrook Road (1)	The site now has permission for 127 dwellings.
Land East of Ferry Road, Eastham (1)	The site now has permission for 1 dwelling.
Hind Street mixed use development behind Birkenhead Central Station (5)	This site is proposed to be allocated for residential development in the Local Plan Submission Draft (RES-RA5.1 refers).
Hoylake Town Square (1)	The site now has permission for mixed use development including 40 apartments
Sites in Heswall raised by the Heswall Society (1), additional land in Heswall which has not yet been identified in the Local Plan (82)	Suitable and available sites in Heswall have been proposed to be allocated for development in the Local Plan Submission Draft.

Victoria Road, Birkenhead (1)	While no specific proposals are identified, Victoria Road is shown as part of a Primarily Residential Area in the Local Plan Submission Draft.
Land at Paulsfield Drive Woodland, Birkenhead (1)	The site is proposed to be designated as Urban Open Space (OS-SA5.9) and as Local Wildlife Site (LWS-SA5.1) in the Local Plan Submission Draft.
Land to the east of Riverbank Road (2)	The site is proposed to be designated as a Mineral Safeguarded Area (MSA-SA4.1) within a Primarily Employment Area in the Local Plan Submission Draft.
Noctorum Playing Fields (1)	The site is proposed to be designated as a Local Green Space (LGS-SA3.3 refers) in the Local Plan Submission Draft.
Octel Sports Club (1)	The site is proposed to be designated as an Urban Sports Facility (SR-SA4.2 refers) in the Local Plan Submission Draft.
Carr Lane (1)	In line with the Council's preferred Urban Intensification option, no sites have been identified for development in the Green Belt in the Local Plan Submission Draft and residential development has recently been dismissed at appeal at Carr Lane and at Top House Farm.
Top House Farm, Thingwall Road (1)	
Front section of Heswall Cemetery, Irby Road (1)	
Booster's Yard, 300 Irby Road (1)	Planning permission has been granted for extensions at 300 Irby Road, which are now under construction. The adjacent land has been cleared but no developer has yet been identified. The sites are both included as part of a Primarily Residential Area in the Local Plan Submission Draft.
Golf courses in the Wirral (1)	In line with the Council's preferred Urban Intensification option, no sites have been identified for development in the Green Belt and golf course sites in the urban areas have been identified for continued protection (SR-SA1.1 and SR-SA3.1 refer) in the Local Plan Submission Draft.
Land at Bromborough Wharf (2)	The site is proposed to be allocated for residential development (RES-SA4.7) in Local Plan Submission Draft.
Land to the south of Former Epichem (1)	Planning permission has recently been refused for residential development and the site is proposed to be shown as part of a Primarily Employment Area subject to proposed Local Plan Policy WS4.2 and as a Local Wildlife Site (LWS-SA4.1) in the Local Plan Submission Draft.
Land at Quarry Road East, Port Sunlight (1)	The site is proposed to be allocated for residential development (RES-SA4.11) in the Local Plan Submission Draft.
Land at West Kirby Concourse and West Kirby Fire Station (1)	The sites are proposed to be included in the West Kirby Concourse Master Plan Area (MPA-SA6.1) in the Local Plan Submission Draft.
Disused Public Toilets and Shelter beside Irby Library (1)	The site has not been declared surplus and is proposed to be shown as part of Irby Village Local

	Centre (TC-SA7.2) in the Local Plan Submission Draft.
Thingwall Methodist Church, Acre Lane (1)	The site is still in use and is proposed to be included in a Primarily Residential Area in the Local Plan Submission Draft (SHLAA 1909).
Respondents recommended building floating homes on Morpeth Dock (1)	Noted. Morpeth Dock is proposed to be included in a Mixed Use Area (MUA-RA3.1) in the Local Plan Submission Draft.
Building a new school at Pensby High school and using part of the disused site for residential development (1)	The site is in the Green Belt and is not proposed to be identified for development in the Local Plan Submission Draft.
Adding more sites to the Brownfield Register (2)	While there are no other known sites within the urban area that could currently be identified for future housing development in the Local Plan Submission Draft. the Council's Strategic Housing Land Availability Assessment will be kept under constant review. An allowance has however been included in the Local Plan Submission Draft for the future return to use of empty homes, net gains from conversions and changes of use and new-build windfalls that are expected to continue to come forward within the Plan period, which will also be able to contribute towards the housing land supply.
All available brownfield sites in Birkenhead (1)	
Redeveloping derelict buildings (1)	
Respondents also noted there were no additional urban sites to suggest (6).	

2. Do not support Green Belt development (2), do not support green space development (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

3. The housing requirement is too high (2). Sufficient land has already been identified for residential development (1). Count empty homes towards the housing requirement (1). The site selection process is flawed because it is only based on developer interest in a site (1).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

4. The question is confusing (1)/is more appropriate for developers, not Wirral residents (83).

**Council Response:** Noted, feedback regarding the consultation will be taken into consideration in future Local Plan consultations.

**Q4.8: Do you have any comments on the proposed urban employment allocations set out in Appendix 4.6.? Are they deliverable and developable?**

All proposed employment allocation sites		
Key Issues	# comments	Council Response
Objection-Green Belt development	2	The Local Plan Submission Draft is based on the Council's preferred urban intensification option. The Council does not believe that exceptional circumstances exist to justify changes to
Objection-green space development	3	

		Green Belt boundaries and is therefore not proposing any release of Green Belt for any purpose including for employment uses.
Assess traffic impact from brownfield sites on the strategic road network	1	Modelling has been undertaken of the impact of Local Plan housing and employment allocations together with committed network updates on the highway network.
Consider B8 use class employment allocations	1	The 52.9 hectare employment land need requirement includes 26.2Ha for B8 warehousing and distribution uses and all the allocations are identified as potentially suitable for this use.
SHELMA growth assumptions are too high	1	The Wirral Employment Land and Premises study 2021 provides an updated assessment of employment land need, the basis of the 52.9ha need requirement.
Conduct flood risk Sequential Test and Exception Test	1	Strategic flood risk assessments have now been prepared at both Level 1 and Level 2, and a separate sequential test and exception test report sets out the Council's approach and justification for site allocations.
Consider recreational disturbance impacts on coastal designated sites	1	Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. Policy WS5.5 refers.
Design Wirral Waters to accommodate corridors for birds	9	
Support proposed employment allocation sites	2	Support noted.
Objection to proposed employment allocation sites-no specific reason given	2	Objection noted.
Commercial premises should be relocated to better locations to make way for residential housing	1	The Local Plan Submission Draft does include several sites/ areas which have been allocated/ designated for residential or mixed use areas which were previously identified as for employment use in the previous Unitary Development Plan.
Add more brownfield sites to brownfield register	1	The Local Plan Submission Draft employment allocations form part of a wider portfolio of sites assessed in the Wirral Employment Land and Premises Study 2021. The Council's Strategic Housing Land Availability Assessment (SHLAA) has been updated to April 2021 and is kept under constant review. Further information is set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Support Birkenhead regeneration	6	Support noted.
Protect heritage in Central Birkenhead	8	A heritage topic paper assesses the impact of local plan allocations on heritage assets.

SHLAA 0398 – QE2 Dock, Eastham		
Key Issues	# comments	Council Response
Traffic increase concerns	2	Noted. The site has not been allocated for development in the Local Plan Submission Draft but will sit within the port and maritime zone on the Local Plan Policies Map (DKS-SA4.1 refers)
Close Bankfields Drive	1	
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Objection-need for wildlife corridors	1	

SHLAA 2068 – East of Typhoo, Moreton		
Key Issues	# comments	Council Response
Consider disturbance on bird species on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar and North Wirral foreshore SSSI)	1	Part of the site closest to the factory is allocated for employment development (EMP-SA5.3) with the remainder allocated for residential development (RES-SA5.3) in the Local Plan Submission Draft. Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment
Objection to proposed allocation	1	

SHLAA 0400 – North Road, Eastham		
Key Issues	# comments	Council Response
Support proposed allocation	2	The site has outline planning permission for up to 46,450 sq m of B2/B8 uses (OUT/19/01633 refers) and is allocated for employment uses in the Local Plan Submission Draft (Policies Map ref EMP-S4.5 refers). Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. Modelling has been undertaken of the impact of Local Plan housing and employment allocations together with committed network updates on the highway network.
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Objection-transport infrastructure cannot cope with increased traffic	1	
Objection-provide green corridors	1	

SHLAA 1716 – Wirral International – East of Tulip		
Key Issues	# comments	Council Response
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	Noted. The site has not been allocated for development in the Submission Draft 19 Local Plan but will sit within the Primarily Employment area on the Local Plan Policies Map. Planning permission has been approved for industrial development which is now complete.
No development on wildlife habitats	1	
Preserve the environment	1	
Extend transport network to rural areas	1	
Objection-transport infrastructure cannot cope with increased traffic	1	
Objection-provide green corridors	1	

SHLAA 1978 – West of Reeds Lane, Moreton		
Key Issues	# comments	Council Response
Consider disturbance on bird species on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar and North Wirral foreshore SSSI)	1	The site is allocated for employment use in the Local Plan Submission Draft (EMP-SA5.2 refers). Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment.

SHLAA 0421 – Twelve Quays – Tower Wharf		
Key Issues	# comments	Council Response
Adjoining land to proposed allocation to be used for Roll-on, Roll-off ships	1	
Consider impact on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Mersey Narrows SSSI, Liverpool Bay SPA)	1	
No development on wildlife habitats	1	
Design Wirral Waters to accommodate corridors for birds	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	

SHLAA 0428 – Twelve Quays – Morpeth Waterfront		
Key Issues	# comments	Council Response
Consider impact on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI, Liverpool Bay SPA)	1	
No development on wildlife habitats	1	
Design Wirral Waters to accommodate corridors for birds	1	

SHLAA 0420 – Oakdale Road, Seacombe		
Key Issues	# comments	Council Response
No development on wildlife habitats	1	
Design Wirral Waters to accommodate corridors for birds	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Support Birkenhead regeneration	1	

SHLAA 1717 – Wirral International – East of Georgia Avenue		
Key Issues	# comments	Council Response
Objection to proposed allocation on land at Riverbank Park	1	
Safeguard existing businesses in proximity to proposed allocation	1	
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	

No development on wildlife habitats	1	
Objection-transport infrastructure cannot cope with increased traffic	1	
Objection-provide green corridors	1	

SHLAA 1714 – Wirral International – Commercial Road		
Key Issues	# comments	Council Response
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	The site is allocated for employment uses in the Local Plan Submission Draft (EMP-SA4.2 refers) for B2/B8 uses.
No development on wildlife habitats	1	Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. Modelling has been undertaken of the impact of Local Plan housing and employment allocations together with committed network updates on the highway network.
Objection-transport infrastructure cannot cope with increased traffic	1	
Objection-provide green corridors	1	

SHLAA 0425 – Cleveland Street Warehouse, Birkenhead		
Key Issues	# comments	Council Response
Design Wirral Waters to accommodate corridors for birds	1	The site is allocated for employment uses in the Local Plan Submission Draft (EMP-RA7.1). Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats
No development on wildlife habitats	1	Regulations Assessment. A heritage
Extend transport network to rural areas	1	impact assessment assesses the impact of local plan allocations on heritage assets
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	

SHLAA 0407 – Peninsula Business Park, Moreton		
Key Issues	# comments	Council Response
Increase the housing requirement	1	The site is allocated for employment uses in the Local Plan Submission Draft (EMP-SA5.1). Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats
Consider disturbance on bird species on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar and North Wirral foreshore SSSI)	1	Regulations Assessment.

SHLAA 1715 – Wirral International – Old Hall Road		
Key Issues	# comments	Council Response
Allocate for residential development if employment proposals cannot go forward	1	The site is now proposed to be allocated for residential development as part of a larger site in the Local Plan Submission Draft (RES-SA4.2 refers) within Master Plan Area MPA-SA4.2.
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Design development to be bat-friendly	1	
No development on wildlife habitats	1	
Objection-transport infrastructure cannot cope with increased traffic	1	
Objection-provide green corridors	1	

Development should be sensitive to Old Hall Road Copse Local Wildlife Site	1	
Development should be sensitive to Eastham Country Park	1	

SHLAA 0953 – Wirral Waters – Bidston Dock		
Key Issues	# comments	Council Response
Objection to proposed allocation for employment use by landowner, should be for leisure instead	2	Noted, the site the site has not been allocated for development in the Local Plan Submission Draft but is included as a masterplan area in Policy RA 6-Bidston Dock Masterplan Area (MPA-RA6.3).
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Consider impact on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA)	1	
Mitigate impact of development on bird habitat at docks	1	
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	

SHLAA 2066 – Wirral Waters – North of Beaufort Road		
Key Issues	# comments	Council Response
Land at Beaufort Road identified for port decant purposes in Mersey Ports Master Plan	1	This site is allocated for employment use in the Local Plan Submission Draft and has been split into MEA Park East (EMP-RA6.3 - allocated for B2/B8 Port related uses) and MEA Park Ph2 (EMP-RA6.4 - allocated for B2/B8 uses). The site is in Masterplan Area MEA Park MPA-RA6.2 and within a Broad Location in the Wirral Waters Regeneration Area. Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. A heritage impact assessment assesses the impact of local plan allocations on heritage assets.
Adjoining land to proposed allocation to be used for Roll-on, Roll-off ships	1	
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Consider impact on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA)	1	
Mitigate impact of development on bird habitat at docks	1	
Support employment designation	1	
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	

SHLAA 2067 - Wirral Waters - Tower Quay		
Key Issues	# comments	Council Response

Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	The site is not allocated for development in the Submission Draft 19 Local Plan but is included within Masterplan Area East Float MPA-RA6.1, in the neighbourhood Four Bridges, and within a Broad Location in the Wirral Waters Regeneration Area. Part of the site has been developed for office use.
Consider impact on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA)	1	
Mitigate impact of development on bird habitat at docks	1	
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	

ELPS 087 – Tower Road, Egerton Square		
Key Issues	# comments	Council Response
Planning application (APP/18/00409) approved for ELPS 087, construction to start September 2020.	2	Noted, the site has not been allocated for development in the Local Plan Submission Draft.

SHLAA 0417 – West Float IE, Seacombe		
Key Issues	# comments	Council Response
Design Wirral Waters to accommodate corridors for birds	1	Noted, the site has not been allocated for development in the Local Plan Submission Draft but sits within the Primarily Employment Area on the Local Plan Policies Map.
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Support Birkenhead regeneration	1	

SHLAA 1718 – Wirral International – Riverbank Road		
Key Issues	# comments	Council Response
New development should not impact existing operations within the area	1	The site allocated for employment uses in the Local Plan Submission Draft (EMP-SA4.1). Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. Modelling has been undertaken of the impact of Local Plan housing and employment allocations together with committed network updates on the highway network.
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
No development on wildlife habitats	1	
Objection-provide green corridors	1	
Objection-transport infrastructure cannot cope with increased traffic	1	

SHLAA 0434 – Wirral Waters – Hydraulic Tower		
Key Issues	# comments	Council Response
Support alternate proposal for a conversion to a hotel	1	The site is proposed to be allocated for Research & Development, Education and Training, Offices and Café mixed use in the Local Plan Submission Draft (EMP-RA6.5). A heritage impact
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	

Consider impact on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA)	1	assessment assesses the impact of local plan allocations on heritage assets. Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment.
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	

SHLAA 0587 – Berner Street, Birkenhead		
Key Issues	# comments	Council Response
No development on wildlife habitats	1	The site is proposed to be included in a Primarily Residential Area within Master Plan Area MPA RA7.1 in the Local Plan Submission Draft.
Extend transport network to rural areas	1	
Preserve the environment	1	

SHLAA 0564 – SMM Business Park, Seacombe		
Key Issues	# comments	Council Response
Design Wirral Waters to accommodate corridors for birds	1	The site is allocated for employment uses in the Local Plan Submission Draft (EMP-RA8.2). A heritage impact assessment assesses the impact of local plan allocations on heritage assets. Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment.
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	

SHLAA 0595 – Lynas Street, Birkenhead		
Key Issues	# comments	Council Response
No development on wildlife habitats	1	The site has been included within a proposed Mixed Use Area in the Local Plan Submission Draft (MUA-RA7.1 refers).
Extend transport network to rural areas	1	
Preserve the environment	1	

SHLAA 1724 – Wirral International – Caldbeck Road		
Key Issues	# comments	Council Response
No development on wildlife habitats	1	Noted, the site is proposed to be allocated for employment uses in the Local Plan Submission Draft (EMP SA4.4). Modelling has been undertaken of the impact of Local Plan housing and employment allocations together with committed network updates on the highway network.
Objection-provide green corridors	1	
Objection-transport infrastructure cannot cope with increased traffic	1	

SHLAA 1725 – Wirral International – Slack Wood		
Key Issues	# comments	Council Response

Do not develop historic site of hamlet dating from around 1660 (listed on HER)	1	Site is not allocated for development in the Local Plan Submission Draft but sits within the Primarily Employment Area on the Local Plan Policies Map.
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	
Objection-provide green corridors	1	
Objection-transport infrastructure cannot cope with increased traffic	1	

SHLAA 1727 – Wirral International – Thermal Road		
Key Issues	# comments	Council Response
New development should not impact existing operations within the area	1	Site is not allocated for development in the Local Plan Submission Draft. The site is now developed for industrial use and will sit within the Primarily Employment Area on the Local Plan Policies Map.
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Objection-provide green corridors	1	
Objection-transport infrastructure cannot cope with increased traffic	1	
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Consider impact on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA)	1	
Mitigate impact of development on bird habitat at docks	1	

SHLAA 0754 – Wirral Waters – Sky City		
Key Issues	# comments	Council Response
Support a mixed use development allocation	1	Noted, the site is proposed to be allocated in the Local Plan Submission Draft for residential development (RES-RA6.2).
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Support outline permission for the site	1	

SHLAA 1861 – Wirral International – Plantation Road		
Key Issues	# comments	Council Response
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	The site is proposed to be allocated for employment uses in the Local Plan Submission Draft (EMP SA4.4). Potential

Design Wirral Waters to accommodate corridors for birds	1	impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. Modelling has been undertaken of the impact of Local Plan housing and employment allocations together with committed network updates on the highway network.
No development on wildlife habitats	1	
Objection-provide green corridors	1	
Objection-transport infrastructure cannot cope with increased traffic	1	

SHLAA 2058 – Wirral Waters – Wallasey Bridge Road		
Key Issues	# comments	Council Response
Mobil Site identified as suitable for decant purposes	1	The Site is allocated for employment use in the Local Plan Submission Draft (EMP-RA6.2). It is in Masterplan Area MEA Park MPA-RA6.2 and within a Broad Location in the Wirral Waters Regeneration Area. Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. A heritage impact assessment assesses the impact of local plan allocations on heritage assets.
Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	
Consider impact on designated sites (Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA)	1	
Mitigate impact of development on bird habitat at docks	1	
An application for MEA Park phase 2 will be submitted for B1, B2 and B8 uses	1	
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	

SHLAA 2061 – Wirral International – Power Road		
Key Issues	# comments	Council Response
Allocate site for residential development	1	The site is not allocated for development in the Local Plan Submission Draft. The site will sit within the Primarily Employment Area on the Local Plan Policies Map.
Design development to be bat-friendly	1	
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Objection-provide green corridors	1	
Objection-transport infrastructure cannot cope with increased traffic	1	
Development should be sensitive to Old Hall Road Copse Local Wildlife Site	1	
Development should be sensitive to Eastham Country Park	1	

SHLAA 2063 – Wirral International – East of Riverbank Road		
Key Issues	# comments	Council Response
Safeguard facilities for the handling and processing of minerals	1	The site is not allocated for development in the Local Plan Submission Draft but is now designated
Allocate site for residential development	1	

Consider impact on designated sites (Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI)	1	as a Mineral Safeguarded Area (MSA-SA4.1) within a Primarily Employment Area on the Local Plan Policies Map.
Design Wirral Waters to accommodate corridors for birds	1	
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	
Objection-provide green corridors	1	
Objection-transport infrastructure cannot cope with increased traffic	1	

SHLAA 2064 – Former Gas Holders, Wallasey		
Key Issues	# comments	Council Response
Design Wirral Waters to accommodate corridors for birds	1	The site is allocated for employment use in the Local Plan Submission Draft (EMP-RA8.1). Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. A heritage impact assessment assesses the impact of local plan allocations on heritage assets.
No development on wildlife habitats	1	
Extend transport network to rural areas	1	
Preserve the environment	1	
Protect heritage in central Birkenhead	1	
Support Birkenhead regeneration	1	

**Q4.9: Are there any other urban sites which you think should be allocated for future employment uses? Please identify each site and say why you think they would be suitable.**

1. Disagree with green spaces allocated for development (66).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

2. Additional urban sites proposed for employment allocations:

Ashton Court on Banks Road, West Kirby (1)	The site now has permission for 14 townhouses, which were allowed on appeal. The trajectory has been updated to take account of the most recent available evidence.
Ellerman Lines site, Hoylake (1)	
Disused land at Pensby High School (1)	
Golf courses (1)	
SHLAA0755 (1)	See Policy RA 6, RES-RA 6.2.
Land between Dock Road and the A59 (1)	Land between Dock Road and the A59 is within the Broad Location Northside Regeneration Area (see Policy RA 8). Two sites are being allocated in the Local Plan Submission Draft – the former gas holders now called Northside West (EMP-RA8.1) and the SMM business park (EMP-RA8.2)

Surplus land at Cammell Laird (1)	Site EMP – SA2.1 Cammell Laird South, Campbeltown Road, Birkenhead is allocated for employment use in the Local Plan Submission Draft.
Hind Street Strategic Mixed Use site (1)	This site is proposed to be allocated for residential development (RES-SRA5.1) in the Local Plan Submission Draft.

3. The identified employment land figure is flawed, it is based on the LCR SHELMA (3).

**Council Response:** The draft Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.

The Wirral Employment Land and Premises Study 2021 uses three scenarios to calculate the need for employment land: Market Capacity Scenario, Workforce Capacity Scenario and the Economic Capacity Impact Scenario. The Local Plan Submission Draft discounts all but the Economic Capacity Impact Scenario.

**Q4.10: Do you agree with our assessment of the advantages and disadvantages of the Urban Intensification Option? Are there any other advantages or disadvantages that you believe we should take into account?**

1. Support dispersed Green Belt release, Green Belt sites can be in sustainable locations (6), weakly performing Green Belt sites can be released for development (2). Do not support urban intensification, it will lead to an unsound Local Plan (2), the sites are undeliverable (3). Disadvantages with urban intensification include: market saturation, insufficient infrastructure, undersupply of large family homes and a lack of investment in West Wirral (1), reduced space for green infrastructure in urban areas (1), and the Local Plan will be unsound because it will not provide sufficient housing (1). Support urban intensification (6), the advantages of urban intensification outweigh the disadvantages (84), it would allow for sustainably located employment opportunities (1), healthcare facilities (1) and more affordable housing delivery (4).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

2. Urban intensification should not encroach on Green Belt land (124). Do not develop green space or Green Belt land (1), provide green space and green infrastructure (1). Any potential for Green Belt release will reduce interest in delivering brownfield land (4).

Recommendations to advance urban intensification include:

- Work with community-focused developers (1).
- Deliver sustainably designed homes (1).
- Take a mixed approach with brownfield development and Green Belt release (2).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

3. Invest in adequate transport infrastructure (1), reduce vehicle dependency through careful design (1). Create a central transport hub at Conway Park rail station (1).

**Council Response:** Securing sustainable travel and reducing the need to travel and reliance on private cars is a Strategic Objective of the Local Plan. Under the Council's Strategy for Transport, Policy WS 9.2, development proposals should provide access to existing or planned sustainable travel options and infrastructure projects to reduce private car usage. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

4. Set a lower housing requirement figure (16). Meet housing needs (1).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

#### Option 1B: Urban Intensification with stepped approach

**Q4.11: Do you believe that a 'stepped approach' would be appropriate to apply, to reflect the complicated nature of many of the proposed sites for development and their longer lead in times, provided that this is made up in the later years of the plan period to take account of the need to bring forward brownfield sites?**

**Summary of response** - Out of 317 responses, 16 said no and 116 said yes.

1. Do not agree with a stepped approach (11), sufficient housing should be identified instead (6), there should be higher delivery rates in years 1-5 of the plan period instead (8). Agree with a stepped approach (100), with long lead-in times for delivery (2), deliver 328 new jobs and 1,169 dpa in years 1-5 of the plan period, and 1,500 dpa in years 5-15 of the plan period (2), brownfield land should be delivered in a stepped approach (73).

**Council Response:** The Local Plan Submission Draft Housing Trajectory sets out the expected realistic delivery timescales for brownfield sites as advised by developers. The Council is working with Homes England and The LCR Combined Authority to identify viability gap funding to ensure that strategic brownfield sites can be delivered in accordance with the trajectory and where possible to accelerate delivery (see Housing Delivery Strategy).

#### **Q4.12: Do you have any views on the sites that have been currently identified under the Dispersed Green Belt Release option, shown in Table 4.5 and on Figure 4.6?**

Site: All Proposed Dispersed Green Belt Release Sites		
Key Issues	# comments	Council Response
Archaeologist involvement required / some Green Belt sites hold archaeological significance	3	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Adverse impact on human health and wellbeing / quality of life	14	
Release would present loss of agricultural land	33	
Loss of (open) space for recreation / leisure	15	
Impact of release on heritage / historical value	88	
Adverse impact of release on character and identity	106	
Loss of biodiversity / impact on environment / habitat	55	

Green Belt sites may be in proximity or functionally linked to designated sites (SSSIs, CAs, BMVs)	11	
Noise pollution concerns from development	5	
Traffic and parking concerns	31	
Air pollution impact of development and / or release	14	
Concern of adverse visual impact from Green Belt development / Green Belt enhances visual amenity	140	
Green Belt dispersal impact on amenity	2	
Creation of urban sprawl / Green Belt provides buffer between urban spaces	141	
Development could overwhelm local / public services	22	
Lack of (transport) infrastructure to accommodate / development could overload infrastructure	27	
Concern over nibbling effect of dispersed Green Belt release	8	
Objection to housing figure / density / allocations	46	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Preferred urban intensification [option]	5	Support noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification.
Prefer release of other site / brownfield site / (general objection to Green Belt site release / development)	259	
Risk of flooding / Green Belt prevents flooding / drainage infrastructure concerns	9	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Development of Green Belt against national policy	15	
Green space beneficial for tourism and visitors	70	
Access issues of proposed Green Belt sites	2	
Green Belt release would assist contribution to housing land supply	12	
Support for release of sites under 2A if necessary to meet housing needs	14	
Land at Clatterbridge Hospital should be allocated for dispersed Green Belt release	1	
Intensification numbers unachievable / unrealistic	3	
Protected trees present on Green Belt sites	3	
Planning blight / deterioration of sites after allocation	60	
In event of development on Green Belt, infrastructure (incl. sewage and transport) should be improved	5	
Site specific policies are required for dispersed Green Belt release sites	2	
Concern over developers "playing the system"	1	

Need for WBC to focus on ensuring deliverability / viability / delivery strategy of sites	30	
Information / evidence used for site selection incorrect / flawed / not robust	25	
I&O paper does not acknowledge benefits of Green Belt development (new homes, employment, public income etc.)	1	
Proposed sites for release should be reviewed	1	
Need for greater dispersal of sites / units (Concern raised over concentration on commercial core)	8	
Local market supply / demand issues with new development (in terms of absorption and viability)	4	
Larger strategic sites required for Green Belt release to achieve supply (rather than piecemeal)	1	

Site 1: Parcel 4.13 (SP049) South of Mill Park Eastham		
Key Issues	# comments	Council Response
Damage to air quality / air pollution because of release and / or development	7	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Archaeologically important site (Battle of Brunanburh and HER)	15	
Impact of release on heritage / historical value (Battle of Brunanburh and Historical Environment Record)	17	
Traffic and parking related infrastructure and safety concerns of development	31	
A41 access and safety concerns (concern around M53 roundabout – A41 turn off) (lack of parking bays on Mill Park Drive)	9	
Site not currently viable – junction works required (impact on costs)	1	
Site is constrained by roads access (Mill Park Drive) and woodland	2	
Concerns of development overloading infrastructure	2	
Adverse impact of release and / or development on environment / biodiversity / habitat	4	
Adverse impact of release on special character and identity of Irby, Frankby, and Greasby	5	
Loss of amenity / recreation value of green space as a result of release	2	
Adverse impact on human health and wellbeing / quality of life	2	
Noise pollution concerns	2	
Housing figure overestimated	3	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery

		Strategy which accompanies the Local Plan Submission Draft.
Release would present loss of agricultural land / agricultural land should be retained	7	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Concern over nibbling effect of dispersed Green Belt release	1	
General objection to Green Belt development	10	
Public transport infrastructure and services improvement required	1	
Drawn boundary incorrect	1	
Site contributes to NPPF 5 purposes of Green Belt / is not a weak contribution to Green Belt / release would be against national policy	17	
Drainage infrastructure works required / currently lack capacity	1	
Any future scheme should improve natural environment features (landscaping and tree planting)	2	
Site provides a buffer zone	1	
Development could overwhelm local / public services	11	

Site 2: Parcel 5.8 (SP0005, SHLAA 0740) East of Garden Hey Road, Saughall Massie		
Key Issues	# comments	Council Response
Adverse impact on wildlife / biodiversity	2	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Adverse impact of release on special character and identity	3	
Impact of release on heritage / historical value (Grade II listed building in proximity)	4	
Footpaths inadequate at present	1	
Traffic concerns (impact on amenity in CA)	1	
Release would create coalescence of Saughall Massie with Moreton	1	
Release would present loss of agricultural land	2	
Site contributes to NPPF 5 purposes of Green Belt / is not a weak contribution to Green Belt / release would be against national policy	2	
No environmental constraints (EA)	1	
Proposed release compliant with NPPF / is a weak contribution to Green Belt	1	
Housing figure overestimated	3	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Open landscape (Moreton to Saughall Massie) constraints	3	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to
Site provides natural extension to urban area and settlement	1	
Flood risk (SFRA)	1	
Proximity / functional link to designated site (Saughall Massie CA)	4	

		meet the Borough's development needs.
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Site 3: Parcel 5.9 (SP004, SHLAA 0925) North of Saughall Massie Conservation Area		
Key Issues	# comments	Council Response
Impact on wildlife / biodiversity / environment	3	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Impact of development on water (Arrowe Brooke) that would require mitigation	2	
Traffic concerns (through Saughall Massie and Saughall Road)	1	
Adverse impact of release on special character and identity	2	
Proximity / functional link to designated site (Saughall Massie CA)	3	
Adverse impact of release on visual amenity / open space	4	
Green Belt provides buffer zone (Upton, Moreton and Saughall Massie)	2	
Release would present loss of agricultural land	1	
Any future scheme should improve natural environment features (EA)	1	
Concerns of loss of privacy as a result of development	1	
Concerns of loss of neighbouring property value as a result of development	1	
Site contributes to NPPF 5 purposes of Green Belt / is not a weak contribution to Green Belt / release would be against national policy	2	
General objection to Green Belt development	2	
Objection to proposed housing figures	2	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Housing figure overestimated	3	
Adverse impact on human health and wellbeing / quality of life	1	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Flood risk (Zone 2 and 3)	4	
Impact of release on heritage / historical value (Grade II listed buildings in proximity)	2	
Proposed release compliant with NPPF / is a weak contribution to Green Belt	1	

Site 4: Parcel 6.15 (SP013, SHLAA 4056) West of Column Road, West Kirby		
Key Issues	# comments	Council Response
Development risks damage to Local Wildlife Sites/corridor (Caldy Hill and Stapledon Wood, Royden Park) (Priority habitat)	48	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Proximity / functional link to designated site (Caldy and Glebe CAs) (area of special landscape value)	54	
Development risks damage to wildlife / biodiversity / environment	58	
Development risks damage to water (pond)	2	
Site contributes to 5 purposes of Green Belt (NPPF) / is not a weak contribution	49	
Development risks overloading local services / infrastructure (drainage)	1	
Would present loss of high quality arable agricultural land	25	
Impact of release on heritage / historical value	19	
Adverse impact of release on character and identity	28	
Adverse visual amenity impact (open views)	35	
Site will not contribute to (affordable) housing target	1	
General objection to Green Belt release / brownfield preferable	31	
Flood risk / drainage concerns	9	
Site selection criteria / method questioned	34	
Development could overwhelm local / public services	15	
Traffic and parking impact concerns (Column Road and Caldy Road)	19	
Air pollution impact of development and / or release	5	
Noise pollution concerns	3	
Light pollution concerns	3	
Lack of public transport infrastructure (new bus and highway links required)	5	
Concentrated brownfield development preferable	2	
Drawn boundary misleading	9	
Recreational value of site at risk	5	
Source protection Zone 3 (outer zone) (EA)	2	
Any future scheme should improve natural environment features (EA)	2	
Housing figure overestimated (viability / developability concern)	2	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Objection to proposed housing figure	6	
Presence of TPOs / woodland	4	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is
Green Belt provides buffer zone (Caldy and West Kirby / Grange)	51	

Need for more balanced spatial strategy for homes delivery	1	Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Site can contribute to housing delivery	1	
Low potential for archaeological remains		
No impact of development on heritage assets	1	
No constraints / site is developable	1	

Site 5: Parcel 7.11 (SP071) Land at Chester Road, Gayton		
Key Issues	# comments	Council Response
Release would present loss of agricultural land	6	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Traffic level and safety impact concerns (Gayton Roundabout, Brimstage Junction 5) (A540) (A551)	8	
Impact on biodiversity / environment (priority habitats on site)	5	
Adverse impact of release on character and identity	1	
Constrained by Merseyrail lines	1	
Lack of transport infrastructure to accommodate development	2	
Objection to proposed density	2	
Adverse visual impact (open aspect)	2	
Site selection criteria / method questioned	1	
Flood risk constraints (loss of natural drainage)	4	
General objection to Green Belt development / brownfield preferable	8	
Air pollution / quality concerns	2	
Prevention of urban sprawl / buffer zone	3	
Concern over nibbling effect of dispersed Green Belt release	1	
Development would be against national policy	2	
Site is deliverable and developable	3	
Development would be in line with national policy	1	
Sewerage network has sufficient capacity	1	
No physical constraints to deliverability	1	
No environmental constraints on site (EA)	2	
Potential for high quality development (with blue green infrastructure and assets protected)	2	
Green Belt beneficial / attractive for tourism and visitors	1	
Impact on local / public services (Barnston Primary)	4	
Brownfield development incapable of delivering appropriate housing no. (Preferred Approach unsound)	1	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Proposed housing figures / capacity overstated	4	

Site 6: Parcel 7.18 (SP061) North of Gill's Lane, Pensby		
Key Issues	# comments	Council Response
Creation of urban sprawl / Green Belt buffer zone (Barnston, Irby, Thingwall and Pensy)	10	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Impact on wildlife / biodiversity (badgers)	9	
Adverse impact of release on character and identity	4	
Adverse visual impact (landscape sensitivity)	4	
Impact on environment (climate change concerns)	3	
Impact on conservation village of Barnston	2	
Traffic safety impact concerns (Gills Lane and Barnston Road)	9	
Poor access	2	
Pollution concerns	3	
Impact on noise levels on neighbouring residents	1	
Neighbouring residential property privacy concerns	1	
Impact of release on heritage / historical value (Viking links)	1	
Flood risk (lack of and loss of natural drainage, site adjacent to reservoir)	3	
Release would present loss of (low quality) agricultural land	6	
Concentrated release of Green Belt preferred	1	
Impact on local / public services (no capacity)	4	
Negative impact on neighbouring property values	2	
General objection to Green Belt release / brownfield preferable	9	
Site contributes to 5 purposes of Green Belt (NPPF) / is not a weak contribution	3	
Site on fringe of built up areas (not development infill)	1	
Site is developable and deliverable	1	
Development in line with national policy	1	
Loss of Green Belt land negative impact on tourism and visitors	2	
Lack of evidence / clarity of methodology for site selection	2	
United Utilities land at site is not available for development	1	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Potential for high quality development (with blue green infrastructure and assets protected)	1	
Presence of TPO	1	
Unrealistic housing figures / density of site overstated	2	
Objection to housing figure and methodology (12,000)	2	
Brownfield development incapable of delivering appropriate housing no. (Preferred Approach unsound)	1	

Site 7: Parcel 7.19 (SP065) West of Lower Thingwall Lane, Thingwall		
Key Issues	# comments	Council Response
Development could overwhelm local / public services	1	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Impact / disruption to roads (traffic concerns)	4	
Creation of urban sprawl / Green Belt buffer zone (Barnston, Irby, Thingwall and Pensy)	3	
Proximity to designated sites of biological importance	1	
Impact on conservation village of Barnston	2	
Lack of public transport infrastructure / service	2	
Adverse visual impact	2	
Pollution concerns	2	
Noise pollution	1	
Recreational value	1	
Poor access (pedestrians and amenities)	1	
Impact on local / public services	1	
Impact of release on heritage / historical value (Viking links)	2	
Flood risk (lack of and loss of natural drainage)	1	
Release would present loss of agricultural land	2	
Impact on wildlife	2	
Impact on environment	2	
General objection to Green Belt release / brownfield preferred	4	
Concentrated release of Green Belt preferred	1	
Site contributes to 5 purposes of Green Belt (NPPF) / is not a weak contribution	2	
Supports removal of SHLAA 0931 from Green Belt options	1	
Environmental constraint – Source protection Zone 3 (outer zone) (EA)	1	
Site requires screening against evidence base	1	
Site on fringe of built up areas (not development infill)	1	
Proposed release compliant with NPPF / is a weak contribution to Green Belt	1	
Development of site would not create urban sprawl / merging	1	
Unrealistic housing figures / density of site overstated	1	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.

Site 8: Parcel 7.25 (SP009, SHLAA 1778) West of Sandy Lane, Irby		
Key Issues	# comments	Council Response
Impact on wildlife - site has high biodiversity	20	

Risk of damage to wet heath (Thurstaston Common SSSI) / proximity to designated sites (protected orchard) (Wirral BC CA)	17	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Impact on environment	2	
Impact on water – Greasby Brook	9	
Flood risk (loss of natural drainage and presence of Brook)	7	
Release would present loss of agricultural land	7	
Lack of capacity of infrastructure / services	7	
Adverse impact of release on character and identity (rural feeling)	18	
Pollution concerns	8	
Noise pollution	7	
Adverse visual impact (special landscape value)	21	
Traffic concerns (Thurstaston Road, Sandy Lane (narrow) and Hill View Road) (M53)	35	
Insufficient public transport infrastructure	10	
Development could overwhelm local / public services	18	
Development should take place elsewhere (brownfield use instead)	20	
Buffer zone / protection against urban sprawl (Irby and Thurstaston) (to and from NT land)	19	
Concern over density of site	5	
Impact of release on heritage / historical value (Roman road of Sandy Lane) (Viking heritage)	11	
Presence of TPOs (oak tree)	9	
Potential presence of archaeological remains on site	2	
Inconsistent site boundaries	1	
General objection to Green Belt release / development	55	
Option 2B preferable over 2A	1	
Site contributes to 5 purposes of Green Belt (NPPF) / is not a weak contribution	2	
Green Belt beneficial / attractive for tourism and visitors	5	
Site selection criteria / method / evidence base questioned	4	
Adverse impact on human health and wellbeing / quality of life	9	
"Quiet area" / Impact on amenity and recreational value (of Thurstaston Common and Royden Park)	8	
Source protection zone 3 (EA)	1	
Support allocation of site	1	
Unrealistic housing figures / density and developability of site overstated	2	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery
Objection to housing figure	9	

		Strategy which accompanies the Local Plan Submission Draft.
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Site 9: Parcel 7.26 (SP059C, SHLAA 1764) 41 Thurstan Road, Irby		
Key Issues	# comments	Council Response
Development of sites 9, 10, 11 would have little influence on character of Irby	3	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Any proposed design should be sensitive to character	1	
General objection to Green Belt release / development	7	
Pollution concerns	2	
Impact of release on heritage / historical value (Irby medieval)	4	
Adverse impact of release on character and identity (rural atmosphere)	7	
Development should take place elsewhere (brownfield use instead)	1	
Adverse visual impact (LCA)	5	
Adverse impact on human health and wellbeing / quality of life	5	
Development could overwhelm local / public services	1	
Insufficient public transport infrastructure	1	
Impact on water – Greasby Brook	2	
Flood risk (loss of natural drainage and presence of Brook) (Flood zone 1)	1	
Buffer zone / protection against urban sprawl (Barnston, Thingwall, Pensby and Thurstan)	2	
"Quiet area" / Impact on amenity and recreational value (of Thurstan Common)	4a	
Traffic impacts and concerns (travel times)	5	
Impact on wildlife / biodiversity	2	
Development would allow for ecological improvements	1	
Green Belt beneficial / attractive for tourism and visitors	2	
Accurate estimate of delivery figures	1	
Proximity / functional link to habitat / designated site (SPA and Ramsar birds) (Thurstan Common)	2	

Site 10: Parcel 7.26 (SP059B, SHLAA 1765) 59 Thurstan Road, Irby		
Key Issues	# comments	Council Response
Development of sites 9, 10, 11 would have little influence on character of Irby	3	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Proximity / functional link to habitat / designated site (Thurstan Common)	1	
Insufficient public transport infrastructure	1	
Development should take place elsewhere (brownfield use instead)	3	
Impact on wildlife / biodiversity (owls, great crested newts)	2	

Development could overwhelm local / public services	3	
Importance of impact of design on character	1	
Traffic impacts and concerns (travel times)	7	
Buffer zone / protection against urban sprawl (Barnston, Thingwall, Pensby and Thurstaston)	5	
Adverse visual impact (LCA)	7	
Impact of development on water – Greasby Brook	3	
Flood risk	2	
General objection to Green Belt release / development	10	
Adverse impact of release on character and identity (rural atmosphere)	10	
Impact of release on heritage (Irby medieval)	3	
Green Belt beneficial / attractive for tourism and visitors	3	
Pollution concerns	4	
Proposed density is inappropriate for area	1	
Accurate estimate of delivery figures	2	
Site selection criteria / method / evidence base questioned	1	
“Quiet area” / Impact on amenity and recreational value (of Thurstaston Common)	6	
Adverse impact on human health and wellbeing / quality of life	5	

Site 11: Parcel 7.26 (SP059D, SHLAA 1766) 61 Thurstaston Road, Irby		
Key Issues	# comments	Council Response
Insufficient public transport infrastructure	1	
Proximity / functional link to habitat / designated site (Thurstaston Common, Blackford Road Pond LWS)	2	
Development should take place elsewhere (brownfield use instead)	2	
Pollution concerns	4	
Buffer zone / protection against urban sprawl (Barnston, Thingwall, Pensby and Thurstaston)	2	
Development could overwhelm local / public services	2	
Development of sites 9, 10, 11 would have little influence on character of Irby	3	
Importance of design on character	1	
Traffic impacts and concerns (travel times)	5	
General objection to Green Belt release / development	8	
Adverse impact of release on character and identity (rural atmosphere)	7	
Impact of development on water – Greasby Brook (Main river) (mitigation from pollution needed)	3	
Flood risk (loss of natural drainage and presence of Brook)	2	

Impact on wildlife / biodiversity	2	
Adverse visual impact (LCA)	5	
"Quiet area" / Impact on amenity and recreational value (of Thurstaston Common)	4	
Proposed density is inappropriate for area	1	
Accurate estimate of delivery figures	2	
Impact of release on heritage (Irby medieval)	3	
Green Belt beneficial / attractive for tourism and visitors	2	
Adverse impact on human health and wellbeing / quality of life	6	

Site 12: Parcel 7.27 (SP060) South of Thingwall Road, Irby		
Key Issues	# comments	Council Response
Unrealistic housing figures / density of site overstated	7	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Objection to housing figure	5	
Proposed density inappropriate	5	
Site not deliverable or developable (access and land ownership constraints – land unavailable)	13	
High density does not ensure needs met across Wirral / need for proportionate distribution	10	
Serious damage to and loss of amenity of designated site (Harrock Wood LWS) (Royden Park) (habitat fragmentation)	18	
Development should take place elsewhere (urban intensification / brownfield use instead)	17	
Adverse impact of release on character and identity (rural village atmosphere)	15	
Impact on environment	6	
Impact on biodiversity / wildlife and corridors (tawny owls, migrating birds)	20	
Release would present loss of agricultural land	4	
Proximity / damage to water (Arrowe Brook)	3	
Mapping and boundaries misleading	3	
Insufficient utilities infrastructure / services (sewer capacity)	7	
Traffic impacts and concerns (Thingwall corner and Arrowe Park Road and hospital bottleneck, Irby village bottleneck) (Barnston village block) (Elme Road narrow)	24	
Light pollution	3	
Noise pollution	5	
Pollution (general)	5	
Air pollution (result of traffic)	6	
Insufficient roads / public transport infrastructure	7	

Designation of surrounding areas as "settlements" flawed	1	
Adverse impact on human health and wellbeing / quality of life	9	
Adverse visual impact (Irby & Pensby Sandstone Hills Landscape Character Area and privacy concerns)	11	
Buffer zone / Creation of urban sprawl (Irby and Thingwall, Pensby)	35	
Impact of release on heritage (Viking settlement, medieval furrows, ancient well) and archaeological remains	10	
Flood risk (bog) (loss of natural surface water drainage, regular flooding) (Thurstaston Road) (high risk level) (flood zone 2 and 3, Arrowe Brooke, SPZ 3)	9	
General objection to Green Belt release / development	17	
Release would present loss of high quality BMV agricultural land used for grazing	5	
Site contributes to 5 purposes of Green Belt (NPPF) / is not a weak contribution	6	
Site selection criteria / method / evidence questioned	5	
Loss of recreational value / right of way	8	
Development could overwhelm local / public services	20	
Green Belt beneficial / attractive for tourism and visitors	5	
Development should provide environmental improvements	3	
No known environmental constraints on the site	1	
Site is in accordance with ecological considerations	1	
Site would have minimal impact on climate change policy	2	
Further Green Belt release required to meet housing needs	2	
Site would not impact on landscape quality	1	
Site is well placed to accommodate development	1	
Proposed scheme would have limited highways impact	1	
Site in proximity to several amenities	1	
Proposed release compliant with NPPF / is a weak contribution to Green Belt	2	
Site serviced by frequent public transport	1	

**Q4.13: Do you think that any of the other weakly performing land identified in the Green Belt Review should be considered for release to meet any residual housing or employment requirements?**

1. Do not support Green Belt release (57), there are no 'weakly performing' Green Belt sites (81).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

**2.** Individual Green Belt sites part of strategic parcels have not been assessed (5). Green Belt sites proposed for release to meet residual housing or employment requirements include:

- SHLAA0642, SHLAA3094, SHLAA4020, SHLAA0928, SHLAA1929, SHLAA1942, SHLAA 3055, SHLAA 3056, SHLAA 4058, SHLAA 4068
- Parcels 1.3, 1.4, 2.6, 4.3, 4.5, 4.8, 4.11 (4), 4.12 (4), 4.15, 4.16 (2), 5.11 (2), 5.13, 5.14A, 6.11 (2), 6.16, 7.1, 7.2, 7.3, 7.4, 7.5, 7.10, 7.11, 7.22, 7.26 (3), 15, 65
- Ellerman Lines site
- The Raby Hall Road site
- Land opposite Townsend Avenue, bounded by Telegraph Road
- Small plots of Thurstan Road
- Eastham Village Conservation Area

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

**3.** The housing requirement figure is too high (81).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

**Q4.14: Do you agree with our assessment of the advantages and disadvantages of a dispersed approach to releasing sites from the Green Belt under Option 2A? Are there any other advantages or disadvantages that you believe we should take into account?**

**1.** Advantages to dispersed Green Belt release include:

- Increased access to green space (6)
- Meet housing need identified in the SHMA (13)
- Provide affordable housing (11)
- Deliverability (14)
- Infrastructure improvements/connect to existing infrastructure/limited strain on infrastructure (26)
- benefit existing settlements (12)
- development dispersed evenly across the Borough (7), limited impact to surrounding areas (8)
- limited impact to the loss of the Green Belt (2)
- dispersed pollution from traffic (1)
- phased delivery (1)

Disadvantages to dispersed Green Belt release include:

- urban sprawl/coalescence (3)
- impact to wildlife/wildlife corridors/habitats/biodiversity (4)
- health impact from increased pollution (1)
- increased car use due to limited public transport (1)
- disproportionate number of sites allocated in Irby (4)

Reduce the housing requirement figure (88). Oppose all Green Belt development (188), support urban intensification instead (82).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

#### Option 2B: Single Urban Extension

#### **Q4.15: Do you have any views on the areas that have been currently identified for the single large scale urban extension, shown in Table 4.7 and on Figure 4.7?**

Site: All Single Urban Extension Green Belt Sites		
Key Issues	# comments	Council Response
Development / regeneration of brownfield sites preferable	132	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
General objection to Option 2B Green Belt development / release	236	
Release would cause coalescence / sprawl (Heswall, Barnston, Pensby, Storeton) / Green Belt provides buffer zone	116	
Release would cause adverse impact on rural character / identity	113	
Disruption of amenity caused by construction	11	
Archaeological constraints (Thingwall) (MEAS red scoring)	6	
Impact on heritage / historical value and appeal	97	
Impact of release on environment and climate change (mitigation and adaption)	26	
Climate change adaptation only considers flooding and no other aspects	1	
Climate change mitigation does not consider carbon storage in vegetation and soil	1	
Adverse impact on human health, wellbeing, or quality of life of residents	12	
Adverse impact on biodiversity / wildlife corridors (habitat fragmentation / destruction) (presence of badgers, foxes, pheasants and bird species)	45	
Proximity / functional link to designated site (Barnston Village CA, Dee Estuary SPA)	9	
Traffic and road infrastructure safety and congestion concerns  (Whitehouse Lane, Acre Lane "rat run" for M53 access) (proximity to M53) (Clatterbridge Roundabout) (Barnston Dip) (Barnston Road junction bottleneck) (Gills Lane)	72	
Biodiversity Net Gain cannot be easily achieved	1	
Parking infrastructure capacity concerns	4	
Objection to housing figures 12,000 / targets	36	The future housing land supply has been reconsidered in the light of the comments received and the latest

		available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Lack of public transport infrastructure / services and capacity to accommodate development	12	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Infrastructure (drainage and sewage currently inadequate) constraints	18	
Air pollution and quality concerns	17	
Light pollution concerns	2	
Noise pollution concerns	10	
Pollution concerns (general)	7	
Car dependency of new development (due to distance from services / urban cores) / in conflict with strategic objective 3	7	
Overreliance on single site presents risk of no delivery	3	
Site/area is not accessible	3	
Long lead in of large urban extension – units would not contribute to 5-year supply	12	
Site contributes to NPPF 5 purposes of Green Belt / is not a weak contribution to Green Belt / release would be against national policy	16	
Requires greater dispersal of sites to alleviate undersupply / meet short-term housing needs	16	
Option 2B would not provide appropriate variety and mix of housing to meet need	2	
Objection to need for proposed density / units on site	12	
Impact on (stretched) local / public services	26	
>2 mile distance safe walking route to schools	1	
Loss of BMV agricultural land (loss of 3 farms at Barnston) for food production	34	
Adverse visual impact / loss of sensitive landscape amenity	26	
Green Belt release would impact on attractiveness for tourism / visitors	2	
Loss of or damage to (protected) trees, woodland and / or hedgerows	12	
Lack of employment / opportunities to support housing	4	
Loss of recreational value of green space	11	
Other options available to meet residual need	2	
Option 2B would not meet sustainability objectives for Wirral as a whole	5	
Distance of site from urban core	2	
Loss of green / open space	9	
Loss of public right of way / public access	9	
Flood risk (loss of natural drainage) (proximity to reservoir) (at Barnston Road) (Whitehouse Lane railway bridge) (Brimstage Brook)	17	
Multiple ownership of land can compromise sustainable development	2	

Some allocations within Source Protection Zones 1 or 2	1	
Irreversible / impact on future generations	18	
Site selection process and Green Belt Review flawed / not robust / requires greater evidence	21	
Register of sites / boundaries misleading / incorrect	3	
Site is a weak contribution to Green Belt	1	
Proposed development should provide for sustainable transport solutions / infrastructure	2	
Availability of alternatives to public sewer for surface water drainage should inform site selection	1	
"Settlement areas" designation holds no weight	1	
Need for affordable housing (on brownfield sites)	12	
Market absorption / demand constraints for level of development	7	
Site shown is deliverable and developable	3	
Sites not shown to be developable or deliverable in the short term	11	
Concern over pressures of development on infrastructure / resources (general)	15	
Any proposed development should be required to improve green and blue infrastructure, including SuDS	3	
Need for early involvement and discussion with landowners, EA and utilities providers	5	
Development would require extensive and expensive infrastructure work to be viable (Gill's Lane and east west link road)	25	
Green Belt / Option 2A infilling preferred / more deliverable over single urban extension	8	
Site specific policies / master planning approach required for successful delivery	6	
Design brief should be produced for development with community	4	
Preference for single urban extension over 2A	3	
Support for single urban extension	9	

Site: Parcel 7.17 (SP062A, SHLAA 0884) - West of Barnston Road, Heswall Single Urban Extension Green Belt Sites		
Key Issues	# comments	Council Response
Development / regeneration of brownfield sites preferable	2	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
General objection to Option 2B Green Belt development / release	2	
Release would cause coalescence / sprawl (Pensby, Barnston and Thingwall) / Green Belt provides buffer zone	1	
Release would cause adverse impact on rural character / identity	2	

Adverse impact on human health, wellbeing, or quality of life of residents	1	
Adverse impact on biodiversity / wildlife corridors (habitat fragmentation / destruction) (bat population)	2	
Proximity / functional link to designated site (Barnstondale LWS, Barnston Village CA)	3	
Traffic and road infrastructure safety and congestion concerns  (B5138, A551, A5137 congested, Thingwall Gayton roundabouts at capacity) (M53 J3 and J4 at capacity)	2	
Lack of public transport infrastructure / services capacity and access to accommodate development	2	
Infrastructure (drainage and sewage currently inadequate) constraints	1	
Damage to water from pollution (Prenton and Brimstage Brooks and Drinking Water Safeguard Zone))	2	
Pollution concerns (general)	1	
Site contributes to NPPF 5 purposes of Green Belt / is not a weak contribution to Green Belt / release would be against national policy	2	
Loss of or damage to (protected) trees, woodland and / or hedgerows	1	
Flood risk (loss of natural drainage) (proximity to reservoir, Brimstage Brook)	1	
Site selection process and Green Belt Review flawed / not robust / requires greater evidence	1	
Sites not shown to be developable or deliverable	1	
Development would require extensive and expensive roads infrastructure work to be viable	2	

Site: Parcel 7.17 (SP062A, SHLAA 0884) - West of Barnston Road, Heswall Single Urban Extension Green Belt Sites		
Key Issues	# comments	Council Response
Development / regeneration of brownfield sites preferable	2	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
General objection to Option 2B Green Belt development / release	3	
Release would cause coalescence / sprawl / Green Belt provides buffer zone	5	
Release would cause adverse impact on rural character / identity	2	
Health Risk Assessment would be required for the site	1	
Impact on heritage / historical value and appeal (Historic Landscape Character types)	3	
Adverse impact on human health, wellbeing, or quality of life of residents	2	

Adverse impact on biodiversity / wildlife corridors (habitat fragmentation / destruction) (large mammals, bat population and red and amber listed birds)	5	
Concern of environmental damage from development	2	
Proximity / functional link to designated site (Barnstondale LWS, Barnston Village CA, Dee Estuary SPA)	4	
Traffic and road infrastructure safety concerns (Barnston Road Accident Alert Road)	3	
Traffic and road infrastructure congestion and capacity concerns (through Heswall)	4	
Adverse visual impact / loss of sensitive landscape amenity	3	
Impact on (stretched) local / public services (primary schools and health services)	5	
Lack of public transport infrastructure / services capacity and access to accommodate development	2	
Drainage and sewage infrastructure currently inadequate	5	
Damage to water from pollution (Prenton and Brimstage Brooks and Drinking Water Safeguard Zone)	5	
Air pollution and quality concerns	2	
Light pollution	1	
Pollution concerns (general)	3	
Loss of agricultural land for food production	3	
Parking infrastructure safety concerns	1	
Site contributes to NPPF 5 purposes of Green Belt / is not a weak contribution to Green Belt / release would be against national policy	2	
Loss of or damage to (protected) trees, woodland and / or hedgerows (high priority and ancient designations)	4	
Objection to housing figures / trajectories	3	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Flood risk from development (loss of natural drainage) (Brimstage Brook) (roads flooding at Whitehouse Lane railway bridge)	6	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Low flood risk currently	1	
Loss of recreational value of green space	1	
Green Belt release would impact on attractiveness for tourism / visitors	1	
Site selection process and Green Belt Review flawed / not robust / requires greater evidence	3	
Loss of green / open space	1	
Irreversible / impact on future generations	1	

Loss of public right of way / public access	2	
Development would require extensive and expensive sewage and drainage infrastructure work to be viable	2	
Land not available on parcel, to be retained by utilities provider	1	

Site: Parcels 7.15 and 7.16 (SP062) - West of Barnston Road, Heswall		
Key Issues	# comments	Council Response
Development / regeneration of brownfield sites preferable	11	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
General objection to Option 2B Green Belt development / release	5	
Release would cause coalescence / sprawl / Green Belt provides buffer zone	7	
Release would cause adverse impact on rural character / identity	5	
Health Risk Assessment would be required for the site		
Archaeological importance / interest of area (Viking links)	2	
Impact on heritage / historical value and appeal	3	
Adverse impact on human health, wellbeing, or quality of life of residents	1	
Adverse impact on biodiversity / wildlife corridors (habitat fragmentation / destruction) (red and amber list birds, bat population)	9	
Impact of release on environment and climate change (mitigation and adaption)	4	
Large scale loss of Green Belt unsustainable	1	
Development would be car dependent	1	
Proximity / functional link to designated site (Barnstondale LWS, Barnston Village CA, LCR Core Biodiversity Area, Dee Estuary SPA)	7	
Traffic and road infrastructure safety concerns (narrow roads, Barnston Road Accident Alert Area)	2	
Traffic and road infrastructure congestion and capacity concerns (B5138, A551, A5137 congested) (Thingwall Gayton roundabouts at capacity) (M53 J3 and J4 at capacity)	8	
Adverse visual impact / loss of sensitive landscape amenity	3	
Impact on (stretched) local / public services (primary schools and health services)	8	
Lack of public transport infrastructure / services capacity and access to accommodate development (no train service to Liverpool)	9	
Utilities infrastructure concerns	3	
Drainage and sewage infrastructure currently inadequate	7	

Damage to water from pollution (Prenton and Brimstage Brooks and Drinking Water Safeguard Zone)	5	
Air pollution and quality concerns	3	
Light pollution	2	
Noise pollution	2	
Pollution concerns (general)	4	
Loss of arable agricultural land for food production	9	
Damage to culture and community of the area	1	
Site contributes to NPPF 5 purposes of Green Belt / is not a weak contribution to Green Belt / release would be against national policy	3	
Loss of or damage to (protected) trees, woodland and / or hedgerows (high priority and ancient designations)	4	
Objection to housing figures / trajectories	5	The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy which accompanies the Local Plan Submission Draft.
Flood risk from development (loss of natural drainage) (Flood zone 3, Barnston Dip)	6	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs.
Loss of recreational value of green space	1	
Green Belt release would impact on attractiveness for tourism / visitors	1	
Site selection process and Green Belt Review flawed / not robust / requires greater evidence	4	
Irreversible / impact on future generations	1	
Loss of public right of way / public access	3	
Development would require extensive and expensive drainage and sewage infrastructure work to be viable	2	
Development would require extensive and expensive roads infrastructure work to be viable	4	
Development would require extensive and expensive general infrastructure work to be viable	3	

**Q4.16: Are there any other areas that you think should be considered for a single large scale urban extension to meet any residual housing or employment requirements?**

1. A single large extension could take place at:

- Pensby High School
- Saughall Massie Road and Pump Lane site
  - o Developable and deliverable weakly performing green belt site capable of delivering 385 homes, and around 1000-1250 as part of the larger parcel, as a medium scale urban extension
- The horse paddocks along Lever Causeway

- Storeton
- SHLAA4010/4075/4076 (The Storeton Garden Village)
  - o Can deliver contribution to housing requirement over plan period
- Golf courses (2)
  - o To ease pressure on the Green Belt (1)
- SP071
- SHLAA 1774 / 1776
  - o Flexible site which makes a weak contribution to green belt capable of delivering 190 homes
- SHLAA 1938, 1939, 1941, 1967, 1968

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

2. Large scale single urban extensions should be confined to Wirral Waters (88), or regeneration areas (85) as these are the areas with the greatest need for development (2). Greater numbers should be allocated to these sites (2). The areas around Wirral Waters must be regenerated urgently also (1). To support the extension, the mid Wirral railway should be electrified with new stations at Storeton and Gayton (1). Plans for new services, amenities, employment and transport systems are required at Wirral Waters (1).  
The development of Wirral Waters should be brought forward / prioritised / carried out as soon as possible (82) through close working with the landlord (2). The slow progress threatens Green Belt and agricultural land with development (2).

**Council response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

3. Development/housing needs can be accommodated within existing urban areas without the need for a single large extension (3) or green belt release (1) – Birkenhead / Rock Ferry / Wirral Waters (2) which would provide greater benefit to Wirral as a whole (1).  
Large scale single urban extensions should not be developed on green belt land (94). Brownfield sites should be developed (6). Empty properties should be reviewed (1). No sites should be classed as weakly performing (1) and the release of green belt sites would be against national planning policy (1). A Green Belt location cannot support this level of development (1) in terms of employment growth (1). If the single urban extension is inappropriate, a number of separate sites concentrated between Bromborough and Eastham should be developed (1) and not dispersed across the Borough (1).

**Council response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

4. The housing figure is unrealistic (2), too high (1) and should be reassessed (1). The scale of development is not needed (1) as there is not high enough demand (1).

**Council response:** The Borough's housing needs have been re-assessed in the finalised and independently verified Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

5. A single large scale urban extension is an inappropriate option for the Local Plan (3). Medium-smaller extensions would be preferred (3) which would provide a better opportunity to meet housing needs (2). These should be sustainably dispersed (1). Larger strategic sites present challenges with deliverability and ownership (3).

Allocation of large strategic sites should be complimented with a dispersed Green Belt release (2) and Option 2A should be considered (1).

**Council response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.

6. The Council's evaluation of sites is flawed (1) and a number of development parcels will need to be re-evaluated (1). The Eastham urban expansion area has not been assessed as thoroughly as Heswall (1). These evidence gaps should be addressed to ensure soundness (1).

**Council response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.

7. The Eastham option should be considered (2) – it performs better on landscape sensitivity grounds and performs similarly to the Heswall option (1).  
Option(s) 1 should be delivered instead (1). No sites in Option 2 are well served by public transport (1). Development would therefore result in traffic and associated impacts on amenity and the environment (1).

**Council response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas.

8. Due to the size and general layout of the towns and villages in the Borough, any large-scale urban expansion would lead to dramatic impacts on separation distances of towns and villages as well as having large impacts on local infrastructure (6). The character of the borough would change as a result of large-scale urban expansion (1).

**Council response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas.

9. Any large-scale release of land would have an impact on wildlife (1).

**Council response:** Noted, the Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas.

10. The New Ferry Masterplan should be taken into account (1).

**Council response:** The New Ferry Masterplan Area has been included in the Local Plan Submission Draft under Policy RA 11 New Ferry Regeneration Area (MPA-RA11.1).

**Q4.17: Do you agree with our assessment of the advantages and disadvantages of a more concentrated approach to releasing a single urban extension from the Green Belt under Option 2B? Are there any other advantages or disadvantages that you believe we should take into account?**

1. A single large scale urban extension would enable a serious transition to low carbon living (1). A single large scale urban extension would provide the opportunity for good quality designs (1) and provide open spaces for communities (2). The location is served by public transport and infrastructure planning would reduce the need for car dependent travel (1). Improvements to infrastructure could create a highly desirable garden village (1). Site can provide opportunity for fast delivery through volume house builder (1). Site is close to Arrowe Park and Clatterbridge hospitals (1). Approach would allow dwelling mix to be optimised according to needs (1). Land assembly is not an issue in this case as parcels for single urban extension is controlled by one landholder (1).

This approach would allow a phased approach and therefore greater flexibility to reflect changing socioeconomic and environmental issues (1). If Green Belt is required, a single urban extension is preferable to dispersed development (1) as development would be of a higher standard and better infrastructure could be provided for. Buffer zones should be used in the event of development to protect residents from the loss of amenity and green space (1) and create wildlife corridors (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

2. Objection to advantages / no advantages to single urban extension (5).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

3. Objection to approach to release green belt for a single urban extension Option 2B (87+69+7). Green Belt should not be released for development and should be protected (31). The impact on the green belt outweighs the stated advantages of Option 2B (7). Advantages of this are not compelling (90) – there is no justification / advantages of this (6). Green belt development would damage habitats/wildlife (4), damage human health and wellbeing (3), damage air quality (2) and trees (1) and set back Wirral's Climate Change targets (3). Alternatives are available to GB release (1) and brownfield sites should be developed/explored first (5). The Green Belt Review is flawed in methodology (1). Option 2B would fail green belt purposes as set out in national planning policy (3) and no sites are weakly performing (1). Heswall, Barnston, Pensby and Irby would be ruined (1) and merged as a result of green belt release (2). Release may set planning precedent (1) and pressure would be placed on other parcels (1). Green belt prevents flooding (1).

The rural character of the West of Wirral would be damaged (1). The character of Barnston, Thingwall, Thurstanston and Irby would be damaged (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

4. Wirral Waters should be developed (1). Birkenhead should be developed (1) – Development should only occur at and be focussed where regeneration is needed (5).

Other parcels would be more appropriate as proposed land is on open agricultural land which would be damaged (7).

Option 2B requires significant investment in new infrastructure given the scale of the proposal (2). Option 2B is less sustainable than modest additions to existing settlements (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

5. Housing figure is too high (10) and flawed (5) and should be recalculated using a more realistic approach (3). 2,500 homes on one green belt site is not required (1) and failure to deliver the site would result in a strategic failure to deliver the minimum number of homes (1). Housing needs can be met without green belt release (3). Building on such a large scale should not occur (2) as this would not be sustainable (2) – there is no housing need or job availability to accommodate this scale (2). The housing market would be saturated by the level of building in one location (6). A series of smaller sites would make a greater contribution to housing supply (1) – a large single extension would not (3).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development. The single large urban extension option is not being pursued furthered. The Borough's housing needs have been re-assessed in the finalised and independently verified Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

6. A single urban extension would be against national policy in that it does not allocate smaller and medium sized sites (2). Development should not be concentrated within one area (3) - impacts of air pollution and traffic would not be dispersed (4) and it would be unfair to existing residents (1). Construction impacts would be prolonged due to the scale (1). Concentration of impacts in one area is not an advantage to the Borough (3). Larger strategic site allocations will result in a slow build out rate and delivery later in the plan period (3). This would not be a balanced spatial housing strategy (1). A better mix of homes would be provided by a dispersed release (1). Housing needs for the West of Wirral (2) and other Urban Settlements would be overlooked (5). A sufficiently dispersed release would allow greater control (2), provide greater flexibility to reflect changing socioeconomic and environmental issues (2) and meet needs across the Borough (3). A large number of homes should not be built until it is apparent that those residences are necessary (1). Complementary land uses in terms of employment land and highways infrastructure must be provided near the site if a larger site is used (1). There is no evidence to suggest that smaller sites cannot provide necessary infrastructure (1) or would result in a less sustainable pattern of development (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored furthered.

7. Traffic in Heswall cannot accommodate additional traffic flows resulting from development (92). Heswall would be overwhelmed (1). Other infrastructure issues in Heswall (86). Local infrastructure does not have capacity to accommodate this scale of development (3). Sewage and drainage infrastructure is currently under strain in the area (1). Road and transport infrastructure cannot support such expansion (2) and the site is highly constrained by this lack of access (6). Traffic jams are present at Storeton, Barnston Road, Chester High Road (2). Major

investment and high costs would be needed in the short term (3) to enable viability which includes major and overly expensive road alterations between Heswall and Thingwall (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored furthered. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

8. Affordable housing may not be adequately provided on such green belt sites (1) and there is no evidence to suggest a single large extension would provide more AH than a dispersed release (2). Major environmental impacts would occur as a result of the single large urban extension that should be referenced (4) including damage to protected species and habitats (1). Dispersed release would be less impactful on wildlife than a single large urban extension (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored furthered.

9. The land at Diamond Farm should be included within the site release as it will cause no material harm to the NPPF green belt purposes and would prevent the 'sandwiching' of the farmland (2) and would retain heritage assets (1) and a logical form of development (2). Buildings at the Farm are potentially convertible and could be retained (1). The SHLAA does not include the Farm farmstead (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

10. Disagreement with listed disadvantages (2).

**Council response:** Noted.

11. The first two disadvantages can be mitigated through a phased strategic plan in consultation with the existing community (1). It will not take longer to develop homes as these will be developed and released in stages (1). Quick fix solutions shouldn't be adopted with such potential impacts (1).

**Council response:** Noted.

12. Agreement with disadvantages of single urban extension. There are no advantages to the single urban extension (2). The advantages are not compelling. Area should not be considered in any way for development (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

13. No Green Belt land should be released for development and should be protected (20). No Green Belt land should be released under Option 2B (28). There are no advantages to release of Green Belt under option 2B (4). Development would destroy / encroach on a large area of high-quality, open countryside (10). Agricultural productive land would be destroyed (4) which should be retained. Regeneration will not be achieved (1). Approach would compromise the integrity of the Green Belt (3). Release may set planning precedent (3). There is no requirement for homes to be built on green belt land (1) or at the proposed location (1). No green belt sites are weakly performing (2) – exceptional circumstances have not been identified (1). The Green Belt review

is flawed (1). Green belt prevents flooding (1). Green spaces are essential to improving mental health and wellbeing (1) and quality of life (1).

Urban sprawl would be created merging Heswall, Thingwall, Pensby and Barston and Irby (12).

Development should occur on brownfield land should be prioritised (3). Wirral Waters should be the focus of the single large urban extension (1). Brownfield sites have been overlooked in many areas of the Wirral (2). Regeneration should occur at Birkenhead and where it is needed most (3). Regeneration elsewhere, especially in the green belt, would result in a loss of financial resources to Birkenhead and other areas of need (8).

**Council response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.

**14.** Development of this scale would have detrimental effects on the environment (5). Wildlife and habitats would be damaged by a single large scale urban extension (8), including badgers on the sites (1). Valuable wildlife is present on the site (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored furthered.

**15.** A single urban extension would be against national policy in that it does not allocate smaller and medium sized sites (1). Concentrated development in one area would not be fair to existing residents (1). Housing needs for the West of Wirral and other Urban Settlements would be overlooked (1). A better mix and variety of homes across the district would be provided by a dispersed release (4). Such a scale would result diversity and choice in the housing market (1). Bringing forward smaller sites could increase the level of housing by over 10% (1). A dispersed release of land would take pressure off on single area and development would be equally and fairly distributed. It would also mean existing infrastructure could be utilised (5).  
The character of any area with a single large urban extension would be damaged (7) with high impacts on the local area (8). Flood risk existent on fields on / near proposed site (2) and watercourses (1), and development would cause faster run off and further increase flood risk (3) as it is a hilly landscape.

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored furthered.

**16.** Housing figure is too high (5) and flawed (3). It must be challenged (1). There is a lack of evidence around economic growth (1). National policy has changed regarding the number of new homes required (1). Development should not be a box ticking exercise for housebuilding (1). The target for 30% affordable housing will not be achieved (3) as developers would try to argue that it would be unviable (1).

**Council response:** The Borough's housing needs have been re-assessed in the finalised and independently verified Strategic Housing Market Assessment 2021 including the latest economic forecasts for the City Region.

**17.** Support for arguments for infrastructure and affordable housing (1). Poor infrastructure planning at the site would increase car dependency (1) and worsen existing traffic (1). The area is not convenient for commuters (1).

Local infrastructure would not support development of this scale (12), especially in Heswall (1) and Barnston (1). The site is not served well by local services (2). Development in a single area may place additional pressure on primary care services (1) and therefore increased investment would be required for health infrastructure and workforce (2). Schools are at capacity (1). No public transport, employment opportunities and amenities to support affordable housing (3). The area is poorly serviced by rail transport compared to other areas of the Wirral (1) which would require investment to enable sustainable development (1). There would be significant costs of new required infrastructure provision (13) and infrastructure constraints are present on the site currently (1).

Road and transport infrastructure would not accommodate this scale of development and would lead to increased traffic (15). Area is highly constrained by highways infrastructure (1). Highways improvements are required (1). Traffic in Heswall and junction between Barnston Road and Storeton lane cannot be accommodated (7). The traffic pinch point in the centre of Heswall cannot accommodate any greater traffic flows (1). The area around Barnston school is currently congested (1) with poor visibility (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored furthered. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

**18.** Financially risky development (3). Difficulties with land assembly due to multiple landowners may impact deliverability (11). Land assembly is not an issue in this case as parcels for single urban extension is controlled by one landholder (1). Local housing markets will not be able to absorb proposed levels of homes in one location (2). This will reduce pace of delivery (2). Sites will have a longer lead in time due to the large scale (1). Build out rates will be slow due to scale (1). The scheme would make no contribution to 5 year land supply (7). Prolonged disruptive development/construction would create noise, traffic and impact on residents (4). The size of the site does not matter as much as the willingness of those involved to proceed (1). The Council has not delivered the development promised by Peel Investments (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored furthered.

#### **Q4.18: Do you agree with our preferred approach to meeting demands in Wirral through Urban Intensification?**

206 responses answered yes, and 34 responses answered no.

1. Support urban intensification (150). Support densification (1) in accordance with good planning practice (86). Support spatial option 1B (4). Prioritise empty homes (5). Support the inclusion of the demolition allowance (1). Support the release of employment land for residential development (2). Do not support the release of employment land for residential housing (1). Urban intensification is only needed at Wirral Waters (1).

**Council response:** Support noted.

2. Identify more brownfield sites (2).

**Council response:** There are no other known sites within the urban area that could be considered for future housing development, albeit we recognise that the Council is concurrently carrying out a further 'call for sites' exercise. However, if any additional urban sites any are identified during the call for sites process these will likely be small sites and within the Urban Conurbation and as such there will still be a need for the Draft Local Plan to identify sites within the Urban Settlements.

3. Identify more sites with a capacity for less than 20 dwellings (1).

**Council response:** There are no other known sites within the urban area that could be considered for future housing development, albeit we recognise that the Council is concurrently carrying out a further 'call for sites' exercise. If any additional urban sites any are identified during the call for sites these will be identified within the Urban Settlements.

4. Provide United Utilities with anticipated delivery rates (1). Identify sites according to the availability of alternatives to public sewers for the discharge of surface water (1). Work with United Utilities for the delivery of brownfield sites (1).

**Council response:** The Council has engaged with United Utilities to address these matters.

5. Infrastructure will not cope with densification (3). Ensure sufficient infrastructure is in place to accommodate new development (1).

**Council response:** The Infrastructure Delivery Plan which has informed the Local Plan and addresses these matters. The Council is also working with the Government and the LCR CA to deliver specific infrastructure which will assist with higher density living, in particular new mass transit and heat network systems for Birkenhead. The Council is also exploring the use of on street domestic waste storage systems which are suited to higher density living.

6. Support development in sustainable locations (2).

**Council response:** Noted. The Local Plan Submission Draft Preferred Urban Intensification option locates development in the most sustainable locations.

7. Provide open space (1), provide green space (2), provide sports space near schools (1). Provide space for green infrastructure when developing brownfield sites (1).

**Council response:** The Local Plan Submission Draft Policy WS 5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection deals with this issue.

8. There is too much traffic around SHLAA3095, SHLAA0915 and HLA 703800 (1).

**Council response:** The Council is not allocating SHLAA 3095 and SHLAA 915 for housing within Wirral Local Plan. HLA 703800 has received planning permission. The transport statement submitted alongside the planning application has been considered acceptable by the Local Highway Authority. All housing site and employment site allocations and planning permissions have been assessed using Wirral Traffic model to understand any impact on the road network.

9. Do not build on school sites, open space, green space (3), churches or cemeteries (1).

**Council response:** Sites which are afforded protection due to their importance for open space, environmental or heritage importance will not be developed. It may be possible in future for redundant school sites to be considered for development subject to consideration of planning

applications which will take account of all policies in the saved UDP and emerging Local Plan as appropriate.

- 10.** Avoid development in designated Source Protection Zones (1). Protect the coast (1). Protect wildlife (1). Development on brownfield sites must mitigate impacts on wildlife according to national guidance (1).

**Council response:** The Local Plan Submission Draft contains policies which address these concerns.

- 11.** Support sustainably designed development (2). Densification will impact local character/historic character (18). New development on brownfield sites should be sensitive to existing development (1).

**Council response:** Policy WS7-Principles of Design address this issue. The Birkenhead Design Guide also provides detailed guidance on sustainable development.

- 12.** The approach to determining the spatial strategy is unsound as an option has already been identified (1). There are deliverability concerns with the urban intensification option (9), robust evidence is required to demonstrate deliverability (5), the evidence is inaccurate/inadequate (5).

**Council response:** The evidence base for the Local plan has adequately demonstrated that the Preferred Spatial Strategy as set out in the Local Plan Submission Draft is sound and is deliverable.

- 13.** There are concerns with the accuracy of the windfall allowance (5) and the potential for double counting (3). Reduce the windfall allowance to avoid double counting (2). Do not include the windfall allowance (7). The windfall allowance should be no more than 10% (5). Data on demolitions and completions should be up to date (1), the evidence is insufficient on demolitions (1).

**Council response:** The windfall allowance in the Local Plan Submission Draft is based on the continuous delivery of new build dwellings on new sites that have not previously obtained permission for housing or been identified in a previous Strategic Housing Land Availability Assessment, with no duplication or double counting. The proposed allowance represents 3.5 percent of the Plan's housing requirement and 2.9 percent of the identified land supply. Further information is set out within the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.

- 14.** Not all affordable housing programme dwellings have planning permission, and therefore should not count towards housing supply (1). Other pipeline sites included in Table 2.2, Appendix 4.4 do not have planning permission and should therefore not be included (1). Other SHLAA 2019 sites included in Table 2.2, Appendix 4.4 do not have planning permission and should therefore not be included (1). Clear evidence is required for the deliverability of sites with outline permission. Sites identified in the Employment Land Options Study are not deliverable as they do not have planning permission (1).

Dwellings under 'intensification, rescheduling and the inclusion of additional urban allocations' should not be included as they deviate from the evidence set out in the SHLAA (2019), they are not deliverable (1).

No site-specific assessments have been conducted for Wirral Waters, Hind Street and Woodside and their projected supply is inflated (1).

**Council response:** Sites have only been included in the land supply where they can be shown to be 'deliverable' or 'developable' in terms of the definitions set out in national planning policy and

guidance, which includes information provided by relevant developers and landowners. Further information is set out in the SHLAA 2021 and the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.

- 15.** There is a discrepancy between the figures listed in Table 4.2 and the total supply from sites listed in Appendix 4.5 'Wirral Local Plan Housing Trajectory' for years 1 to 5 (1).

**Council response:** The information has been superseded by the housing trajectory set out within the Local Plan Submission Draft.

- 16.** Do not discount the 20% buffer from the housing supply (1).

**Council response:** An appropriate buffer has been applied in line with paragraph 74 of the National Planning Policy Framework in the Local Plan Submission Draft.

- 17.** Review job growth figures (1).

**Council response:** This has been addressed through the employment Land Study 2021 and the SHMA 2021.

- 18.** Urban intensification alone will result in a housing shortfall (6). Spatial Option 1A/Urban intensification alone will not meet identified housing needs (16), housing mix (5) and affordable housing need (2). Do not support urban intensification (1).

**Council response:** The Council has been able to identify sufficient brownfield land through Urban Intensification to meet the Borough's Housing Needs. See also the Housing Delivery Strategy.

- 19.** Reduce the housing requirement (1). Government should review the Standard Method (1).

**Council response:** See response to Q2.1

- 20.** Support Green Belt release (11), in addition to urban intensification (26). Support spatial option 2A (3). Support spatial option 2B (1). Green Belt development should be a last resort (1). Do not support Green Belt release (11). Do not support greenfield development (3). Develop brownfield Green Belt sites (1). Consider Green Belt development in years 5-10 of the plan period (1). Green Belt development will be unaffordable for residents (1).

**Council response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

- 21.** Peel's representation on Wirral Waters should be made publicly available (1). The Consultation statement for the Development Options Review did not adequately capture opposition to Green Belt development (3).

**Council response:** Peel's representations on Wirral Waters have been taken fully into account in developing the housing trajectory as set out in the Local Plan Submission Draft.

**Q4.19: If it was necessary to supplement urban intensification by releasing land from the Green Belt, would you prefer to see a dispersed release of land, a single larger urban extension, or a hybrid of the two options, and why?**

1. The responses received to this question equally favoured Option 2A or 2B:
  - a. Option 2A: Dispersed Release (31)

- b. Option 2B: Single larger urban extension (29)
- c. Hybrid option involving a mix of options 2A and 2B (14)

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

**Q4.19a: Please explain your choice:**

- 2. No Green Belt release, only brownfield development and support urban regeneration (93). Support spatial option 1B (1). Do not support any Green Belt release (133). Prioritise brownfield above Green Belt release (1).
- 3. Support Green Belt release (2). Support the development of sustainable Green Belt parcels (1). Assess Green Belt sites robustly before considering their allocation (1). Support spatial option 2A (40). Support spatial option 2B (25). Support smaller urban extensions (2). Support a hybrid approach to development, combining spatial options 2A and 2B (12).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

- 4. Recalculate the housing requirement to avoid Green Belt release (6).

**Council Response:** See response to Q2.1

- 5. The evidence to inform the decision to Q4.19a is insufficient/inaccurate (3).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

- 6. Support a phased development approach (1).

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

- 7. Road infrastructure deficit in Storeton Lane/Barnston Road junction (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

**Q4.20: Do you have an alternative option you would like to propose that would also meet the housing and employment land requirements for Wirral over the Plan period?**

- 1. Identify additional employment allocations to meet employment need in the Wirral (2). Specific sites mentioned for employment are as follows: SHLAA4057 (1) and the West Road site (1).

**Council Response:** SHLAA 4057 (east of Rivacre Rd/north of West Road, Eastham) is in the Green Belt. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries and is therefore not proposing any release of Green Belt for any purpose including for employment uses in the Local Plan Submission Draft.

2. Recalculate the housing requirement to achieve a lower figure (17). The housing requirement is too low and should be at 2018 levels (1). The standard method should be reviewed by the Government (2). Control population growth (1). Use an evidence based and independently reviewed method to calculate the housing requirement (1). Commission the University of Manchester to produce a housing requirement figure (3). Employ specialists to create an appropriate methodology to calculate the housing requirement (1).

**Council Response:** See response to Q2.1

3. Support brownfield development, in particular the regeneration of the Wirral docklands (229). Support spatial option 1A (2). Support brownfield and Green Belt development (2). Actions to ensure sufficient urban land supply include:
  - Co-housing (1).
  - Compulsory purchase of unused religious land/buildings (1).
  - Assess all available brownfield land and determine maximum capacity figures on each site (1), assess all brownfield land (1).
  - Densify brownfield land (1).
  - Prevent brownfield land banking (1).
  - Requisition empty homes (1), bring empty homes back onto the market (1).
  - Combine brownfield sites (1).
  - Convert abandoned railway routes into new transport links (1).
  - Abolish leaseholds (1).

**Council Response:** The Council has considered most of these options to maximise the supply of brownfield supply in the Local Plan Submission Draft. Whilst the Council consider the use of its CPO powers including vacant religious land and properties where appropriate to enable the delivery of brownfield development. The Council has no powers to abolish leaseholds.

4. Support Green Belt release (4). Support spatial option 2A (1). Support a hybrid approach to development, combining spatial options 2A and 2B (10). Support Green Belt release of sites assessed on the basis of public transport if there is insufficient brownfield land (1). The evidence base must demonstrate exceptional circumstances for Green Belt release (5). Specific parcels mentioned for development are as follows: SHLAA1774/1776 (1), SHLAA1880 (1), SHLAA3003 (1), SHLAA4009 (1), SHLAA4010 (1), SHLAA4020 (1), SHLAA4075 (1), SHLAA4076 (1), SHLAA0638 (1), SHLAA0927 (1), SHLAA4065 (1), SHLAA4035 (2), SHLAA1962 (2), SHLAA1963 (1), SHLAA1969 (1), SHLAA1952 (2), SHLAA4040 (1), SHLAA3087 (1), SHLAA4048 (1), SHLAA1982 (1), SHLAA1943 (1), SHLAA1819 (1), Parcel 65 (1) as well as land at Gayton Parkway, Heswall (1) and the whole of Eastham Village (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

5. Do not support Green Belt development (11). Do not develop green spaces (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

6. Use the Golf Resort land in Hoylake for residential development (1). Develop Golf Links Courses (1).

**Council Response:** The Hoylake Golf Resort proposals are not being pursued. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas. No green belt release is proposed.

7. Deliver affordable homes (1).

**Council Response:** Policy WS 3.3 of the Local Plan Submission Draft sets out Affordable Housing Requirements

8. Design innovative and sustainable homes (1).

**Council Response:** Policy WS 6 Placemaking for Wirral and Policy WS 7.1 Design principles deals with design and sustainable development. Innovative designs which are in accordance with these and other policies of the local plan will be supported.

9. Support sustainable farming practices, train farmers and support organic farming on 10% of land and low pesticide use on 90% of land (1).

**Council Response:** Noted but other than protecting agricultural land through maintenance of the Green Belt and promoting allotments food production is not something which the Local Plan can directly influence. The Local Plan Submission Draft Policy WS5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection deals with allotments and local food growing opportunities. The Council does not own farmland with which to offer farming training.

10. Combine tree cover increase with natural regeneration (1). Restore insect populations (1).

**Council Response:** Policy WS 6.1 Placemaking Principles deals with protection and enhancement of biodiversity including trees.

11. Produce a joint plan across the LCR (1).

**Council Response:** The Liverpool City Region a Combined Authority are preparing a [Spatial Development Strategy](#) for the Combined Authority area.

## 5. Our Homes

### Overall Mix of Housing

**Q5.1: Do you agree with our preferred approach to seeking to ensure an appropriate mix of dwelling type and size by requiring developers to take account of the proportions set out, while taking account of any site-specific opportunities or constraints, which could also include the need for a higher density of development on appropriate sites?**

**Summary of responses** – 164 out of 219 responses did not agree with the Council's preferred approach. 55 agreed with the preferred approach.

**Q5.1a: If you answered No, what alternative approach would you suggest and why? If you answered Yes, you can comment here.**

1. **Summary of responses** – 186 provided additional comments of which 22 had agreed with the preferred approach and 164 had not.

The main points arising in comments for and against suggested that:

- 8 considered that a standard approach should be avoided. Dwelling type and mix should be flexible and assessed on a case by case basis, taking into account location and site characteristics, viability, applicants rationale and social ethos. The latest SHMA may not reflect the position at the time of an application and it should be acknowledged that mix can vary geographically. Densities should be increased where appropriate. The approach would not meet the needs of all families.
- 14 indicated there should be fewer bungalows, 11 of which purported a shift in favour of more flats. It was contended that 18% of bungalows is highly unrealistic given the need for high density and viable developments in urban conurbations, there should be more flats, and policy should recognise Wirral Waters is predominantly apartment led. Other level-access options for housing for elderly and disabled people due to land shortage should explored. Ground floor flats would provide to same sort of space and with care a good mixed community could enhance quality of life for all.
- 2 supported more bungalows – people are looking for large detached bungalows to release homes for young families. Suggested mix was: 1 bedoomed (15%), 2 bedoomed (35%), 3 bedoomed (30%) and 4/+4 bedoomed (20%), and in terms of type it should be 50% houses, 25% flats and 25% bungalows. There should less flats at Wirral Waters.
- 8 supported more affordable housing, and in the comments it was recommended that the tenure split should be more related to NPPF definition, reflect the need for social rather than market homes. One asked about starter homes and 3 queried the need more luxury housing.
- 2 supported self-build, and a requirement for large sites to deliver 2% - 6 & was suggested.
- The ability to achieve 60% of 3 bed or larger homes via the urban intensification model was challenged in 6 responses. It was contended that the identified land supply will not meet identified needs and the solution is the release of sustainable and suitable Green Belt sites.
- 1 considered 60% need for houses is not required if suitable flats and elderly residential villages were built.
- The number of houses needed was challenged in 100 out of the 186 the responses. It was contended that the Borough does not need 12.000 + houses and the Councils Compendium of Statistics and those of University Professors was cited amongst claims no evidence for this.

**Council response:** Policy WS3 will be drafted to secure the most appropriate mix of housing taking account of site specific circumstances, viability and updated national planning guidance & Strategic Housing Market Assessment.

For the number of dwellings needed, the Council applies the Government's standard method of calculation in accordance with national planning policy and guidance. The calculations have been independently verified in the revised Strategic Housing Market Assessment. It has been concluded that there is no evidence to justify the changing the boundaries of the Green Belt to meet the need for housing.

#### Affordable Housing Need

**Q5.2: Do you agree with our preferred approach of seeking to achieve up to 30% affordable housing from all new developments of 10 dwellings or over, subject to viability, based on the mix of size and tenure recommended in the SHMA 2019?**

**Summary of responses** – 137 out of 217 responses did not agree with the Council's preferred approach. 71 had agreed with the preferred approach and 9 did not indicate either way.

**Q5.2a: If you answered No, what alternative approach would you suggest and why? If you answered Yes, you can comment here.**

1. **Summary of responses** – 187 provided additional comments of which 41 had agreed with the preferred approach and 136 had not. The remaining 10 had not indicated either way.

The main points arising in the comments suggested that:

- 27 considered that 30% affordable housing was too low. 3 indicated higher figures of 40%, 50%, and 60%. The Council could ask for proportional contributions from sites of less than 10 dwellings. Viability should be an excuse to threaten future provision and there should be a substantial allocation. Land value must be informed by policy as in judgment in [2018] EWHC 991 (Admin). Council needs to borrow if private developers can't afford to build. Specialist accommodation should not be required to contribute because of critical national shortage, costs are greater, communal accommodation would be provided
- 9 contended 30% is too high. Housing numbers are wrong and 1 indicated 15% would be more acceptable. Most development is on smaller sites where 30% (or even 10%) would significantly reduce viability and make the trajectory of affordable housing uncertain. 10% provision which NPPF, para 64 sets out seems viable and sensible. The Local Plan Baseline Viability Study 2018 shows affordable housing is not viable in Zones 1 and 2. Policy should acknowledge the tenure split may be different to the preferred approach and the SHMA be updated
- 70 indicated that social/council housing should be in areas that need them. There should not be blanket figures in all areas and provision should be reflective of local context. A more flexible plan should accommodate an ageing population, first time buyers, changes in lifestyle and enable off site provision or contributions in lieu.

**Council response:** The rate of affordable housing to be secured by new build market housing will be set in Policy WS 3.3 taking account updated national planning guidance, Strategic Housing Market Assessment, and the Local Plan Viability Assessment, which will recognise that land values will vary in different part of the Borough. The tenure split will take account of further research and national planning guidance which expects major development to contribute to affordable home ownership.

To enable regeneration to occur on sites with poor viability, it is proposed in the initial stages of development have a reduced affordable housing requirement. However, the policy would include measures to ensure appropriate provision for affordable housing is made if land values increase during later stages in the development process. This would be managed via Planning Obligations and S106 agreements.

### The needs of other groups

**Q5.3: Do you agree with our approach to the provision of specialist housing for older people and for ensuring that a proportion of all new homes meet optional accessibility standards?**

**Summary of responses** – 25 out of 205 responses did not agree with the Council's preferred approach. 177 had agreed with the preferred approach and 4 did not indicate either way.

**Q5.3a: If you answered No, what alternative approach would you suggest and why? If you answered Yes, you can comment here.**

1. **Summary of responses** – 156 provided additional comments of which 129 had agreed with the preferred approach and 23 had not. The remaining 4 had not indicated either way.

The main points arising in the comments suggested that:

- In 97 of the comments there was a general consensus that specialist housing and accessible housing should be provided.
- 74 suggested more apartments should be built on the waterfront, whereas 3 contended the focus should enable people to stay in their homes, with provision to age well. 2 others added that specialist housing should not just focus on older people but also on other groups with protected characteristics such as people with learning disabilities and/or autism, families with disabled children and people with mental health needs and be suitable for young people with reduced mobility and other impairments.
- Older people thrive better in a mixed environment rather than being isolated in remote areas. Ideally, all new dwellings should have wheelchair access.
- Concern was raised in 8 comments that the lack of suitable housing puts a significant strain on the NHS and other public services. Needs assessment should be linked to social and health policies to ensure adequate provision for those in need of care. It's not necessary to only build bungalows for elderly and disabled residents; ground-floor flats could be part of a healthy community. Housing associations and Councils should work together to meet needs of those excluded by private market housing.
- 8 advised the Council that there should be sufficient robust evidence of need to justify optional and accessibility standards. 1 indicated that wheelchair accessible homes (M4(3)) should only be applied where the local planning authority is responsible for allocating or nominating the person and the ageing population is not sufficient evidence to justify the accessibility standards.
- Other Individual comments indicated:
  - i. Green Belt sites were suggested at Greasby, Hoylake, Meols and Eastham. Another fails to see how provision of specialist housing for older people can be achieved, if almost all growth is directed to Commercial Core, where Wirral Waters is intended to provide high-density flats. Own assessment shows significant demand above that estimated in SHMA. There are many “appropriate sites” adjacent to the Settlement

- Areas in West Wirral. Without a positive approach to the release and allocation of existing Green Belt land, specialist housing needs will go unmet.
- ii. There is no definition of “appropriate sites” which could be used by Developers to overcome restrictions in the Green Belt.
  - iii. There are suitable sites with significant capacity at West Kirby Disused Fire Station/Car Park and Council Maintenance Yard on Arrowe Park Road where operations could be transferred to financial benefit to Landican Cemetery Maintenance facilities. Whilst agreeing with SHMA findings, there is no evidence that any of the schemes considered would accommodate the needs of the projected ageing population nor an appropriate housing mix.
  - iv. Older people need to be close to facilities and transport routes, not isolated in ‘ghettoes’, but may need to be clustered into specific areas. Small parcels of land released from the Green Belt might not provide the appropriate places for such developments. Good quality accommodation might release housing no longer required to other sections of the community.

**Council response:** The Council's evidence indicates there is a need for a broader housing offer to help people to live independently for longer and ensure that when required people can gain access to supported accommodation. The Wirral Health and Care Commissioning Teams are currently working jointly with developers and housing associations to develop Extra Care Schemes across the Borough.

Analysis of changes to the population suggest a need for an additional 1,149 residential care (C2 Use Class) places and 2,332 units of specialist older persons dwellings (C3 class) such as sheltered and Extra Care homes by 2037. It is also expected that there will be a need for co-housing for self-identified groups in the community seeking to share housing and care provision and that the general housing stock can also be adapted to meet changing needs as people age or face disabilities.

Levels of poor health are above the national average in Wirral with 21.2% reporting in the 2011 census that they were in ‘fair/bad/very bad health compared to a national average of 18.3%. The household survey associated with the Strategic Housing Market Assessment indicated that 21.8% of all residents have an illness or disability with 8.6% citing a physical disability or impairment. In 2020 there were an estimated 24,245 people with mobility difficulties across all age groups and this is projected to increase by around 1900 by 2035. Wirral’s All Age Disability Ability Strategy estimates that by 2030 around 64,000 Adults (18+) in Wirral will have some form of limiting long term illness or disability that would be around 1 in 4 of the projected adult population.

Given the aging population of the Borough and the identified levels of disability amongst the population, it is considered reasonable to expect that 6% of new dwellings will be wheelchair accessible, and that all other new dwellings will be built to be accessible and adaptable in line with optional Building Regulation standards under the terms of Policy WS 3.1.

Policy WS 3.6 will make provision for specialist housing in sustainable locations with good access to local services and appropriate on-site amenity space. This will include accommodation for older people, adults and children with particular needs that must be designed and managed to provide the most suitable type and level of support and care for the future occupiers. Proposals will also need to show how any support staff and associated services including medical care will be properly incorporated.

It has been concluded that there is no evidence to justify the changing the boundaries of the Green Belt to meet the need for specialist housing.

### Empty Properties

#### **Q5.4: Do you have any views on our preferred approach for promoting the re-use of empty homes and buildings to provide for additional housing within the Plan period?**

1. Summary of responses - Of 289 responses, 169 supported including the reuse of empty properties, especially to support regeneration and tackle homelessness (1).

Of those who expressed a preference, five supported Option 1 (a static figure of 75 long term empty homes brought back into use each year, equivalent to an additional 1,125 dwellings over the Plan period), sixteen supported Option 2 (a higher static figure of 95 empty homes each year, equivalent to 1,425 dwellings) and thirty supported Option 3 (the Council's preferred approach – tapered delivery equivalent to 1,350 dwellings). The remainder did not express a preference for any specific Option.

70 respondents wanted a higher allowance to be included, given the recorded level of past performance (31) and the number of remaining empty properties (10). Three believed that the target should be to remove all properties. Three believed the annual figure should be at least 200 returned to use and a further two at least 250. Eight believed that the target should allow for no more than 0.5% of the stock to be empty at any one time and two that the targets should also include vacant shops, offices and upper floors.

Of the 11 respondents who wanted a lower allowance, seven believed the allowance to be unjustified, nine unrealistic and one undeliverable, another because of the difficulty of persuading private owners. Three noted that the number of empty homes had only reduced by 844 over the last ten years and six that national average of 0.9% would suggest a figure of only 500 would be achievable over the plan period.

Of the 6 who did not want any allowance to be included, all believed they were not a predictable or reliable long-term source, some that they would only contribute a negligible increase (4) and another that they should only be used for flexibility and not as part of the calculated land supply (1). Others indicated that the surplus in the SHMA was only 507 (1) and that case studies from other areas were not relevant (1).

Other comments suggested that the return of empty homes should focus on increasing their energy efficiency (1) and should be included in the windfall allowance but not within the first three years, to prevent double counting (6) and that the total allowance for new-build windfalls, conversions, changes of use and empty homes should be no more than 10% of the supply (5).

**Council Response:** A separate allowance for the return of empty homes has been included in the Local Plan Submission Draft, based on the performance of a funded programme which has operated since April 2011 and a tapered delivery under Option 3. Vacant shops, offices and upper floors are already included in the allowance for net gains from conversions and changes of use, which are not duplicated with records for the reuse of empty homes. Further information is set out in the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.

**Q5.5: Do you think there is anything else that the Council could do to promote the reuse of empty homes within the Local Plan?**

**Summary of responses** - Of 225 responses, 7 said 'no' and 70 said 'yes'. The remaining 148 did not answer 'yes' or 'no'.

1. Eleven respondents said that the Council 'should do more' without specifying what this should be. The majority indicated that the Council should use compulsory purchase powers (189), if for example, properties were not returned within a set time period (1) or within 6 months (1). Of those who indicated that other incentives should be used (43), the following were suggested:

- increase Council Tax (10) and offer tax credits (1)
- give more encouragement to landlords (4) and other owners (1)
- make sure grants are being applied for (1) and give the programme greater publicity (3)
- commit more resources (3) and track down owners (1)
- buy them to provide Council housing (2)
- collaborate with housing associations to support purchases (1) and match properties to the waiting list (1)
- use 'Homes for a Pound' schemes like in Liverpool (2)
- include employment premises (1) and re-use flats above shops (2)
- appoint estate agents and arrange for auctions (1)
- demolish them (1)
- don't use examples from inappropriate case studies to minimise delivery assumptions (1)

Eight site-specific responses requested action at the Victoria Lodge Hotel, Victoria Road, Tranmere.

**Council response:** The Council has an existing funded programme, which has recently been extended. The initiatives it includes are kept under constant review based on their cost and practicability. The existing programme includes advice and guidance, assistance with sales and auctions, linking owners with purchasers and tenants, and property grants. Council Tax is currently charged at 200% for properties left vacant for between 2 and 5 years, and at 300% for properties left empty for between 5 and 10 years. Further information can be obtained from the Wirral Council [website](#).

Compulsory purchase is a regulated process for when all other avenues have been exhausted, for which funding is not currently available outside approved regeneration or priority areas.

**Gypsies, Travellers and Travelling Show People****Q5.6: Do you agree with our preferred approach to meeting any future housing needs for Gypsies and Travellers, if they arise during the Plan period? If not, what alternative approach do you think we should follow?**

**Summary of responses** - Out of 113 responses, 19 said no and 94 said yes.

1. Agree with the approach to meeting any future housing needs for Gypsies and Travellers (2). Provide pitches with appropriate amenities (2). Provide affordable housing for Gypsies and Travellers wanting to settle (1). Meet housing need for Gypsies and Travellers through allocations in the Local Plan (1). The Local Plan is capable of meeting the need identified in the 2019 GTAA (1).

**Council Response:** Noted.

2. Respondent queried whether Gypsies and Travellers needs had been assessed (1).

**Council Response:** Gypsy and Traveller needs have been assessed in the Gypsy and Traveller Accommodation Assessment 2019.

3. Gypsies and Travellers should have access to housing (6), but should not have special priority (2). Do not support building new homes specifically for Gypsies and Travellers (80). Do not release Green Belt land for housing for Gypsies and Travellers (1). Do not concentrate housing for Gypsies and Travellers housing in one location (1). Local Plan policy should resist the establishment of camps (1).

**Council Response:** National planning policy requires the assessment of local housing needs, including those of travellers to inform planning policy. No specialist needs were identified in the 2019 Gypsy and Traveller Accommodation Assessment and no green belt sites have been promoted for development.

4. Respondent expressed uncertainty regarding the policy requirements (1).

**Council Response:** No specialist needs were identified in the 2019 Gypsy and Traveller Accommodation Assessment. Where there is no identified need, National planning policy guidance states that criteria-based policies should be included to guide decision making in the case of planning applications. Policy WD9 of the Local Plan Submission Draft sets out the criteria for development proposals for permanent and temporary accommodation.

5. Respondent queried whether Gypsies and Travellers pay Council tax (1).

**Council Response:** This is not a matter for the Local Plan.

#### Primary Residential Areas

**Q5.7: Do you agree with the boundaries to the Primarily Residential Areas (PRA) that the Council proposes to include on the new Local Plan Policy Map? If not, please say where they should be revised and why?**

**Summary of responses** - Of 225 responses, 24 said 'yes' (22 with no further comment) and 201 said 'no'.

1. Of those who said 'no', the majority indicated that any boundaries should not be set just to meet planning needs (82) and should be kept the same (3) or reflect existing settlements and residential areas (6) and under-utilised previously developed land (1). More industrial sites could be included (1) but Green Belt should continue to be protected (87) unless it was proposed to be released from the Green Belt (11).
2. The following site-specific comments were also raised:

Comment received	Council response
Ditton Lane Nature Area (OS238) should not be included in the PRA with an amended boundary (1)	Ditton Lane Nature Area is now proposed to be designated as a Local Green Space and as a Local Wildlife Site with an amended boundary, in the Local Plan Submission Draft (LGS-SA5.1 and LWS-SA5.4 refer)

Eastham Village should be included in the PRA (and excluded from the Green Belt) (2)	Eastham Village and Conservation Area has been retained in the Green Belt in the Local Plan Submission Draft.
Land at Barnston (Urban Extension under Option 2B) should not be included in the PRA (1)	The land subject to Option 2B has been retained in the Green Belt in the Local Plan Submission Draft
Land at Boundary Lane, Heswall should not be included in the PRA (1)	The site is now proposed to be designated as a Local Green Space in the Local Plan Submission Draft (LGS-SA7.13 refers).
Paulsfield Drive Woodland, Moreton (OS254) should be included in the PRA (and not designated as an open space) (1)	The site is designated in the Local Plan Submission Draft as open space (OS-SA5.9) and as Local Wildlife Site (LWS-SA5.1) and is not suitable for development.
Open space at Greasby Village should not be included in the PRA (1)	Two open spaces are now proposed to be designated as a Local Green Space in the Local Plan Submission Draft (LGS-SA5.3 and LGS-SA5.4 refer)
Green Belt Parcel 7.27 (SP060) should not be included in the PRA (1)	Parcel 7.27 has been retained in the Green Belt in the Local Plan Submission Draft.
The builder's yard at Berwyn Drive, Heswall (SHLAA 0898) should be included in the PRA (1)	SHLAA 0898 continues to be shown as part of the PRA in the Local Plan Submission Draft.
Ellerman Lines Sports Ground, Carr Lane, Hoylake (SHLAA 0637) should be included in the PRA (and excluded from the Green Belt) (1)	SHLAA 0637 has been retained in the Green Belt in the Local Plan Submission Draft.
Green Belt Parcel 6.15, SHLAA 4056 (Column Road, West Kirby) should not be included in the PRA (2)	Parcel 6.15 has been retained in the Green Belt in the Local Plan Submission Draft.
A series of amendments should be made to the PRA in Heswall (83) [linked to the request to consider additional sites for the designation of Local Green Space].	Ten open spaces are now proposed to be designated as a Local Green Space in the Local Plan Submission Draft (LGS-SA7.1 to LGS-SA7.4 and LGS-SA7.8 to LGS-SA7.13 refer).
Noctorum Road Playing Field (SHLAA 0929, OS140) should be included in the PRA (and not designated as a sports ground) (1)	SHLAA 0929 is now proposed to be designated as a Local Green Space in the Local Plan Submission Draft (LGS-SA3.3 refers).
Sites in Lower Heswall in the Green Belt along the Dee Coast should be included in the PRA (SHLAA 1938, SHLAA 1940, SHLAA 1941, SHLAA 1967 and SHLAA 1968 within Green Belt Parcels 7.2, 7.3, 7.4 and 7.5) (1)	Parcels 7.2, 7.3, 7.4 and 7.5 have been retained in the Green Belt in the Local Plan Submission Draft.

3. Other responses stated that the proposed Primarily Residential Areas were not available (1) or could not be downloaded (1) and that any changes proposed had not been highlighted (1). One comment indicated that any density

**Council Response:** The Primarily Residential Areas within the Borough's urban area have been amended to reflect the policies and proposals now set out within the Local Plan Submission Draft. The response to site-specific comments is set out in the table above. There is no proposal to include land within the Green Belt.

The initial draft proposed Primarily Residential Areas were shown on the draft Regulation 18 on-line Policies Map which can still be viewed on the Wirral Council [website](#).

The density zones shown on Draft Regulation 19 Policies Map have been drawn to coincide with relevant boundaries within the urban area.

#### Housing in Multiple Occupation

**Q5.8: Do you agree with the Draft Policy for Houses in Multiple Occupation, which the Council proposes to use in the determination of planning applications as set out in Appendix 5.1? If not, please say how it should be revised and why?**

**Summary of responses** - Out of 170 responses, 43 responded no and 57 responded yes.

1. Count each occupier of HMOs against the Council's housing need (1). HMOs will not help meet housing need (1).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (2021) including the latest economic forecasts for the City Region.

2. Recommendations for HMOs are:

- Provide more than one green and grey bin for HMOs (1)
- HMOs should offer safe and healthy living conditions (10)
- HMOs should be zero carbon (10)
- Encourage the provision of en suite bedrooms (2).

**Council Response:** New HMOs will need to meet policy requirements set out in Policy WD 7 Houses in Multiple Occupation.

3. Landlords of HMOs should be subjected to the Selective Licensing Scheme (1) and should be closely monitored (1).

**Council Response:** This is beyond the scope of the Local Plan.

4. HMOs are apartments (74), provide apartments instead (2).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (2021) including the latest economic forecasts for the City Region, and has informed housing mix requirements set out in the Local Plan Submission Draft.

5. Bullet d which states that "the proposal not resulting in a change in the character of the surrounding area which would be detrimental" is too open for interpretation (1). Parking is an issue with HMOs (1). In regards to Bullet e "the proposal not resulting in a concentration of HMO's in an area such that the character of the area is adversely affected", designate areas for

HMOs (1). HMOs should not be built in areas with no HMOs (1). Control the number of HMOs (1).

**Council Response:** Design standards and the over-concentration of HMOs is addressed in Policy WD 7 Houses in Multiple Occupation.

6. The relevant information for HMOs is not available online (1). This policy area is too complex (1).

**Council Response:** Policy requirements for new HMOs are set out in Policy WD 7 Houses in Multiple Occupation, in the Local Plan Submission Draft.

7. Revise minimum space standards to be 14 square metres for a single bedroom and between 16 to 18 square metres for a double bedroom (2).

**Council Response:** Space standard policy requirements are set out in Policy WS 3.1 Housing Design Standards.

## 6. Our Economy

### Employment

**Q6.1: Do you agree with our preferred or the alternative approach to meet current and future employment demands in Wirral for everyone in our community?**

1. Adopt both approaches (1).

**Council Response:** The approach to meet employment demands in Wirral is set out in Policy WS 4 Strategy for Economy and Employment.

2. There is a lack of evidence for either approach (4).

**Council Response:** The Wirral Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.

3. The housing and employment figures are too high (4), consider Brexit and Covid (1), too many brownfield sites are undeliverable (1). The employment land figure should be 60 hectares (1). The 36 sites proposed for allocation exceed the 80ha requirement (1). Large warehouses are excessive in relation to need (1). The flexibility allowance is too high (1) Exclude Wirral Waters from the employment land supply (1). Do not continue developing out of town retail parks and centres (1)

**Council Response:** The Wirral Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.

4. Employment allocations in the south of the Borough may have an impact on the A41 corridor, M53 and Wirral line based on transport modelling reports. (1)

**Council Response:** Using transport modelling software, a cumulative traffic impact assessment has been undertaken that accounts for changes associated with planned Local Plan housing and employment together with any committed network updates across the borough. The inclusion of strategic transport schemes planned during the Local Plan period are forecast to have a positive effect on network performance and capacity along the corridors to which the schemes are local to.

5. The employment land study does not adequately refer to the rural economy, including the visitor economy (1) Neither approach considers rural employment needs and should either release Green Belt land for rural employment purposes or allow employment uses as an exception from inappropriate development to support rural businesses. (1) Promote Wirral as a tourist destination (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

The Local Plan Submission Draft seeks to support the Wirral Visitor Economy Strategy to promote tourism through the delivery of the spatial strategy, access to the countryside, and improvements to tourism facilities and the green and blue infrastructure network.

6. Assess the deliverability of undeveloped allocations in the UDP (6).

**Council Response:** All appropriate undeveloped employment allocations have been assessed as part the Wirral Employment Land and Premises Study 2021.

7. Support the approach if employment sites are brownfield land (1) Housing and employment allocations should be flexible brownfield sites (1) Support the planned reuse of existing but unused non-domestic properties by the Council (1)

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway.

8. Protect access to the natural environment (1). Refuse planning applications for fossil fuel processing industries (1), audit manufacturing/retail businesses for sustainability (1)

**Council Response:** Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection which includes provision for the protection, enhancement and accessibility of green and blue infrastructure.

9. Focus tourist growth on public transport, walking or cycling use. (4) Workplaces should be accessible by public transport/walking (3)

**Council Response:** Securing sustainable travel and reducing the need to travel and reliance on private cars is a Strategic Objective of the Local Plan. Under the Council's Strategy for Transport, Policy WS 9.2, development proposals should provide access to existing or planned sustainable travel options and infrastructure projects to reduce private car usage. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

10. Designate sites as 'flexible commercial use'. (1)

**Council Response:** The Wirral and Employment Land Premises Study 2021 assesses anticipated demand for employment land over the plan period, including use classes and identifies a need for B2/B8 uses.

11. Support regeneration at Birkenhead (3). Attract and retain more graduates from LCR Universities (1), attract more business and jobs to Wirral (68), focus new office development should be focused on Birkenhead and Wirral Waters (3), encourage private enterprise (1). New jobs should be green new deal jobs (5). Increase the local skills base and reduce dependency on the public sector (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and focuses investment and regeneration toward the Urban Conurbation to the east of the M53 Motorway and which seeks to stimulate job growth. Employment and skills are covered in Policies WS 1.2 Employment, WS 2 Social Value and WS 4 Strategy for Economy and Employment.

**Q6.2: Do you agree with the proposed release of some employment land in Bromborough for housing (as set out in paragraphs 6.1.19 and 6.1.22)?**

**Summary of responses** - 132 out of 147 respondents agreed. 34 provided no additional comment.

1. Agree with the proposed release of some employment land in Bromborough for housing (2) if the land is already designated as employment land and is not considered as green belt or its release impacts on the green belt. (83), if sufficient employment land is released to meet need and from the loss of employment land at SHLAA 2072 (Prices Way), SHLAA 4012 (Southwood

Road) and SHLAA 1715 (Old Hall Road) (2), if it is unmarketable for employment purposes (1).  
Reallocate land at former Epichem (ELPS 364), SHLAA 1715 and SHLAA 1719 for housing (1).

**Council Response:** The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Borough's development needs through the development of brownfield land within existing urban areas.

2. Residential development should be sensitively designed near Eastham Country Park. (1)

**Council Response:** Policy WS 5.4 Ecological Networks seeks to protect and enhance the biodiversity of Eastham Country Park and Policy WP 4.2 Residential Sites sets out the policy design requirements for Site RES-SA4.2, RES SA 4.3 [MPA-SA4. 2] Land South of Riverwood Road and Old Hall Road, Bromborough near Eastham Country Park.

3. Disagree, the housing would be in unsustainable locations (2), would impact trees and disturb protected species (3).

**Council Response:** The sites are in sustainable locations with easy access to the Croft Retail area and public transport routes. The potential environmental impacts have been assessed as part of the site selection process. Potential detailed ecological impacts will be dealt with at planning application stage.

4. Consider the presence of the existing plant at Bromborough and ensure that surrounding and nearby future developments are compatible with existing lawful land uses, new development should demonstrate that the proposal would not result in an adverse impact on existing operations (1)

**Council Response:** The safeguarding of industrial and mineral land interests is set out in Policy WM 3 Safeguarding Mineral Reserves and Infrastructure.

5. Safeguard industrial and mineral land interests within the emerging Local Plan. (1)

**Council Response:** The safeguarding of industrial and mineral land interests is set out in Policy WM 3 Safeguarding Mineral Reserves and Infrastructure.

**Q6.3: Do you agree that strategic employment land at Wirral Waters should be made available for general employment use?**

1. Support some land at Wirral Waters to be considered for employment purposes (79).

**Council Response:** The land allocated for employment use at Wirral Waters is at West Float which is identified for employment uses in Wirral Waters Masterplan and will not impact on potential residential development at East Float.

2. Employment land at Wirral Waters should be made available for general employment use, improve transport links at Wirral Waters. (1)

**Council Response:** Noted. The Council is working with the LCR CA to deliver a mass transit system which will serve both employment and residential neighbourhoods at Wirral waters.

3. So long as there is a justification that the land is no longer required for port related use, then it would seem reasonable to allow general employment use in the future (2). This must be focused on high value jobs.

**Council Response:** The employment site at MEA park would be able to accommodate port related businesses. There is likely to be a range of job opportunities including those requiring skills related to modular housing development.

4. Disagree, as within MEA Park employment facilities are proposed to enable existing occupiers in East Float to relocate and it is proposed to accommodate manufacturers and supply chain organisations to undertake advanced manufacturing, logistics, assembly, R&D and administration specifically, but not exhaustively, in the energy, marine & maritime and housing sectors. The MEA Park part of the MWEZ also benefits from an Enhanced Capital Allowances (ECA) designation.

**Council Response:** The Council consider the allocation of land at West Float as general employment land will impact on its potential to accommodate decanted businesses from East Float nor businesses which would expect to take advantage of its Enterprise Zone Status.

5. Land at Wirral Waters will be unavailable to local businesses so other sites should be identified, such as SHLAA4057.

**Council Response:** This site lies within the green belt. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification Strategy and no green belt release is proposed.

6. Re-evaluate the employment land supply and meet local employment needs instead of providing strategic sites (1).

**Council Response:** The Wirral Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.

7. Use land at Wirral Waters to increase residential dwellings and employment land focused in regeneration areas (1).

**Council Response:** Residential development at Wirral Waters is focussed at East Float.

8. Rather than look to Wirral Waters, the draft Local Plan should look to other sites, such as land in the Green Belt at West Road, Eastham.

**Council Response:** This site lies within the green belt. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification Strategy and no green belt release is proposed.

#### **Protection of Existing Employment Areas**

**Q6.4: Do you agree with the boundaries to the Primarily Industrial Areas that the Council proposes to include on the new Local Plan Policy Map? If not, please say where they should be revised and why?**

Due to the way in which the question was answered it is not possible to give any accurate statement on the numbers of responses which agreed.

1. Support the proposed boundaries of Primarily Industrial Areas if there is no encroachment on the green belt and open spaces are provided. (82)

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification Strategy and no green belt release is proposed.

2. We reserve the right to comment on the boundaries and policy within the Draft Local Plan

**Council Response:** Noted.

3. Support a strategy changing the use of industrial sites to residential where the land is suitable for housing and relocate existing commercial operations to suitable brownfield sites. This should be applied to the former Champions site at Arrowe Hill in Upton (1).

**Council Response:** The Council support appropriate alternative uses within employment areas.

4. The following site-specific issues were raised:

Comment received	Council response
Do not support the designation of land surrounding Wirral Waters as Primarily Industrial Area (PIA), instead refer to an 'area of anticipated change' or equivalent, to make clear the Council's intended approach.	Land to the north of Wirral Waters is designated as Primarily Employment Area while land to the south is a combination of Primarily Residential, (subject to a masterplan) and mixed use designations reflecting the Council's intended approach for these areas.
Cheshire West and Chester Council support the proposed identification of the Primarily Industrial Area at Eastham and the allocation of the QE2 Dock site and the North Road site for employment uses.	Support noted.
The sites north of Bedford Road East (Royal Mersey Yacht Club, Tranmere sailing Club, the Refreshment Rooms and the old Vester oil site) should allocated for tourism or leisure (1).	The adjacent Tranmere Oil Terminal potentially limits the scope for alternative uses but the Mersey Yacht Club, Tranmere Sailing Club and Refreshment Rooms will be included within the Primarily Residential Area to match the conservation area boundary. The Vesta oil site remains in what is now the Primarily Employment Area.
The North Road site should address restrictions on the use of the site from neighbouring hazardous installations, biodiversity issues that may require mitigation, and the need to prevent sterilisation of the freight rail line, which runs along the southern boundary of the site. The site should be classed for B2 or B8 uses.	Land at North Road Eastham within the Wirral Council boundary is allocated for B2/B8 uses in the Local Plan (EMP-SA4.5). The site already has outline planning permission for these uses (OUT/19/01633 refers).
Amend the emerging Policy Map to remove the proposed employment allocation (ELPS 415) and to identify this Site as a residential allocation for up to 150 new homes (1).	The site is designated as part of the surrounding Primarily Employment Area and as a Minerals Safeguarding Area (MSA-SA4.1) for marine-won sand and gravel in the Local Plan Submission Draft.

Disagree with the proposed reallocation of The Croft with the 'Proposed Primarily Industrial Area' and should either remain allocated as an 'out-of-centre retail location' or be unallocated (1).	The out of centre retail designation from the UDP has not been carried forward into the Local Plan. The Croft Retail and Leisure Park is designated as a Primarily Employment Area, and this designation takes account of the introduction of the new Use Class E.
Exclude land within North Cheshire Trading Estate from the proposed Primarily Industrial Area and Junction One Retail Park should be identified as a Retail Warehouse Park (1).	These sites have been included within the Primarily Employment Area a designation which takes account of the introduction of the new Use Class E.
Other than the land at Quarry Road East, the previously identified surplus land is no longer surplus to operational requirements. The sites identified as SHLAA 3067, SHLAA 1957, SHLAA 2092 and SHLAA 0505 are still required for operations at Port Sunlight and the open space designation at OS195 should be removed (1).	The whole Port Sunlight Factory complex is included in the Primarily Employment Area, except for the public areas associated with the Port Sunlight Cycle path and the woodland associated with the River Dibbin which are proposed to be designated as Urban Open Space in the Local Plan Submission Draft (QS-SA4.17 Bromborough Road Woodland and Cycleway refers).

**Q6.5: What is your view of providing for a wider range of uses within these Areas and which uses do you think should be included?**

1. A wider range of uses within these areas should be supported. Ensure that Wirral Waters development doesn't detract from the centre of Birkenhead. Ensure employment led regeneration is not just on industrial and retail but also: cultural venues, event spaces, health promoting initiatives, leisure services, parks and open spaces, food growing opportunities and expanding green tourism. Convert existing retail designation to housing and leisure. (9) Green brownfield and other PDL sites, and include a sustainable mix of uses in close proximity. (2)

**Council Response:** The Council support appropriate alternative uses within employment areas.

The Council has through the Draft Employment Land Options Study 2019 and the subsequent Employment Land and Premises Study 2021 considered the quality of employment sites.

2. The policy wording should include a wider range of uses within Primarily Industrial Areas to not restrict the supply of land for different uses. (16), such as trade counter uses, A2/D1 uses suited to business parks, other sui generis employment uses (1).

**Council Response:** Policy WS 4.2 Designated Employment Areas of the Local Plan Submission Draft sets out the policy requirements for appropriate alternative uses within employment areas.

3. Take a criteria-based policy approach, which picks up compatibility with a future masterplan in terms of uses and/or design principles (1).

**Council Response:** Policy WS 4.2 Designated Employment Areas of the Local Plan Submission Draft sets out the policy requirements for appropriate alternative uses within employment areas including compatibility with existing character and market signal evidence.

4. Incorporate green infrastructure from the start and link sites to public and active transport infrastructure. (3)

**Council Response:** Securing sustainable travel and reducing the need to travel and reliance on private cars is a Strategic Objective of the Local Plan. Under the Council's Strategy for Transport, Policy WS 9.2, development proposals should provide access to existing or planned sustainable travel options and infrastructure projects to reduce private car usage. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

5. Encourage a circular economy and green jobs. (3)

**Council Response:** The transition to a low carbon Borough and circular economy is a Strategic Objective of the Local Plan (SO4).

6. Use land along the river Mersey to develop tourism locally. (1)

**Council Response:** Policy WS 4.4 addresses tourism and Urban Tourism Areas which includes Mersey riverside sites such as Woodside, New Ferry, Seacombe and New Brighton waterfronts. Development within or adjacent to Urban Tourism Areas should maintain or enhance public access to and along the Wirral waterfront.

7. Future iterations of the Local Plan should consider the presence of existing lawful uses and plants, which by their nature have potential to generate a degree of dust, and noise emissions, as well as traffic movements and the need to safeguard industrial and mineral land interests within the emerging Local Plan. Proposed development should ensure it would not result in an adverse impact on existing operations. (1)

**Council Response:** Consideration of existing lawful uses is detailed in the economic strategy in Policy WS 4.1 Meeting the Strategy. The safeguarding of industrial and mineral land interests is set out in Policy WM 3 Safeguarding Mineral Reserves and Infrastructure.

8. Increase activity at the oil terminal at the north east of SHLAA 4037, an oil terminal must consider residential use in Eastham Village and not prevent opportunities for further residential development in the village. (1)

**Council Response:** The Eastham Port and Maritime Zone (DKS-SA4.1) is subject to Policy WS4.3 which includes safeguards for neighbouring uses in relation to those port and marine proposals requiring approval from the Local Planning Authority.

9. Remove the small business levy for a minimum of three years. (1)

**Council Response:** This is not a planning matter

**Q6.6: Do you agree with the Council's preferred approach to protect all sites currently in use, or allocated, for employment and resist development change of use to ensure continuation of employment uses for those sites? Or do you think that the alternative approach whereby the Council will not take forward a policy to protect existing employment land and will let the market determine future use, taking account of tests for sustainable development should be adopted?**

1. Protect employment land for employment use. (64) Maintain the overall amount of land for employment. (1) Allocate sufficient employment land (1).

**Council response:** The Local Plan Submission Draft allocates 65.60ha of additional employment land to accommodate jobs growth over the plan period. Policy WS 4 Strategy for Economy and Employment safeguards employment land and seeks to protect and support the economy.

2. Release sites no longer appropriate for industrial use to residential use (7), including the former Champions site at Arrowe Hill in Upton (1). Support a more flexible policy. (4) Take hybrid approach. (1)

**Council response:** The Council support appropriate alternative uses within employment areas.

3. Council should retain powers to determine the suitable location of land use across Wirral. (2)

**Council Response:** Noted, the Council determines land use through the Local Plan and planning applications.

4. Do not support the introduction of other non-employment type uses at Hooton Park. (1)

**Council Response:** Hooton Park is within the CWaC boundary, not within the WBC area and therefore the Local Plan does not contain policy for this site.

5. Increased activity on the oil terminal in Eastham Village must consider existing residential uses in the village and not prevent opportunities for further residential development in the village. (1)

**Council Response:** The Eastham Port and Maritime Zone (DKS-SA4.1) is subject to Policy WS4.3 which includes safeguards for neighbouring uses in relation to those port and marine proposals requiring approval from the Local Planning Authority.

6. The Croft should not be considered as 'Employment Land' and the proposed allocation and associated policy tests for any future proposals would not be appropriate for this location. (1)

**Council Response:** The out of centre retail designation from the UDP has not been carried forward into the Local Plan. The Croft Retail and Leisure Park is designated as a Primarily Employment Area, and this designation takes account of the introduction of the new Use Class E.

## Town Centres and Retail

### **Q6.7: Do you agree with our Preferred Approach to meet retail demands in Wirral for everyone in our community? Would you suggest an alternative approach?**

**Summary of responses** - Out of 136 responses, 15 disagreed with the preferred approach and 43 agreed.

1. Object to out of town retail developments (1), regenerate existing shopping areas first (1), adapt to changing shopping patterns (1). Moderate retail demand (103).

**Council Response:** The Plan recognises the changing nature of retail and shopping and the continuing decline of retail floorspace and seeks to direct uses to within the identified town centre boundaries. Where proposals lie outside of or on edge of centre locations, impact assessments will be applied under Policy WS 11.3.

2. Support local shopping businesses (1), provide and support artistic and cultural attractions (1). Convert retail space in Birkenhead to residential development (1). All designated town centres should have access to a public convenience available during shopping hours (1). Provide convenience retail space in West Kirby (1).

**Council Response:** Policy WS 11 Strategy for Town, District and Local Centres aims to maintain the vitality and viability by allowing and enabling appropriate meanwhile, pop-up, and residential uses and providing for further cultural and community uses. Specialist advice suggests giving consideration to meeting the convenience floorspace capacity floor both West Kirby and Hoylake in Hoylake due to the lack of medium or large-scale convenience in Hoylake.

3. Agree with the preferred approach (1) and agree with locally set thresholds for retail impact assessments (2).

**Council Response:** Noted. Locally set thresholds for new edge of and out of centre proposals are set out under Policy WS 11.3 in the Local Plan.

4. The preferred approach to meeting retail demands is unclear (1). The Retail and Centres Study is insufficient and should be reviewed (1), assess the need for retail and leisure uses to support the allocation of sites in the Local Plan (1). Review the retail hierarchy (1). Birkenhead is not a sub regional centre (2), identify core shopping areas (1), Have regard to the sequential test for planning retail policy and retail allocations. (2) Recognise The Croft Retail Park as a retail and leisure destination through the retention of the existing appropriate 'out-of-centre' allocation (1). List Local Centres, including Greasby, in the Draft Local Plan (1).

**Council Response:** The Wirral Retail & Centres Study – 2021 Retail Capacity Update updates the 2019 study. Local Centres are listed in the Plan under Policy WS 11 which includes Greasby Village.

**Q6.8: Do you agree with our preferred approach to seek to maximise the potential of town centres' vitality and viability including residential development? Would you suggest an alternative approach?**

**Summary of responses** - Out of 244 responses, 224 said yes and 3 said no.

1. Agree with the preferred approach to maximise the potential of town centres' vitality and viability including residential development (23), agree as long as the strategy seeks to address the climate emergency (9), agree if a sequential approach to support the existing centres for retail allocations is taken (2).

**Council Response:** Support noted. Proposals for out of or edge of centre development must take into account the sequential test and must demonstrate no suitable alternative sites are available within or at the edge of Town, District and Local Centres. While the climate emergency is not directly referenced in the Town centre strategy, the Council's 'Cool 2' Climate action has informed the Local Plan Submission Draft and Strategic Objectives 1, 3 and 4 of the Local Plan address climate change.

2. Do not build large retail outlets in small centres (1). Birkenhead has no capacity for additional retail floorspace (1). Provide access to local services in physical locations, like libraries (1), in all communities (1). Encourage High Street shops to shift to online retail (1), diversify town centres to counter online shopping (1). Reduce the size of retail centres, convert unused retail space to residential use (3). Use town centres and unused retail space for community cafes/purpose developed hubs for older people and/or people with additional needs (1). Support local retail shops (1). Increased convenience floorspace in West Kirby should be guided by a masterplan approach (2), local character should be maintained (3).

**Council Response:** Policy WS 11 Strategy for Town, District and Local Centres aims to maintain the vitality and viability of centres by allowing and enabling appropriate meanwhile, pop-up, and

residential uses and providing for further cultural and community uses. No assessed convenience floorspace capacity for Birkenhead and no capacity for additional comparison floorspace in any centres across Wirral.

3. Review the retail hierarchy (1). Birkenhead is not a sub regional centre (1), identify core shopping areas (1). Disagree with the classification of Hoylake as a District Centre (1).

**Council Response:** The Wirral Retail & Centres Study – 2021 Retail Capacity Update updates the 2019 study. Sub regional, District and Local Centres are listed in the Local Plan Submission Draft under Policy WS 11 Strategy for Town, District and Retail Centres.

4. Support spatial option 2A (1). Support regeneration in Birkenhead (6).

**Council Response:** Support noted. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Boroughs development needs through the development of brownfield land within existing urban areas, including Birkenhead.

5. Do not impose parking charges (2).

**Council Response:** Parking charges are beyond the scope of the Local Plan.

**Q6.9: Do you agree with our preferred approach to defining a locally set threshold for retail impact assessments? Would you suggest an alternative approach?**

**Summary of responses** - Out of 122 responses, 109 said yes and 3 said no.

1. Agree with the preferred approach to defining a locally set threshold for retail impact assessments (100), support New Ferry's 'local centre' designation (1). Involve local communities in defining a locally set threshold (7). Proposals for retail development located within defined centres should not need to have consideration of impact or the sequential approach (1). There should be a threshold where an impact assessment is required for sites outside the defined urban centre (1). The thresholds for impact assessments should be expressed using different levels for different use classes to avoid adverse impacts on the regeneration of Birkenhead town centre (1). Do not support new large outlets (1).

**Council Response:** The thresholds for the size of proposal requiring an impact assessment for the different centres are drawn from the evidence provided by the 2021 Wirral Retail & Centres Study Capacity update.

2. The retail evidence base is out of date (1). Birkenhead is not a sub-regional centre (1), define the core of shopping areas (1).

**Council Response:** The Wirral Retail & Centres Study – 2021 Retail Capacity Update updates the 2019 study. Sub regional, District and Local Centres are listed in the Local Plan Submission Draft under Policy WS 11 Strategy for Town, District and Retail Centres.

3. Hoylake's re-emergence as a vibrant town centre is not sufficiently recognised or supported in the emerging Local Plan (1).

**Council Response:** Hoylake is designated as a District Centre under Policy WS 11.2 focus for district level shops, services and community facilities at a level above local centres.

4. The Croft would welcome the opportunity to discuss the appropriate floorspace thresholds in more detail with Wirral Council (1).

**Council Response:** Noted.

**Q6.10: Do you agree with the boundaries to the town centres shown on the Council's website? If not, please say how they should be amended and why.**

1. Extensions should only be considered where there is growth. (67) Settlement extensions can only be justified if there is robust data to support a growth conclusion. (1)

**Council Response:** Revised town centre boundaries are shown on the Policies Map reflecting changes in the extent of town centre activities since the UDP was adopted in 2000.

2. Minor adjustment to be proposed. (90) The local community must be involved in defining a locally set boundary.

**Council Response:** No details submitted

3. Change the corner of 76-76A Pensby Road and Daryl Road and "Silverdale" in Mount Avenue to residential use. The latter is subject to a current planning application for conversion to residential development. There should be no requirement for any retail unit in the redevelopment of Silverdale.

**Council Response:** 76 Pensby Road is within the Primarily Residential Area on the Local Plan Policies Map. The former Silverdale Medical centre is in the town centre boundary, but outside the Primary Shopping Area allowing greater flexibility (Policy WS11.6 refers).

4. The Croft should retain its existing UDP allocation of 'out-of-centre retailing'. The proposals to amend the retail impact assessment thresholds would also impact any future proposed changes to the existing offer at The Croft should new floorspace, and proposed changes of use and variations of conditions be applied for in the future. Therefore, Our Client would seek to discuss these thresholds in more detail with Wirral Council and encourage an open dialogue moving forwards to agree the best policy strategy.

**Council Response:** The out of centre retail designation from the UDP has not been carried forward into the Local Plan. The Croft Retail and Leisure Park is designated as a Primarily Employment Area, and this designation takes account of the introduction of the new Use Class E.

5. Support the separate classification of Hoylake from West Kirby, Irby from Pensby, Irby and Greasby from West Kirby, and the Moreton/Leasowe area from Woodchurch/Bidston/Birkenhead area. (1) Support the town centre boundaries. (1)

**Council Response:** Noted.

6. The definitions of towns should be used in terms of building requirements rather than the current 'settlement' definitions. (1)

**Council Response:** Noted.

7. The Retail Economy section does not take account of the Junction 1 retail area located between Wallasey and Bidston, adjacent to the M53, consider the impact of this area on neighbouring centres and its potential for future development (1).

**Council Response:** The out of centre retail designation from the UDP has not been carried forward into the Local Plan. The Junction 1 Retail Park is designated as a Primarily Employment Area, and this designation takes account of the introduction of the new Use Class.

8. Reduce the boundary of the shopping area in Birkenhead town centre. (1) Review Town Centre boundaries when there is a need for expansion. (1)

**Council Response:** The boundary of Birkenhead Town Centre has been reviewed to reflect the findings of the Birkenhead 2040 Strategy.

## Tourism

### **Q6.11: Do you agree with our preferred approach for planning for tourism within Wirral?**

1. Disagree with the preferred approach to planning for tourism within Wirral. Only develop existing assets, do not increase building on green belt land. (159)

**Council Response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

2. Disagree with the preferred approach to planning for tourism in rural areas, it is insufficient. The Local Plan should make exceptions for Green Belt release and support the reuse/replacement of existing buildings instead. (1)

**Council Response:** Proposals for visitor facilities in the Rural Area will be supported where they meet the tests of national Green Belt Policy under Policy WS 4.4.

3. The preferred approach for sustainable tourism seeks to improve public access to the coast and countryside subject to the protection of European sites and their supporting habitats. We support this approach but retain the right to comment on the sustainable tourism proposals once the Draft Local Plan and the full Appropriate Assessment are consulted upon. (5)

**Council Response:** Noted.

## 7. Our Physical and Social Infrastructure

### Our approach to infrastructure planning

#### **Q7.1: Do you agree with our preferred approach for planning for infrastructure within Wirral? Do you have a suggested alternative approach?**

- 1. Summary of responses** - Of 266 responses, 45 said 'yes' and 35 said 'no'. 186 did not answer 'yes' or 'no'.

A number sought a comprehensive approach (95), to include transport, energy, communications, social, community, green and blue infrastructure, and waste. Some thought the link to public transport improvements was underdeveloped and that all modes should be considered, including prioritisation of walking and cycling, bus services, tram systems and an improved mid-Wirral rail network. Schools, hospitals, GP services and dentists should also be considered.

A number were concerned about the impact on site viability (21). Credible and robust evidence base was required to show how infrastructure will be delivered, taking all known viability considerations into account, particularly as growth is currently directed to previously developed land in lower value areas where the added burden of CIL / planning obligations could prevent sites coming forward and undermine the spatial strategy and the delivery of the housing requirement and very little growth was being directed towards higher value areas.

Government grants will be required, if significant contributions towards highway improvements, public transport and active travel initiatives are required. If brownfield sites are not developed, the plan for infrastructure will need to be adapted, and an alternative housing strategy will be needed, using sites that are known to be viable, to fund the key infrastructure needed without reliance on public subsidy.

Local infrastructure is barely coping. Additional houses will adversely affect infrastructure capacity (1) and there will be further impacts on roads, drains, sewers, public transport, school places, doctors, dentists and hospitals (4), the environment (1), Green Belt (1) and climate change (1). The A41, Poulton Road and Spital Road cannot tolerate any more traffic and are now dangerous at peak times with traffic queuing back to junction 4 on the M53 (1), existing congestion is harmful in Heswall Town Centre (1), public transport is inadequate on routes without services to Liverpool (1) and the Poulton-Lancelyn housing estate has no children's play area or community facility (1).

Selecting spatial options based on developer interest rather than future sustainability was unacceptable. The scale and extent of new additional infrastructure required to support Option 2B is likely to be of higher cost and environmental impact compared to more dispersed investments under Option 1A. Housing should only be proposed in areas where there is capacity to accommodate it and the draft plan contains no plans for new schools, healthcare, roads or utilities.

Case law [2018] EWHC 991 (Admin) has established that land value must be informed by policy. It is not acceptable for the Council to grant permission for an application that is deficient in developer contributions and Local Plan policies must be tightly written. Wirral residents should not be required to shoulder the burden of infrastructure costs on behalf of developers.

No decision has yet been made on whether a Community Infrastructure Levy will be implemented (12) and 'policy asks' need to be more clearly set out (5) and any contributions must be based on up-to-date and robust evidence, fully justified and satisfy the tests set out under paragraph 56 of the NPPF and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. A flexible approach should be adopted, where packages of infrastructure proposals are tested with a "pick &

mix" approach, aligned to specific areas or groups of sites, capable of considering site-specific viability assessments at the point of delivery.

Infrastructure planning needs to address:

- green infrastructure (4)
- sustainable transport (2)
- avoiding car use (2)
- reducing road traffic (2)
- making walking and cycling preferred options (2)
- consolidating public transport with unified ticketing (2)
- digital infrastructure (1)
- sustainable energy (1)
- the impact on underground pipelines, which could result in serious consequences in terms of health and safety, expense and other attendant liabilities (1)
- existing shortfalls (1)

Any new infrastructure should be well-designed (1) and meet the highest standards of sustainable development (1) and all "grey" infrastructure such as road improvements, should be reviewed in the light of the climate emergency (1).

Cycling policies must develop local networks, strategic and inter-urban routes (not simply commuter routes and leisure routes), with the provision of cycle parking facilities at origin and destination (1), with tree planting, use of parks and open spaces, and non-thoroughfare roads that will support a mix of low-speed vehicles, bicycles and pedestrians without rigid segregation (1) and the use of disused rail lines as sustainable travel corridors (1).

Statements of Common Ground need to be provided under the Duty to Cooperate (1).

Nine respondents reserved the right to comment on the final Infrastructure Delivery Plan at a later stage.

**Council response:** The Council's preferred strategy is for urban intensification and the comprehensive regeneration of Birkenhead, consistent with the priority to be given to brownfield development in national policy. The scale of potential brownfield development in Birkenhead is evidenced in the Birkenhead 2040 Framework and supporting Neighbourhood Frameworks.

At the time of writing, more than £78.5m had already been secured towards major regeneration projects in Birkenhead including £19.6m Levelling Up Fund to transform the waterfront at Woodside. £25m Town Deal; £24.6m to support the transformation of the town centre through the Future High Streets Fund; £8.3m from the Liverpool City Region Combined Authority to support the removal of the tunnel flyovers at Hind Street; with a further £1m of Town Deal accelerator funds to help bring forward projects in the Argyle Street area.

Policy WS10 will require appropriate on- and off-site infrastructure provision. Policy WS9 will promote movement by active travel and sustainable modes and including provision for cycling and Policy WS8 the strategy for renewable and low carbon energy.

A detailed Infrastructure Delivery Plan provides information on the types of infrastructure that will be required, including costs; funding; organisational responsibility and timescales, with further information set out in area-based and site-specific policies and in Appendix 10, informed by the Local Plan Viability Assessment underlying the Local Plan. Statements of Common Ground with developers and infrastructure providers are being drafted and agreed.

## Transport

**Q7.2: Do you agree with our approach to prioritise public and active transport improvements and electric vehicle charging infrastructure provision in new development, and to support the construction of major new roads only where they are related to achieving sustainable development, environmental enhancement, public transport or road safety benefits?**

1. **Summary of responses** - Of 300 responses, 73 said 'yes' and 42 said 'no'. A further 185 did not answer 'yes' or 'no'.

A number disagreed with major new road schemes unless for essential access (13), especially in the Green Belt (176), on the basis that new road schemes only increase traffic and do not achieve sustainable development or environmental enhancement and all road schemes needed to be reviewed for climate impact.

243 comments were directed to electric vehicle charging. An extensive but flexible approach was required. At least one per household is needed but homes without a driveway may not be able to have their own charging points. A specialist housing scheme is also unlikely to require the same number as, say, a typical office or apartment scheme. Others indicated that the limited benefits of electric vehicles should also be considered, as whilst they reduce NO<sub>2</sub>, they do not reduce harmful Particle Matter (PMs) pollution. One thought that any requirement would be unnecessary, in light of the Government's proposal to introduce a new functional requirement under the Building Regulations, which was expected to come into force during 2020 (1).

A number of respondents felt that 'active transport' options should be prioritised (3). Users should be consulted, to ensure all types of people will feel safe using them, particularly to and from work/school. Cycle lanes needed to be high quality, well-lit and well-maintained, not in isolated locations and ideally separated from other vehicles on the road, with a greater use of multiuse pathways and the restriction of roads to generate a safer cycling environment (7).

All new homes needed easy access cycle storage, able to compete with parking on the road. Garages and driveways should be of greater width, to allow a car and bicycle or pedestrian to pass. Cycle stands need to be well-sited, under cover if possible, on level ground, well-spaced apart, with space beyond the stands which support the bicycle frames. The Mini-Holland form of development should be promoted in major urban centres (2).

For larger housing developments, public transport should be available for the first day of occupation. cycling provision should at least provide a route to a Local Centre, unless the new development is large enough to have one itself, cycling facilities should be provided next to shops and any new internal or external road links should be designed for active travel (2).

39 responses were concerned about the impact on site viability. A number noted that new public transport and active travel links can only be secured through necessary planning obligations or public funding and that the Commercial Core still requires over £500m for transport improvements but has no funding confirmed. Others suggested that greenfield sites, which are generally viable, could be used to promote sustainable transport (3) and that road infrastructure improvements could be used to resolve existing highway constraints (2).

Similar responses to Question 7.1 identified the need to be clear about ‘policy asks’; make a decision on a Community Infrastructure Levy (12); and not shouldering the burden of costs on behalf of developers (6); and that any requirement which would render developments unviable or undeliverable would not be supported (9). A wide range of respondents considered that planning for new infrastructure should address:

- the impact of new homes on infrastructure capacity (3)
- traffic congestion in Heswall Town Centre (90)
- congestion at Junctions 4 and 5 on the M53 (4)
- capacity of Barnston Road (A551) (4), including the narrowness of Barnston dip, which is already subject to restrictions on heavy goods vehicles (3)
- congestion along the A540 (1)
- the capacity of Gills Lane, which already causes problems for two-way traffic (3)
- the lack of alternative route options in west Wirral (1)
- better and more frequent public transport (11)
- electrification of the Bidston-Wrexham line with extra stations and park and ride facilities (2)
- a reopened rail link to Chester (2)
- a direct rail service from Heswall to Liverpool (227)
- potential new (or reinstated) ferry routes, including from Liverpool to New Brighton (1)
- bus service capacity and frequency to Liverpool, as services through Tranmere are infrequent, always full and should start earlier to better match work start-times (1)
- bus service capacity and frequency to Arrowe Park Hospital and other health and care facilities (1)
- the reinstatement of tram systems (1)
- small electric buses servicing local communities and non-diesel school buses (2)
- reallocation of road space to other users (3)
- linear parks or tree planting especially along busy routes (3)
- car-free town centres, with exceptions for those who struggle to walk or access public transport (1)
- grid capacity for electric vehicles (1)
- making the Mersey Road Tunnels free to use (1)
- climate change (1)
- more local street-specific residents parking controls (1)
- improving road safety by not turning street lighting off and making sure existing lights and roads are kept in good working order (3)

Nine respondents reserved the right to comment on the final Infrastructure Delivery Plan at a later stage.

**Council response:** The Local Plan does not propose to promote any major new road schemes in the Green Belt. The Council plans to remove overengineered roads and create new sustainable transport connections to, between and within regeneration areas. A detailed Infrastructure Delivery Plan provides further information on the infrastructure required; costs; funding; organisational responsibility and timescales, with further information set out in set out in area-based and site-specific policies and in Appendix 10.

The Draft Local Plan also provides for the delivery of the following key transport infrastructure:

- active travel networks for walking and cycling that enable safe access to jobs, leisure and health facilities (Policy WS9.2)

- a new mass transit system in Birkenhead, to connect new neighbourhoods and key locations (Policy WS9.1 and Appendix 8)
- a new greenway within central Birkenhead (Policy WS9.1)

The proposals will also be supported by planned improvements to the existing public transport network on the Bidston to Wrexham and Merseyrail railway lines, including new rolling stock and improved timetables.

Policy WS7 will require well-designed, safe and appropriately supervised parking and electric vehicle charging facilities and Policy WS9 the provision of cycle facilities, with standards of provision are set out in Appendix 7A cumulative traffic impact assessment has been undertaken, alongside strategic modelling to understand the impact on the M53 motorway and its junctions in consultation with National Highways.

## Utilities

**Q7.3: Do you agree with our approach to consider the cumulative impact of development on the utilities networks to ensure resilience, where possible reduce reliance on fossil fuels, improve water efficiency and sustainable drainage and to monitor and respond to future technological advances?**

1. **Summary of responses** - Of 256 responses 72 said 'yes' and 16 said 'no'. 168 did not answer 'yes' or 'no' but 167 agreed with the approach providing that any new infrastructure did not destroy Green Belt, fields or open spaces. Four indicated that any requirement which would render developments unviable or undeliverable would not be supported and reserved the right to comment further at a later stage.

24 respondents wanted a greater emphasis on energy efficiency, renewable energy and local solutions. The Council should do all it can to promote on and offshore wind electricity generation. All new building should meet high standards of energy efficiency including Passivhaus, with renewable energy systems, water efficiency, saving and recycling measures and sustainable drainage, perhaps via soft landscaping and green and blue infrastructure. All new build properties should be orientated to the South to maximise solar energy. No new gas lines should be laid and solar panels should be used. Some believed that the climate emergency had not been given enough weight. A "where possible" approach is inadequate and the response needs to be immediate (5). The proposals are too aspirational (1). Every effort must be made to reduce reliance on fossil fuels including in commercial premises. All new development should be designed to be "zero carbon in use", to meet City Region policies for net zero-carbon by 2040 or 2041.

Policies should also be included for existing communities, especially where recurring small scale flooding and drainage issues disrupt lives and additional development would exacerbate an already challenged drainage system (1). Development should be focused in regeneration areas (1) not in the Green Belt (1) and surface water-related habitat impacts should be taken into account (1). Road flooding could be reduced by clearing the drains more frequently (1).

17 believed that further work was required to understand any future costs. Most utilities were outside Council control. It was not clear that utility-network resilience had been taken into account in site selection (1). The suitability and practicality of providing sites with utilities was still currently unknown and had not yet been fully assessed, to determine whether the preferred spatial strategy is achievable (7). This was particularly relevant to supplying water to existing urban areas in the

northern parts of the peninsula, including Birkenhead and Bromborough, which will need to be incorporated into the Infrastructure Delivery Plan (1).

Early engagement is required with infrastructure providers, including any masterplans before land transactions or planning applications are submitted, to explore infrastructure options as early as possible. The delivery of development needs to be co-ordinated with the timing of any necessary infrastructure and a comprehensive, site-wide Infrastructure Strategy should be required to be submitted as part of any planning application for any strategic allocation (3).

**Council response:** The Council's preferred strategy is for urban intensification and the comprehensive regeneration of Birkenhead. The Local Plan does not propose to release any land from the Green Belt.

Policy WS6 requires development proposals to be flood resilient and incorporate sustainable drainage and water management systems and adaptability to address climate change. Policy WS 8 sets out the Council's strategy for minimising energy demand and reducing carbon emissions. Policy WS 3.1 proposes to adopt the optional higher water efficiency standard under the Building Regulations for all new homes. Policy WS5.2 requires development proposals to contribute to high quality and well-connected networks of blue and green infrastructure.

Policy WS10 will require strategic allocations and master plans to be accompanied by a comprehensive, site-wide infrastructure strategy.

An infrastructure assessment has been undertaken as part of the development of the Local Plan in consultation with key stakeholders and a transport and utilities assessment has been undertaken for strategic site allocations. A detailed Infrastructure Delivery Plan provides further information on the infrastructure required; including costs; funding; organisational responsibility and timescales. The Council is engaging with utility providers and will produce Statements of Common Ground where necessary.

#### **Communications Infrastructure**

**Q7.4: Do you agree with our approach to support a choice of digital infrastructure providers for new developments and to support the expansion of electronic communications networks?**

**1. Summary of responses** - Of 165 responses 74 said 'yes' and 11 said 'no'. The remaining 80 did not answer 'yes' or 'no'. One reserved the right to comment further at a later stage.

Respondents were concerned about the health impacts of 5G (5); damage to farms, fields, trees, open spaces, landscapes and heritage (12) and the impact on energy demand (1).

Six would not support any policy requirement that would render developments unviable or undeliverable.

Others wanted 'choice' to include 'open' and 'more ethical' digital providers (14); ensure coverage in areas like Hoylake and Heswall, not just in major centres like Wallasey and Birkenhead, to support working from home (20); and to support homes for life and telehealth/ telecare approaches (1).

One respondent wanted digital infrastructure to be left to the market but another wanted a particular overseas company to be excluded.

**Council response:** Wirral Council is a strategic partner in a City Region initiative which will deliver a 250km high-speed Local Full Fibre Network by 2023. Within Wirral, the proposed route, shown in the Infrastructure Delivery Plan which accompanies the Local Plan Submission Draft, runs through the Regeneration Areas at Seacombe River Corridor (RA1), Birkenhead Waterfront (RA3), Central Birkenhead (RA4) and Hamilton Park (RA7) and skirts the proposed housing allocations at Hind Street (RES-SRA5.1), Moreton (RES-SA5.1 and RES-SA5.2) and Bromborough (RES-SA4.2 and RES-SA4.3).

NPPF (chapter 10) indicates that advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

Local Plan Policy WS10.2 seeks to ensure a choice of network provider. Sites coming forward in proximity to the Full Fibre Network will be required to support appropriate connections.

### Social Infrastructure

**Q7.5: Do you agree with our approach to work with our partners to undertake capacity assessments of existing social infrastructure, identify needs arising from growth and the opportunity for potential expansion or new provision as appropriate?**

1. **Summary of responses** - Of 156 responses, 56 said 'yes' and 24 said 'no'. 76 did not answer 'yes' or 'no'.

73 respondents felt the Council should be improving existing social infrastructure and constantly reviewing it on a regular basis. An assessment of capacity was vital before any potential expansion or new provision is planned (5). Plans for schools, health, leisure and special needs were currently inadequate given the scale of housebuilding requirements (8) and did not yet appear to be a factor in the site selection process (1). A comprehensive approach was needed (1), controlled to prevent abuse by vested interests (1). A more collective approach based on a 'library of things' would help reduce consumerism, waste and carbon footprints (1).

New development should focus on areas where there is existing social infrastructure (2), such as regeneration areas (1), rather than in the Green Belt where particularly large amount of new infrastructure would be needed (2). One respondent believed that no new social infrastructure, such as schools, doctors, hospitals, early years centres should be built in the Green Belt.

72 responses believed that the building of more homes was unnecessary, as there were already enough schools, GP's and leisure services and 69 indicated that employment growth, (rather than more housing) should be encouraged. Only one respondent thought that growth could be used to improve the viability of social infrastructure.

18 respondents were concerned about the implications of any new requirements on site viability, particularly as growth was being directed towards previously developed land in lower value areas. The Council needed to ensure that they had the evidence to support this policy and were able to justify the contributions that will be expected based on both need and viability.

In terms of content, the following needs and opportunities were identified:

- adequate open space, including parks and playing fields, for local health and recreation (10)

- a new primary school, if development was permitted on a Green Belt to the north of Greasby (SHLAA 3003) (1)
- policies to protect facilities such as community halls, cinemas, theatres/arts centres and pubs which are valued by local people, with proper marketing to ensure that the facility is no longer required by the community (1)
- work with local communities to ensure new development includes local shops, libraries, cultural and community centres, green spaces, schools and medical centres (8)
- an expanded definition of cultural infrastructure beyond just cinemas, bingo and ten-pin bowling (8)
- District and Local Centres need to include not just conventional retail but community cafés, growing spaces, community banks, and cultural centres (8)
- social infrastructure should include recycling facilities and local capacity to process garden and food waste. (8)
- a climate change policy (1)
- Improved health infrastructure in West Kirby, given the quality of the existing buildings, waiting times and the difficulty in securing medical appointments (1)

New development should be more robustly required to provide or contribute towards social infrastructure (1), invest in active travel (1) and not 'just build homes' (1).

The current situation with partners closing facilities such as walk-in-centres, could leave the Council with significant liabilities for the consequences of failure (2).

**Council response:** The Council's preferred strategy of urban intensification and regeneration reflects the national priority for brownfield development. The Local Plan does not propose to release any land from the Green Belt.

An assessment of social infrastructure has been undertaken with key stakeholders. The Infrastructure Delivery Plan that accompanies the Local Plan Submission Draft provides information on the types of infrastructure that will be required, including costs; funding; organisational responsibility and timescales. Further information is set out in the relevant area-based and site-specific policies in Part 4 and Part 5 of the Local Plan, which has been subject to the Local Plan Viability Assessment.

Local Plan Policy WS10 will require the appropriate provision and protection of relevant on- and off-site infrastructure and developer contributions will be sought where needed, in line with the requirements in Appendix 10.

## 8. Our Environment

### Climate Change

#### **Q8.1: Do you have any views on our preferred approach to plan for Climate Change in Wirral?**

1. Green belt should not be released for development (3) Releasing Green Belt land for development is contrary to the Council's climate change commitments and policy and contrary to national policy and legislative requirements on climate change mitigation and adaptation and carbon reduction (5) and should be invested in as a positive measure to tackle climate change (3).

Green belt release will impact on Wirral's rich habitat, trees and biodiverse areas and green belt should be given special protection (11). Green belt contributes to air quality (2) and human health and wellbeing (2) and quality of life (2). Arable land is a key aspect of carbon capture (1) and green belt release would release carbon / reduce tree cover (1). The economic benefits of the green should be recognised (10). In view of recent flooding events, it is clear that our Green Belt provides significant protection as a flood defence (4).

No Green Belt should be classed as weakly performing (2). Brownfield regeneration should be prioritised through planning policy (5). Options 2a and 2b should be removed from the Local Plan 2020-2035. (1)

Building houses in Green Belt would directly reduce still further the viability of housing in the north and east of the Peninsula, delaying their rejuvenation and improved quality of life. (2) The chapter on Climate Change is just empty words if the Council pursues spatial strategy option 2A or 2B (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option (Option 1 or Option 1a) which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed

2. The housing number/population is too high / and (6) therefore not contribute to carbon reduction and climate emergency targets. This calculation must be challenged (1) and a correct needs assessment would mean targets could be met more easily (2) and therefore no green belt would need released (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed. The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (2021) including the latest economic forecasts for the City Region. The Council are working with Peel Land and Property to bring forward development at Wirral Waters (see Policy RA6 in the Local Plan Submission Draft) See also response to Q2.1.

3. Climate change mitigation and adaption should be the main focus/priority of the plan (4) – the Council's response is inadequate (1). Wirral's Climate Strategy objectives need more prominence (10). United Utilities would support an approach that would directly address the Climate Change challenge with a direct, overarching policy (1).

The ambition / intention should be firmer and the language used to express the approach should reflect this – not using phrases such as "where appropriate and feasible" (12).

There needs to be more robust / detail / rigorous policy (16) to support officers in making planning decisions. These should be proactive and improve resilience for existing communities (1). An integrated approach is needed across strategies and programmes / initiatives (2). Fast

actions / responses are needed to reduce carbon / climate change (2). All planning decisions should be made with climate change as the main consideration / priority (7), however should, other highly supported planning objectives should not be ignored (1).

**Council response:** Addressing climate change is a key part of the Local Plan. Strategic Objectives 1, 3 and 4 of the Local Plan address climate change. The Council recognise however that to meet our target for Zero Carbon targets it will require action by Government.

4. The plan should prioritise the protection of natural capital (tree planting, biodiversity protection, flood management, and a ban on exploration for more oil/gas) (10). Protection / enhancement of natural capital should be the main focus / priority of the plan (2) and strictly adhered to (2) For wildlife, the ambition should be not just to conserve, but to improve conditions (i.e. BNG) (1). No development should be allowed in any site that may currently protect vulnerable biodiversity (2).

**Council response:** Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection which includes provision for biodiversity net gain for all new development. This Policy also sets out requirements for the provision and access to open space.

5. Climate change policy and the current options document are diametrically opposed to each other. (2). The Council have not calculated the carbon footprint or any other climate emergency matters in connection with the Local Plan or informed us of how the effects of the Local plan will be mitigated from a climate emergency viewpoint. (2) Climate change is not an issue for local government and many elements can only be secured by legislation at the national level (4), and the Council should focus on more local issues (1). The target of 2041 to decarbonise our energy supply is hopeless as the emergency dictates a target of 2021. (2)

**Council response:** Whilst Climate Change can only fully be addressed through national policy and regulations, the Local Plan has an important role.

6. The preferred approach should reflect wider climate change considerations and not just focus on energy (1) The preferred approach seems to focus almost entirely on energy yet the text appears to touch upon wider aspect of climate change, including the working draft 'Cool 2' which has two goals and eleven objectives (1). Green infrastructure should be included in any overarching Climate Change policy as it helps to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk (1). Preservation of existing green spaces is essential to tackle climate change - we need to stop clearing trees and concreting over our Green Belt (2). Homes must have gardens or access to pocket parks in areas of higher density development (1). Landscape designers, ecologists and community enablers must be at the core of the design team. Masterplanning should connect all the natural and green spaces to promote coherent wildlife corridors.

**Council response:** Addressing climate change is a key part of the Local Plan. Strategic Objectives 1, 3 and 4 of the Local Plan address climate change. Policy WS5 deals with a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection, Policy WS 8 deals with a Strategy for renewable and low carbon energy, Policy WD 4 addresses Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management, whilst Policy WS 1.4 Flooding and drainage. The Council recognise however that to meet our target for Zero Carbon targets it will require action by Government. The Local Plan Submission Draft is based on the Council's preferred

urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

The Cool Wirral Partnership's local climate strategy 'Cool 2' adopted in December 2019 is key evidence which has informed relevant policies in the Local Plan.

7. There is a huge challenge around improving the health of soils and many of the existing land uses on Wirral continue to encourage carbon loss rather than improving soil health and carbon sequestration (2)

**Council response:** The Local Plan sets out a comprehensive range of policies intended to protect and enhance natural capital – see Policy WS 5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection. The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

8. Trees in mature areas should not be felled (1). All trees make a contribution to tackling climate change (2). Protection should be afforded to trees across the borough and a wide scale planting programme should be undertaken (1) – replanting or offsetting is not sustainable (2). The provision of young trees, especially along the main highway routes, would reduce traffic pollution and help Climate Change policies, as well as providing an attractive visual characteristic along roads which are currently devoid of adequate planting. (1)

**Council response:** The Local Plan Submission Draft Policy WD 1.2 Trees sets out requirements for replacement trees impacted by development and is informed by the Council's [Tree Planting Strategy](#).

9. WBC's efforts to address climate change through its recognition in the local plan are supported (9) and necessary actions are well set out in policy (1). The aims of the Climate Change Strategy are supported (1) and this should underpin the Local Plan (1). A climate emergency action plan should be developed (2).

**Council response:** Support noted. Addressing climate change is a key part of the Local Plan. See response to 8.1(6) above. The Council has adopted a Climate Change Action Plan – see [Climate Emergency | www.wirral.gov.uk](#)

10. We should aim to form resilient food supplies that rely on a diverse set of local, regional, and global sources, according to where food types grow best (1). No agricultural land and associated grassland, trees etc. should be released for development as this is important to address climate change (3). Community food growing and recycling initiatives should be considered (1) to support this.

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed. Noted but other than protecting agricultural land through maintenance of the Green Belt and promoting allotments food production is not something which the Local Plan can directly influence.

11. In order to achieve sustainable growth new development will need to consider the impacts of climate change including increased flooding in both severity and frequency, impacts to biodiversity and habitats and the wider water environment (1).

Policy should holistically address the number of factors that contribute to Climate Change that would not focus on solely reducing emissions but also seek to address the challenge of more

frequent extreme weather events and heightened flood risk. The recommended policy should consider all contributions to climate change and adapt to its effects, including reducing the risk and impacts of flooding. Policy should require the sustainable management of surface water (1). Development should not be permitted in flood risk areas (2). Environmental considerations should be at the forefront of design (1).

**Council response:** The Local Plan Submission Draft is clear that the location of development must avoid areas at greatest risk of flooding and account for expected changes to flood risk as a result of climate change. Policy WD 4 deals with Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management.

**12.** Green roofs should be promoted and encouraged as these contribute to carbon reduction and climate change mitigation (1). New development should provide for solar panels (3) and electric vehicle charging points (2). New development should be properly insulated and retrofitted where not (78) to meet current environmental standards (1). All new housing built should be carbon zero (1).

**Council response:** Home insulation is not a matter for the Local Plan and is dealt with Building Regulations. The Local Plan will promote the incorporation of green roof solutions where appropriate. Policy WS 8.2 of the Local Plan Submission Draft Sustainable Construction – Energy Efficiency and seeks to achieve zero carbon development.

**13.** All new homes must be built off the national grid with alternative heating and power sources e.g. air/ground source pumps. (1) Electricity should be sourced from renewables (11) and low carbon energy (9) and a regional approach to providing renewables should be considered (1). Uncertainty was expressed around what the [Renewable Energy] study criteria is going to be (1). Respondents expressed the wish to reserve the right to comment once the Climate Change and Renewable Energy Study and the relevant policies in the Draft Local Plan (9). Would not support any policy requirement which would render developments unviable or undeliverable (3).

**Council response:** It is not practicable for all new development not to be connected to national energy grids. The Local Plan Submission Draft will promote the use of various renewable energy technologies on new development- see Policy WS 8 Strategy for renewable and low carbon energy.

Relevant policies in the Local Plan Submission Draft addressing Climate Change have been tested for impacts on Viability through the Local Plan Viability Assessment. The Council does not assume that all renewable energy solutions can be adopted within Wirral. Policy WS 8 Strategy for renewable and low carbon energy supports proposals for renewable and low carbon energy schemes in appropriate locations, with particular emphasis on the use of decentralised energy networks and in identified areas of opportunity subject to national green belt policy. Opportunity areas for renewable energy within the Borough have been identified in the Wirral Renewable Energy Study 2020.

**14.** The Council should seek to allocate land in the most sustainable of locations, both in terms of proximity to services and facilities, together with accessibility by modes of sustainable transport, reducing the dependency on travel by car which in turn will assist the Council in meeting its objective to achieve net zero carbon emissions by 2041. (1) Traffic, road building and car use increase carbon emissions, (3) and therefore car-based travel should be discouraged (3). Development that is spatially concentrated in one area will create a large number of cars and will increase pollution, therefore impact the health of the residents (1). Development that is

located in the West of the Borough (1), will massively increase congestion pollution and worsen air quality (1) due to the need to travel to employment centres.

Public transport should instead be improved (3). Tourism would greatly increase the carbon footprint unless there was a significant plan to use public transport, rather than a huge influx of vehicles to the area. It is therefore imperative that better public transport is available through, for example, trams. Concentrate cultural events on areas where excellent public transport links exist.

**Council response:** The Local Plan Submission Draft will contain policies promoting a shift away from private cars to public transport and active travel, walking and cycling. The preferred Option to locate all new development within existing urban developments will enable new development to be served by existing or improved public transport services which will contribute to the Council being able to meeting its objective to achieve net zero carbon emissions by 2041. The Council recognises the role of landscapes, active travel routes and supports appropriate diversification of uses within the green belt to contribute to tourism in the Borough.

15. Helping to Tackle Climate Change Permitting housing development on any of sites SP039, 040 and 042 would require substantial improvement of the 85137 leading from the roundabout over junction 4 of the M53 motorway to the cross roads at the Three Stags Hotel which, in turn, would necessitate the removal of a significant number of mature trees. (1)

**Council response:** The Local Plan Submission Draft is based on the Council's preferred Urban Intensification Option and no Green Belt land is proposed for release.

16. Ditton Lane Nature Area has been proposed for LWS designation following detailed surveys of plant and animals. The western part of the present Nature Area could not be built on as it is a Flood water storage basin. (1)

**Council response:** Noted.

17. Tower Grounds (OS024) in New Brighton is another important resource for exercise and enjoyment of nature and needs to be protected. Please do not allow this area to be built on.

**Council response:** The New Brighton masterplan which is currently in preparation will inform the future use of Tower Grounds. There are no proposals for the comprehensive development of this important recreational resource. (See also Q8.10)

18. Request for the area of Greasby that is on the corner of Frankby Road with Pump Lane, adjacent to Griffiths Close, Greasby a protected green space. Apart from improving visibility coming round the roundabout - there is a crossing place on Frankby Road, outside the Redrow housing, and close to the roundabout, this area is of historic significance to Greasby, being the site of the 'Pump' of 'Pump Lane' and presumably the 'Well' in 'Well Lane' fame. The character of Greasby would be severely damaged should this piece of history be removed or be built around. The safety of pedestrians crossing the road would also be impaired. This area should become a Protected Green Space.

**Council response:** Please see Question 8.10

19. Major concerns about the selling of St Bridget's playing field (1) St Bridget's school playing field West Kirby should be included in the list of Open Spaces to be protected in Appendix 8.1. It should be protected from any development as it is vital that children have a green space in which to play, rather than just a tarmacked school yard. (1)

**Council response:** Please see Question 8.10

- 20.** Site SHLAA 3095 West Kirby is a lovely seaside town that many people of the Wirral enjoy visiting. This is a field that gives great character to the approach to West Kirby and to build here would detract from the attractive character of the community. The road adjacent to the field is on a hill, is narrow, has a blind bend and is frequently congested I would therefore have serious concerns re traffic safety. Building on this land would be damaging to the local environment as much wildlife is supported by this field. I propose that this area should be a Local Green Space.

**Council response:** Please see Question 8.10

- 21.** The Hind Street Strategic Site has the opportunity to make a direct contribution to meeting the Liverpool City Region Combined Authority has set to become Zero Carbon by 2040, targets, which can be achieved through the redevelopment of a brownfield site, to create a compact walkable and cyclable neighbourhood with access to several public transport options and a zero net energy and zero net carbon development, including energy efficient buildings, implementing passive strategies, adopting energy recovery systems and on-site energy production (Solar Photovoltaics), and the potential to deliver an onsite energy centre, powered by a renewable energy source, which could act as a pathfinder for other projects both regionally and nationally.

**Council response:** Policy RA5 of the Local Plan Submission Draft includes the Hind Street Urban Garden Village Masterplan Area (MA7) which will be developed as a low carbon urban garden village.

- 22.** It would help if we knew when the climate emergency plan was due to be delivered and whether there would be consultation on the plan. 8.9 States the Council wants to reduce the overall demand for energy on the Wirral and make sure as many homes as possible are improved to at least EPC Band C by around 2030. The plan does not make it clear what this means for building control et cetera. Extinction Rebellion Wirral supports the preferred option of “development of a positive strategy to promote the delivery of renewable and low carbon energy and which would incorporate requirements on housing, employment, retail, leisure and tourism development to meet higher standards of energy efficiency.

**Council response:** For the latest information on the Council's Climate Emergency Plan please see [Climate Emergency | www.wirral.gov.uk](https://www.wirral.gov.uk/climate-emergency/). It is likely that the main influence on energy efficiency of new buildings will be through the Building Regulations. However, the Local Plan Submission Draft will include a policy seeking to move towards zero carbon buildings as soon as practicable having regard to viability.

- 23.** As part of the forthcoming guidance, we would wish to ensure that the setting of heritage assets, and local landscape character are taken into account when considering renewable energy development (1). Historic environment can play a role in supporting efforts on climate change and in making the Plan area carbon neutral and this is important that any initiatives are sensitive to its unique qualities and characteristics. (1)

**Council response:** The Council recognises the importance of the role of heritage and the green belt in tackling Climate Change. Impacts on heritage assets will be taken into account when determining planning applications for stand alone renewable energy developments and on site technologies as appropriate.

**Q8.2: Would you support including additional measures within the Local Plan to plan for Climate Change, including allocating sites for renewable energy or including additional requirements on housing, employment, retail, leisure and tourism developments to meet higher standards of energy efficiency?**

**Summary of responses** - There were some 180 responses to this question. Because not all of these responses answered Yes/ No it is not possible to give percentages. However, a large majority of responses did support additional measures. Again, because a large number of those who answered yes to this question then failed to indicate which additional measures they supported it is not possible to give an accurate indication of which particular measure was supported. However, it is clear from the responses that there was strong support for all the additional requirements- a) allocation sites for renewable energy; b) additional requirements on housing development; c) additional requirements on employment uses; d) additional requirements on retail development; e) additional requirements on leisure development; f) tourism developments to meet higher standards of energy efficiency.

**Q8.2b asked those who chose other to give further details.**

1. The following responses were given:

	<b>Comment</b>	<b>Council response</b>
A	Identify partnerships/ incentivise improving soil health/ carbon capture/ biodiversity, etc	See Policy WS 5 of the Local Plan Submission Draft which sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection.
B	Walking and cycling and green public transport must take precedence over the car. To this end car parking space must be minimised and safe, sufficient and secure cycle storage must be provided.	Policy WS 9 of the Local Plan Submission Draft sets out a Strategy for transport which includes the promotion of walking and cycling.
C	Sites to absorb carbon, whether into wetlands, trees or well-managed grassland.	Sites will be identified in accordance with Policy WS 5 of the Local Plan Submission Draft which sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection.
D	Specific examples - cycling infrastructure, solar panels	See appropriate responses in Q8.1.
E	for e.g. an insistence that all new developments incorporate renewable energy, minimise car parking space and include sufficient, secure, covered cycle storage.	See Policy PWS 8 Strategy for renewable and low carbon energy, Policy WS 7.3 Car Parking and Policy WS 9.3 Servicing development
F	Reduce the number of fossil fuelled vehicles on Wirral roads	The Local Plan Submission Draft will include a requirement for all new development to

		make provision for electric car charging points
G	Planting Kelp beds offshore	This is not a Local Plan matter.
H	Detailed design and practical guides to incorporate climate change requirements into new development should be set out as supplementary planning guidance	The Council will prepare Design Guide SPDs for Birkenhead and the rest of the Borough to be adopted after the adoption of the Local plan.
I	Vast source of energy could be enhanced by tidal power generators in the river Mersey we would have access to an unlimited power supply. Wirral should work with the Liverpool region to tap this wonderful, natural and eternal power supply.	Noted. The Liverpool City Region Combined Authority are investigating the potential for electricity generation from Tidal Power. No specific proposals will be included in the Local Plan Submission Draft.
J	Query re additional requirements on commercial, retail and leisure	Unsure about the nature of this comment.
K	Massive tree planting and retention of all green spaces including Green Belt	See responses in Q8.1

**Q8.2.c asked for further details for choice of answer at Q8.2.**

2. For those who answered *No that they didn't support including additional measures*, the following responses were given:

	<b>Comment</b>	<b>Council response</b>
A	No, this has to be about reduction in any form of development and protection of our natural assets i.e. Green Belt, and greenspaces. Green Belt should be increased not decreased. Objective must be to increase our Green Belt percentage over the local plan period.	The Local Plan Submission Draft is based on the Council's preferred option to meet all development needs within existing urban areas. No Green Belt release is proposed.
B	Whilst we support the general principles that underpin this approach, we would expect that through the Examination that the "policy on" implications of this policy and a range of other policies have been properly tested. For example, approaches such as BREEAM may not necessarily represent the best metric to measure sustainable development and the latent opportunity to utilise a different metric. The Examination should rigorously test that the "policy on" implications have been assessed and consider how to proceed if it cannot be shown to result in no impact on the delivery of	The viability implications of Climate Change Policies set out in the Submission Drat Local Plan have been assessed by the Local Plan Viability Assessment.

	viable development in all parts of the District across the Plan period.	
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3. For those who answered Yes that they did support including additional measurers the following further details were given:

	<b>Comment</b>	<b>Council response</b>
A	Positive, collaborative working with Wirral's largest landowners, is essential to addressing climate change. (3)	Noted. The Council will work with all landowners to promote proposals which address climate change in an appropriate manner and location having regard to national and local policies.
B	We wish to stress that there is a need to ensure plans and programmes are put into place with effective mechanisms to ensure delivery and monitoring for initiatives as well as the flexibility to change and adapt initiatives where necessary. (3)	The Council will ensure that monitoring measures are included in the Local Plan to measure the effectiveness of appropriate policies related to climate change.
C	Initiatives such as additional requirements on housing, employment, retail, leisure and tourism developments to meet higher standards of energy efficiency will likely lead to increased development costs and as such may negatively impact the viability of allocated sites in the draft Local Plan. In particular, this would be the case for those urban brownfield regeneration schemes which the Council are relying heavily upon to meet its housing and employment land requirements which already demonstrate questionable viability (6)	All policies included in the Local Plan will be assessed through the Local Plan Viability Assessment.
D	The Examination should rigorously test that the "policy on" implications have been assessed and consider how to proceed if it cannot be shown to result in no impact on the delivery of viable development in all parts of the District across the Plan period.	
E	ITPAS supports the Council's endeavour as clarified in our comments in answer to Q8.1. The additional capital cost of such measures should be recouped through lower lifetime running costs. The task is how to prevent the issue of viability at the initial capital cost stage being allowed to water down this approach.	

	This might be facilitated by arrangements between developers, mortgage companies, utility firms and agents; or more simply by companies offering mortgages which cover energy costs – do they exist already?	
F	Improved sustainability and biodiversity for listed landscapes, and sustainable improvements to the public realm.	Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection.
G	A Council Motion was passed unanimously stating that NO productive agricultural land will be released for development. The Local Plan Options fail to adhere to this commitment. The existing Green Belt is already making an important contribution towards tackling Climate Change, reducing harmful pollution and promoting health and well being through leisure activities and its attractiveness. (2)	The Local Plan Submission Draft is based on the Council's preferred Urban Intensification spatial strategy to meet all of the Borough's development needs maximising the use of brownfield land within existing urban areas. No green belt release is proposed.
H	Further measures should include increasing tree cover through large scale tree planting (2).	The Local Plan Submission Draft Policy WD 1.2 Trees sets out requirements for replacement trees impacted by development and is informed by the Council's <a href="#">Tree Planting Strategy</a> .
I	Improving wildlife habitats by creating and maintaining wildlife corridors, linking with urban parks and open spaces; Providing further opportunities for recreation.	Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection.
J	Improving air quality, reducing high incidence of asthma	The potential air quality impacts of development proposals have been informed by an Air Quality Impact Study.
K	Would support allocating additional sites to develop renewable energy	Noted. No specific sites are allocated in the Local Plan Submission Draft. However, Policy WS 8 -Strategy for renewable and low carbon energy supports the development of stand alone renewable energy sites in appropriate locations.
L	Should allocate sites for renewable energy production provided it is NOT nuclear, or biomass or UCG, and that it utilises existing brownfield sites.	The Local Plan Submission Draft Local Plan Policy WS 8.5 Heat and Power networks supports low carbon energy projects in appropriate locations.  The opportunity areas for renewable energy technologies are identified in the

	<p>Please may we have sites for anaerobic digestion close to points where methane can be injected into the main gas supply?</p>	<p>Renewable Energy and Climate Change Study.</p>
M	<p>All new developments incorporate renewable energy, minimise car parking space and include sufficient, secure, covered cycle storage, car charging points, insulation, grey water. (15)</p> <p>New homes must be built without dependence on the national grid e.g. alternative heating such as air source/ground source. Solar panels on roofs should be compulsory. (2)</p> <p>Wirral should aim to be a leader in green infrastructure, with better environmental targets for new housing than the legal minimum, building with the future of our planet firmly in mind.</p> <p>Support the inclusion of a policy which requires all new residential developments to deliver high energy efficient standards. We are supportive of the Building for Life initiative as advocated in the Framework together with Homes England and the Design Council. Notwithstanding, any such requirements should be subject to viability testing so as to ensure the deliverability of development is not compromised.</p> <p>All new housing built must be carbon zero.</p> <p>Making sure that new housing/business/retail is as energy efficient as possible, using the latest heating (and air conditioning) approaches to reduce CO<sub>2</sub>, etc. is a sensible use of planning controls - as long as it does not completely halt the building needed in all these areas.</p>	<p>The Local Plan Submission Draft through policies WS 8.1 Energy Hierarchy and Policy WS 8.2 Sustainable Construction – Energy Efficiency promote the use of renewable energy and energy efficiency in building design. Local Plan Policy WS7 requires development proposals to provide well-designed, safe and appropriately supervised parking and electric vehicle charging facilities that incorporate appropriate landscaping and materials to reduce visual impact and not dominate the street scene. Local Plan Appendix 7 sets out the requirement for all applications for residential dwellings with off street parking must accommodate 1 active Electric Vehicle charging point per dwelling. All applications for non-residential development must include at least 25% of their car parking provision to be served by active electric vehicle charging infrastructure and a further 25% of passive infrastructure to allow for future capacity, with a minimum of one parking space serviced by electric vehicle charging infrastructure for all schemes. This requirement is proposed to increase to 50% by 2027 and 100% by 2030.</p> <p>Policy WS 3.1 Housing Design Standards requires compliance with the higher water efficiency standard of 110 litres/ per person/ per day under Regulation 36(3) of the Building Regulations or any successor standard.</p> <p>Policy WS 8.2 Sustainable Construction – Energy Efficiency requires that all development should be ‘zero carbon ready by design’ to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping.</p>
N	<p>As long as council maintains the 12,000 dwelling figure when we know they would like</p>	<p>See Response to Q2.1</p>

	to build on green belt, I can't take their climate change position seriously.	
O	Can they turn those big arc lights off at Pensby School when no one is playing for a start.	This matter has been referred to Pensby School to address.
P	We also need to set aside land to absorb carbon, to achieve climate change targets.	See Policy WS 8.4 Carbon Compensation in the Local Plan Submission Draft.
Q	Providing safe walking and cycling across the Wirral.	Local Plan Policy WS9 states the Council's ambition to promote movement by active travel and sustainable modes and includes requirements for developers to provide cycle facilities which provide a safe, comfortable, and attractive modal alternative.
R	Establish a food recycling programme.	This is not a matter for the Local Plan.
S	Wirral's Climate Strategy objectives need more prominence.	See response to Q8.1(4)
T	Any decision needs to take the climate emergency into account. (2)	Decisions on planning applications will need to have regard to relevant national planning policy in respect to climate change and to relevant climate change policies set out in the Local Plan Submission Draft.
U	We should also be giving over more land to community food growing purposes and food recycling purposes. (4)	The Local Plan Submission Draft Policy WS5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection deals with allotments and local food growing opportunities. No specific food recycling proposals are included as these are outside the scope of the Local Plan.
V	There must be retrofitting incentives to older homes to further reduce the carbon footprint. (5)	This is not a matter for the Local Plan.
W	We already are surrounded by wind farms, visible from West Kirby on pretty much every way we look - so additional renewable energy, if Wind Farms around West Kirby/Hoylake/Moreton/New Brighton, would be unreasonable. Alternative renewable energy facilities would be more acceptable.	<p>The Local Plan Submission Draft Local Plan Policy WS 8.5 Heat and Power networks supports low carbon energy projects in appropriate locations.</p> <p>The opportunity areas for renewable energy technologies are identified in the Renewable Energy and Climate Change Study.</p>

X	<p>Cheshire West and Chester notes Wirral's intention to commission a Renewable Energy Study early in 2020. Our respective authorities have both declared 'Climate Emergencies' and it may be helpful to share information on the development of this piece of work and other initiatives, as both authorities develop a policy response to the climate emergency.</p>	<p>The Renewable Energy and Climate Change Study has been prepared to inform the Local Plan Submission Draft.</p>
Y	<p>Only when the whole of the Hind Street strategic mixed site is considered that a scale of development can be realised that will meet the aspirations of the Council to create an Urban Garden City or Left Bank-Regeneration Zone. Land to the north and south of Hind Street can be redeveloped to achieve a strategic mixed-use site that is of a scale to make a significant contribution to meeting the Council's housing requirement and the positive regeneration of Birkenhead Town Centre. Maximising the full extent of the Strategic Mixed Site will create a quantum of land that will also provide the Council with the opportunity to accelerate the delivery of new homes and commercial space and the positive redevelopment of a prominent edge of centre brownfield site that will create a compact walkable and cyclable neighbourhood with access to several public transport options. It is only at this scale of development that effective and efficient ways to directly address Climate Change objectives and targets can be achieved.</p>	<p>Policy RA5 allocated the site for residential development.</p> <p>The Council recognise that the proposed Hind Street Low Carbon Urban Garden Village will make an important contribution to meeting the Borough's housing needs. It will involve the remediation and development of a strategic scale development in a highly accessible edge of Town Centre location. The delivery of this scheme will be an exemplar scheme for the Borough demonstrating with low carbon, energy efficiency principles.</p>
Z	<p>The Government is proposing to remove the ability of LPAs to set higher energy efficiency standards than those in Building Regulations which has led to disparate standards across the country and inefficiencies in supply chains. The Government wants to create certainty and consistency. The situation is confusing with decisions about technical appropriateness, application and enforcement of energy standards considered by planning officers, committees, and Planning Inspectors rather than by qualified Building Inspectors. An uplift to Part L standards in 2020 will improve the energy efficiency of new homes</p>	<p>The Council notes the role of Building Regulations in moving towards higher levels of energy efficiency in new development. However, the Council considers that the Government's current regulations do not recognise the urgency of tackling climate change and the need to move quickly to zero carbon development.</p> <p>Policy WS 8.2 Sustainable Construction – Energy Efficiency requires that all development should be 'zero carbon ready by design' to minimise the amount of energy needed to heat and cool buildings through landform, layout, building</p>

	<p>and prepare housebuilders and supply chains in readiness for the further uplift in 2025 to meet the Future Homes Standard so there is no need for LPAs to seek higher standards.</p> <p>Requirements must be according to legislation, as promoted by Government.</p>	orientation, massing and landscaping. This has been tested through the Local Plan Viability Assessment.
Aa	<p>This has to be about reduction in any form of development and protection of our natural assets i.e. Green Belt, and greenspaces. Green Belt should be increased not decreased.</p> <p>Objective must be to increase our Green Belt percentage over the local plan period.</p> <p>The chapter on Climate Change is just empty words and somewhat platitudinous especially if the Council pursues spatial strategy options 2, as stated about the pursuit of these options will have an adverse impact on climate change. Therefore, the harm caused by either of option 2 is fundamentally at odds with the stated objectives of the emerging Local Plan. Don't build on the green belt. (2)</p>	The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification Option which seeks to meet all development needs of the Borough within existing Urban areas. No Green Belt release is proposed.
Bb	<p>Most of West Wirral has limited public transport (odd bus route but very little train network) so any housing development in these areas would likely heavily rely on cars. With limited employment opportunities in that area car usage will be great with consequent impact on air pollution/particulates. Increased housing would also put pressure on drainage systems potentially increasing the risk of flooding in the area. Furthermore any land given up to housing development in this area would probably have been previously used for farming thereby reducing further the peninsula's ability to achieve carbon neutrality. As a result of this I think that any development in these areas should be limited in scale.</p>	Noted. The Local Plan Submission Draft spatial strategy accords with this approach.
Cc	<p>It is recognised that building stock is probably the largest single user of energy and therefore can make a significant contribution to cutting greenhouse gas emissions and assisting the Plan in working towards carbon neutral targets. With regards improving the energy</p>	Noted. This will be addressed in the Local Plan Submission Draft.

	<p>efficiency of existing buildings, this will need to be applied with particular care in the case of historic buildings and those of traditional construction. Two principal areas of risk when upgrading older buildings is that such measures can cause unacceptable damage to their character and appearance and can also cause damage through technical conflicts between the exiting construction and changes to improve energy efficiency. This is reflected in Part L of The Building Regulations (2010), which contains some exemptions for historic buildings as well as circumstances where special considerations should apply. Historic England has produced an advice note which provides further information on this (<a href="https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partll/">https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partll/</a>).</p>	
Dd	I support additional measures that will not be detrimental to the contribution our parks and green spaces already make in the context of climate change.	Policy WS 10.5 of the Local Plan Submission Draft seeks to protect existing open space.
Ee	Reference to document from Friends of the Earth: Local plans need to be compliant with the National Planning Policy Framework (NPFF)-The NPPF in England is weak in a number of areas (for example on urban sprawl) but it does require local plans to “help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience and support renewable and low carbon energy and associated infrastructure.	Noted.

**Q8.3: Do you think there is anything else that the Council could do to address or plan for Climate Change within the Local Plan?**

1. Green belt land should not be released for development (9) as this is contrary to the Council's climate change commitments and policy and contrary to national policy and legislative requirements on climate change mitigation and adaptation and carbon reduction (6) and is against sustainable development (2). Green belt land reduces pollution (3) and promotes health and wellbeing for residents (124). This should be invested in as a measure to tackle climate change and should be protected (124). Green belt release would impact the viability of housing

in the north and east of the Peninsula, delaying their rejuvenation and improved quality of life. (122) It also prevents the coalescence of settlements and provides access to the countryside (1). There are plenty of brownfield sites that should be mandatory to be used for development (2).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No Green Belt release is proposed.

2. Green spaces should not be developed if the council is serious about climate change. (2)

**Council response:** Policy WS 5 of the Submission Local Plan-Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection includes provision for the protection of open spaces. Settlement policies in Part 5 of the document include policies for the protection of various green spaces as Local Green Space.

3. The huge increase in both housing and population runs counter to the council's own Climate change emergency and would not lead to a reduction in CO2 or an improvement in air quality in Wirral (72) due to increases in traffic, etc. (1). The 12,000 unit figure should be lowered (1) and challenged (1) to prevent green belt release (2). A more realistic figure for housing would contribute to reducing the climate crisis and carbon emissions (4) and meet climate change targets easier (1).

**Council response:** See response to Q2.1 in respect to Housing Numbers.

4. The Council should allocate sufficient land in sustainable locations to reduce the dependency on car related travel (1). Highways should be reviewed in order to reduce the present (and future) hotspots (1). Public transport should be significantly and quickly improved, particularly in the centre of the Borough (3) to reduce car usage. Suggestions as to public transport improvements included bus stops with solar powered smart dynamic signage (saying when buses are due to arrive and where they are going) should be a local plan priority (1), the introduction of a tram system, and keeping large HGVs off minor roads (1). A wider provision of cycle routes would contribute to health and well-being as well as providing an alternative to transport with high carbon emissions (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. This will enable housing provision to be delivered at higher densities in more sustainable locations and be better served by public transport and active travel networks.

Local Plan Policy WS 4.3 requires development to minimise the visual impact on the surrounding area and the amenity of neighbouring users, including through the use of routing protocols for traffic (which would include HGVs) to and from the development.

Local Plan Policy WS9 states the Council's ambition to promote movement by active travel and sustainable modes. The council are progressing a mass transit system for the wider Birkenhead Framework area including innovative mobility hubs incorporating smart technology. We will continue to work closely with the LCRCA with regard to the delivery of their Bus Service Improvement Plan that was submitted to the DfT in October 2021 which seeks investment to transform LCR Bus Services and the customer experiences through the creation of a comprehensive and integrated network which delivers quick and reliable journeys.

Using transport modelling software, a cumulative traffic impact assessment has been undertaken that accounts for changes associated with planned Local Plan housing and employment together with any committed network updates across the borough. The inclusion of strategic transport schemes planned during the Local Plan period are forecast to have a positive effect on network performance and capacity along the corridors to which the schemes are local to. Rather than the provision of additional highway capacity, Wirral Council are committed to reducing car use from new developments through public transport and active travel improvements through the Wirral Mass Transit scheme, development mobility hubs, active travel junction improvements and walking and cycling investment. Further, it is worth noting that Wirral's ambition to primarily utilise brownfield sites for the delivery of the Local Plan will maximise the opportunity for residents to make use of existing transport hubs and infrastructure in established urban areas. This will also be complimented by reduced car parking numbers will also be supported for appropriate residential development within the Birkenhead Regeneration Area and town centres.

5. Climate change should be the primary concern of planning / policy (5) and all policies should be made in this context (1) as it is the most important issue for people and the planet (1). This will give decision-makers more leverage to make the tough decisions required to make Wirral a climate fit-for-purpose Borough and achieve the many associated health gains from cleaner air, safer roads etc. (1). All decisions should have climate change as the top priority (1). WBC could be more ambitious with the timescale and scope of the climate change targets (3) - Seek to reduce emissions to net zero by 2025 (1). Adhere to the Climate Change Strategy for Wirral - Cool 2 Strategy. A question was raised over which targets had been used, specifically whether the Tyndall Carbon Targets were used (1). There is an opportunity to move towards a green and circular economy (1).

**Council response:** The Council agrees that there are huge potential economic opportunities arising from addressing climate change. The Council's emerging Economic Strategy identifies sustainability as a key working principle and recognises that the green economy is projected to grow at four times the rate of the rest of the UK economy. The emerging Strategy sets out a range of opportunities and actions to support the green economy, including the use of sustainable methods of construction and renewable energy sources; the retrofitting of existing properties to make them more energy efficient; designing new zero carbon buildings; using heat networks in urban areas; and the use of smart grid technologies to take advantage of the decentralisation of energy generation and storage. The Strategy also seeks to improve local skills in green technologies and support the provision of 'green and blue' infrastructure as part of our place regeneration programme.

The Cool 2 strategy has informed the Local Plan Submission Draft Policies. The emissions reduction goal in the local climate strategy, Cool 2, to "stay within a local emissions 'budget' of 7.7 million tonnes (Mt) of CO<sub>2</sub> between 2020-2100 and to reach 'net zero' pollution as early as possible before 2041" is based on use of the Tyndall Centre local carbon budget tool.

The Council is using the Tyndall Carbon Budget data to understand the carbon footprint of the Borough and monitor carbon emissions annually.

6. The Green and Blue infrastructure strategy they have put in place for 2020 should have been done before the Plan. How can you protect areas that might already have been allocated for housing if the preferred option is to go ahead? Green and Blue infrastructure policy should have priority over housing, employment et cetera.

**Council response:** The Green and Blue Infrastructure Study has informed the preparation of the Local Plan Submission Draft.

**7.** What is the criteria for allocating sites and will there be a consultation on the criteria?

**Council response:** The site selection criteria and methodology for identifying urban site allocations is set out the Housing Delivery Strategy published in support of the Local Plan Submission Draft.

**8.** Consult the Green Party councillors.

**Council response:** Noted. All Councillors have been consulted in the preparation of the Local Plan Submission Draft.

**9.** The Council along with activity under the ‘Cool Wirral Partnership’ should work together with the Liverpool City Region Local Nature Partnership, Nature Connect, to understand what partners such as the Environment Agency, Natural England are doing and how it can be a good partner. (1) The Metro Mayor held a Year of the Environment 2019 Summit where many pledges were made to address climate change issues. It is important for the Local Plan to contain policies that support climate change action, urgently. The Liverpool City Region Ecological Network should be taken into account and the Council should only include Local Plan policy and allocations that will embed what is truly sustainable development in the Submission Version Local Plan, in line with it declaring the Environment and Climate Emergency in July 2019, and so that it may be found sound at examination. (1)

**Council response:** The Local Plan Submission Draft addresses Climate Change in a comprehensive manner (see paragraphs 1.3 to 1.11 of the Submission Draft Document)

**10.** Tackle food miles and food availability issues by providing more land for allotments and community food-growing, both on greenspace within urban areas and on the urban fringe. There is a huge waiting list for allotments on Wirral. Large developments should provide food-growing opportunities as part of their open space requirement (3). Good quality agricultural land should not be released for development (4) as it is needed to safeguard future food supplies as per Council motion 55 2018. High quality farming contributes to tourism (1). Horticultural land should not be released for development as it this is important for the sustainable maintenance of healthy populations (1). Local horticulture and food production should be encouraged and invested in (4) to reduce food miles and carbon footprint (4). Some market gardens should be brought back into productive use (2).

**Council response:** Noted but other than protecting agricultural land through maintenance of the Green Belt and promoting allotments food production is not something which the Local Plan can directly influence. The Local Plan Submission Draft Policy WS5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection deals with allotments and local food growing opportunities. The Council does not own farmland with which to offer farming training.

**11.** A tree planting scheme could assist carbon reduction and reduce flood risk. This could be carried out with residents/schools/nature conservation groups in partnership with tree suppliers (2). Trees should be planted around the perimeter of recreation, sports and open space sites (2). Areas of the Green Belt could be reforested (1), however large scale tree planting should not be carried out in or near sensitive sites or habitats (LWSs, well-managed grasslands) (3). Mature trees should be protected from development (1) through greater use of TPOs and strict enforcement (1) Dead or damaged trees on roads should be replaced (1) – these contribute to

natural parking prevention (1). The production of timber / timber fuel products should be supported (3).

More wildflower meadows should be planted alongside railway tracks on motorway verges roundabouts in parks and on the Council's golf courses. (2) Residents and commercial owners should be encouraged to plant trees & shrubs where possible (1).

Care of soils and afforestation could contribute to carbon capture. A policy should be added that commits to the implementation of new carbon capture methods and the furthering of research of such methods (1).

Support for the acknowledgement that increasing tree cover and protecting soils and natural habitats will capture more carbon, but what is missing is that habitat creation and habitat restoration of all semi-natural habitats has an enormous capacity to capture and store carbon. Working with landowners/farmers to protect and restore semi-natural habitats will not only help address climate change but will help address the ecological crisis too by slowing the loss of biodiversity (2).

**Council response:** See various responses to Q8.5, Q8.6 and the Council's Tree Strategy

- 12.** More fixed and temporary air quality monitoring stations should be provided across the borough as part of the plan (2) (particularly on hotspots). We need a monitor to record pollution blowing in from ships which is likely to be NO<sub>2</sub>.

**Council response:** We currently do not undertake air quality monitoring in the area, as the [DEFRA technical guidance](#) states that areas around ports will only exceed if specific limits are breached. As New Brighton is located more than 1km from the nearest docks and the large ship movements do not exceed 15000 per year, the technical guidance does not expect there will be any exceedances of annual objectives.

- 13.** WBC should utilise tidal power and work with the Metro Mayor to investigate tidal energy. As a peninsula in an area with large tides, Wirral is particularly well placed to exploit it (2).

**Council response:** Noted. The Liverpool City Region Combined Authority are investigating the potential for electricity generation from Tidal Power. No specific proposals will be included in the Local Plan Submission Draft.

- 14.** The ambition for Wirral Waters is to create an exemplar low carbon neighbourhood including low and zero carbon technologies. To achieve this, regional and central government support is needed to promote Wirral Waters as a demonstrator project for low cost, scalable, sustainable, energy infrastructure. Funding is required to research and test energy sources and technologies and complete technical designs. (1)

**Council response:** Noted. The Council has worked with Peel Land and Property, Homes England and the Combined Authority to accelerate the delivery of Wirral Waters as an exemplar low carbon neighbourhood.

- 15.** All new developments should be required to provide means of using energy more efficiently. (solar panels etc) (5). A water efficiency policy for new development should be inserted into any climate change policy to take the long-term implications for water supply in the borough into account. Robust strategic and enabling policy requirements should be developed to support climate change retrofit for residential, commercial and listed buildings and sites (5). 6-Move away from coal and gas-fired power to electricity generated from nuclear power, renewable sources, and new technologies such as carbon capture and storage. (1)

**Council response:** The Local Plan Submission Draft through policies WS 8.1 Energy Hierarchy and Policy WS 8.2 Sustainable Construction – Energy Efficiency promote the use of renewable energy and energy efficiency in building design. Policy WS 3.1 Housing Design Standards of the Local Plan Submission Draft deals with water efficiency.

- 16.** Historic England expressed that there is an opportunity within the Plan to highlight issues and to define the relationship between all aspects of the area's environment as defined in the NPPF's definition of sustainable development should include, the protection and enhancement of the historic environment including buildings, parks, landscapes, open spaces and blue infrastructure and the positive contribution they can make to managing climate change. This can include additional landscaping that responds to local character and distinctiveness, investment in existing assets including buildings that can increase energy efficiency, reduce carbon footprint and also sustain historic places and spaces that not only contribute to the climate agenda but also the health and wellbeing of its residents and workers. (1)  
Further support was expressed for the enhancement and management of existing green infrastructure (1) and the introduction of green infrastructure in existing communities and improved sustainability / biodiversity in existing listed landscapes and conservation areas (1).

**Council response:** Please see the Green and Blue Infrastructure Study. The Council is also developing a comprehensive environmental strategy which will address wider opportunities for planting.

- 17.** Protecting, improving and then utilising our natural environment assets can provide a multitude of benefits including climate change mitigation / adaptation and we believe this is something your council should pursue. We would refer you to the Natural Capital Work being undertaken by the Natural Capital Working Group. (1)

**Council response:** The work of the Natural Capital Working Group is beyond the scope of this Local Plan but is a matter for exploration at a corporate level in the Council.

The Local Plan recognises the value of the natural environment assets in its vision and strategic objectives (in particular 1, 4, 5 & 6) and its policies in respect of a number of policies including Policy WS 1, WS 5, WD 1 and WD 3. Many of the Regeneration Policies recognise the multiple benefits of ensuring a green public realm.

- 18.** The Local Plan should not block proposals to avoid maintenance costs. Any such extra costs could be allocated to Policy LP 44.

**Council response:** Policy WD 1.1 of the Local Plan Submission Draft deals with Landscaping proposals and includes a requirement for aftercare.

- 19.** The tallness and quantity of streetlights should be reduced and the spacing between posts should be expanded. The tallness of the street lighting is more akin to what one would normally see on a motorway and a one size fits all approach should not be used. Artificial light at night is causing a severe reduction in the insect population.

**Council response:** This is not a matter for the Local Plan. Street Lighting mounting heights and spacing are compliant in accordance with the recommendations contained within BS 5489-1:2020. Furthermore, all LED Street Lights currently installed across Wirral fully complies with Photobiological Safety and Optical Hazard Assessment to test standards IEC 62471:2006, EN 62471:2008 and with BS EN 60598-2-3 Particular requirements — Luminaires for road and street lighting.

**20.** Do not use companies that invest in fossil fuels. No new fossil fuel projects can be allowed.

**Council response:** This is not a matter for the Local Plan.

**21.** Minimise development of all kinds, especially the Hoylake Golf Resort (1).

**Council response:** The Hoylake Golf Resort proposals are not being pursued.

**22.** Stop treating beaches parks and pavements alleyways and verges with glyphosate.

**Council response:** This is not a Local Plan matter.

### **Green and Blue Infrastructure**

#### **Q8.4: Do you have any views on our preferred approach for planning for Green and Blue Infrastructure within Wirral?**

**Summary – total of 271 responses**

1. The preferred approach is supported (116) as it is consistent with national policy (10). General agreement with the council's preferred approach (96) / No objection in principle to the Council's preferred approach for planning for green and blue infrastructure (4). Support for setting Green and Blue Infrastructure Standards for the quantity, quality and accessibility of parks and gardens; natural and semi-natural greenspace; outdoor sports provision; amenity greenspace; provision for children and young people and allotments. This will help to protect and enhance the environment (10). These sites should be protected (96).

Support for the recognition of the importance of Blue and Green Infrastructure's role in achieving sustainable development in the Plan (1). Support for the Council's Preferred Approaches to Green and Blue Infrastructure Standards, New Development and Tree Planting Strategy and other existing and proposed workstreams related to Green and Blue Infrastructure, (3) which should be considered alongside other evidence on release (1).

**Council response:** Support noted thank you.

2. WBC should adopt a similar approach to the Greater Manchester Combined Authority. The GBIS should have been complete prior to short listing of sites for development due to the lack of detail in the of the previous LCR study (1). The GBIS and Ecological network review have been commission too late to inform land allocation (1). The 'Wirral Landscape Character Assessment 2019', 'Draft Wirral Open Space Assessment 2019' and 'Wirral Strategic Flood Risk Assessment 2019 need to be better employed in completing and improving the currently deficient assessments throughout the Evidence Base (1) and WBC should take advantage of the Natural Capital Assessment work undertaken by LCR Natural Capital Group (1).

**Council response:** Since the end of the Issues and Options Consultation in April 2020 the Council has undertaken further consultation on the draft Green and Blue Infrastructure and Environmental Sensitivity Studies. Work to complete other evidence studies has also been ongoing including completing the Open Space Assessment and the Wirral Strategic Flood Risk Assessment. These studies have informed the preparation of the Local Plan Submission Draft.

3-Net gains in biodiversity should be delivered and implemented wherever possible (20). The mitigation hierarchy should be applied to all releases of land for development to avoid damage to natural habitats. (1) Offset unavoidable losses of replaceable habitats should require compensation

using a robust and independently verified set of metrics (10). The Council must set out how the environment will be protected once the EU Habitats Directives no longer apply (10).

**Council response:** Policy WS 5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection of the Local Plan Submission Draft sets out a number of policies to protect and enhance important ecological sites and networks

3. Any policy requirement which would render developments unviable or undeliverable would not be supported (4) and reserve the right to comment when further detail is released at a later stage of the process (4). The right to comment is reserved until information on land allocations, the green and blue infrastructure strategy, visitor management strategy, tree strategy and relevant policies in the draft LP is available (96).

**Council response:** Noted. All relevant policies included in the Local Plan Submission Draft have been tested for their impacts on development viability through the Local Plan Viability Assessment.

4. Development should not disrupt any key wildlife networks or linkages (1). Buffer zones should be applied to LWSs, SSSIs, and all watercourses. All habitats involving trees and other natural assets should have a 50m development-free buffer. Wetlands should have a buffer applied based on their underground hydrology (1).

**Council response:** Policy WS 5 of the Local Plan Submission Draft sets out a comprehensive strategy for the protection and enhancement of green and blue Infrastructure networks, biodiversity, open space and landscape protection for the Borough.

5. Green Infrastructure in the built environment (multi-functional greenspace) should adopt approved quality standards such as BREEAM or Building with Nature in order to secure tangible benefits to the community and the environment. (2)

**Council response:** The Local Plan Submission Draft preparation has been informed by a wide range of environmental related studies.

6. Green belt sites should not be released for development (1) as this would be in conflict with the preferred Green and Blue Infrastructure approach (14). Options 2a and 2b should be removed from the plan and there is no evidence to support Green Belt release against NPPF requirements. A green and blue infrastructure strategy document should be produced before the plan is published (13).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

7. New development should set out how it achieves a significant volume reduction in surface water discharge with no surface water discharging to the existing public combined sewerage network as a standard expectation. Green infrastructure can reduce the surface water run-off rate. (1) Language used in policies should be firmer/stronger to ensure protections for all designated species (1) and the provision of high-quality Green and Blue Infrastructure should be given the highest possible priority in the decision making process (1). The following policy should be used.: "Development within urban areas should allocate space for the management of surface water through the use of sustainable drainage systems with multi-functional benefits as part of a high-quality green and blue water environment, in line with policy \*\*\*\* (green infrastructure). New

development will be expected to incorporate exemplary Sustainable Drainage methods and follow the surface water hierarchy" (1).

**Council response:** The policy contained within the Regulation 19 version of the plan strengthens both sustainable water management and its links to green and blue infrastructure. Refer to policies WS 5 and WD 4 in particular.

In respect of designated species, the policies of the plan are as strong as they are able to be within national policy context.

8. Include the protection and enhancement of the many heritage assets associated with waterbodies and man-made waterways (1). High quality, well planned green and blue infrastructure (natural capital) is essential for the cultural, provisioning and regulating services it provides (ecosystem services) as well as its intrinsic value (1).

**Council response:** The Council fully recognises the importance of green and blue infrastructure networks and Policy WS 5 of the Local Plan Submission Draft sets out a positive comprehensive strategy for the protection and enhancement of green and blue Infrastructure, biodiversity, open space and landscape protection for the Borough.

9. Agriculture is of significance to the Wirral's economy and adjacent development disturbance can have operational implications for cropping patterns and livestock husbandry which is important post-Brexit. The Secretary of State's Strategic Guidance for Merseyside specifically states that development allowed near farms should avoid incompatible land uses (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

10. Enhancements to biodiversity assets and access to the countryside, as well as the creation of new open space and green infrastructure could be achieved by the Council through working with land owners to achieve transformative development (1).

**Council response:** Since the end of the Issues and Options Consultation in April 2020 the Council has undertaken further consultation on the draft Green and Blue Infrastructure and Environmental Sensitivity Studies. The Council recognises the valuable contribution that the proposals set out in the Leverhulme Vision document would make to the overall Green and Blue Infrastructure and Active Travel networks across the borough but does not accept the need for green belt release to deliver these. The Council wishes to work closely with Leverhulme to help develop appropriate proposals for green infrastructure and active travel links across Wirral's rural areas.

#### **Q8.5: Do you have any views as to how the Local Plan should promote tree planting?**

There were 339 responses to this question.

1. Noctorum Field (OS140) is covered by Tree Preservation Order BK 0030A001, and this should be used to protect and further enhance tree coverage in the area. (95)

**Council response:** Noted. See the Council's Tree Planting Strategy.

2. Create a Wirral Forest on hundreds of acres of land. (61)

**Council response:** The Council has joined the Mersey Forest project and through the Council's Tree Planting Strategy and the Green and Blue Infrastructure will seek to identify opportunities for strategic tree planting. No specific areas are identified in the Local Plan Submission Draft.

3. We support the new Wirral tree strategy and trees should be part of the landscaping plans of any new development. (81)

**Council response:** The Local Plan Submission Draft Policy WD 1.2 Trees will require tree planting as part of all developments.

4. Wirral Wildlife is one of the authors of the Wirral Tree Strategy: the full Strategy needs to be applied, with action plans regularly updated.

**Council response:** This is a matter for the Tree Strategy rather than the Local Plan but the action plan will be updated regularly and a progress report provided to Committee.

5. Tree retention is more important than new planting, so existing trees must be retained wherever possible, including in new development. (1) Local communities must be involved in planting plans. Public and Council officer education needed. (1)

**Council response:** Local Plan Submission Draft Policy WD 1.2 sets out how the protection and replacement of trees affected by development will be dealt with.

Neighbours adjoining development sites are always consulted on planning applications.

6. Plant native tree species. (84) Tree planting should not harm the natural environment or propagate diseases and pests. (9) Management of new plantings/natural regeneration must be arranged beforehand. (1) Encourage local tree nurseries including volunteer-led ones (1). Plant trees, fruit and nut trees as well as edible hedges where possible. (10)

**Council response:** The Local Plan Submission Draft Policy WD 1.1 Landscaping proposals deals with these issues.

7. Natural regeneration is better for wildlife (and much cheaper) than planting, and should be encouraged wherever possible.

**Council response:** The Local Plan Submission Draft Policy WD 1.1 Landscaping proposals deals with these issues.

8. Plantings must be designed, not trees planted without thought to the future appearance, tree health and public use. (1)

**Council response:** Under Policy WD 1.1- Landscaping proposals of the Local Plan Submission Draft - Development proposals will be required to demonstrate how suitable landscaping has been used to contribute positively to visual amenity and successfully integrate the development within the landscape character and local distinctiveness of the area.

9. TPOs, Conservation Area orders and planning conditions affecting trees must be monitored and enforced. Mitigation and compensation for loss of trees needs to be calculated using the DEFRA metric and any funds kept strictly for furthering tree cover. (1)

**Council response:** The Council does monitor TPOs and planning conditions affecting trees. The Local Plan submission places great importance on the protection and enhancement of tree coverage (see Policies W6.61 Placemaking and Policy WD1.2 Trees).

**10.** Ensure the Local Plan addresses the need to protect existing trees as well as planting new (8).

The latest version of The Tree Strategy states, "WBC will apply suitable planning conditions to protect new and existing trees and enforce them." Planning conditions should include ones to deter unnecessary felling, pollarding or pruning of trees. Developers and Wirral Council should stop unnecessary felling of trees (20).

**Council response:** Policy WD1.2 of the Local Plan Submission Draft sets out requirements for the protection and replacement of trees affected by development proposals.

**11.** Commission a Wirral Green Infrastructure Plan were commissioned by an appropriate professional which provides a coherent plan for the development of wildlife corridors, identifies the most appropriate sites for tree planting and names the best tree species for that site (8).

**Council response:** The Council has prepared the Wirral Green and Blue Infrastructure Study which has been prepared by specialist qualified consultants. The study has informed the Local Plan preparation and will be used to guide the Council's management and investment decision for Green and Blue Infrastructure.

**12.** Where new saplings/trees are planted, members of the local community or neighbourhood must be identified for their care and ownership (1). Encourage schools to involve pupils in tree planting. (20) Evergreen hedges are useful to improve air quality and edible hedges demonstrate to school children where some food comes from. (1) Stop cutting urban greenery, to enable wildlife corridors to develop and wild flowers to flourish, thereby encouraging pollinators. (1)

**Council response:** The role of landscaping in mitigating air quality will be addressed in Under Policy WD 1.1- Landscaping proposals of the Local Plan Submission Draft.

The role of school children in tree planting is an important one and the Council is working to develop community planting initiatives.

The Council is developing landscape management strategies to encourage wildlife.

**Q8.6: Do you have any ideas as to where the Council should promote new tree planting as part of its Tree Planting strategy?**

**1.** Tree planting should be used to extend our parks and woodlands as well as more trees in the urban areas, in particular Birkenhead (63).

**Council response:** Tree planting will be addressed as part of the Council's tree planting strategy and emerging open space improvement strategy.

**2.** Development should always contribute to the targets and outcomes identified in the Wirral Tree Strategy and Cool 2 the Climate Change Strategy for Wirral (6).

**Council response:** See Policy WD1.1 of the Local Plan Submission Draft.

**3.** Don't build on the Green Belt, plant more trees on the Green Belt (10)

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development. Tree planting will be addressed as part of the Council's tree planting strategy and emerging open space improvement strategy.

**4. Specific sites for tree planting mentioned:**

- The Abbots Grange Estate in Bebington and main road corridors such as the A41.
- Plant in empty grass verges or verges where trees were felled in residential areas.
- Harrison Park, Wallacre Field, Wallasey, Coronation Park Greasby, Behind Aldi Prenton,
- Road verges, for example between Heswall and Thurstaston, along the Chester High Road and between Meols and Bidston.
- Plant on roadsides.
- Within housing estates in Rock Ferry and Prenton.
- Upgrade parks and open spaces such as Ashton Park, The Priory, Birkenhead Park, Sandlea Park and Tower Grounds New Brighton. Plant to the back of Kings Parade New Brighton and restore the willows removed from Green Lane and Park Lane.
- Improve hedges and plant in the Carr Lane fields. Encourage hedge planting in any suitable locality.
- Orchards in Primary schools and open spaces even within the urban areas of Birkenhead such as Ilchester Park would be beneficial.
- Plant trees along shop fronts.
- Telegraph Road - from Gayton roundabout to Tescos, replace trees that have been cut down and add new ones.
- Pensby Road - from junction with Belmont Drive to Thingwell Road East. Replace the numerous trees that have been cut down and add new ones.
- Locations across the Woodchurch estate junction of A5088 and B5145.
- All four sides of Liscard shopping centre, especially along the A551 where the school backs onto the road.
- All along the A554 - Seabank Road, King Street, Brighton Street and Wheatland Lane.
- Deliver pocket parks in urban areas on unused rough ground, such as on the corner of Westbourne Rd and Ridley St, between Craven St and Bentinck St and the old tennis courts next to the Edward Kemp Community Gardens.

**Council response:** These proposals have been passed to the Council's Environment and Parks Teams for consideration as part of the Council's Tree Planting Strategy implementation.

**5. The Council will have to release land from the Green Belt in the Local Plan in order to meet its housing and employment land needs. There are significant parts of Leverhulme's Wirral Estate where tree planting could be undertaken alongside land release from the Green Belt for development. Leverhulme welcomes the opportunity for early engagement with the Council to discuss development across the Estate including areas where new tree planting could be delivered and maintained for future generations.**

**Council response:** The Local Plan Submission Draft is based on the Council's preferred Urban Intensification Strategy to meet all of its development needs within existing Urban Areas. However, the Council wishes to work with all land owners across the Borough including those within the Green Belt to develop proposals for Green and Blue Infrastructure improvements and for active travel route enhancements.

**Open space, sport and recreation**

**Q8.7: Do you have any views on the Council's proposed approach to the provision of open space and sport and recreation facilities?**

**Summary of responses** - Of 261 responses, 21 said 'no, 6 of which submitted no further comment and 51 said 'yes', of which 14 submitted no further comment. The remainder made comments but did not clearly say 'yes' or 'no'. 5 respondents reserved the right to comment at a later stage in the process.

1. 96 respondents indicated that open space should be protected, especially in areas with little (1) and in high density areas (1), including for physical and mental health (4), to prevent flooding (2); assist sustainable drainage (1); and respond to Covid-19 (1). Others indicated that improved maintenance was needed (6) and that sites should be easily accessible (3). Smaller sites should be required to contribute financially in areas of shortfall (1) and on-site provision should be preferred, as a financial contribution would not address the need for additional space (1).  
14 respondents indicated that additional open space was required, including in Seacombe (3), Rock Ferry (3) and Birkenhead (2) and in other high density areas (2), in new development (3) and in areas of deficiency (1). A new play area was required in New Brighton (1) and Spital had no recreation facilities or playing pitches (1). More allotments were needed (1) and there were no up-to-date plans for skiing and the facility at the Oval was now inadequate (1).  
Six respondents noted the lack of open space at Wirral Waters, where most land allocations were being proposed. They also considered that the proposed standards were not consistent with high density development and would affect viability, which could affect the housing trajectory (6). Another considered that the proposed catchment distances were too restrictive and that an over emphasis on on-site provision would reduce developable areas and affect housing delivery (1). Others would not support any requirement that would render development unviable (4) and suggested that high density sites should not be allocated if they are unable to make sufficient provision (2). The relationship with requirements for green infrastructure and drainage should also be clarified (1)  
Other comments included that it was incorrect to include the coastline as this would skew the results (1); that there should not be a golf resort in Hoylake (2), which should be used for a wildfowl and wetlands centre (1); that it was unclear why sport and recreation had been included with general open space (1); that open space standards should not be applied to provision for outdoor sport (1); that provision for indoor sport should only be made on brownfield land (1); that the Playing Pitch Strategy needed updating (1); that Active Design principles should be adopted (1); and questioned why permission for houses has been granted at a rugby club in Eastham (1).  
A number of respondents considered that protection should include agricultural land (89), especially for its economic value (1) and for food (2); school playing fields (6), which should not be 'sold-off' even if the school closes (1) and if they are identified in the Playing Pitch Strategy (1); Green Belt (14), for its recreation value (1), especially in areas of deficiency (1); allotments (2); high quality sport and recreation facilities (1); biodiversity (2); the public footpath network (1); and that the list of sites should be able to be added to over time (1).

**Council response:** The Council recognises that access to quality open space is key to the health and well being of residents. Policy WS 5.1 of the Local Plan Submission Draft which deals with Open space provision sets out the standards for open space and children's play on new development. The Policy requires that all the new dwellings would be within 720m safe walking distance of a publicly accessible open space of 1.5 hectares or above, and all new dwellings would be within 400m safe walking distance of an appropriately equipped children's play facility.

Site specific responses are reported in Q8.8 below.

**Q8.8: Do you agree with the list of open spaces identified for protection from development set out in Appendix 8.1 and the boundaries shown on the Council's website? If not, please state how they should be revised and why.**

**Summary of responses** - Of 364 responses, 29 said 'no' and 132 said 'yes'. A further 83 indicated support for the list of sites in the main comments field, of which 82 indicated that some sites should be designated as Local Green Space, which are reported under Question 8.10. The remaining respondents made comments but did not clearly say 'yes' or 'no'.

**1. Site specific comments included:**

Site	Comment	Council Response
Site Specific - St Bridget's Playing Field, West Kirby (omitted)	Add to list for protection (27)	The site is proposed to be designated as a Local Green Space (LGS-SA6.4) in the Local Plan Submission Draft.
Site Specific - Tower Grounds, New Brighton (OS024)	Support protection (6), including for its play area (1)	The site is proposed to be designated as a Local Green Space (LGS-SA1.9) in the Local Plan Submission Draft.
Site Specific - Noctorum Road Playing Field (OS140)	Support for protection (94). One respondent stated the site should not be protected because a package of compensation will comply with national policy	The site is identified for protection in the Playing Pitch Strategy 2021 and is proposed to be designated as a Local Green Space (LGS-SA3.3) in the Local Plan Submission Draft.
Site Specific - Hoylake Trinity Cemetery (omitted)	Site should not be used as a playing field (1)	Noted
Site Specific - Octel Sports Club/Knockaloe (OS216)	Support for protection (3) 1 respondent believes the site is miscategorised as it is a private site and is no longer in use	The site is identified for protection in the Playing Pitch Strategy 2021 and is proposed to be designated as an Urban Sports Facility in the Local Plan Submission Draft (SR-SA4.2 refers)
Site Specific - Rectory Road Stables, West Kirby (omitted)	Add to list for protection (8)	The site is proposed to be designated as a Local Green Space (LGS-SA6.2) in the Local Plan Submission Draft.

Site Specific - Bluewood Drive, Bidston (OS073)	Should not be protected as the site was brownfield and there was already enough open space at Bidston Hill (OS055 and OS056) and Gautby Road (OS072) (1)	The site is proposed to be shown as part of a Primarily Residential Area subject to proposed Local Plan Policy WD 10 in the Local Plan Submission Draft.
Site Specific - Irby Recreation Ground (OS331)	Needs new pavilion and drainage (1)	Noted. The site is proposed to be designated as a Local Green Space (LGS-SA7.16) in the Local Plan Submission Draft.
Site Specific - Bromborough Road Woodland North (OS195)	Formed part of an operational manufacturing plan and had no amenity, landscape or conservation value (1)	The site is part of a linear woodland corridor and continues to be designated as Urban Open Space (OS-SA4.17) in the Local Plan Submission Draft.
Site Specific - Former Royal Rock Hotel, Rock Park (OS095)	Should be set aside for car parking in line with a previous regeneration strategy (1)	The site is proposed to be designated as Urban Open Space (OS-SA3.23) in the Local Plan Submission Draft.
Site Specific - Ditton Lane Nature Reserve, Leasowe (OS238)	Support protection but the area proposed to be designated should be further expanded (3)	The boundary has been amended and the site is proposed to be designated as a Local Green Space (LGS-SA5.1) and as a Local Wildlife Site (LWS-SA5.4) in the Local Plan Submission Draft.
Site Specific - Birket Walkway, Leasowe (OS239)	The area proposed to be designated should be further expanded to the north (1)	The boundary has been amended and the site is proposed to be designated as Urban Open Space (OS-SA5.23) in the Local Plan Submission Draft.
Site Specific - Cheltenham Crescent Open Space, Leasowe (omitted)	Appears to have been omitted (4)	The site is proposed to be designated as Urban Open Space (OS-SA5.52) in the Local Plan Submission Draft.
Site Specific - Oulton Way, Oxton (omitted)	Add to list for protection (1)	The site is proposed to be designated as a Local Green Space (LGS-SA3.7) in the Local Plan Submission Draft.
Site Specific - Arno Road, Oxton (omitted)	Add to list for protection (1)	The site is proposed to be designated as Urban Open Space

		(OS-SA3.57) in the Local Plan Submission Draft.
Site Specific - Kelsall Close, Oxton (omitted)	Add to list for protection (1)	The site is proposed to be designated as Urban Open Space (OS-SA3.55) in the Local Plan Submission Draft.
Site Specific - Mill Hill, Oxton (omitted)	Add to list for protection (1)	The site is proposed to be designated as a Local Green Space (LGS-SA3.8) in the Local Plan Submission Draft.
Site Specific - Slatey Road, Oxton (omitted)	Add to list for protection (1)	The site is proposed to be designated as a Local Green Space (LGS-SA3.6) in the Local Plan Submission Draft.
Site Specific - Tabley Close, Oxton (omitted)	Add to list for protection (1)	The site is proposed to be designated as Urban Open Space (OS-SA3.31) in the Local Plan Submission Draft.
Site Specific - Riverwood Road, Bromborough (omitted)	Add to list for protection (1)	The site is proposed to be allocated for residential development (RES-SA4.3) in the Local Plan Submission Draft.
Site Specific - Bromborough Court House (OS190)	Support protection. The site is a Scheduled Monument (1).	Noted. The site is proposed to be designated as Urban Open Space (OS-SA4.11) and is identified as a Scheduled Monument (SAM-SA4.1) in the Local Plan Submission Draft
Site Specific - Abbots Drive Open Space, Bebington (OS151)	Support protection (1)	Noted. The site is proposed to be designated as Urban Open Space (OS-SA4.72) in the Local Plan Submission Draft
Site Specific - Monks Way Open Space, Bebington (omitted)	Add to list for protection (1)	The site is proposed to be designated as a Local Green Space (LGS-SA4.1) in the Local Plan Submission Draft
Site Specific - Slack Wood, Bromborough (omitted)	Add to list for protection (1)	The site is proposed to be designated as part of a Primarily Employment Area subject to proposed Local Plan Policy WS 4.2 in the Local Plan Submission Draft.

Site Specific- Morpeth Dock, Birkenhead (omitted)	Add to list for protection (1)	The site is proposed to be designated as part of a Mixed Use Area (MUA-RA3.1) in the Local Plan Submission Draft
Site Specific - One O Clock Gun, Birkenhead (omitted)	Add to list for protection (1)	The site is proposed to be designated as part of an Urban Tourism Area (TLR-SA2.1) in the Local Plan Submission Draft.
Site Specific - The Glen, Oxton (Green Belt)	Club seeks extended lease to provide toilets on site (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply. Toilets may be permitted subject to the approval of appropriate details.
Site Specific - Solly Recreation Ground, Oxton (OS123)	Club wants to provide toilets on site (1)	The site is proposed to be designated as Urban Sports Facility (SR-SA3.2) in the Local Plan Submission Draft. Toilets may be permitted subject to the approval of appropriate details.
Site Specific - Oxton Fields (Holm Lane Recreation Ground) (OS058)	Club seeks use for extra playing pitches (1)	The site is proposed to be designated as Urban Open Space (OS-SA3.5) in the Local Plan Submission Draft. Playing pitches may be permitted subject to the approval of appropriate details.
Site Specific - Arrowe Park (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Royden Park (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt. and further protection is not needed. National Green Belt controls will apply.
Site Specific - Thurstaston Common (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Irby Quarry (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.

Site Specific - Irby Heath (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Dawpool Primary Playing Field (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Landican Allotments (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Stapledon Woods (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Harrock Wood, Irby (Green Belt)	Appears to have been omitted (2)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - New Ferry Butterfly Park (OS166)	Support protection (1)	Noted. The site is proposed to be designated as Urban Open Space (OS-SA4.19) and as a Local Wildlife Site (LWS-SA4.2) in the Local Plan Submission Draft.
Site Specific - Port Sunlight River Park (OS168)	Support protection (1)	Noted. The site is proposed to be designated as Urban Open Space (OS-SA4.1) in the Local Plan Submission Draft.
Site Specific - Arrowe Park Golf Course (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Brackenwood Golf Course (Green Belt)	Appears to have been omitted (1)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.

Comments that were not site-specific are reported under Question 8.7 above.

#### Local Green Space

**Q8.9: Do you support the designation of ‘the Glebe land’ at West Kirby as a Local Green Space?**

**Summary of responses** - Of 230 responses, 164 said ‘yes’ and 2 said ‘no’. The remainder either had no further comment (5), were not familiar with the site (56) or submitted comments on another site.

1. The reasons for opposing the designation included that the land:

- was in private ownership, with no public right of way or access;
- was an urban site better used for development to meet local needs for housing for older people;
- designation was unnecessary, as Conservation area controls already provided an appropriate level of protection, with the flexibility to consider proposals against the historic character of the site; and
- a smaller area may still be appropriate for designation, to cover the most sensitive areas of the site.

Comments on other sites are reported under Question 8.10 below.

**Council response:** The site has been independently assessed and an appropriate area has been recommended for designation as a Local Green Space under NPPF paragraph 103.

**Q8.10; Are there any other sites which you think should be considered for designation as a Local Green Space?**

**Please provide a map with a proposed boundary marked on it or provide a clear description of the location of the site so that we can identify it and tell us how you think it meets the criteria set out in paragraph 100 of the National Planning Policy Framework.**

**Summary of responses** - Of 392 responses, 382 said ‘yes’ and 10 said ‘no’, with no further comment submitted. 70 respondents indicated that there were too many to list and 2 respondents suggested ‘all existing greenspaces’, with no further specific sites suggested.

1. The following sites were specifically requested to be considered for designation as Local Green Space:

Site Name	Council Response
Site Specific - Ashton Park, West Kirby (OS318) (4)	The site is proposed to be designated as a Local Green Space (LGS-SA6.1) in the Local Plan Submission Draft.
Site Specific - St Bridget's Playing Field, West Kirby (omitted) (68)	The site is proposed to be designated as a Local Green Space (LGS-SA6.4) in the Local Plan Submission Draft.
Site Specific - Greenfield Estate, Grange Road, West Kirby (SHLAA 3095) (33)	The site is proposed to be designated as a Local Green Space (LGS-SA6.3) in the Local Plan Submission Draft.
Site Specific - Tower Grounds, New Brighton (OS024) (2)	The site is proposed to be designated as a Local Green Space (LGS-SA1.9) in the Local Plan Submission Draft.

Site Specific - Noctorum Road Playing Field (OS140) (106)	The site is proposed to be designated as a Local Green Space (LGS-SA3.3) in the Local Plan Submission Draft.
Site Specific - Belvidere Recreation Ground, Wallasey (OS013) (3)	The site is proposed to be designated as a Local Green Space (LGS-SA1.1) in the Local Plan Submission Draft.
Site Specific - Wallasey Oval Cricket Ground (OS042) (1)	The site is proposed to be designated as a Local Green Space (LGS-SA1.11) in the Local Plan Submission Draft.
Site Specific - The Breck Recreation Ground, Wallasey (OS019) (2)	The site is proposed to be designated as a Local Green Space (LGS-SA1.6) in the Local Plan Submission Draft.
Site Specific - Blue Bell Woods, Burford Avenue, Wallasey (omitted) (2)	The site is proposed to be designated as Urban Open Space (OS-SA1.14) in the Local Plan Submission Draft.
Site Specific - Cross Lane Playing Fields, Wallasey (OS018 and OS043) (1)	School Lane Playing Fields are proposed to be designated as a Local Green Space (LGS-SA1.2). The remaining open space is proposed to be designated as Urban Open Space (OS-SA1.2) in the Local Plan Submission Draft.
Site Specific - Elleray Park, Wallasey (OS009) (3)	The site is proposed to be designated as a Local Green Space (LGS-SA1.3) in the Local Plan Submission Draft.
Site Specific - Harrison Park, Wallasey (OS004) (3)	The site is proposed to be designated as a Local Green Space (LGS-SA1.5) in the Local Plan Submission Draft.
Site Specific - Bayswater Gardens, New Brighton (OS003) (1)	The site does not meet the criteria for designation as a Local Green Space but is proposed to be designated as Urban Open Space (OS-SA1.21) in the Local Plan Submission Draft.
Site Specific - The Dips, Coastal Drive, New Brighton (OS002) (1)	These sites are proposed to be designated as Local Green Space (LGS-SA1.8) in Local Plan Submission Draft.
Site Specific - Wallacre Playing Fields, Wallasey (OS021) (3)	The site is proposed to be designated as a Local Green Space (LGS-SA1.10) in the Local Plan Submission Draft.
Site Specific - Wallacre Play Area, Wallasey (OS022) (1)	The site does not meet the criteria for designation as a Local Green Space but is proposed to be designated as Urban Open

	Space (OS-SA1.25) in the Local Plan Submission Draft.
Site Specific - Flynn's Piece, Grove Road, Wallasey (OS006) (3)	The site is proposed to be designated as a Local Green Space (LGS-SA1.4) in the Local Plan Submission Draft.
Site Specific - Wallasey Grange, Grove Road, Wallasey. (OS005) (3)	The site does not meet the criteria for designation as a Local Green Space but is proposed to be designated as part of an Urban Sports Facility (SR-SA1.1) in the Local Plan Submission Draft.
Site Specific - Epsom Road Open Space, Leasowe (OS237) (1)	The site is proposed to be designated as a Local Green Space (LGS-SA5.2) in the Local Plan Submission Draft.
Site Specific - Riverwood Road, Bromborough (omitted) (1)	The site does not meet the criteria for designation as a Local Green Space. The site is proposed to be allocated for new housing development (RES-SA4.3) in the Local Plan Submission Draft.
Site Specific - Monks Way Open Space, Bebington (omitted) (1)	The site is proposed to be designated as a Local Green Space (LGS-SA4.1) in the Local Plan Submission Draft.
Site Specific - Land at Birkenhead Library (omitted) (7)	The site does not meet the criteria for designation as a Local Green Space and is proposed to be designated as part of a Primarily Residential Area subject to proposed Local Plan Policy WD 10 in the Local Plan Submission Draft.
Site Specific - Land at Ball's Road East, Birkenhead (omitted) (7)	The site does not meet the criteria for designation as a Local Green Space and is proposed to be designated as part of a Primarily Residential Area subject to proposed Local Plan Policy WD 10 in the Local Plan Submission Draft.
Site Specific - Land at Borough Road, Birkenhead (omitted) (7)	The site is proposed to be designated as a Local Green Space (LGS-SA3.1) in the Local Plan Submission Draft.
Site Specific - Tree lined areas of Upton Road (omitted) (1)	The site does not meet the criteria for designation as a Local Green Space and is proposed to be designated as part of a Primarily Residential Area subject to proposed Local Plan Policy WD 10 in the Local Plan Submission Draft.

Site Specific - Birkenhead School, Beresford Road, Oxton (OS139) (1)	The site does not meet the criteria for designation as a Local Green Space but is proposed to be designated as a School Playing Field (SR-SA3.22) in the Local Plan Submission Draft.
Site Specific – Scout Field, Irby (omitted) (1)	The site is proposed to be designated as a Local Green Space (LGS-SA7.15) in the Local Plan Submission Draft.
Site Specific – Irby Village Copse (omitted) (1)	The site is proposed to be designated as a Local Green Space (LGS-SA7.14) in the Local Plan Submission Draft.
Site Specific – Londymere Roman Well, Irby (Green Belt) (1)	The site would qualify for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific – Oaklea Road Open Space, Irby (OS333) (1)	The site is proposed to be designated as a Local Green Space (LGS-SA7.6) in the Local Plan Submission Draft.
Site Specific – Land at Glenwood Drive (omitted) (1)	The site is proposed to be designated as a Local Green Space (LGS-SA7.5) in the Local Plan Submission Draft.
Site Specific – Irby Recreation Ground (OS331) (1)	The site is proposed to be designated as a Local Green Space (LGS-SA7.16) in the Local Plan Submission Draft.
Site Specific - Heswall Dales and Cleaver Heath (OS336) (89)	The site does not meet the criteria for designation as a Local Green Space but is proposed to be designated as Urban Open Space (OS-SA7.1), Site of Special Scientific Interest (SSI-SA7.1), Local Nature Reserve (LNR-3) and part of Area of Special Landscape Value (LAN-SA8.3) in the Local Plan Submission Draft.
Site Specific - Telegraph Road Open Space, Heswall (OS335) (89)	The site does not meet the criteria for designation as a Local Green Space but is proposed to be designated as Urban Open Space (OS-SA7.3) in the Local Plan Submission Draft.
Site Specific - Poll Hill Reservoir, Heswall (omitted) (87)	The site does not meet the criteria for designation as a Local Green Space. The adjacent land at Poll Hill is proposed to be designated as a Local Green Space (LGS-SA7.12) in the Local Plan Submission Draft.

Site Specific - Puddydale, Heswall (OS338) (88)	The site is proposed to be designated as a Local Green Space (LGS-SA7.10) in the Local Plan Submission Draft.
Site Specific - Dawstone Park and War Memorial, Heswall (OS342) (88)	The site is proposed to be designated as a Local Green Space (LGS-SA7.2) in the Local Plan Submission Draft.
Site Specific - Heswall Beacons (OS341) (88)	The site has been proposed to be designated as a Local Green Space (LGS-SA7.9) in the Local Plan Submission Draft.
Site Specific - Heswall Pinewoods North and South (OS343) (87)	The sites are proposed to be designated as a Local Green Space (LGS-SA7.8) in the Local Plan Submission Draft.
Site Specific - Telegraph Road by the Catholic Church (omitted) (90)	The site is proposed to be designated as a Local Green Space (LGS-SA7.13) in the Local Plan Submission Draft.
Site Specific - Whitfield Common, Heswall (OS344) (87)	The site is proposed to be designated as a Local Green Space (LGS-SA7.11) in the Local Plan Submission Draft.
Site Specific - Castle Buildings frontage, Telegraph Road, Heswall (omitted) (1)	The site does not meet the criteria for designation as a Local Green Space and is proposed to be designated as part of Heswall Town Centre (TC-SA7.1) in the Local Plan Submission Draft.
Site Specific - Hill House Grounds, Heswall (OS340) (87)	The site is proposed to be designated as a Local Green Space (LGS-SA7.4) in the Local Plan Submission Draft.
Site Specific - Feather Lane Woods, Heswall (OS339) (86)	The site is proposed to be designated as a Local Green Space (LGS-SA7.1) in the Local Plan Submission Draft.
Site Specific - Heswall Library Bowling Green (OS340) (86)	The site is proposed to be designated as a Local Green Space (LGS-SA7.3) in the Local Plan Submission Draft.
Site Specific - East of Greasby Health Centre, Greasby Road (OS273) (2)	The site is proposed to be designated as a Local Green Space (LGS-SA5.3) in the Local Plan Submission Draft.
Site Specific - Greasby Library Frontage (omitted) (2)	The site is proposed to be designated as a Local Green Space (LGS-SA5.4) in the Local Plan Submission Draft.
Site Specific – Farmland at Column Road, West Kirby (Green Belt) (4)	The site does not meet the criteria for designation as a Local Green Space but is in the Green Belt and further protection is not

	needed. National Green Belt controls will apply.
Site Specific - Arrowe Park (Green Belt)	The site does not meet the criteria for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Royden Park (Green Belt)	The site does not meet the criteria for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Thurstaston Common (Green Belt)	The site does not meet the criteria for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Irby Quarry (Green Belt)	The site would qualify for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Irby Heath (Green Belt)	The site is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Dawpool Primary Playing Field (Green Belt)	The site does not meet the criteria for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Landican Allotments (Green Belt)	The site would qualify for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Stapledon Woods (Green Belt)	The site would qualify for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific - Harrock Wood Woodland, Irby (Green Belt) (1)	The site would qualify for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.

Site Specific – Farmland at Harrock Wood, Irby (Green Belt) (1)	The site does not meet the criteria for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific – Farmland between Gill's Lane and Heswall (Green Belt Option 2B) (1)	The site does not meet the criteria for designation as a Local Green Space but is in the Green Belt and further protection is not needed. National Green Belt controls will apply.
Site Specific – Land at Sainsbury's Roundabout, Upton (omitted) (1)	The site does not meet the criteria for designation as a Local Green Space and is proposed to be designated as part of a Primarily Residential Area subject to proposed Local Plan Policy WD 10 in the Local Plan Submission Draft.

More general, non site-specific comments are reported under Question 8.7 above

**Council response:** The sites submitted for consideration for designation have been independently assessed and the recommendations were published for public comment in June 2021 (Local Greens Space Designations: Review of Sites, February 2021). Additional sites submitted for consideration have also been assessed in the Local Green Space Designations: Review of Sites (August 2021) and relevant sites that meet the criteria set out in national policy have been proposed for designation as Local Green Space in the Local Plan, as indicated in the table above.

Sites in the Green Belt have not been designated as no additional protection from development is required and paragraph 100 of the National Planning Policy Framework does not allow extensive tracts of land to be included.

## Landscape

### **Q8.11: Do you have any views on our preferred approach for protecting and conserving landscapes within Wirral through the Local Plan?**

1. Support / agreement for the preferred approach (16). Disagreement with elements of the preferred approach (3). No objection to the specific guidance for new developments was expressed as these represent sustainable development (2). The updated Landscape Character assessment 2019 and Landscape Sensitivity Assessment 2019 are important documents to be considered in the Local Plan evidence base (2) and must be accurate and inform policies to prevent unacceptable development (2). Agreement with general methodology of the assessments (6).

**Council Response:** Support noted.

2. The findings / principles / landscape conservation must be adhered to thoroughly / given weight in planning decisions (2). Local Plan policies should protect and enhance valued landscapes in

line with the NPPF (2) and identify and define these (1). Policy wording should strike an appropriate balance between landscape protection and enhancement whilst reflecting the Borough's landscape hierarchy (2). All landscapes should be protected from unnecessary development by the Council (97).

3. As a result of development, Wirral has been subject to a loss of levels of tranquillity which can impact on wildlife populations and breeding (3). The sensitivity of the landscape to receive further development must be carefully considered (3). Hedgerows and woodland are important habitats that must be protected and expanded where these have been lost (3). Trees must be preserved (1). Policy contains an over emphasis on hedgerows, however (1). Policy should have inclusion and specific reference to other such landscapes, like coastal or riparian habitats (1). Heathland areas are subject to wear and tear from human footfall and these should be protected also (1). Dog footfall threatens nesting birds and plant life (1).
4. Development should not impact on views (1). Sightlines and character that would be destroyed in town edge development should be accounted for, e.g. the Sheep Fields in West Kirby (1). It is imperative that recognised Conservation Areas are supported, protected and maintained without any development as an important part of the Local Plan especially West Kirby Old Village (2). Wirral contains many areas with red sandstone, stone walls (1) and coastal land which gives rise to its character and historical and environmental importance (1) and sets visual boundaries (1). Natural landscape is a part of the historic, visual, and cultural character of Wirral and the plan must address this (4). Guidance should consider and be sympathetic to the contribution of landscapes to local character (3). Stronger language should be used surrounding protection of the diverse landscape for encouraging biodiversity (1). Areas of vulnerable biodiversity must not be damaged (1).
5. Wirral's environment and landscapes give Wirral its character and contributes to wellbeing (1). Landscapes bring enjoyment and well-being to residents (1). Landscapes attract tourists (2) and employment (1). Natural landscape protection will enhance the value of locations for biodiversity and geological diversity (3). Commitment to enhancing pathways and public rights of ways should be enhanced (2). Access between parks is difficult and dangerous (1). WBC does not have the resources to protect and conserve the landscape (1).

**Council Response:** The Council has published an updated Landscape Character Assessment and consulted on a review of Local Landscape Designations. Further information is now also set out within an Environmental Sensitivity Study. Proposed Local Plan Policy WS 5 sets out a strategy for open space, green and blue Infrastructure, biodiversity and geodiversity, including landscape protection, Policy WS 7 Principles of Design sets out a strategy for design, including the protection of views and hedgerows, and Part 6 of the Local Plan Submission Draft includes detailed policies for landscaping including trees (proposed Policy WD1), heritage assets (Policy WD 2) and biodiversity and geodiversity (Policy WD 3). The 'Sheep Fields in West Kirby' are proposed to be designated for protection as Local Green Space in the Local Plan Submission Draft (LGS-SA6.3 refers).

6. Council's housebuilding policy is flawed (1).

**Council Response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (2021) including the latest economic forecasts for the City Region. Policy WS 3 Strategy for Housing Local Plan Submission Draft sets out policy requirements for residential development.

7. Engage with Wirral Wildlife Trust, Wirral Tree Wardens and all the Friends of Groups (1).

**Council Response:** Noted, the Council will engage with stakeholders where necessary. The Cheshire Wildlife Trust, Wirral Wildlife and representatives of Friends Groups are already included in the Council's consultation databases.

8. An additional site-specific assessment of all general SHLAA sites put forward (in the Development Options Review) should be carried out, rather than assessment of a strategic parcel (12). The approach is sound but decisions are based on incomplete and flawed studies (1). A review of Areas of Special Landscape Value should be used to identify valued landscapes in the Borough (2). Landscape Studies do not give recognition to the urban nature of the Borough and the fact that it is a narrow peninsula (1). An Environmental Capacity Study must be undertaken to inform the final local plan (1). Questions raised over whether there will be an opportunity to comment on landscape assessments before completion of the plan (1). The right to comment at a later stage was reserved by some respondents (4).

**Council Response:** A review of Local Landscape Designations, an Environmental Sensitivity Study and an Addendum to the Wirral Landscape Sensitivity Assessment were completed following public consultation during 2020.

9. The minimum possible Green Belt should be released only to meet requirements (1). Green belt should be protected from development and encroachment (11). Farmland should be protected from development (7). Open spaces (3), parks (1), nature reserves (1), and open spaces (1) should be protected. All available brownfield land should be used (1). Preferred approach should be applied throughout the green belt (1). Landscape studies should have been concluded before Green Belt sites were selected for release (2). No decisions should be made on Green Belt release until all landscape and green infrastructure studies are complete (2) and these require full association (1). The Green Belt Review does not take into account landscape value or proximity to protected areas and sites which must be done at site selection stage (1). Green belt release should aim to relieve development pressure on sites with protected landscapes / conservation (1). Carr Fields between Hoylake and West Kirby should be protected from housing development and a golf resort and should be developed as a nature/bird reserve to complement the estuary habitat and provide a tourism/nature attraction (1). Ashton Park should be retained as an urban park and not used for tree planting and should be protected from development at the Diocese land at Church Road (2).

**Council Response:** The Local Plan Submission Draft sets out a comprehensive range of policies intended to protect and enhance natural capital – see Policy WS 5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection. The Plan is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed. Ashton Park is proposed to be designated for protection as Local Green Space in the Local Plan Submission Draft (LGS-SA6.1 refers).

10. Seal colonies should be protected (1).

**Council Response:** Policy WS 5 of the Local Plan Submission Draft sets out a strategy for open space, green and blue Infrastructure, biodiversity and geodiversity, including habitat protection. Part 6 of the Local Plan Submission Draft also includes a more detailed policy for biodiversity and geodiversity (Policy WD 3).

11. Areas with high erosion should be closed for recovery (1). The coastal strip west of the Wirral Way should be specifically protected from development through a statement in the Local Plan regarding its views and wildlife due to its functional link to the Dee Estuary (1). The Dee Coast

should continue to be designated as Area of Special County Value (1). Coastal landscapes should have specific protection policies to protect their key features (1).

**Council Response:** Proposed Local Plan Policy WD 4.1 Coastal Defence and Erosion sets out policy requirements for coastal protection. The Dee Coast continues to be designated as an Area of Special Landscape Value in the Local Plan Submission Draft (Policy WS 5.8 and LAN-SA8.1 refers).

**12.** Any policy requirement that renders developments unviable or undeliverable would not be supported (4).

**Council Response:** Viability of Local Plan policies has been assessed in the Local Plan Viability Assessment.

**13.** New landscapes can be created to mitigate fluvial flood risk; eg a wildfowl and wetlands centre (1).

**Council Response:** Policy WD 4.3 Sustainable Drainage Systems (SuDS) and Natural Flood Management from the Local Plan Submission Draft sets out policy requirements for Sustainable Drainage Systems.

**14.** Little evidence of environmental protection (1).

**Council Response:** The proposed Local Plan Submission Draft includes policies that have significant regard for the quality of the local environment and its protection. For example, Policy WS 5 sets out a strategy for green and blue Infrastructure, biodiversity, open space and landscape protection, Policy WS 7 Principles of Design sets out a strategy for design, including the protection of views and hedgerows, and Part 6 of the Local Plan Submission Draft includes detailed policies for landscaping (proposed Policy WD1), heritage assets (Policy WD 2) and biodiversity and geodiversity (Policy WD 3).

**15.** A hierarchy should not be allowed within the local plan and landscape conservation should carry appropriately high weight (1).

**Council Response:** It is national policy that plans should: distinguish between the hierarchy of international, national and locally designated sites; and allocate land with the least environmental or amenity value, where consistent with other policies in the Framework (NPPF, paragraph 175).

## Flood Risk and Coastal Change

### **Q8.12: What are your views on the Council using a sequential risk-based approach to direct development to areas at lowest risk of flooding?**

**1. Summary of responses** – Support the sequential-based approach (12)

There are no objections to the Council using a sequential risk-based approach to direct development to areas at lowest risk of flooding providing this fully accords with national guidance. Proposed urban housing allocations in Appendix 4.1 in FZ 2 and 3 should also undertake sequential test.

**2. Summary of responses** – Sustainable development (3)

Flood events across countries are a reminder of the harm to communities and threat posed by unsustainable development on the flood plain.

**Council response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. It reflects national policy requirements to direct development to areas at lowest risk of flooding from any source unless the sequential test and where necessary the exception tests have been passed. This approach has been applied in the allocation of sites for development in the Local Plan through the Strategic Flood Risk Assessment (SFRA) which have been prepared at both the Borough-wide Level 1 and the more detailed site-specific Level 2, based on the most up to date flood risk information available, including climate change impacts. A separate Wirral sequential and exception test report sets out how the sequential and exception tests have been applied in allocating sites in the Local Plan and the justification for the Council's preferred approach.

### **3. Summary of responses – Flood Risk Management / Mitigation**

Natural Flood Management (NFM) and mitigation should be implemented and made clear in Local Plan policies. Land should be protected to ensure NFM defence strategies can be designed for alleviation, including carefully-located tree planting, marshland and using fields as flood storage areas at times of heavy rainfall e.g. Ditton Lane nature area and the fields to the west.

Effective catchment and basin management through active land management including agriculture and reforestation would mitigate flooding in brownfield sites and urban areas ready for regeneration.

Any area which is prone to flooding (no matter how small) should be risk assessed thoroughly and monitored with preventative measures put in place to reduce flood risk, including the use of soft landscaping in developments to reduce flood risk (3), and the use of defence walls to mitigate (6).

SuDS should be demanded for all developments.

**Council response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. It sets out the approach to Natural Flood Management (NFM) to aid with flood alleviation and the requirements for sustainable drainage. Local Plan Policy WS 5.2 will require development proposals to contribute appropriately towards the protection, enhancement, creation, connection and/or maintenance of green and blue infrastructure. The Level 1 Strategic Flood Risk Assessment Interactive Maps indicate areas within the Wirral which would benefit from Natural Flood Management measures. Local Plan Policy WD1.1 Landscaping proposals; the Council's Tree Strategy, and SuDS Technical guidance for developers will provide additional guidance.

### **4. Summary of responses – Green Belt / Green open space**

Greenbelt and green spaces are proven flood protection, and many greenfield sites flood every year; therefore the reduction of greenbelt / green open space / trees and agricultural land will increase flood risk and therefore not good enough land for high quality housing.

Rezone green field agricultural sites to potential residential development should not be considered

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred option to meet all development needs within existing urban areas and through the redevelopment of brownfield land. No Green Belt release is therefore proposed in the Local Plan. The Local Plan Policies Map identifies a network of open spaces within the urban area for protection under Policy WS10.6 as part of a network of Green and Blue infrastructure. The Level 1 Strategic Flood Risk Assessment Interactive Maps indicate areas within the Wirral which would benefit from Natural

Flood Management measures. Local Plan Policy WD1.1 Landscaping proposals; the Council's Tree Strategy, and SuDS Technical guidance for developers will provide additional guidance.

**5. Summary of responses – Development and Flood Risk (99 responses)**

Of the 99 responses received regarding development and flood risk, 72 consultees agreed that development in flood risk areas should be assessed and monitored vigorously, with 17 consultees stating that no development should be built on flood plains, low lying coastal land or at areas at risk of flooding.

No need for exceptions.

Prioritizing areas with lower risk of flooding above other criteria.

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. It reflects national policy requirements to direct development to areas at lowest risk of flooding from any source unless the sequential test and where necessary the exception tests have been passed. Site allocations in the Local Plan have been informed by the Strategic Flood Risk Assessment (SFRA). SFRA's have now been prepared Borough-wide (Level 1) and site-specific (Level 2), based on the most up to date flood risk information available, including climate change impacts. A separate Wirral sequential and exception test report sets out how the sequential and exception tests have been applied in allocating sites in the Local Plan and the justification for the Council's preferred approach.

**6. Development in low risk areas could impact the risk in other areas of flood risk, in terms of surface water and foul water which has a poor network in SA8.**

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. Policy WD4.2 includes a requirement in line with national policy to demonstrate that development should not increase flood risk elsewhere. Policy WD4.3 requires that all planning applications should be supported by strategies for the foul and surface water and sets out in detail the requirements relating to the management of surface water in new development and the prioritisation and provision of sustainable drainage systems. Policy WD14 Pollution and Risk additionally sets out the approach to safeguarding water quality.

**7. Land at 'flood risk' is a missed opportunity to develop. Only a minor stream causing the risk which can be diverted or culverted to release land for development (Moreton to Wallasey).**

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. The Level 2 Strategic Flood Risk Assessment assesses sites at higher flood risk, to determine if further works can be carried out to bring potential development forward and ensure the site is safe for the lifetime of the development and not increase flood risk elsewhere, whilst providing wider sustainability benefits. National policy is to reduce the use of culverts as these can give rise to additional problems and increase flood risk, for example if they become blocked and as such, Policy WD4.2 encourages measures to naturalise water courses such as de-culverting.

**8. Major allocations in Birkenhead are within FZ3. The Sequential Test wouldn't support development of these sites. Further assessment as to how sites will be deliverable in line with climate change policies (6 responses).**

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. The Council's Sequential and Exception Test report sets out the

process by which the proposed Local Plan allocations have been selected in terms of flood risk, including satisfying the Sequential and Exception tests, as set out in national policy. It addresses part (a) of the Exception Test (providing wider sustainability benefits outweighing flood risk) where needed. The Level 2 Strategic Flood Risk Assessment (SFRA) addresses part b) of the Exception Test which requires development to be safe for its lifetime without increasing flood risk elsewhere and where possible, reducing flood risk overall.

9. Development should take account of worst possible scenario of SLR as the amount of sea level rise is uncertain.

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. The Level 1 Strategic Flood Risk Assessment (SFRA) used the most up to date Environment Agency flood modelling and flood risk information available at the time of writing, including climate change allowances. The Level 2 SFRA uses the updated UKCP18 climate change allowances for sea level rise. The Local Plan also considers the recommendations of the Shoreline Management Plan and Wirral Coastal Strategy relating to management of the coastline. Responding and adapting to the challenge of Climate change is a priority for the Local Plan as a whole in line with the Council's declaration of an Environment and Climate Emergency.

10. Empty Homes - Bring empty homes back into use.

**Council Response:** The Council has a proactive programme for bringing empty homes back into use and in recognition of this the Local Plan Submission Draft includes an allowance for empty homes in the housing supply.

11. Hoylake Golf Course - Reject Hoylake Golf Resort and develop nature/bird reserve on flood plain of Carr Fields.

**Council Response:** The Hoylake Golf Resort proposals are not being pursued. The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

**Q8.13: Do you think there is anything else that the Council could do to address or plan for flood risk and coastal change within the Local Plan?**

1. UKCP18 figures for the level of allowance to be applied to tidal flooding over the lifetime of the development have been updated and the Wirral Level 1 SFRA does not consider this update. (8)

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. The Level 1 Strategic Flood Risk Assessment (SFRA) used the most up to date Environment Agency flood modelling and flood risk information available at the time of writing, including climate change allowances. The Level 2 SFRA uses the updated UKCP18 climate change allowances for sea level rise. The Local Plan also considers the recommendations of the Shoreline Management Plan and Wirral Coastal Strategy relating to management of the coastline. Responding and adapting to the challenge of Climate change is a priority for the Local Plan as a whole in line with the Council's declaration of an Environment and Climate Emergency.

2. Reserve Green belt and greenspaces to mitigate against climate change.

**Council Response:** Noted. The Local Plan Submission Draft is based on the Council's preferred option to meet all development needs within existing urban areas and through the redevelopment of brownfield land. No Green Belt release is therefore proposed in the Local Plan. The Local Plan Policies Map identifies a network of open spaces within the urban area for protection under Policy WS10.6 as part of a network of Green and Blue infrastructure. The Level 1 Strategic Flood Risk Assessment Interactive Maps indicate areas within the Wirral which would benefit from Natural Flood Management measures. Local Plan Policy WD1.1 Landscaping proposals; the Council's Tree Strategy, and SuDS Technical guidance for developers will provide additional guidance.

3. Increase in sea level rise due to climate change may make many areas of Wirral susceptible to flooding and will be difficult and expensive to protect low lying buildings.

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. It reflects national policy requirements to direct development to areas at lowest risk of flooding from any source unless the sequential test and where necessary the exception tests have been passed. The Level 1 Strategic Flood Risk Assessment (SFRA) used the most up to date Environment Agency flood modelling and flood risk information available at the time of writing, including climate change allowances. The Level 2 SFRA uses the updated UKCP18 climate change allowances for sea level rise. The Local Plan also considers the recommendations of the Shoreline Management Plan and Wirral Coastal Strategy relating to management of the coastline. Responding and adapting to the challenge of Climate change is a priority for the Local Plan as a whole in line with the Council's declaration of an Environment and Climate Emergency.

4. Need to deal with climate change on Wirral and recognise its importance, climate change is an unknown quantity. Make climate change a priority for the whole Plan and adhere to Council's Climate Change Emergency statement. We can already see the effects of climate change around our coast. Let nature take its course and allow dune system development

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. The Level 1 Strategic Flood Risk Assessment (SFRA) used the most up to date Environment Agency flood modelling and flood risk information available at the time of writing, including climate change allowances. The Level 2 SFRA uses the updated UKCP18 climate change allowances for sea level rise. Responding and adapting to the challenge of Climate change is a priority for the Local Plan as a whole in line with the Council's declaration of an Environment and Climate Emergency in December 2020. The Local Plan also considers the recommendations of the Shoreline Management Plan and Wirral Coastal Strategy in relation to coastal erosion and protection against tidal flooding. The Council has concluded that no Coastal Change Management Areas need to be designated in this Local Plan but that this should be reconsidered when the Local Plan is reviewed.

5. The process of natural deposition and erosion of coastline should be allowed to continue naturally

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. The Local Plan considers the recommendations of the Shoreline Management Plan and Wirral Coastal Strategy which set out the policy framework for the future management of Wirral's coastline in relation to coastal erosion and protection against tidal flooding. The Council has concluded that no Coastal Change Management Areas need to be designated in this Local Plan but that this should be reconsidered when the Local Plan is reviewed.

6. Summary of responses – Development and Flood Risk

No development on flood plains or low-lying coastal land (74). Selfish to build at an area at risk of flooding as community pays for costs of remedial work when floods (1). No development on areas at risk of flooding. (6) Sea Level Rise over the years increasing (flooding on West Kirby promenade and cliffs). Linked to housing development. Drainage is full of silt and localised flooding may occur due to poor run off. Front of houses slabbed.

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. It reflects national policy requirements to direct development to areas at lowest risk of flooding from any source unless the sequential test and where necessary the exception tests have been passed. This approach has been applied in the allocation of sites for development in the Local Plan through the Strategic Flood Risk Assessment (SFRA) which have been prepared at both the Borough-wide Level 1 and the more detailed site-specific Level 2, based on the most up to date flood risk information available, including climate change impacts. A separate Wirral sequential and exception test report sets out how the sequential and exception tests have been applied in allocating sites in the Local Plan and the justification for the Council's preferred approach.

#### **7. Summary of responses – Development and Surface Water Flood Risk**

Control of surface water in urban development should be a serious consideration. Hard standing where garden lawns once existed significantly contributes to increased run off, streams and rivers causing erosion, flooding and increased pollution where only combined sewers exist across rural landscapes. Drainage in Barnston area is a problem. Discharges from Thingwall Reservoir caused erosion. More housing will only make the flooding here worse. UU would like to outline preference for site selection process having regard to alternative availability to public sewer for discharge of SW e.g. local watercourse / land drains. More sustainable sites than the combined sewer for discharge or SW should be preferred as allocations are finalised. Important to ensure future risk to development through lack of maintenance of SuDS features is given equal importance. Reduce SW discharging into public sewer network to reduce risk of sewer flooding and pressure on combined sewers. Provides environmental benefits like biodiversity net gain. 9.2 response shows policy suggestion to SW management. SuDS management may still contribute to localised flooding.

**Council Response:** Policy WD 4 Coastal protection, flood risk, sustainable drainage and water management refers, which has been prepared in consultation with the Council's Lead Local Flood Authority and United Utilities. WD4.2 requires that surface water flood risk is afforded equal importance and consideration as other fluvial and tidal flood risk and WD4.3 requires that planning applications should be supported by strategies for foul and surface water with the latter discharged in accordance with the drainage hierarchy. The policy also sets out the approach to Sustainable drainage (SuDS). The Council has produced separate SuDS & Surface Water Management Technical Guidance on approach to be taken in new development.

**8. A Wildfowl and Wetlands centre could dramatically reduce fluvial flood risk along the Birket while creating jobs, attracting investment, benefitting the environment and boosting tourism. Selfish to build at an area at risk of flooding as community pays for costs of remedial work when floods and developers profit.**

**Council Response:** Noted. The Council is not proposing any release of Green Belt in the Local Plan so that part of the Birket catchment within the Green Belt which is not protected by flood defences will not be subject to any development proposals in the Local Plan. Local Plan Policy WD 4 reflects

national policy requirements to direct development to areas at lowest risk of flooding from any source unless the sequential test and where necessary the exception tests have been passed.

**9. Summary of responses – Flood Risk Management / Mitigation**

Do not canalise rivers. Continue to monitor effluent into Mersey and Dee Estuaries and into watercourses. Increase the planting of willow along watercourses to improve uptake of water. reinstate willow removed from low lying areas of the North Wirral foreshore. Allow natural processes - development of protective salt marsh at Hoylake. More emphasis on protecting land from flooding and not just improving drainage

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management and Policy WD14 Pollution and Risk refer. WD14(d) states that development that would adversely affect the quality or quantity of water in any watercourse, or of groundwater, or cause deterioration in a water body or element classification levels defined in the Water Framework Directive (or in any national regulations covering this matter) will not be permitted. Policy WD4.2 encourages measures to naturalise water courses such as de-culverting. The Local Plan Policies Map identifies a network of open spaces for protection under Policy WS10.6 as part of a network of Green and Blue infrastructure. The Level 1 Strategic Flood Risk Assessment considers the scope for Natural Flood Risk Management (NFM) across the Borough and these areas are shown on the interactive maps in Appendix A of the Level 1 SFRA.

**10. Structures often increase flood risk (redundant weirs, hardbanks / culverts) and should be considered for removal. Ensure all flood defences are adequate and sustainable. We encourage the use of sustainable alternatives to hard defences, further detail on the selection of measures to use, and ways in which the effects of flood defences on the natural environment can be minimised or mitigated, would be beneficial in demonstrating the protections and net gains for the aquatic environment and ecology.**

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers, which reflects both national policy and local evidence such as the Shoreline Management Plan, Wirral Coastal Strategy and Wirral Strategic Flood Risk Assessment (SFRA). The Level 1 SFRA provides details on the location, condition and design standard of existing Environment Agency flood defence assets and also provides information on more sustainable alternatives to hard defences, including areas suitable for Natural Flood Risk Management (NFM) to protect, restore and re-naturalise rivers to reduce flood and coastal erosion risk. The interactive maps in Appendix A of the Level 1 SFRA shows which areas this may apply to across the Borough. Local Plan Policy WD4.2 encourages measures to naturalise water courses such as de-culverting. The Local Plan Policies Map identifies a network of open spaces for protection under Policy WS10.6 as part of a network of Green and Blue infrastructure in the Borough.

**11. Coastal land management will reduce flood risk and erosion by effective land management of flood zones and catchment areas. Some areas of west Wirral coastline are suffering due to successful coastline management practices further up the coast. The Council should look at existing coastal defences and assess their suitability with regards to rising sea levels.**

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. The Local Plan reflects the Shoreline Management Plan and Wirral Coastal Strategy which set out the policy framework for the future management of Wirral's coastline in relation to coastal erosion and protection against tidal flooding. The Council has

concluded that no Coastal Change Management Areas need to be designated in this Local Plan but that this should be reconsidered when the Local Plan is reviewed.

- 12.** To increase flood prevention: tax/fine anyone who paves front gardens. Deny planning permission for those who want to do this. Don't pave / tarmac gardens and grass areas, as this adds to surface water complications.

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management refers. In 2008 the Government changed the General Permitted Development Order such that the hard surfacing of more than 5 square metres of domestic front gardens with impermeable materials such as concrete requires planning permission. The Government have produced guidance on the permeable surfacing of front gardens: [Guidance on the permeable surfacing of front gardens - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/guidance-on-the-permeable-surfacing-of-front-gardens).

- 13.** Contingency plans should be prepared by Council in case areas need to be evacuated.

**Council Response:** The Council's Emergency Planners have been consulted in the production on the Local Plan and Level 2 Strategic Flood Risk Assessment. There are a number of useful tools including The Flood Hub - <https://thefloodhub.co.uk/>, which aim to support communities to manage flood and coastal risk across the North West.

- 14.** Flooding, prevention, and management can impact the historic environment and the significance of heritage assets. Alterations of the physical characteristics of a river (weirs or other in-channel structures) which may be heritage assets, decanalisation or re-cutting old meanders that have the potential to destroy or harm archaeological and palaeo-environmental remains.

**Council Response:** Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management and Policy WD2 Heritage Assets refer. National policy is to reduce the use of culverts as these can give rise to additional problems and increase flood risk, for example if they become blocked and as such, Policy WD4.2 encourages measures to naturalise water courses such as de-culverting. Policy WD2.1 sets out the protection mechanisms for development which has the potential to impact on a heritage asset, (whether or not it is formally designated) and Policy WD2.3 sets out the approach to archaeological assets.

- 15.** Local Plan policies should set out flood mitigation through SuDS during development design. The Local Planning Authority should be aware that all properties built from 1 July 21 are ineligible for government flood defence grant aid funding to resolve flooding issues - imperative that site SuDs design for current and future flood risk management is suitable.

**Council Response:** Policy WD 4 Coastal protection, flood risk, sustainable drainage and water management refers, which has been prepared in consultation with the Council's Lead Local Flood Authority and United Utilities. WD4.2 requires that surface water flood risk is afforded equal importance and consideration as other fluvial and tidal flood risk and WD4.3 requires that planning applications should be supported by strategies for foul and surface water with the latter discharged in accordance with the drainage hierarchy. The policy also sets out the approach to incorporating Sustainable drainage (SuDS) into new development. The Council has produced separate detailed SuDS & Surface Water Management Technical Guidance on the approach to be taken in new development.

- 16.** NPPF reference missing references to Para 20 and 165. United Utilities - split flood risk and SW management into 2 policies. Separate planning policy would set out clear SW management process, for drainage for all new development rather than applications with certain criteria.

**Council Response:** Policy WD 4 Coastal protection, flood risk, sustainable drainage and water management refers – there are separate sub-policies for flood risk (Policy WD4.2) and sustainable drainage and natural flood management (Policy WD4.3).

## Habitats and Biodiversity

### **Q8.14: Do you have any views on the Council's approach to ensuring biodiversity is properly addressed within the Local Plan and that important species and habitats are protected?**

**Summary of responses** - There were 386 responses. The yes/ no question was answered inconsistently issues raised were:

1. Agree with the general approach to adopt a City Region mitigation strategy. The suggested managed approach in the Habitats Regulations Assessment seems to be the most sensible approach, rather than a SANGs based policy sometimes utilised in other locations. (14) The preferred approach is supported by the National Trust (1).

**Council response:** Noted

2. Biodiversity should be addressed at all times and the Council must do everything it can to protect and enhance the natural environment (74).

**Council response:** Policy WD 1.1 Landscaping proposals and Policy WD 3 Biodiversity and Geodiversity of the Local Plan Submission Draft addresses these issues.

3. The plan should have a greater commitment to biodiversity net gain (1) and net biodiversity gain should be expected from all new developments at a 10% uplift in line with the Environment Bill and this should be reflected in policy (2) and encouraged (1). The mitigation hierarchy must be followed (avoid, mitigate and only as a last resort compensate).

The wording of policy is outdated as it reflects that in the 2012 NPPF and not the revised 2018 NPPF. Specifically, the inclusion of the caveats ‘where possible’ and ‘seek to’ when describing biodiversity net gain and protecting the environment. These caveats do not appear in the 2018 version and should be removed. The new guidance refers to securing measurable gains for biodiversity in three sections of the NPPF (2). This should include the ten Biodiversity Net Gain good practice principles. (1) Wording of Local Plan policy on natural environment should be clearer and stronger to enable officers to make decisions (7) to support nature’s restoration and recovery (6). Qualifying statements on natural environment such as “where possible” should be strengthened to “by all means within its power”. (1)

The following revised wording was suggested for Habitats and Biodiversity: “The council will protect and enhance the natural Environmental Assets of the borough, including the designated biodiversity and geodiversity sites; priority habitats and species; ancient woodland; and ancient and veteran trees found outside ancient woodland; and provide net gains in biodiversity and establish coherent ecological networks.” (1)

Securing measurable Biodiversity Net Gain could include increasing the total amount of wildlife habitat in the borough, restoring existing areas of high-value habitat, linking up areas of high-value habitat that may currently be fragmented. (1) It is essential that losses and gains of natural assets are measured using a standard Biodiversity Net Gain calculation. As set out in the Biodiversity Net Gain good practice principles all Biodiversity Net Gain should be documented and transparent. Biodiversity offsets should be used where compensation is not appropriate

onsite. All habitat creation should be managed in the long term by a competent offset provider.  
(1)

**Council response:** Policy WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection from the Local Plan Submission Draft sets out the strategy for the protection, enhancement and delivery of biodiversity, including the requirement for all development to deliver 10% biodiversity net gain, measured using the DEFRA metric.

4. Habitats should have legal protection (73). All wildlife sites, whatever their designation, should be protected, as well as those linked to designated protected sites (e.g., fields used as resting sites for waders when pushed off the estuaries by particularly high tides (1). Evidence based decisions are required. Core sites - statutory and non-statutory, supporting habitat, priority habitat/species and ecological networks should be mapped and incorporated into the strategy (1). These sites should be buffered from impacts such as disturbance and light/water pollution (this should be 50m for the most sensitive habitats) (1).

All recommendations of the Habitats Regulations Appraisal should be included within the Regulation 19 plan's policies, supporting text and design guidelines if this is to be sound, to safeguard bird populations (1).

The Issues and Options paper, Green Belt Review and MEAS RAG report do not pay sufficient attention/consideration to Local Wildlife Sites and site of biological importance (86) and these should not be released for development (1).

Development on or adjacent to these sites may have detrimental impacts on ecological networks and corridors (1) and more information and data is needed on sites with these features (1).

There is more ancient woodland than is listed, (i.e. sites smaller than 2ha) such as Harrock Wood, Dibbinsdale and Barnstondale which are important for wildlife and form wildlife corridors (2) and require recognition / protection (1). More work should be done to identify Supporting Habitats, similar to work done in North Wales (2). Sites of biological Importance and Supporting Habitats should be shown in the Local Plan (1). Every badger set in Wirral should be designated as an LWS due to their need for protection from persecution and traffic deaths (1)

The impact on development on coastal environments also needs greater consideration (1).

**Council response:** Local Wildlife Sites are selected by the Wirral LWSP through the Cheshire LWS criteria. Sites that no longer meet the criteria and have low restoration potential will be deselected, and all sites are reviewed at least once every 10 years. Local Wildlife Sites are provided protection in the Local Plan, are referenced in Policy WD 3 and are recognised as Sites of Local Importance. The Policy requires a suitable mitigation or compensation strategy in the event of development, and a Preliminary Ecological Appraisal will be required to identify development proposals which have the potential to affect important ecological features. In addition, under the Environment Act 2021 all development will legally require a minimum of 10% increase in biodiversity net gain.

5. The irreplaceable Green Belt should not be disposed of especially now with the environmental prospects in danger. Green belt release would result in a loss of wildlife (2), and birds of prey including owls and bats etc. and newly planted hedgerows is unthinkable (1).

The majority of Green Belt sites in Wirral have wildlife / ecological importance and concerns as per the Green Belt Review 2018 (83). Out of the 10 sites suggested at present for GB release, 3 have major wildlife objections and another 3-5 have wildlife concerns where at least some impacts would happen. The Green Infrastructure report has not informed Regulation 18 work and therefore green belt should not be released until this study is considered as this could be considered unsound (1). No green belt should be described as weakly performing (1) and release would be against national planning policy (1). Green belt release would detrimentally impact

biodiversity (3). Ecologically important sites within green belt areas act as supporting habitat to the Dee Estuary SPA – roosting and foraging sites require open space with no light pollution. Release of green belt land would adversely impact on agricultural land and the agricultural economy and consideration has not been given to the importance of this to Wirral's character (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

**6. Public rights of way should be protected (6)**

**Council response:** The Council fully recognises the importance of green and blue infrastructure networks and Policy WS 5 of the Local Plan Submission Draft sets out a positive comprehensive strategy for the protection and enhancement of green and blue Infrastructure, biodiversity, open space and landscape protection for the Borough. Local Plan Policy WS5.2 ensures development contributes to connecting green and blue infrastructure with the built environment and other open space including the creation or enhancement of public rights of way.

**7. Protect Barnstondale LWS (1). Protect the Arrowe (1) and Greasby Brooks (81) from pollution and scour. Development impacts of allocations near Harrock Wood and Thurstanston Common may impact important habitats and the RMS should be applied here (1).**

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

**8. Policy requirements for net biodiversity gain on future development would not be supported if this would render development unviable or undeliverable (4). Concern expressed over approach on the deliverability of the local plan. The policy of recreation mitigation may impact on the deliverability of housing across the borough given that many of the proposed allocations are on constrained brownfield sites within 5km of the coast (1).**

**Council response:** Viability of Local Plan policies has been assessed in the Local Plan Viability Assessment.

**9. The principles/recommendations of the Recreation Mitigation Strategy should be applied to emerging policy to mitigate recreation disturbance from new development within a radius of nationally important wildlife sites (2). These should be worded with flexibility to ensure implementation in planning application determination (1). Levels of resources for biodiversity and nature management in the Wirral should be increased (1). The full quantum of housing development should have been considered and mitigated for within the plan period rather than a threshold to ensure full mitigation of pressure on internationally designated sites. (1)**

**Council response:** The Local Plan Submission Draft is accompanied by the relevant Habitats Regulations Assessment and Policy WS 5.5 Mitigating Recreational Disturbance on International Sites for Nature Conservation sets out policy requirements to mitigate recreation disturbance from new development.

**10. Rewilding methods should be used (1).**

**Council response:** Submission Draft Local Policy WD1 Landscaping A states 'The natural regeneration of suitable plant species on site will be encouraged'.

- 11.** Carr Fields and areas threatened by the Golf Resort have ecological significance which needs to be recognised (1).

**Council response:** Policy WS 5.4 Ecological Networks of the Local Plan Submission Draft seeks the protection, enhancement and increase of biodiversity assets.

- 12.** Stop spraying poison on beaches (8).

**Council response:** Spraying of weed killer on beaches is not a Local Plan matter.

- 13.** Site specific comments received:

Comment received	Council response
Parcel 7.20 (SP065,66) Landican, infill of village. Site has heritage value, surrounding hamlet harbours several protected species (bats, badgers, great-crested newts) and ponds.	
Parcel 6.11 North of Hilbre School, West Kirby. Nearby Hoylake Langfields area has served as supporting habitat for waders wintering on the Dee Estuary and Wirral Foreshore Ramsar / SPA sites. Detailed planning would be needed to ensure that the site would potentially remain useful for birds and that there would be no loss in biodiversity.	
Parcel 6.15 (SP013) West of and along Column Road, West Kirby, includes Caldy Hill LWS (heathland), Stapledon Wood LWS and high quality farmland, the latter containing ponds. Badger population, wild birds, insect wildlife, presence of bats on site. Development would impact value of LWS through increased and damage to fauna and flora, increased visitors numbers causing disturbance, light and noise pollution disturbance to Stapledon Wood.	
Parcel 7.25 Sandy Lane by Irby Hill. Site located close to a part of Thurstan Common SSSI which is damp heath, a rare habitat in Wirral (and Chester) with some rare plants. Nearby development might lower the water level and cause this special habitat to dry out and also suffer from increased trampling by people.	The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.
Parcel 7.26 (SP009) Rear of Irby Hall, Backford Road Pond. Contains a fairly large pond with a substantial great-crested newt population which is a legally protected species that needs sufficient terrestrial habitat near the breeding pond to forage. Thus the farmland West of the pond must be protected and not developed, gardens around the houses would not suffice for maintaining the population. Numerous bird species visit the pond to feed, a pair of Coots has bred on it.	
Parcel 7.27 (SP060), South of Thingwall Road, Irby. Development on this National Trust farmland LWS would cause huge damage to the adjacent Ancient Woodland known as Harrock Wood. Indirect impacts of nearby development through increased footfall could cause damage to the site. The farmland area which is accessible on public footpaths, would lose its Landscape Value as established hedgerows and also evidence of an ancient field pattern on the farmland would inevitably disappear. There is also a danger that the Arrowe Brook which flows through the field and Harrock Wood could become polluted, damaging the river and its banks, and therefore the integrity and biodiversity of the woodland.	

Gilroy Scrape, off Gilroy Road, West Kirby is not included in this list. It was home to 1000s of Black Tailed Godwits and needs to be returned to its previous state and protected.	
Noctorum Field (OS140) should be designated as a site of biological importance given its character as part of a wildlife corridor occupied and used by bats and other birds (94).	The site is identified for protection in the Playing Pitch Strategy 2021 and is proposed to be designated as a Local Green Space (LGS-SA3.3 refers) in the Local Plan Submission Draft.

## Healthy communities

### **Q8.15: Do you have any views on the Council's approach to ensuring that new development will take account of health and wellbeing through the Local Plan?**

**Summary** – total of 257 responses

1. Health and wellbeing of a community's residents should be paramount to the Council. Building on Green Belt, open spaces and farmland is not conducive to health and wellbeing, neither is increased vehicle use. (200)

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

2. There is a lack of open space and recreation opportunities within Wirral Waters and south/ east Birkenhead where a large proportion of housing allocations are to be located. Given that high density development is proposed and there are viability issues on these sites we are concerned that the appropriate amenities will not be in place/ provided for future residents. This will no doubt impact the health and wellbeing of these residents whilst also causing an even greater divide between the western parts of Wirral and the urban conurbation. (8)

Please green our urban areas making them a healthier and more pleasant place to live. Pocket parks, trees and flower beds, community gardening initiatives and allotments to be prioritised in areas where poverty is at its greatest such as Birkenhead, Seacombe and Rock Ferry. Squeeze pocket parks into these areas rather than more housing. These areas shame us all. The quality of life and mental and physical well being of residents is massively affected by the run down housing stock and the general lack of possibilities for contact with nature. (8)

Maintaining and developing green spaces in our urban areas is essential for making them healthy, pleasant places to live. Small parks, trees and flower beds which inspire community gardening and allotments need to be established in poor areas of Birkenhead, Seacombe and Rock Ferry. The Council must upgrade houses and make them carbon zero, bringing empty houses into use. Extra community policing and better public transport should be prioritised in these areas (8)

**Council response:** The Council recognises that access to quality open space is key to the health and well being of residents. Policy WS 5.1 of the Local Plan Submission Draft which deals with Open space provision sets out the standards for open space and children's play on new development. The Policy requires that all the new dwellings would be within 720m safe walking distance of a publicly

accessible open space of 1.5 hectares or above, and all new dwellings would be within 400m safe walking distance of an appropriately equipped children's play facility. Areas of open space have been provided as part of the Wirral Waters north bank scheme. In addition, the Council is progressing the development of the Dock Branch Park through the central part of Birkenhead through the reuse of the disused railway cutting.

The Council has a proactive programme for bringing empty homes back into use and in recognition of this the Local Plan Submission Draft includes an allowance for empty homes in the housing supply.

3. Needs more robust approach to developer contributions to such facilities or strict direction as part of planning permission. (2)

**Council response:** Informed by the Local Plan Viability Assessment, Appendix 10 of the Local Plan sets out the Council's approach to assessing the impacts of new development on open space, education, healthcare, sport, and recreational pressure at the coast and to determining any developer contributions sought, towards meeting the infrastructure and, or mitigation needs arising from development.

4. Health and well-being of the local population should be one of the main priorities of the Council. Maintaining green spaces, green belt and accessible leisure facilities all contribute to health and well being. One of the major threats to the residents of the Wirral is climate change. The Council has declared a crisis but needs to be more proactive especially in terms of the Local Plan in reducing carbon emissions in new developments, planting more trees and converting to greener energy sources. (10)

**Council response:** See Responses to Q8.1 and 8.2. in respect to climate change.

The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed

Policy WS 5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection of the Local Plan Submission Draft will ensure that existing green spaces are protected and enhanced.

5. All new developments should be built on the principle of low car use. Prioritising walking and cycling over car use will promote health as well as helping Wirral to achieve its Climate Change strategy. (10)

**Council response:** Securing sustainable travel and reducing the need to travel and reliance on private cars is a Strategic Objective of the Local Plan. Under the Council's Strategy for Transport, Policy WS 9.2, development proposals should provide access to existing or planned sustainable travel options and infrastructure projects to reduce private car usage. The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

6. WBC is not following its own approach. WBC are not applying the recommendations and guidelines of the heath impact report The Interim Health Impact Assessment of the plan has 12 strategic objectives in its scoping report. The selection and use of green belt sites in options 2a and 2b would directly oppose, negatively impact, undermine or shift focus in 11 of the 12 objectives. WBC has provided the following excellent reasons not to release Green Belt for the promotion of health and wellbeing. (1)

By considering Green Belt sites WBC have not supported Strategic Objectives 1, 2, 3, 4 and 8. (1)

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.

**Q8.16: Do you think there is anything else that the Council could do to address health and wellbeing within the Local Plan?**

**Summary of responses** - There were a total of 224 responses to this question.

1. Preserve and enhance all open spaces. (2) Planning committees must be accountable on this issue. (160)

**Council response:** Policy WS 5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection of the Local Plan Submission Draft will ensure that existing green spaces are protected and enhanced.

2. Reduce or restrict fast food and gambling (1). Landlord licencing should be expanded to improve conditions for Renters. (1) Use cumulative impact policies to prevent more alcohol retailers, especially in economically disadvantaged parts of the Borough. (1)

**Council response:** Policy WD 12 Hot Food and Drink of the Local Plan Submission Draft seeks to limit the provision of fast food facilities within centres. Landlord licensing is not a matter for the Local plan.

3. Improve public transport to increase access to the countryside. (1) More can be done to reduce traffic. (1) In terms of walking and cycling, active transport must be prioritised over road development and car use. We will all be healthier if there is a reduction in pollution from cars and if we actively walk more. One answer lies in the development of low car neighbourhoods, based on the Mini Holland developments where residents are encouraged to walk within neighbourhood by default, because of the way the walking routes and roads are designed. (20)

**Council response:** Local Plan Policy WS9 states the Council's ambition to safeguard land and promote movement by active travel and sustainable modes and includes requirements for developers to where appropriate to provide cycle facilities which provide a safe, comfortable, and attractive modal alternative.

4. Ensure adequate healthcare for communities in existing areas as well as in new developments. This would include working with health authorities to help ensure that there is an adequate ratio of General Practitioners to patients in all areas, particularly the East side of the borough. Ensure there are frequent direct public transport links to key health service sites, such as Arrowe Park and St. Catherine's hospitals. (20)

**Council response:** The Infrastructure Delivery Plan sets out all appropriate infrastructure required to meet development needs, produced in consultation with NHS Wirral and NHS Property Services. NHS Wirral and WUTH are updating their Estates Strategy which will account for the planned levels of growth. While it is expected that existing GP practices will accommodate the overall level of growth planned, Regeneration Areas within Birkenhead delivering high numbers of residential units towards the end of the Local Plan period are likely to require additional GP capacity to serve the increased numbers of patients in those areas where there does not appear to be existing capacity.

5. The housing stock in the areas to be upgraded and retrofitted to make them carbon zero. Empty houses to be brought into use. Extra community policing to make residents feel more secure. Better public transport in these areas in particular, including trams. Squeeze pocket parks into these areas rather than more housing. Repair recycling and upcycling of resources to be encouraged in these areas in the form of workshops. All community centres should be upgraded to the standard of the same in affluent areas. (20)

**Council response:** No proposals for the improvement of existing housing stock are set out in the Local Plan. However, Wirral Council, with the Liverpool City Region Combined Authority, commenced delivery of a low carbon housing retrofit project in mid-2021 utilising the government's Green Home Grants Local Authority Delivery funding. Under Phase 2 which lasts until early 2022, £2.3m is available for low income, privately owned Wirral households to improve insulation levels or install renewable energy technologies. Funding must primarily be directed at properties in Energy Performance Certificate (EPC) Bands E, F or G. At an average grant of £10,000 per property, around 230-250 homes will be improved.

The council has decided to direct this funding to where it most needed in the borough: where overall energy efficiency levels are low, fuel poverty levels are high and where there are also higher levels of income and health deprivation. This approach means a focus on 20 "lower super output areas" (LSOAs), totalling around 13,000 private homes, where there is the highest degree of overlap between these factors. The LSOAs are based in different parts of Wallasey, Birkenhead and New Ferry.

The funding available from government only enables a small proportion of homes to be assisted, and so the Council is in the process, with the Liverpool City Region Combined Authority and neighbouring local authorities, to seek a longer term funding solution. In the short term however, a bid has been submitted to government for funding under Phase 3 of the Green Home Grants Local Authority Delivery as well as new Home Upgrade Grants for properties currently heated by electricity.

The majority of social housing in Wirral has good energy efficiency performance and isn't part of this scheme. However, for pockets of properties in need of improvement, the government's Social Housing Decarbonisation Fund has been made available which, depending on a successful bid outcome, will lead to around 200 social homes in the borough receiving insulation and heating improvements.

Community policing is not a matter for the Local Plan but the Council does work with Merseyside Police

6. The Local Plan should designate the land currently covered by Europa Pool as leisure instead of housing and retain the pool on site. (20)

**Council response:** The Council is currently reviewing the provision of leisure facilities across the Borough and will need to consider the optimal location and nature for leisure provision in Birkenhead as part of the comprehensive land and population changes within the central part of the town as proposed by the Birkenhead 2040 Framework and set out Part 5 of the Local Plan Submission Draft.

7. Our Client is committed to working proactively with the Council to deliver programmes and schemes addressing the health and wellbeing challenges identified in the Interim Health Impact Assessment and other evidence base documents and takes a holistic approach to placemaking.

**Council response:** The Council is happy to engage with all land owners with development proposals within the existing urban areas which can deliver high quality homes in appropriate locations. The Council is also willing to engage with land owners outside the urban areas to deliver long distance active travel routes and green infrastructure improvements which does not involve the loss of Green Belt for housing development.

## Heritage

### **Q8.17: Do you agree with the Council's approach to how heritage is dealt with in the Local Plan?**

**Summary of responses** - There were 446 responses to this question. Not all questions answered yes and no, and of those that answered yes that they did support the Council's approach most also added a suggestion as to how it could be approved.

Because of inconsistent responses in terms of indicating whether they agreed with the approach to how Heritage is dealt with in the Local Plan it is not possible to give an accurate number of yes/no answers. The way the question was phrased allowed both yes and no responses to add comments. These comments are dealt with together below. Some 445 comments were received.

1. The Monks Ferry car park and surrounding area is the site of the historic ferry to Liverpool. This area should be designated as a heritage site so that the public can park and enjoy the site of the ancient ferry and stroll up to visit the associated priory (where car parking is limited. Signs should be erected to give visitors details of the ancient charter and method of working. i.e. rowed boats at still water and even the carriage of horses. need better signposting and clearer, more pleasant walking routes from Woodside to Birkenhead Priory (10)

**Council response:** The Monks Ferry car park is an undesignated heritage asset, recorded in the Merseyside Historic Environment Record. This concludes that it is highly unlikely to be the location of the original, mediaeval ferry operated by the Priory, and is essentially a 19th century structure, with interventions in the 20th century. Whilst there are various potential sites for the actually original ferry site, none can be confirmed, and the riverside has constantly evolved since mediaeval times.

The Council will address signposting of heritage sites through the preparation of the Birkenhead Design Guide and Public Realm Strategy

2. Conservation areas need to be protected. It is shocking that 47 Argyle Street, Birkenhead was recently allowed to be demolished and is now an ugly car park. (1)

**Council response:** Conservation areas are offered some protection through both national and local policies, and with any form of development, the degree of heritage harm to development proposals forms part of the assessment at the planning application stage. In general terms, development should enhance the understanding of a conservation area, and retain those buildings and spaces which help to describe its special character and appearance. Not every building in a particular conservation area makes a positive contribution to the place, and in these circumstances, a development proposal may replace an existing structure. In the case of 47 Argyle Street (Riley's Snooker Hall) an application was approved which sought to replace the existing building with a terrace of buildings of a similar scale and design to those found along Argyle Street, which were more suitable to the heritage context of Hamilton Square. Whilst this development has not yet commenced on site, a recent application to extend the timescale of the temporary car park has been refused, as it does not enhance the conservation area. For the Hamilton Square conservation area,

an updated management plan is being produced, enforcement action has been taken on some unauthorised changes to buildings and will continue, and a new public realm scheme is being designed for the square, and Argyle Street.

Policies for every conservation area are included in the Local Plan, and these aim to protect those aspects which help contribute to their special character and appearance.

3. Recent initiatives to protect Hamilton Square (e.g. removing satellite dishes) are very welcome.  
(1)

**Council response:** Noted thank you.

4. Whilst conservation areas can be designated outside of the plan making process, it would be useful if the current Local Plan included future, planned conservation areas. I am aware that boundaries and a character analysis was prepared for a new conservation area called Noctorum Ridge, in 2007. This did not progress due to financial implications for preparing the relevant documentation, rather than for any issues on the merits of the proposed conservation area. Local planning authorities are under a positive legal duty to assess their area and review it from time to time, to consider whether areas are suitable for designation, or to remain designated (S.69 Planning (Listed Buildings and Conservation Areas) Act, 1990), and the Local Plan would provide added weight to the intention. I request that the previously proposed Noctorum Ridge conservation area, which did not progress, should be re-visited as part of the Local Plan process, and designation supported. I would be grateful if you would provide me with updates on the issues raised in the above comments (96)

**Council response:** The Council cannot show potential future conservation areas on the Local Plan Policies Map.

The Council will work with local interest groups in 2022 to commence a programme of undertaking Conservations Appraisals for potential new conservation areas as well as updating existing Conservation Area Approvals and Management Plans. Noctorum Ridge will be considered for inclusion in this programme.

5. We do not consider that the Council's approach to heritage is adequate. In particular, we do not consider that there is sufficient protection for buildings classed A and B in Heswall's Conservation Areas Management and Appraisal Plans nor for sandstone walls and trees within the conservation areas. We strongly advocate a Local Listing for non-designated heritage assets (e.g. Heswall Police Station) (72). More can be done to preserve and promote our local heritage. The authority should have a list/register of buildings to retain across Birkenhead to ensure heritage and character are retained. This includes, but is not limited to public houses, commercial and residential buildings. There sadly has been instances of developers demolishing buildings that are part of the area's history (1)

Wirral is uniquely situated between Chester and Liverpool, two hugely important areas of history and heritage and this must be realised and exploited by the culture team to improve the heritage offer. Wirral Council has had a heritage policy since about 2012, approved by the Council, but then totally ignored. This has to rectified. The plan updates asap, if only 'the actions'. So deeds not words! (1)

**Council response:** It is the Council's intention to commence a review and update of existing Conservation Areas in 2022. The Council working with other Merseyside Authority's on Pilot Project funded by Historic England to develop a local listing strategy. Consultation will take place in 2022.

Subject to resources the Council will commence work on an updated Conservation Strategy in 2022.

6. More should be done/ As much as possible should be done to identify, preserve, conserve, protect and promote awareness of our heritage and heritage sites in Wirral for the benefit of residents and visitors. They should be linked to the policies regarding tourism. (75)

**Council response:** Policy WD 2 of the Local Plan Submission Draft sets out a comprehensive approach to the protection of Heritage Assets. Part 5 of the document sets out individual policies for each Conservation area

7. Continue to support Conservation Areas with unchanged polices but improve enforcement staffing and bring back a Conservation Officer [Enforcement]. Council must maintain its heritage buildings and facilities better wherever they are including parks where heritage is ignored except in Birkenhead Park. Wirral Council maintenance and project management is very poor and needs substantial improvement (2)

**Council response:** Within a difficult financial context the Council will be expanding its Conservation and heritage resources during 2022.

8. We reserve the right to comment again once we see the Council's final policy but would insist that the Council pay regard to national planning policy and place weight on the assessment of 'significance' when it comes to determining the impacts on heritage assets and ensure any harm to the asset that is deemed to be less than substantial is then balanced against the positive aspects of any proposal. (4)

**Council response:** Noted. Policy WD 2 of the Local Plan Submission Draft sets out a comprehensive approach to the protection of Heritage Assets. Part 5 of the document sets out individual policies for each Conservation area.

9. A number of comments were submitted in relation to the relevance of heritage matters to green belt option/ site selection. The Council has failed to have proper regard to the impacts upon heritage assets, particularly development that is within and/or adjacent to a conservation area. Parcel 6.15 in the Green Belt Review has been proposed for release under Option 2A in the Plan. Parcel 6.15 is an area of open land partially within and substantially adjacent to Caldy Conservation Area. Any proposed development will clearly have an impact on the setting of the Conservation Area. We have very significant concerns that the Plan could lead to unacceptable impacts on the setting of Caldy Conservation Area. (4)

The importance of conservation areas and heritage such as Caldy are not being taken in account when evaluating parcels of green belt for release for developing. This seems VERY low down WBC list of importance BUT will have an important impact on tourism and place desirability in the future. This is such a shame as the relatively high prices commanded by housing in heritage areas will be impacted by the loss of WBC interest in heritage and will lead to these areas being less appealing to future residents. Cheshire may become a more desirable and less expensive option for many people in the future who are interested in preserving heritage. (1) The plan is not reflecting the approach or its heritage policy Arup's greenbelt report did not make any assessment of purpose 4 Preserving the Setting and Special Character of Historic Towns – or heritage. Arup applied no contribution to each parcel for this purpose. WBC had the opportunity to apply some local knowledge regarding heritage value to their site selection process but have failed to do so. Appendix 4.7 table 6 lists proposed greenbelt development sites with archaeological interest, yet they remain on the list. I refer to the WBC Heritage policy 2014 Any Greenbelt Development would contravene this policy. A quote (below) from that

document sums up in WBC own words why Green belt should not be developed. WBC should apply the heritage policy to the development of the plan. The importance of conserving our natural heritage and biological diversity is becoming increasingly recognised. The natural world is an integral part of our cultural heritage and identity. It is important in defining local character and distinctiveness. It affects the quality of life of the people of Wirral, contributing to our health and wellbeing. A good quality natural environment has a positive impact on house prices and makes high density housing more liveable. Our green infrastructure as a whole also provides 'ecosystem services' such as carbon sequestration, flood prevention, maintenance of water quality, micro-climate control and even pollination for our crops. In Wirral, the importance of heritage as a driver for regeneration was demonstrated in the Single Regeneration Budget initiatives of the 1990s. (1)

There is not enough information at present to answer this question. In relation to Frankby however - that green belt land on one side of this historic village is described as weakly performing is a worrying indication that Wirral's heritage assets are grossly misunderstood and underappreciated (Map B, appendix 4.7, area 5.13, SP007) (1) The proposal of the Western Urban Extension simply ignores characteristics worthy of retention as recorded in the evidence base, with regard to Barnston Conservation Area and its rural setting, the grade 2 listed Christ Church Barnston, the historic landscape that surrounds the village, the importance of the four working farms two of which could well date to Domesday and the potential links emerging from the evidence of Brunanburh. All have simply been ignored in view of a suspicious Green Belt review. WBC need to explain. (1)

**Council response:** The Submission Draft of the Local Plan is based on the Council's preferred strategy which is to meet all of its development needs within existing urban areas. No green belt release is proposed.

- 10.** We do not object in principle to the Council's approach to heritage but would not support any policy requirement which would render developments unviable or undeliverable and reserve the right to comment when further detail is released at a later stage of the process. (5)

**Council response:** Noted. The potential impact of heritage policies on development viability has been assessed through the Local Plan Viability Assessment.

- 11.** Wirral Wildlife support the main approach, but heritage should also include such human-natural heritage as pre-Enclosure field systems, important hedges (Hedgerow Regulations 1997) and "notable" trees which are of cultural or nature conservation importance to the local community. ITPAS (like other Groups) considers there is much more work to be done to ensure the Local Plan properly considers any possible development in the context of NPPF Section 16: 'Conserving and enhancing the historic environment'. See the uploaded file for Report on Heritage failings and opportunities. It is noted from the detailed policy list in Appendix 9.1 that there will be 32 policies relating to Heritage, so we will interrogate those policies in due course at the Regulation 19 stage when more information is forthcoming (if not published before then). Please note that Heritage should also include such human-natural heritage as pre-Enclosure field systems (as cover 25% of Site 7.27, SP060), important hedges (Hedgerow Regulations 1997) and "notable" trees which are of cultural or nature conservation importance to the local community. An example of this is the ancient tree between Irby Hall and the Anchor PH, which features in the iconic view out from the Village across countryside to the Welsh Hills but which one Council Consultant appears to consider it acceptable to fell for an access road (although another comment is that this could create an even busier and more dangerous junction). This is not joined-up thinking. (1)

Yes, I would support this approach. In addition heritage should also include natural heritage eg landscape, trees, hedges, rivers, ponds which are also of wildlife importance [agriculture]. (2)

**Council response:** Heritage policies are just one part of the Local Plan which deal with the historic built environment and natural environments, and many of the landscape features are also given substantial protection as part of Wirral's Green Belt. Full heritage protection is subject to legislation and guidance which only covers the historic built environment, and is limited in its capacity to deal with landscapes. Additionally, there may be some protection afforded in rural conservation areas if the hedges can be considered to fall under the guidance contained in the Hedgerow Regulations (1997).

**12.** There are concerns about the approach to heritage particularly in Conservation areas where the preservation of walls, hedges, gardens and trees is essential.

**Council response:** Where these features are part of the underlying character and appearance of a conservation area, the proposed policies state that they should be retained. However, whilst there is specific protection for walls, as structures, and trees within conservation areas, the legislation does not cover the removal of hedges outside the remit of a planning application. There may be some protection afforded in rural conservation areas if the hedges can be considered to fall under the guidance contained in the Hedgerow Regulations (1997).

**13.** There is not enough detail to convince me that existing policies and management plans for Conservation Areas will be incorporated into the Draft Plan. I support the submission of Conservation Areas Wirral. (1)

**Council response:** Noted. Policy WD 2 of the Local Plan Submission Draft sets out a comprehensive approach to the protection of Heritage Assets. Part 5 of the document sets out individual policies for each Conservation area.

**14.** Again the unrealistic housing need figure which threaten many Green Belt sites which are important heritage sites.

**Council response:** See Response to Q2.1

**15.** The historic environment is often little understood by local residents. WBC could do more to promote knowledge and the importance of our heritage assets. Conservation areas should be subject to planning constraints applicable to their management plans and appraisal plans rather than to the discretion of council officers

**Council response:** Conservation Area Appraisals and Management Plans are part of the toolkit for managing change in these areas, and are widely used when considering development proposals. They are also subject to compliance with national policies some of which may conflict with heritage policies and guidance, and in these instances, planning officers and Members are required to reach a judgement taking into account all relevant issues. Conservation areas and their management plans will be reviewed in 2022, to ensure that they remain relevant and accurate, and a Culture and Heritage Strategy is currently being produced, which relates to the importance of heritage more widely in the Borough.

**16.** This is an opportunity to make more of the Viking and Medieval treasures on the Wirral such as the Hogback stone in St Bridget's church in West Kirby. The ancient barns in Rectory Road field date back to 1660 and are at threat from the proposed development. They illustrate the history

of Glebe land provided by the local community to support the local church. Listing these buildings would help to preserve them.

**Council response:** Whilst listing a structure offers protection to historic structures, this is a process undertaken by Historic England as the national organisation responsible for overseeing the management of heritage assets. A request to list a particular building can be made by anyone to Historic England, who will then assess the heritage merits, and decide if it warrants statutory protection. Whilst a Local Planning Authority does not have the powers to list buildings, a Local List is being produced which will identify those structures which have local significance, and where their retention is important. A consultation will be held on this, and the Local List will be monitored and updated.

**17. Non-designated heritage assets should have the same legal protection as designated assets.**

**Council response:** The Local Planning Authority can only work within the legislation as set out by government, and this currently identifies a difference between designated and undesignated heritage assets. Nevertheless, the production of a Local List will afford further protection to a number of buildings, and these are not limited to those within conservation areas, but throughout the Borough. Similarly, conservation areas are being reviewed, and new areas which would qualify for this status are being identified.

**18. We believe that little strategic thinking has been done for heritage thus far in the development of the local plan. The Heritage Policy rehashes the NPPF with only minor divergence. It fails to present proactive strategic policies to conserve and enhance heritage in Wirral and lacks innovative or supportive policies to promote climate change adaptability, improvements to public realm, and/or strategies to limit adverse impacts to heritage sites.**

Adaptive use or continued use of a building gives significant carbon savings in terms of embodied energy in the fabric of the building. The focus of this policy will be to enhance the performance of heritage buildings as much as practicable without damaging their significance. Proposals to enhance the environmental performance of heritage assets will be supported where a sensitive approach to design and specification ensures that the significance of the asset is not compromised by inappropriate interventions. Any works should be undertaken based on a thorough understanding of the building's historic evolution and construction (where these matters relate to the heritage significance of the asset), architectural and historic significance, and demonstration of the building's environmental performance.

Applications should be accompanied by an assessment of the building's current fabric and energy performance. For relevant planning applications, details of post construction monitoring in the form of a building monitoring and management strategy will be required to be submitted in order to assess the ongoing impact of the implemented measures on the asset's historic fabric. Monitoring requirements will be proportionate to the significance of the asset and the scale and scope of works undertaken. Where monitoring shows that interventions are causing harm to the significance of the asset, appropriate remediation works will be required.

Supporting text-Acceptable levels of intervention will vary dependent upon the impact on the significance of the heritage asset in question. Where works would harm the heritage asset's integrity or significance, that harm will be weighed against the public benefit of the proposal.

Applications for works to heritage assets will need to demonstrate a thorough understanding of the building in question via the submission of the following information: survey of existing construction, to include walls, floors, ceilings and roofs; baseline energy consumption data before and after improvements have taken place; measured data of existing environmental performance of the building's fabric; an indication of any national performance standards being

targeted as a result of works; and description of measures to be implemented in order to achieve the standard.

**Council response:** The Regeneration Area Policies Set out in Chapter 4 of the Local Plan Submission Draft and policies such as Ws6 and WS7 support our proactive approach to heritage.

Section in Policy WS8.3 'Improvements to Historic Buildings' identifies that improvements to the environmental performance of heritage assets are supported subject to ensuring that the significance of the asset is not compromised, and that works should be undertaken on a thorough understanding of the historic evolution of the building.

- 19.** The historic and Heritage areas of Birkenhead and Wirral could be promoted to a greater extent than is indicated in the Local Plan proposals. Support of local community projects to enhance the Heritage Proposals should be included in the Local Plan proposals

**Council response:** The Local Plan does not promote our heritage assets as such but seeks to protect them and enable their appropriate adaptation and interpretation.

- 20.** We have numerous archaeological sites situated throughout the borough, and I believe that most of these can be linked to the 937AD Battle of Brunanburgh. I welcome Wirral Archaeological society's move into investigating this significantly historic episode and hope that Council do more to protect this and our other heritage assets.

**Council response:** The Council has commissioned a report to examine the importance of the archaeological finds by Wirral Archaeology which could be linked to Battle of Brunanburgh. The completion of this study has been delayed by the Covid Pandemic, but it is hoped to be able to publish the final report in early 2022.

- 21.** Our Client broadly agrees with the Council's approach. Wirral's heritage is a core element of the Our Client's landholding and its ongoing legacy. It is the custodian of almost 10% of the Borough's listed heritage assets; 69 Grade II listed buildings along with the Grade I listed Brimstage Hall and Tower and numerous undesignated buildings of historic interest as well as being responsible for originating and delivering two of the most iconic parts of Wirral in Port Sunlight and Thornton Hough. Our Client is keen to ensure that its heritage assets are preserved, enhanced and utilised to their greatest benefit. Therefore, whilst it notes that the Council's Preferred Approach set out in the Issues and Options document is not especially detailed with no supporting studies having yet been prepared as part of the Local Plan's evidence base, it is supportive of the Council's ambition outlined at paragraph 8.114 that its forthcoming Heritage Strategy will "set priorities for capital investment in heritage and heritage assets to maximise educational, recreational, tourism and regeneration opportunities".

Yes, we broadly agree with the Council's Preferred Approach. Wirral's heritage is a core element of our landholding and our ongoing legacy. We are the custodian of almost 10% of the Borough's listed heritage assets; 69 Grade II listed buildings along with the Grade I listed Brimstage Hall and Tower and numerous undesignated buildings of historic interest as well as being responsible for originating and delivering two of the most iconic parts of Wirral in Port Sunlight and Thornton Hough.

**Council response:** The Council has commissioned a Culture and Heritage Strategy for Birkenhead which will be published in 2022. It is the Council's intention to develop a heritage strategy for the wider borough subject to resources.

**22.** Protecting local heritage is important for local communities and visitors alike. Promoting heritage to visitors will encourage tourism and thus income to the area. This is something that could be much developed in West Kirby, building on the work done by the Charles Dawson Museum, and developing a more extensive history trail, taking into account the Grade 2 listed building of St Bridget's Church and the war memorial., as well as the Ring o' Bells pub and other buildings in the West Kirby Old Village Conservation area. An application has been made to have the tithe barn in Rectory Field (dating from 17th century) to also be listed.

**Council response:** Noted

**23.** In potential green belt developments there should be every effort made to ensure that a dig is done to see if there is any historical importance such as anywhere near already identified historic areas as settlements expanded and we should not lose anything of importance by building on these areas

**Council response:** The Local Plan Submission Draft is not proposing to release green belt sites. Policy WD 2 Heritage Assets will require archaeological investigations and recording where appropriate.

**24.** How does the Council's plan to protect heritage assets, especially those at risk, tally with its housing plans for demolishing the art deco facade of the New Brighton Amusement Arcade (SHLAA 4086); demolishing the old Victorian bank near Seacombe ferry (HLA 103100) or not protecting Gibson House (old Mariners' Home, SHLAA 2006) from being overwhelmed by 3 blocks of flats being built behind it - which will also impact on the view from the promenade? But nice to see the importance of Brunanburgh acknowledged

**Council response:** Heritage policies relate to both protection and managing change in the historic built environment, and need to accord with national heritage policies. Each planning application is judged on its individual merits, and against the policy background, and this includes heritage and other planning policies. A Local Listing study has commenced which will identify those buildings which contribute positively to Wirral's heritage, but which are of insufficient merit to qualify for statutory designation. Once completed, this will be subject to consultation and review.

**25.** Considering building new houses adjacent to a conservation area is incredulous

**Council response:** The development of new housing adjacent to Conservation Areas is appropriate subject to design considerations being met.

**26.** "Nearly all 26 Conservation Areas have been the subject of character appraisals and related management plans plus supplementary planning guidance and these are listed in an Appendix to the plan. It is the intention of the Council to complete a comprehensive coverage of all these areas to ensure they have up to date policy frameworks which clearly define their character and its constituent elements. This suite of policy guidance sources is also supplemented by other related policies which have a bearing on these areas: Policy CS1B-Achieving sustainable places by design • Establishes the principle that development should "enhance the character, quality and distinctiveness of the area" • Establishes that "character appraisals or area-specific action or management plans" will be material considerations. The explanatory text expands on this: "Conservation Area Appraisals and Management Plans approved by the local planning authority will be important material considerations for proposals likely to affect the character or setting of the Borough's designated Conservation Areas". • Recognises the need to protect the heritage and historic value of individual buildings • Recognises the need to protect unifying design features including gates, walls, landscape having regard to the materials used • Establishes the

principle that extensions to existing properties should be sympathetic to the design of the parent building • Note – this policy may need to be amended in the light of the recently published national guidance on Design. The explanatory text refers to a proposed SPD on local design standards. Policy CS1C- Achieving sustainable places by design-landscaping, trees and hedgerows • Requires that all proposals for full planning permission are accompanied by landscaping schemes that have been incorporated at an early stage in the evolution of the proposals • Identifies elements that should, where relevant, be incorporated including established trees, stone walls and piers, gates, street furniture • Establishes that when felling of mature trees is justified in exceptional circumstances suitable replacement planting will be required Policy CS42-Protection of heritage assets • Establishes the special protection to be afforded to designated (including CAs and Listed Buildings) and non-designated (including local listing and other buildings identified as having heritage significance) heritage assets • Requires evidence in the form of Heritage Impact Assessment for any proposal affecting a heritage asset (presumably what is currently termed Heritage Statement) • Sets out the tests in terms public benefits that would have to be passed before development which could harm a heritage asset could be permitted. In accordance with NPPF guidance on this issue. Policy CS42c-Demolition control within Conservation Areas Establishes the principle that any proposal to demolish a building in a CA must be accompanied by detailed plans for redevelopment that would enhance the character of the area following demolition

**Council response:** These matters are addressed in Policies Policy WD 2 Heritage Assets and [Policy WS 6 Placemaking for Wirral](#) of the Local Plan Submission Draft.

**27.** There are currently 26 varied Conservation Areas located throughout the Wirral. They range from the globally recognised Port Sunlight Village and Birkenhead Park to the grandeur of Hamilton Square and the substantial dwellings of Meols Drive and Wellington Road. At the centre of the policy for these areas is the need to preserve their overall character. This means it is necessary to protect the character of each area's individual historic features. In some areas this reflects: •the interplay between the buildings, the walls and treescape (Oxton and Lower Heswall) •the rural setting of villages and their open field environment (Saughall Massie and Thurstaston) •the village green settings and traditional buildings (Thornton Hough and Frankby)

**Council response:** Part 5 of the Local Plan Submission Draft sets out a specific policy for each conservation area by settlement. The Council has consulted with CAW on the specific wording of the various Conservation Area Policies set out in Part 5 of the Local Plan Submission Draft

**28.** Statement submitted on the proposed content of a Policy for Oxton Conservation Area.

**Council response:** Part 5 of the Local Plan Submission Draft sets out a specific policy for each conservation area by settlement including for Oxton. We have consulted with CAW on the drafting of these policies.

The Council will subject to resources commence a review of existing Conservation Areas in 2022 and will consider the potential benefits and issues around making Article 4 Directions in Conservations Areas.

**29.** More work to be done to ensure the Local Plan properly plans for development in the context of Section 16 of the NPPF. Local Plan policy should ensure that the area's heritage assets are best protected when development is planned, particularly in the context of each conservation area. It is noted from the detailed policy list in Appendix 9.1 that there will be 32 policies relating to

heritage, so we will interrogate the policies in due course at the Regulation 19 stage when more information is forthcoming.

We acknowledge that the Council has responded to submissions on Brunanburh and has commissioned experts to compile further evidence of local heritage assets. We hope the full assessments will help to identify assets of value and for future protection for the benefit of all in the future.

**Council response:** Noted. Policy WD 2 of the Local Plan Submission Draft sets out a comprehensive approach to the protection of Heritage Assets. Part 5 of the document sets out individual policies for each Conservation Area.

The Council has commissioned a report to examine the importance of the archaeological finds by Wirral Archaeology which could be linked to Battle of Brunanburgh. The completion of this study has been delayed by the Covid Pandemic, but it is hoped to be able to publish the final report in early 2022.

**30.** The council has not given sufficient weight to the increasing evidence that the Battle of Brunanburh was fought on the Wirral. The battle was believed to be the largest battle ever fought on English soil. The indications are that the battle was held on a battlefield that may have run from Clatterbridge to Prenton. We are extremely fortunate that much of this area is largely unbuilt. If and when the historic and scientific worlds accept that Wirral is the battle site this will be an enormous boost for the peninsula. To have built modern housing estates on the site in the meantime would be a travesty.

**Council response:** The Council has commissioned a report to examine the importance of the archaeological finds by Wirral Archaeology which could be linked to Battle of Brunanburgh. The completion of this study has been delayed by the Covid Pandemic, but it is hoped to be able to publish the final report in early 2022.

**31.** Bromborough Pool Village Conservation Area - Although already subject to an Article 4 Direction the recently built and totally intrusive dwellings that were inexplicably granted planning permission have been a shock both to the many visitors and to the residents of this pioneering industrial village. Bromborough Pool, built in 1854, was one of the very earliest Workers' Industrial Villages in the country and very much ahead of its time. Bromborough Court House, its bank and ditch and Fishponds is a Scheduled Ancient Monument Site. This has recently been subject to professional archaeological work approved by Historic England. The finds have largely confirmed that which was already known from early documents, maps, and from invaluable accounts from families who had lived there. The latest planning application now allows a public footpath on the site together with the removal of the protective railings. We would have preferred otherwise but we have to trust that there will be no unintended consequences which would jeopardise the integrity of the site and which may damage it permanently.

**Council response:** Noted.

**32.** Bromborough Village Conservation Area - There have been several instances of clear breaches of planning policy within the Conservation Area. Much delayed retrospective planning applications and lack of enforcement has led to some unpleasant situations. The length of time taken by the Enforcement Team to respond to these breaches is unacceptable. This must be clarified and rectified and, if necessary, the Enforcement team expanded, within the context of

the Local Plan. An Article 4 Direction, as recommended in the Appraisal and Management Plan for Bromborough Village and which has been adopted by the Council, must be implemented.

**Council response:** The Council remains committed to enforcing breaches which are harmful to heritage assets, and this work takes place across the Borough. There are currently capacity issues across the planning and enforcement sections, which can lead to delays in taking action on breaches which have been reported, but the enforcement team has now been expanded to improve this situation. In relation to Article 4 Directions, the latest government advice in the National Planning Policy Framework is that these should be used sparingly and limited in scope. However, further work is being undertaken locally to gauge if Article 4 Directions may still be applied within Wirral's conservation areas.

**33.** Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (<http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) may be useful in the production of your Plan.

The Plan represents a significant opportunity for the protection and enhancement of the historic environment within the area and for highlighting the potential that the historic environment provides for growth and wellbeing. Given the importance of this resource to not just to the region's distinctive character but also to its economy and the social well-being of its communities (and the need for it to be appropriately conserved in line with national policy guidance) that there is a need for it to be considered in developing the strategy for the area. With this wealth of heritage, it is essential therefore that the Plan, as a whole, sets out a robust policy framework for its future management. Given the varied issues and the breadth of the historic environment, we would welcome the production of a heritage topic paper to accompany the Plan. The NPPF requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment through an appropriate heritage profile within the Plan. This should include taking account of opportunities to draw on the contribution the historic environment makes to the character of the place. To this end there needs to be an appropriate heritage profile within the Plan.

The Plan (and its policies) should positively engage with heritage in terms of its potential for place making as well as offering a clear and positive direction that will support the conservation and restoration of heritage at risk assets; the effective management of important assets; and opportunities to maximise public value from the historic environment. In addition there is also an opportunity to promote and foster early engagement in heritage and character early in the policy making and design processes including place making and master planning. It is also important to acknowledge the role that heritage can play in other areas of the Local Plan. Town Centre's are often defined by clusters of heritage assets where policies could promote positively a joined up approach to managing change in these areas to maintain their unique identity and sense of place. Historic England acknowledges the challenge of delivering new development whether this is economic, social, residential or cultural to meet the needs of its residents. The populations of our towns and cities are growing and history and culture play a part in the success of these places whether it is supporting its attractiveness for business, tourism or a place to live. It is essential that the Local Plan area's special character is not eroded as it moves forward towards delivering growth. Historic England recognises the need for this future growth and that this needs to be sustainable and that the efficient use of land, which within the Plan

area's varied urban and rural places, and their different communities, creates a range of challenges and opportunities. To make the most of the opportunities that the historic environment provides, Historic England would like to actively engage with you in the production of the Plan.

One of the principal objectives of planning under the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations. Conservation means maintaining what is important about a place and improving this where it is desirable. It is not a passive exercise. It requires a Plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness. The preferred approach outlined in the consultation does not meet the requirements in the NPPF – for example it only seeks policies that seek to [only] protect heritage assets and each designated conservation area. We would expect the Plan to contain policies that in line with the NPPF and cover all aspects of the historic environment.

**Council response:** The Council notes the various documents produced by Historic England to inform Plan making. These documents have been used to inform the Local Plan approach to heritage

A Heritage Topic Paper [has been](#) prepared to inform the preparation of the Local Plan Submission Draft.

The heritage topic paper contains a historical and spatial introduction to Wirral; a description of the character of Wirral, subdivided into urban, suburban and rural/rural fringe categories, including principle characteristics; a description of the conservation areas and their contribution to the special characteristics; a description of the listing buildings as themes; a description of registered parks and gardens; a description of scheduled ancient monuments; the importance of planned settlements (Birkenhead Hamilton Square, Port Sunlight, Thornton Hough and Bromborough Pool), and the significance of the underlying characteristics.

**34. [Regarding Birkenhead Park]** The World Heritage Site (WHS) Committee firmly believes that it would be invaluable at this stage for [various] restrictive covenants to be enforced (as and when appropriate) [with reference to land adjoining Birkenhead Park]. They will provide a level of planning support which will enable the Council to prevent any future applications which undermine our claim for Outstanding Universal Value, whether in the core area or buffer zone. The revised version of the Birkenhead Park Conservation Area Appraisal and Management Plan which contains a series of important proposals for protecting the future World Heritage Site. Its recommendations include a clear reference to the restrictive covenants should be included in the draft Local Plan's Policy LP42D - Birkenhead Park Conservation Area (Heritage Asset). All three heritage sites of national/international significance (Birkenhead Park, Hamilton Square and Port Sunlight) should also be in a separate category within the Local Plan as a reflection of their strategic importance for the Council.

**Council response:** Whilst restrictive covenants may be used in the management of Birkenhead Park, they form a second tier of advice and guidance, following the overarching policies within the Local Plan. Their inclusion in the more detailed management plan provides further guidance when development proposals are assessed, as part of a comprehensive consideration.

The Conservation Areas of Birkenhead Park, Port Sunlight and Hamilton Square do have international or national significance, and the comments that this should be recognised as part of a heritage hierarchy for Wirral is noted.

**35. Statement submitted on the proposed content of a Policy for Mountwood Conservation Area.**

**Council response:** The Council has consulted with Conservation Areas Wirral on the wording of specific Conservations Policies set out in Part 5 of the Local Plan Submission Draft including Mountwood Conservation Area.

**36.** The heritage section of the Local Plan should give greater focus to identifying those conservation areas of national, even international, importance. It is suggested that the following are such nationally and internationally important conservation areas: - Birkenhead Park: the text within Policy CS42f sets out the national and international case; - Hamilton Square: policy CS42e explains its importance in that it is the largest square outside London composed of Grade I listed buildings; and - Port Sunlight: the case for the international reputation is made in Policy CS42i. Therefore, as a matter of presentation it is suggested that these three conservation areas are identified as particularly significant and should be introduced at the beginning of the listing of conservation areas with a general statement as to why they are so important. (ii) Minimising the future impact of tall buildings on Birkenhead Park If the future development of new tall buildings within sight of Birkenhead Park are likely to be a threat in harming the significance of the heritage assets there should be a separate tall buildings policy in the Local Plan. Regarding the draft Local Plan's Policy CS12 which refers to Wirral Waters, it is suggested adding within the paragraph beginning 'Detailed planning applications for each element...' an extra numbered item (after no.8) stating the following: 'ensure that the impact of any tall buildings will not cause harm to views from Birkenhead Park Conservation Area'.

**Council response:** The identification of the conservation areas at Birkenhead Park, Port Sunlight and Hamilton Square as of primary significance, and forming part of a hierarchy of heritage assets for Wirral, is noted.

The potential impact of tall buildings on the setting and views in and out of the Birkenhead Park conservation area would form part of the consideration of planning applications within Wirral Waters and elsewhere.

**Q8.18: Do you agree with the Council's approach to ensuring heritage assets are preserved or enhanced?**

**Summary of responses** - There were 252 responses to this question. Not all questions answered yes and no, and of those that answered yes that they did support the Council's approach most also added a suggestion as to how it could be approved.

1. Detailed statements were submitted by Conservation Areas Wirral setting out proposed policy changes for the following Conservation Areas: Hamilton Square Conservation Area; Thornton Hough Conservation Area; Wellington Road Conservation Area; Thurstaston Conservation Area; Bromborough Village Conservation Area; West Kirby Old Village Conservation Area; Rock Park Conservation; Caldy Conservation Area; Frankby Village Conservation; Gayton Conservation Area; Barnston Conservation Area; Bromborough Pool Conservation Area; Meols Drive Conservation Area; and Clifton Park Conservation Area.

**Council response:** The Council has subsequently consulted with Conservation Areas Wirral on the wording of specific Conservations Policies for all Conservation Areas set out in Part 5 of the Local Plan Submission Draft including those listed above

2. The oldest area for Wirral's heritage is Birkenhead Priory and Monk's Ferry. This area must be preserved from industrial and commercial intrusion and developed as a heritage bonus. Again, a current area so much overlooked.

**Council response:** The Rose Brae area and the area to the north, east and west of Birkenhead Priory will be included in future neighbourhood framework documents, and the importance of the heritage assets will form part of the underlying principles which will need to be accommodated in any future plans.

3. More should be done to protect heritage (78).

**Council response:** The protection and enhancement of our heritage assets is a key priority of the Council. The Local Plan Submission Draft contains a series of policies which reflect the significant importance which the Council gives to our heritage: Policy WS 1 The Development Strategy for the Borough (G), Policy WS 6.1. Placemaking Principles, Policy WD 2 Heritage Assets, and various conservation area policies as set out in Part 5.

4. Recent building decisions in conversation are conservations areas by WBC demonstrate the absolute lack of interest in preserving or enhancing heritage assets. Locals have no confidence in WBC making decisions other than those that benefit the profits of property developers and in planning meeting often seem to be enjoy seeing certain heritage assets undermined. Even planning consultants believe that WBC are notorious for not protecting their heritage assets and certain decisions passed that would not be passed in other borough councils. WBC decisions such as to include variations to NPPF guidelines such as making distinctions between 'essential' and 'less essential' gaps between settlements and 'connectivity to countryside' in evaluating parcels of green belt sites seems to reflect the planning consultants and local people's options. Liverpool has ensured that heritage assets have been preserved and have benefited (residents and tourists) from being proud of their past, Wirral doesn't seem to care. (1)  
This issue is of significant importance not only for Wirral, but the nation as a whole. We need to ensure that they are preserved, and not buried under a sea of concrete, just to satisfy a selfish developer. (1)

**Council response:** The protection and enhancement of our heritage assets is a key priority of the Council. The Local Plan Submission Draft contains a series of policies which reflect the significant importance which the Council gives to our heritage: Policy WS 1 The Development Strategy for the Borough (G), Policy WS 6.1. Placemaking Principles, Policy WD 2 Heritage Assets, and various conservation area policies as set out in Part 5.

5. Again not enough detail. I would like to see in Heswall more protection for sandstone walls in the Conservation areas and better protection for buildings not listed but making a special contribution to the Conservation Area. (1)  
We do not consider that the Council's approach to heritage is adequate. In particular, we do not consider that there is sufficient protection for buildings classed A and B in Heswall's Conservation Areas Management and Appraisal Plans nor for sandstone walls and trees within the conservation areas. We strongly advocate a Local Listing for non-designated heritage assets (e.g. Heswall Police Station). (82)  
Non-designated but locally significant historic features such as sandstone walling or victorian, red-brick walling should be preserved. If a historic wall is to be removed, the application should reinstate or replace with the same or similar materials or should provide a justification should as

structural survey to demonstrate why a wall may need to be removed or replaced with alternative materials. (1)

**Council response:** The Council is currently promoting a Local Listing survey, which commenced in 2021, and includes buildings both within and outside conservation areas. This will be subject to consultation, and will be monitored and reviewed. With reference to sandstone walls and trees, these are directly referenced in the policy for the conservation area, and are recognised as elements which help define its character and appearance.

6. The plan is not reflecting the approach or its heritage policy The greenbelt is part of our natural heritage and the local plan intends to destroy it. Options 2a and 2b contain beautiful landscape that is part of Wirral's natural Heritage. Appendix 4.7 table 6 lists proposed greenbelt development sites with archaeological interest and areas of special landscape yet they remain on the list. If greenbelt is used for development it will be lost forever to our children and grandchildren. I must refer again to WBC heritage policy 2014. Please adopt it

**Council response:** The Local Plan Submission Draft is based on the Council's preferred Urban Intensification option. No Green Belt release is proposed.

7. Our Client disagrees with the Council's approach and wishes to make some recommendations. Notwithstanding the apparent current lack of evidence base support for the Council's approach to how heritage is dealt with in the Local Plan outlined in our response to Q8.17, Our Client notes that the Council's Preferred Approach is to set a positive strategy for the "conservation and enjoyment" of the Borough's heritage assets through inter alias the "protection" of heritage assets and conservation areas. The Preferred Approach mentions 'conservation' and 'protection', however makes no mention of the desirability of enhancing heritage assets, as outlined in national policy and guidance. In particular, this reflects the requirements of the Framework at paragraph 185 that Local Plans should take into account "the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation". Our Client also wishes to highlight how the Local Plan policies should be worded to allow the requirements of section 16 of the Framework to be discharged in the determination of planning applications, in particular described the balanced approach to decision-making outlined at paragraphs 192 and 196. As such, Our Client recommends that draft Local Plan policies for both the Council's overarching heritage strategy and development management will need to be flexible to allow for new uses sympathetic to the assets' heritage characteristics and value as well as securing their long term survival in line with the requirements of national policy and guidance.

**Council response:** Every proposal which impacts on heritage assets is assessed for the potential to enhance or, conversely, compromise the significance of the asset, either though substantial or less than substantial harm, as outlined in the NPPF. Each application will be appraised on its individual merits.

We note that the July 2021 NPPF reference is Paragraph 190.

The reference to 'enhancement' as a key element in heritage significance is noted, and this has been incorporated as part of the overriding heritage policy WD 2.

Every proposal which impacts on heritage assets is assessed for the potential to enhance or, conversely, compromise the significance of the asset, either though substantial or less than substantial harm, as outlined in the NPPF. Each application will be appraised on its individual merits.

8. Please just ensure that planning applications are really scrutinised for demolition or building. We have lost too many old buildings since 1950's and do not want to lose any more. (1)

**Council response:** The Council is embarking on a Local Listing survey which will identify those undesignated buildings which contribute to the heritage of the Borough, and which should be retained. This will be subject to consultation and review.

9. In addition heritage should also include natural heritage eg landscape, trees, hedges, rivers, ponds which are also of wildlife importance. (1)

Please note that Heritage should also include such human-natural heritage as pre-Enclosure field systems (as cover 25% of Site 7.27 (SP060)), important hedges (Hedgerow Regulations 1997) and "notable" trees which are of cultural or nature conservation importance to the local community. An example of this is the ancient tree between Irby Hall and the Anchor PH, which features in the iconic view out from the Village across countryside to the Welsh Hills but which one Council Consultant appears to consider it acceptable to fell for an access road (although another comment is that this could create an even busier and more dangerous junction). This is not joined-up thinking. (1) Ancient field systems where they are still identifiable, longstanding hedgerows and old, notable trees should be included. (1)

**Council response:** Heritage policies are just one part of the Local Plan which deal with the historic built environment and natural environments, and many of the landscape features are also given substantial protection as part of Wirral's Green Belt. Full heritage protection is subject to legislation and guidance which only covers the historic built environment, and is limited in its capacity to deal with landscapes. Additionally, there may be some protection afforded in rural conservation areas if the hedges can be considered to fall under the guidance contained in the Hedgerow Regulations (1997).

10. Non-designated heritage assets should be given the same statutory protection as designated assets and should be treated as though they are designated. (1) A reference should be added to include one of the most significant elements of Birkenhead's townscape: The Edwardian new town extension (c1903) between Park Road North and Beckwith Street. The Council should designate this area as an area of local interest. (1) But more could be done to conserve and reuse interesting old buildings which are not necessarily designated under any heritage description (1)

**Council response:** The NPPF recognises the role played by undesignated heritage assets, and affords them some protection. However, statutory legislation means that listed buildings, conservation areas, registered parks and gardens and scheduled ancient monuments enjoy more protection than those assets which are undesignated. The Council is currently working on a local listing project, which will identify those buildings which are regarded as being especially important, but which do not possess sufficient architectural or historic merit to be included on the list.

The Council also has a duty to review areas which may warrant conservation area status, and a number of areas will be considered as potential candidates in 2022, subject to resources.

11. Nice to see the importance of the Battle of Brunanburgh acknowledged. It is one of the most important battle's in England's history. Who are the archaeologists working on it? And are historians also going to be involved as well? WBC are simply not adopting the approach which they say they wish to. Heritage has an increasingly important part to play in Tourism. Evidence that the most important battle in national history which determined the formation of England as an independent nation existed on Wirral is a revelation which WBC should exploit and adopt

as a worthy funding stream. Careful consideration should be made regarding release of Green Belt since much of the Battle site its approaches and retreats are still in Wirral's open countryside (1)

The council has not given sufficient weight to the increasing evidence that the Battle of Brunanburh was fought on the Wirral. The battle was believed to be the largest battle ever fought on English soil. The indications are that the battle was held on a battlefield that may have run from Clatterbridge to Prenton. We are extremely fortunate that much of this area is largely unbuilt. If and when the historic and scientific worlds accept that Wirral is the battle site this will be an enormous boost for the peninsula. To have built modern housing estates on the site in the meantime would be a travesty. (1)

**Council response:** The Council has commissioned a report to examine the importance of the archaeological finds by Wirral Archaeology which could be linked to Battle of Brunanburgh. The completion of this study has been delayed by the Covid Pandemic, but it is hoped to be able to publish the final report in late 2021/ early 2022. The report will inform the Council's knowledge of the potential Battle site location.

**12.** note more studies need to be completed to inform the policy and hope there will be more comprehensive policy text to guide what is acceptable and unacceptable from a decision takers point of view, in order to encourage developments in the right locations, and correctly designed to suit the receiving environment. It is paramount for the Council to have complete, and full, heritage assessments in front of it to consider as part of site appraisals, in advance of proposing Green Belt sites in the Options. (1)

**Council response:** The Local Plan Submission Draft is based on the Council's preferred Urban Intensification option. No Green Belt release is proposed. A Heritage Impact Assessment has been undertaken for all sites to inform site allocations

**13.** Port Sunlight Village Trust does not feel Wirral Council has presented proactive, strategic policies to achieve these aims for Port Sunlight or the other 25 conservation areas and submitted detailed proposed policy amendment and new policies submitted in previous question (8.17). Additionally, we are considering a bid to the tentative list for World Heritage Site inscription. The local plan should acknowledge the exceptional significance and value of the Port Sunlight conservation area and establish strategies to protect and enhance its heritage value, setting and character.

**Council response:** Noted. The exceptional significance of Port Sunlight Conservation Area is recognised and this is reflected in the Local Plan Submission Draft policies ensure that the conservation area is provided with protection, whilst also allowing for beneficial change in the surrounding area.

**14.** Comments are as per Q8.17: ITPAS (like other Groups) considers there is much more work to be done to ensure the Local Plan properly considers any possible development in the context of NPPF Section 16: 'Conserving and enhancing the historic environment'.. It is noted from the detailed policy list in Appendix 9.1 that there will be 32 policies relating to Heritage, so we will interrogate those policies in due course at the Regulation 19 stage when more information is forthcoming (if not published before then).

**Council response:** Noted

**15.** But you must put the resources, financial, enforcement and project management there to do it properly. (2)

**Council response:** The Council is committed to ensuring that it has adequate professional and financial resources available to ensure the protection and enhancement of our heritage resources. The Council will build its heritage and design skills subject to financial constraints.

**16.** The Council's Heritage Policy has not, in recent times, been given the priority and profile it needs. Our heritage contributes to our well being, our sense of place and history and puts value on the character of our built environment. This also impacts on tourism and the appeal of the Wirral peninsula. There should be a mandatory requirement to include a Heritage Assessment in all planning applications within or adjacent to Conservation Areas and designated landscape. (1) We think there is more work to be done to ensure the Local Plan properly plans for development in the context of the area's heritage assets, especially development that although not directly within, is located next to conservation areas. (1)

**Council response:** Heritage assessments, including statements of significance, are required for planning applications which have the potential to impact on the significance of heritage assets, National guidance requires that these should be proportionate to the value of the specific asset/s. In some circumstances a heritage assessment can form part of a Design and Access statement, or a separate report. The setting of heritage assets is an important consideration and national and local policies require setting to be considered in assessing planning applications if there is a potential to impact on their setting.

**17.** Was not impressed with the Storeton Hall outcome. It's made one man rich and no benefit to the people of Wirral, except the loss of green belt. Thin end of the wedge I reckon. WBC put up no defense. Of course, Wirral's heritage should be protected. People enjoy the feeling of continuity and it brings people in from outside the area. (1)

**Council response:** Development was approved at appeal by a Planning Inspector appointed by the Secretary of State. The development has already commenced.

**18.** welcome the implied commitment to update and reinvigorate the Conservation Area management plans, such as Frankby.

**Council response:** Subject to resources the Council intends to commence a review of all Conservation Area Appraisals and Management Plans in 2022.

**19.** Request that the previously proposed Noctorum Ridge conservation area, which did not progress, should be re-visited as part of the Local Plan process, and designation supported. I would be grateful if you would provide me with updates on the issues raised in the above comments. (2)

**Council response:** It is not appropriate to designate Conservation Areas through the Local Plan. The Council will consider the potential for designating a Conservation Area for the Noctorum Ridge area as part of a programme of Conservation Area Appraisal update to commence in 2022 subject to resources.

**20.** The Local Plan should also consider the role which the historic environment can play in delivering other planning objectives: Building a strong, competitive economy; Ensuring the vitality of town centres; Supporting a prosperous rural economy; Promoting sustainable transport; Supporting high quality communication infrastructure; Delivering a wide choice of

high quality; homes; Requiring good design; Protecting green belt land; Meeting the challenge of climate change, flooding and coastal change; Conserving and enhancing the natural environment; Facilitating the sustainable use of minerals. In formulating the strategy it is advisable and often necessary to consider the following factors: How the historic environment can assist in the delivery of the vision and the economic, social and environmental objectives for the plan area; How the Plan will address particular issues identified during the development of the evidence base including heritage at risk; The interrelationship between the conservation and enhancement of the historic environment and the other Plans policies and objectives; The means by which new development in conservation areas and within the setting of heritage assets might enhance or better reveal their significance; How local lists might assist in identifying and managing the conservation of non-designated heritage assets; How the archaeology of the Plan area might be managed; How CIL funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified; Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed; What implementation partners need to be identified in order to deliver the positive strategy; What indicators should be used to monitor the effectiveness of the strategy.

**Council response:** The heritage policies and the assessment of potential development opportunities within the Local Plan have the protection of heritage assets at their core. In addition, the Council has also commissioned a Culture and Heritage Strategy which will add further to the recognition of the importance of heritage assets and their management to the future of Wirral. A series of development area frameworks are also in the course of production, which integrate heritage with other important factors, and take a holistic view on how heritage interacts with other issues, so that comprehensive and cohesive strategies ensure that heritage is recognised as playing a wider role.

## Minerals

### **Q8.19: Do you have any views on our preferred approach for planning for minerals within Wirral?**

**Summary of responses** - There were 122 responses to Question 8.19.

Of those who clearly answered 'yes' or 'no', 19 did not agree (4 of which made no further comment) and 31 agreed (15 of which made no further comment). A further 66 respondents also made no specific comment or reserved the right to comment at a later stage.

21. One respondent suggested that no further extraction should be permitted. Another that it should be carefully controlled (1). Peat (2) and open space (1) should be protected and open cast mining prevented (1). With regard to oil and gas, the majority of respondents indicated that fracking, underground coal gasification and acid- injection, including any related research, exploration and extraction, should be prevented (26) or closely controlled (7), particularly in coastal, estuary or off-shore areas (5). Another respondent wanted the PEDL licence area to be shown on the Policies Map (1). With regard to minerals safeguarding, respondents requested that the status of Carr Lane Brickworks (1) and the role of port facilities (2) should be clarified. There was support for the safeguarding of the currently disused marine-won landing facility at Bromborough (1), which should be extended to include other mineral and construction-related activities, to protect them from incompatible development (1). Any approach should avoid conflicts with irreplaceable wildlife (1), the Green Agenda (1) and climate change goals (14),

particularly with regard to greenhouse gas emissions (3), carbon sequestration (2) and the impact on carbon budgets (3). Policies should take account of the most up-to-date Local Aggregates Assessment (1), the shortage of reserves across Merseyside, Greater Manchester and Warrington (1), and make more use of recycled aggregates (1).

**Council response:** Issues related to minerals are addressed in the updated Wirral Minerals Report (January 2022) and in the detailed policies set out in Part 6 of the Local Plan Submission Draft (proposed Policies WM 1 to WM 5 refer).

National planning policy (NPPF, 2021, para 210) requires planning policies to:

- a) *provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction;*
- b) *so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously;*
- c) *safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);*
- d) *set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;*
- e) *safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;*
- f) *set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;*
- g) *when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and*
- h) *ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place.*

## Waste Management

### **Q8.20: Do you have any views on our preferred approach for planning for waste within Wirral as part of a wider City Region partnership?**

1. Wirral should continue to work within a City Region partnership with regards to planning for the collection and management of waste (158) and look for new opportunities (1). A single recycling strategy for the Combined Authority would be useful for all residents. (1) However, any partnership approach should aim to protect Wirral's environment (158). The main priority of any policy should be on protecting the environment (3), as current policy has damaged the environment (3).

**Council response:** Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.

2. There is a lack of effective recycling in Wirral and it has a poor performance compared to other LAs (5). There is concern that recycling rates are inadequate, and have fallen below 40% (10).

**Council response:** Policy WW 1 Waste Management of the Local Plan Submission Draft seeks to improve recycling. Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.

3. An improved and fit for purpose strategy is required – there is a need to widen the scope and range of household recyclables (6) and develop a greater target for recycling to prevent rubbish being unsustainably sent to landfill (6). Wirral should look elsewhere for good examples, such as Cheshire (1) and Sweden (1).

**Council response:** Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.

4. For example, a greater scope and improved retrieval rates for the recycling of plastics will reduce the volume of rubbish being sent to landfill (4). There is greater clarity needed on what can and cannot be recycled – a standard approach should be taken for alignment with the strategies of other authorities (5). Effective enforcement on businesses and households (2) would also help to improve rates of recycling.

**Council response:** Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.

5. There is a need for local facilities to process (biomass) garden and food waste, such as a local composting or digestion facility, to facilitate the easy collection and removal of (biomass) plant and food waste (12). The use of a waste to energy plant was proposed (1), however there is objection to biomass energy plants that may create carbon release (1).

**Council response:** Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.

6. There is a proliferation of wheelie bins (2) which are an eyesore (1), and Eurobins should be used in high density residential developments (1).

**Council response:** Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.

7. In addition to improving local waste management and recycling (proximity principle), there should be an effort to reduce and reuse waste production at the source, (16) promoting reduce reused recycle as part of developments (9), as well as financial incentives for business (1), rather than sending waste to landfill. Plans and policies should support the waste hierarchy (2).

**Council response:** Policy WW 1 Waste Management of the Local Plan Submission Draft seeks to improve recycling. Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.

## 9. Detailed Local Plan Policies

### Q9.1: Do you have any comments on any of the detailed policy subjects?

**Summary** - There were a total of 223 responses

1. Appendix 9.1 provides a list of those policies which may be included within the plan but no detail is provided at this stage. We reserve the right to comment once we see the Council's final policies (5)

**Council response:** Noted.

2. Ensure new development and existing housing stock is designed, insulated or retrofitted for the climate emergency. Adopt the housing space standard. All new development to be net zero carbon by 2030 at the latest. Council led developments to reach passivhaus/BREEAM Outstanding standards. (7)

**Council response:** Climate change mitigation and adaptation design requirements are set out in Policy WS 8.2 Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage and housing space standards in Policy WS 3.1 Housing Design Standards.

3. The questions contained within the Local plan are misguided and complicated to many, many residents. They are/will be acceptable to developers. This is not a fair and proper way to conduct a questionnaire. (80)

**Council response:** Please see response to Q10.1.

4. Policy LP10 should incorporate Design Guides such as the present Gayton Guidelines in the UDP otherwise there would be a significant gap in the protection afforded pending the introduction of Supplementary Planning Documents. This questionnaire is not an appropriate way to get proper resident feedback on such an important document.

**Council response:** The Local Plan Submission Draft provides for the preparation of Design Guide SPD for the Borough which will address detailed design matters.

Please see response to Q10.1.

5. Without knowing the details of the policies being proposed it is difficult to comment on them in any significant manner. We do not disagree with the types of policies being proposed however we would welcome the opportunity to comment on them when they have been substantiated as part of the draft Local Plan. (5)

**Council response:** Noted

6. We have serious concerns that the new Local Plan does not sufficiently take into account strategic Port interests. Whilst it is acknowledged that, for various reasons, the Issues and Options report focuses to a large extent on housing land, it is very important not to lose sight of Port interests at this stage otherwise they are likely to be lost as the Local Plan progresses. There is a requirement for a specific port policy (as per previous Wirral UDP and the neighbouring City Region Local Plans for Liverpool and Sefton), which must also link with the designation/allocation of operational port land with any future Proposals Map, to ensure that the strategic importance of port interests, including the ability to promote further growth, is properly taken into account in the emerging Local Plan.

**Council response:** Noted the Council has subsequently discussed this matter with Peel Ports. Local Plan Submission Draft Policy WS 4.3 The Ports deals with this important matter.

7. There is no reference to a Rural Exception Sites Policy. Such sites are supported by paragraph 77 of the NPPF as means by which to deliver affordable in rural area. In view of the Green Belt constraints across the Borough, rural exception sites can play a key role in delivering affordable housing on sites adjacent to sustainable towns and villages, particularly given that the emerging Local Plan is not proposing to meet the full affordable housing needs of the Borough as identified in the SHMA (705 dwellings per annum). Rural exception sites can help to meet some of this residual need and are a valuable ‘tool.’

**Council response:** It is noted that the July 2021 NPPF contains this matter at Paragraph 78, and that the most recent SHMA (2021) indicates a different level of need to that cited. Nonetheless the Council does not seek to include a Rural Exception sites policy because it has not identified any sites within the green belt for development. This includes rural exception sites. If presented with proposals the council will deal with the matter using the Local Plan policies and within national policy which notes that the council should be responsive to local circumstances

8. Although the list of policy subjects appears comprehensive, ITPAS joins others in wishing to see a policy for ‘Brownfield and Urban Regeneration’. We think a detailed policy on this topic should be a trajectory for performance monitoring of the Birkenhead Regeneration Strategy, and would give more certainty to the Council’s rhetoric on Regeneration, which currently is not being matched by either their approach or actions.

**Council response:** Part 3 of the Local Plan Submission Draft sets out a comprehensive series of policies for Regeneration and brownfield development.

9. Each section of the Local Plan should start with a policy reference on climate change and the Environmental Emergency, stating that all decisions and developments will aim to mitigate climate change and adapt to it, and protect and enhance the natural environment. 12,000+ new homes will cause enormous damage.

**Council response:** The Local Plan Submission Draft emphasises the importance of addressing climate change. Strategic Policies 1, 4 and 6 deal with climate change whilst the following policies are relevant:

Policy WS 6.1 Placemaking Principles, Policy WS 8 Strategy for renewable and low carbon energy and Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management.

Please also see response to Q2.1 regarding housing numbers.

#### **Q9.2: Are there any additional detailed development management policies you suggest are included?**

**Summary** - There were a total of 108 responses.

1. Development management policies should be done on an accurate and proportionate basis. Wirral's Compendium of Statistics proves this plan is NOT [Sound]. (107) Housing numbers are too high (4)

**Council response:** Please see response to Q2.1. The Local Plan Submission Draft Policies are based on a wide range of up to date evidence studies.

2. Include a policy in regard to "Flexible Commercial Uses" which cross-refers to areas shown on the Proposals Map. The policy should identify the types of commercial uses which would be supported on each site, with further text to clarify alternate uses that may be suitable subject to cross-reference to other Plan policies. Include a policy or explanatory text that refers to existing Retail Warehouse Parks and cross-refers to areas shown on the Proposals Map. This should set out the types of use that might be suitable.

**Council response:** The draft Wirral and Employment Land Premises Study 2021 assesses anticipated demand for employment land over the plan period, including use classes and identifies a need for B2/B8 uses. Policy WS 1.2 Employment, Policy WS 4 Strategy for Economy and Employment and site specific policies set out supported use classes.

3. Include a water efficiency policy to ensure the delivery of sustainable development is fully considered in the design of new development and to take the long-term implications for water supply in the borough into account.

**Council response:** Water efficiency policy requirements are set out in Policy WS 3.1 Housing Design Standards.

4. The Council should have proper regard for air quality and has failed to do this in the Local Plan.

**Council response:** Maintaining good air quality is a priority for the Council and is reflected in policies from Local Plan Submission Draft regarding the distribution of development, support for low carbon travel and sensitive design principles. Air quality in the Borough is monitored to ensure the concentrations meet national air quality objectives regarding pollutant levels.

5. Include a policy on health infrastructure.

**Council response:** The Infrastructure Delivery Plan will set out all appropriate infrastructure required to meet development needs. The IDP sits along the Local Plan, which sets out policy requirements for infrastructure in development proposals and the protection of infrastructure in Policy WS 10 Infrastructure Delivery.

6. Include a biosecurity strategy within the Local Plan to help ensure robust implementation of biosecurity protocols for any development, and help preserve the local native environment.

**Council response:** While the plan does not directly address biosecurity, the Plan recognises that control over species mix is necessary to prevent invasive or exotic species that pose a threat to other wildlife (Landscaping paragraph 6.5) and policy WD 1 Landscaping states that development should include an arboriculture assessment with information regarding species mix, and plant and tree selection should conform to the latest British Standard and sourced from UK or Northern Ireland.

7. Creating and encouraging Local Street Communities to monitor and recommend improvements in their local community area should improve local residential and commercial engagement with the Council and its Stakeholders

**Council response:** This is not a local plan matter.

8. Parks and Open Spaces Strategy should be included (3)

**Council response:** The Local Plan Submission Draft has been informed by the preparation of a Playing Pitch Strategy and Open Space Study.

**9.** Policy CS16 (Criteria for Port-Related Development) would be a good starting point for any future port related policies. The policy should also:

- require port related proposals should only meet each objective where applicable;
- define the Strategic Freight network;
- contribute to the reduction in greenhouse gas emissions where feasible; and
- recommend not require assistance in enhancing access to jobs for local residents.

**Council response:** Policy WS 4.3 The Port and Maritime Zone of Local Plan Submission Draft sets out policy requirements for port related proposals, including contributing to reductions in greenhouse gas emissions. The policy encourages the provision of sustainable transport access to ports. Supporting text to Policy WS 4.3 discusses freight from the Port of Liverpool.

**10.** Subject to further discussions with Wirral Council, please see below a proposed Port-related Policy LP16 for inclusion within the emerging Wirral Local Plan. This has evolved from the previous Wirral UDP Policy EM10 and drawing upon port policies included within Sefton Council's adopted Local Plan and Liverpool City Council's Draft Local Plan *Policy LP16 – Criteria for port-related development* Proposals to continue the sustainable development/redevelopment of the Ports will be supported. In particular, port-related development proposals and improvements to the sustainability of freight and passenger access to ports, including road, rail and water transport, will be supported. Within the operational dock areas at Birkenhead and Eastham as defined upon the Proposals Map, development proposals beyond the permitted development rights of the Mersey Docks and Harbour Company or the Manchester Ship Canal Company will be subject to relevant policies in this Plan. Particular regard will be had to the extent to which proposals will utilize the port and / or associated rail facilities. Port and marine-related development requiring approval from the Local Planning Authority will be permitted within the existing Dock Estates at Birkenhead and Eastham; at Twelve Quays; along the Tranmere waterfront at Cammell Lairds; and along the Bromborough Coast; where the proposals will: Comply with other relevant policies in the Local Plan; Include measures to address potential environmental issues raised by expansion of the Ports, including; Impact on the natural, historic and built environment, nationally and internationally important sites and buildings; and The amenity of neighbouring users, including cross-river.

**Council response:** Noted the Council has subsequently discussed this matter with Peel Ports. Local Plan Submission Draft Policy WS 4.3 The Ports deals with this important matter.

**11.** The Environment Agency recommends the following policy is included in regards to groundwater protection: "New development within Groundwater Source Protection Zones will be expected to conform to the following:

- Careful masterplanning to mitigate the risk of pollution to public water supply and the water environment.
- A quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection.
- Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters."

**Council response:** The policy wording recommendations have been incorporated into Policy WD 14 Pollution and Risk, paragraph E, of the Local Plan Submission Draft for development proposals within Groundwater Source Protection Zones.

- 12.** United Utilities recommends a separate planning policy setting out Surface Water Management, sustainable drainage methods and outlining a hierarchy of drainage options for surface water.

**Council response:** The policy wording recommendations to reduce surface water discharge have been incorporated into Policy WD 4.3 Sustainable Drainage Systems (SuDS) and Natural Flood Management of the Local Plan Submission Draft.

- 13.** We wish to see a policy for brownfield regeneration. We think a detailed policy on this topic should include a trajectory for performance monitoring of the Birkenhead Regeneration Strategy.

**Council response:** Part 3 and Policy WS 1 The Development Strategy for Wirral 2021 – 2037 and various policies set out in Part 4 of the Local Plan Submission Draft deal with brownfield development.

- 14.** There should be a dedicated policy on Landscape Character protection as there appears to be no detailed policy, even though it is referred to within Strategic Objective 8 and elsewhere.

**Council response:** Policy 5.7 Landscape Character of the Local Plan Submission Draft deals with this matter.

- 15.** There is no policy in relation to ‘Safeguarded Land.’ We believe that Option 2A should be pursued by the Council within its draft Local Plan. However, should it continue to advance its preferred approach (notwithstanding our objections), as a very minimum the Council should identify ‘Safeguarded Land’ consistent with paragraph 139 (c and d) of the NPPF.

**Council response:** The Local Plan Submission Draft is based on the Council’s preferred urban intensification option and no green belt sites have been promoted for development.

- 16.** Including a policy guiding planning applications on previously developed land in the Green Belt.

**Council response:** The Local Plan Submission Draft is based on the Council’s preferred urban intensification option and no green belt sites have been promoted for development.

**Q9.3: Are there any of the detailed development management Local Plan policies you do not think are needed in the Wirral Local Plan**

**Summary** - There were a total of 93 comments submitted.

1. We do not need or want 12,000 properties. A more realistic figure is set out in the 2019 Compendium of Statistics (87).

**Council response:** See response to Q2.1

2. Introduce a workplace car parking levy and/or similar initiative to fund sustainable transport. Use legal and planning mechanisms such as Section 106 agreements.

**Council response:** The Council is currently developing a new Parking Strategy for the borough which is considering options available. Appendix 10 Developer Contributions sets out how the council will secure money from development for infrastructure requirements.

3. Community Infrastructure Levy and other mechanisms to fund climate actions and nature restoration projects.

**Council response:** The Council will not be proposing to introduce a Community Infrastructure Charging Schedule as part of the Local Plan. However, the Local Plan Submission Draft does deal with this matter (Policy WD3 Biodiversity and Geodiversity).

4. Implement licensing of the private rented sector to cover the enforcement costs of ensuring compliance with minimum [standards].

**Council response:** This is not a matter for the Local Plan.

## 10. Other Comments or Questions

### Q10.1: What section or subject would you like to make a comment on?

1. General objection to the Local Plan (1). The Local Plan lacks a strong vision (2). Extend the Plan period (4) to 2036 (5), to 2040 (3).

**Council response:** Noted. The Plan period is 2021-2037.

2. Public consultation was insufficient/confusing/impacted by COVID-19 and should be postponed (78).

**Council response:** Feedback on the Regulation 18 Consultation will be considered for future consultations. The Council implemented alternative temporary community involvement measures during Covid-19 restrictions.

3. The housing requirement is too high/flawed (171). Provide evidence for the housing requirement (9).

**Council response:** The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (2021) including the latest economic forecasts for the City Region.

4. Support urban intensification (262). Urban intensification is unviable (1). Do not support Green Belt release (373), including Parcel 6.15 (11), Parcel 7.25 (1), Parcel 7.27 (3), Parcel 7.4 (1), Parcel 7.5 (2), SP043 (1), SP061 (2), SP062 (2), SP063 (1), SP064 (1), SP065 (1), SHLAA 2050 (1), land north of Saughall Massie (2), south of Grange Road, West Kirby (1), land of the demolished Higher Farm, Prenton Dell Road (1) and in Greasby (1). Disagree with the methodology and findings of the Green Belt review (4). Support Green Belt release (8), where it is infill development (1). Green Belt release should be a last resort (1) and tightly managed by the Council (1). Spatial option 2A would produce fewer impacts on traffic than spatial option 2B (79).

**Council response:** Noted. The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.

5. Site specific comments included:

Site specific comment:	Council Response:
Protect the playing field used by St Bridget's Primary School (1), Rectory Road Field (2).	Both these sites are proposed to be designated as Local Green Space in the Local Plan Submission Draft (LGS-SA6.4 and LGS-SA6.2 refer).
Do not support development of the greenfield land near the Upton Fire Station, the triangular piece of land between Upton Road and Arrowe	The site does not meet the criteria for designation as a Local Green Space and is proposed to be designated as part of a

Park Road (A551) which is used for pedestrians (3)	Primarily Residential Area in the Local Plan Submission Draft.
Do not support development at Acre Lane School and playing fields (1)	Noted but the site now under construction for 217 dwellings.
Noctorum Field (2)	The site is identified for protection in the Playing Pitch Strategy 2021 and is proposed to be designated as a Local Green Space (LGS-SA3.3 refers).
Support residential development of Paulsfield Drive Woodland (1).	The site is designated in the Local Plan Submission Draft as open space (OS-SA5.9) and as Local Wildlife Site (LWS-SA5.1) and is not suitable for development.

6. Query whether Green Belt sites on Maps B and C in appendix 4.7 are being considered for Green Belt release (1). Query as to why the road sign on Column Road adjoining the fields was changed from 'West Kirby' to 'Newton' (1). Query regarding the status of the proposed golf course in Hoylake (1). Query regarding the status of the management plan for the Magazines (1).

**Council response:** The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development. The Hoylake Golf Resort proposals are not being pursued. It is the Council's intention to commence a review and update of existing Conservation Areas in 2022.

7. Build affordable homes (4) and homes for first time buyers (1). Permit Compulsory Purchase of vacant land (2). Convert empty retail premises to other uses (1). Bring empty properties back into use (1). Produce development briefs for sites being developed in Birkenhead (1). Developers should fund the remediation of brownfield sites (1).

**Council response:** New housing development will need to meet the requirements for affordable housing as set out in Policy WS 3.3 Affordable Housing Requirements, this includes the delivery of First Homes. Compulsory purchase is a regulated process for when all other avenues have been exhausted, for which funding is not currently available outside approved regeneration or priority areas. The Local Plan housing supply includes an empty dwellings allowance. Detailed neighbourhood frameworks or masterplans have been completed for a number of brownfield sites and the Draft Birkenhead 2040 Framework sets out a comprehensive strategy for the regeneration of Birkenhead. The Council is working with Homes England and the LCR CA to win additional public funding to deliver regeneration.

8. Have regard to the sequential test for retail (1).

**Council response:** As per Policy WS 11.3, development proposals for edge of or out of centre uses will only be permitted where no sites are available within or on the edge of centres in line with the sequential test.

9. New development will worsen air pollution (5). Standing traffic exhaust at the Brimstage Road and Storeton Lane Junction has not been identified (82). LED street lighting has negative effects including light pollution and impacts on human and animal sleep patterns (1). The proposed level of housing will increase traffic levels to unsustainable proportions (84). Support sustainable transport (7), increase public transport (2). Do not increase traffic on the A552 from Junction 3 of M53 (1). Provide cycle storage/parking (2). Complete the Brimstage by-pass (1). Require developers to provide funding towards mitigation measures at level crossings (1). Increase

wheelchair accessibility in public transportation (1). There is too much traffic on Westminster Drive, Bromborough (2). Provide adequate infrastructure to meet increased housing (84), support/provide sports and culture facilities (2).

**Council response:** Securing sustainable travel and reducing the need to travel and reliance on private cars is a Strategic Objective of the Local Plan. Under the Council's Strategy for Transport, Policy WS 9.2, development proposals should provide access to existing or planned sustainable travel options and infrastructure projects to reduce private car usage.

The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.

Street lighting is not a matter for the Local Plan. Street Lighting mounting heights and spacing are compliant in accordance with the recommendations contained within BS 5489-1:2020. Furthermore, all LED Street Lights currently installed across Wirral fully complies with Photobiological Safety and Optical Hazard Assessment to test standards IEC 62471:2006, EN 62471:2008 and with BS EN 60598-2-3 Particular requirements — Luminaires for road and street lighting.

**10.** Protect natural and heritage assets (7). Protect Bromborough Village Conservation Area (1). Improve the public realm in Conservation Areas (1). New development should be sympathetic to heritage assets (1). Consider an attraction in the Wirral similar to the Eden Project (1). Manage the Dee estuary upstream from Caldy and Thurstaston (1). Maintain country parks (1). Protect green spaces/green infrastructure (2). The social housing block on Mark Rake Street threatens trees with TPO status (2). Increase planting (3), biodiversity (1) and green infrastructure (9). Include greenery in new developments (1).

**Council response:** The Local Plan Submission Draft contains a series of policies for the protection and enhancement of the Borough's historic environment: Policy WS 1 The Development Strategy for the Borough (G), Policy WS 6.1 Placemaking Principles, Policy WD 2 Heritage Assets, and various conservation area policies as set out in Part 5. Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection which includes provision for biodiversity net gain for all new development. Tree planting will be addressed as part of the Council's tree planting strategy and emerging open space improvement strategy.

**11.** Address the climate emergency (12). Ensure the amenity of existing dwellings is not adversely affected by new development (1). Install electric charging points, solar panels (2). Development on Green Belt land is at risk of flooding (2), including at Greenhouse Farm (1). Consider land drainage with Green Belt release (1).

**Council response:** The Council's commitment to net zero carbon locally by 2041 is acknowledged through the Wirral Council Environment and Climate Emergency Policy Statement (2021). No green belt land is proposed for development.

**12.** Designate the following sites as Local Green Space: The Dales/Cleaver Heath, The Telegraph Road/Thurstaston Road triangle, Feather Lane Woods, The Puddydale, Whitfield Common, The library/Bowling Green area, Hill House Gardens, Dawstone Park including the War Memorial, The Beacons, Heswall Pinewoods North, Heswall Pinewoods South, The area by the Roman Catholic Church, Heswall (1).

**Council response:** See Q8.10.

**13.** Secure sustainable waste management (8). Reduce littering (2).

**Council response:** Waste management is addressed in Policy WW1. The sustainable waste management plan for the Wirral and wider Merseyside region and Halton is covered in the Joint Waste Local Plan for Merseyside and Halton (2013) and Resources Merseyside 2011-2041.

**14.** Meet the Duty to Cooperate (7). Cheshire West and Chester Council support the acknowledgement in the Local Plan that the CWaC cannot meet any of Wirral Council's unmet needs (1). A strategic approach may be required to address historic environment issues (1).

**Council response:** The Council is engaging with neighbouring authorities, statutory bodies, developers and infrastructure providers for strategic issues as part of the Duty to Cooperate process. The Local Plan and its evidence base has been developed in co-operation with partner authorities from across the Liverpool City Region and Duty to Cooperate bodies.

**15.** Refer to the Draft North West Marine Plan (1).

**Council response:** The North West Marine Plan is referenced in supporting text in the Local Plan Submission Draft.

**16.** Page 19 in the Study of Agricultural Economy and Land in Wirral incorrectly references site SP033 instead of SP030 (1).

**Council response:** Noted.

**17.** Do not work with organisations based in tax haven countries, such as Peel Group (3). Reinstate all libraries (1). Ban the herbicide Glyphosate (1). Council should use digital technology (1). End outsourcing of Council services (6). Allow Council employees to continue working from home (3). Increase police presence (2).

**Council response:** These matters are outside the scope of the Local Plan.

## Appendix 5: Key issues raised and Council response

Issues raised across all sections	Council Response	Chapters / Questions referenced
Support brownfield development/urban intensification/regeneration.	The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Borough's development needs through the development of brownfield land within existing urban areas.	Q2.3, Q2.4, Q2.5, Q2.6, Q2.7, Q2.8, Q2.10, Q2.12, Q2.13, Q2.14, Q2.15, Q2.16, Q2.17, Q3.1, Q3.2, Q3.3, Q4.1, Q4.2, Q4.5, Q4.6, Q4.7, Q4.10, Q4.11, Q4.14, Q4.18, Q4.19, Q4.20, Q6.1, Q6.8, Q7.3, Q7.5, Q8.1, Q8.3, Q8.11, Q9.1, Q9.2, Q10.1,
Oppose urban intensification / densification	The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Borough's development needs through the development of brownfield land within existing urban areas.	Q4.10, Q4.18, Q10.1
Open spaces and parks should be protected / enhanced / provided	Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection. The Local Plan Submission Draft is based on the Council's preferred urban intensification option.	Q2.8, Q2.15, Q2.9, Q3.2, Q4.5, Q4.8, Q4.12, Q4.15, Q4.18, Q6.4, Q6.5, Q7.1, Q7.2, Q7.3, Q7.4, Q7.5, Q8.1, Q8.2, Q8.6, Q8.7, Q8.8, Q8.11, Q8.15, Q8.16, Q8.19
Support Green Belt development - to meet housing needs and general employment land needs	The Local Plan Submission Draft does not promote Green Belt development.	Q2.4, Q2.5, Q2.10, Q2.12, Q2.13, Q2.16, Q4.1, Q4.2, Q4.5, Q4.6, Q4.10, Q4.14, Q4.18, Q4.19, Q4.20, Q5.3a, Q6.1, Q6.3, Q8.6, Q10.1

<p>Oppose Green Belt development. Site specific issues were raised for a number of Green Belt sites. Recurring issues raised include: flood risk, loss of agricultural land, impact to wildlife and wildlife habitats, proximity to green and blue infrastructure, preventing sprawl and coalescence, loss of character and identity.</p>	<p>The Local Plan Submission Draft does not promote Green Belt development.</p>	<p>Q2.2, Q2.3, Q2.4, Q2.5, Q2.6, Q2.7, Q2.8, Q2.11, Q2.12, Q2.13, Q2.14, Q2.16, Q3.1, Q3.2, Q3.3, Q4.1, Q4.2, Q4.3, Q4.5, Q4.7, Q4.9, Q4.10, Q4.13, Q4.14, Q4.18, Q4.19, Q4.20, Q5.6, Q5.7, Q6.1, Q6.4, Q6.11, Q7.2, Q7.3, Q7.5, Q8.1, Q8.3, Q8.4, Q8.6, Q8.7, Q8.11, Q.12, Q.13, Q8.14, Q8.15, Q8.17, Q8.18, Q10.1</p>
<p>The housing requirement is too high and should be lower. The standard methodology is inaccurate and proposed alternative methodologies for calculating the housing requirement figure should be used. This would prevent the need for green belt release. Most respondents felt that the housing requirement is too high and with the levels being unproven, stating that the standard method is flawed, uses old data and is not mandatory. Respondents felt that Wirral is not an area of high housing pressure. Further assessment that includes levels of homelessness, local evidence, Brexit, COVID-19 and climate change factors is needed.</p>	<p>The Borough's housing needs have been re-assessed in the finalised and independently verified Strategic Housing Market Assessment (SHMA) 2021 including the latest economic forecasts for the City Region. The Council has applied the standard method in accordance with national policy and guidance, which requires the continued use of the older 2014-based household projections. The calculations have been independently verified in the revised Strategic Housing Market Assessment 2021 (Document H1A). The appropriateness of an alternative calculation, has been addressed in two reports by Liverpool University.</p>	<p>Q2.1, Q2.2, Q2.3, Q2.7, Q2.8, Q2.10, Q2.12, Q2.13, Q2.15, Q2.17, Q3.1, Q3.3, Q4.1, Q4.5, Q4.7, Q4.10, Q4.13, Q4.14, Q4.18, Q4.19, Q4.20, Q5.1a, Q6.1, Q7.5, Q8.1, Q8.2,Q8.3, Q8.17, Q10.1</p>

<p>The housing requirement is too low/should be greater. A smaller number of respondents felt that the housing requirement is too low, and the issues raised in the SHMA can only be addressed by a higher figure - 960 pa was suggested to reflect previous under-delivery.</p> <p>Demographic modelling to reflect growth aspirations indicate a need for between 1,045 dpa and 1,300 dpa. It was argued that the standard method is a minimum requirement and further assessment is needed, which takes into account growth strategies, affordable housing needs and strategic infrastructure impacts.</p>	<p>The Council has applied the standard method in accordance with national policy and guidance. The Strategic Housing Market Assessment 2021 (Document H1A) assesses the components of local housing need and has been updated to take account of relevant Regulation 18 responses. The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (SHMA) 2021 including the latest economic forecasts for the City Region. The Local Plan Submission Draft Policies are based on a wide range of up-to-date evidence studies.</p>	Q2.1
<p>Potential exceptional circumstances for a deviation from the standard methodology indicating a lower housing requirement include Green Belt protection, lower population than projected, low housing need and low economic growth.</p>	<p>The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (SHMA) 2021 including the latest economic forecasts for the City Region. The Local Plan Submission Draft does not promote Green Belt development.</p>	Q2.2
<p>Potential exceptional circumstances for a deviation / uplift from the standard methodology indicating a higher housing requirement include Wirral's high affordable housing need identified in the SHMA and the need for additional development to support economic growth and WLP employment land delivery. There is a need to encourage higher levels of net inward migration amongst economically active age groups. Housing delivery has been suppressed due to a lack of sites and new</p>	<p>The Borough's housing needs have been re-assessed in the finalised SHMA 2021 including the latest economic forecasts for the City Region.</p>	Q2.2

deliverable sites if it is to avoid failing the HDT altogether in the years ahead.		
Alternative approaches to calculating the housing requirement figure include different ONS data, Council statistics, population figures reflective of actual trends and reassessed housing need for a lower/higher figure.	The Borough's housing needs have been re-assessed in the finalised SHMA 2021 including the latest economic forecasts for the City Region. The appropriateness of alternative calculations has been addressed in the reports by Liverpool University.	Q2.3
Flawed / Lack of evidence base to support policy - retail evidence base is out of date (Retail and Centres Study), Density Study, Green Belt Review	Studies were completed in line with national policy and guidance. Some studies have been updated to reflect more recent data.	Q2.1, Q2.3, Q2.5, Q2.7, Q2.8, Q2.10, Q2.12, Q2.13, Q2.16, Q2.17, Q3.1, Q3.2, Q4.1, Q4.2, Q4.3, Q4.5, Q4.9, Q4.12, Q4.13, Q4.15, Q4.16, Q4.17, Q4.18, Q4.19, Q4.20, Q4.1a, Q5.1, Q5.3, Q6.1, Q6.7, Q6.9, Q7.1, Q7.5, Q8.4, Q8.18, Q10.1
Impact of requirements/policy on site viability/deliverability	Viability of policies has been assessed in the Whole Plan Viability Assessment	Q2.2, Q2.8, Q2.12, Q2.13, Q2.15, Q4.3, Q4.5, Q4.15, Q5.1, Q5.2, Q7.1, Q7.2, Q7.3, Q7.4, Q7.5, Q8.1, Q8.2, Q8.3 Q8.4 Q8.7, Q8.11, Q8.14, Q8.15, Q8.17, Q10.1
Lack of supporting infrastructure to support new development / need for infrastructure improvement	The Infrastructure Delivery plan will set out all appropriate infrastructure required to support the delivery of new development.	Q2.2, Q2.4, Q2.5, Q2.6, Q2.8, Q2.12, Q2.13, Q2.15, Q2.16, Q2.17, Q3.1, Q3.2, Q3.3, Q4.1, Q4.2, Q4.3, Q4.5, Q4.8, Q4.10, Q4.14, Q4.15, Q4.16, Q4.17, Q4.18, Q4.19, Q6.1, Q6.5, Q7.1,

		Q7.2, Q7.3, Q7.5, Q8.1, Q8.3, Q8.16, Q10.1
Development / policies would / should not impact on the character or identity of areas / the Borough / maintain character and identity. This should be protected / enhanced.	The Local Plan Submission Draft includes relevant criteria in a wide range of policies for example in Policy WS 6 Place Making for Wirral, Policy WS 7 Principles for Design, Policy WS 3.2 Housing Density, in policies for individual land allocations in Part 4 and Part 5 and in the detailed policies in Part 6.	Q2.4, Q2.8, Q2.9, Q2.16, Q3.1, Q3.2, Q3.3, Q4.2, Q4.3, Q4.4, Q4.5, Q4.12, Q4.15, Q4.16, Q4.17, Q4.18, Q5.8, Q6.8, Q8.1, Q8.11, Q8.14, Q8.17, Q8.18, Q9.2
Impact of approach / policy on wildlife / biodiversity / environment / green and blue infrastructure	Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection which includes provision for biodiversity net gain for all new development and sets out a number of policies to protect and enhance important ecological sites and networks. Part 6 of the Local Plan Submission Draft includes detailed policies for landscaping (Policy WD1), heritage assets (Policy WD 2) and biodiversity and geodiversity (Policy WD 3).	Q2.2, Q2.7, Q2.8, Q2.15, Q2.16, Q3.2, Q3.3, Q4.1, Q4.2, Q4.5, Q4.8, Q4.12, Q4.14, Q4.17, Q4.18, Q6.1?, Q6.2, Q6.4, Q7.1, Q7.2, Q7.3, Q7.4, Q8.1, Q8.2, Q8.3, Q8.4, Q8.5, Q8.11, Q8.14, Q8.20, Q9.2, Q10.1
Policy / approach must address, protect, or mitigate against climate change / emergency	The Local Plan supports Wirral Council Environment and Climate Emergency Policy Statement 2021 and measures to mitigate and adapt to climate change are threaded throughout the plan, addressed at a range of geographical scales and	Q2.1, Q2.2, Q2.7, Q2.8, Q2.15, Q2.17, Q3.1, Q3.2, Q3.3, Q4.3, Q4.5, Q4.12, Q4.15, Q4.17, Q6.8, Q7.1, Q7.2, Q7.3, Q7.5, Q8.1, Q8.19, Q8.2, Q8.3, Q8.6, Q.13, Q8.15, Q9.1, Q10.1

	<p>policy actions. This is explained on page 1 of the plan.</p>	
Vacant properties in the Borough should be brought back into use	<p>A separate allowance for the return of empty homes has been included in the Local Plan Submission Draft, based on the performance of a funded programme which has operated since April 2011 and a tapered delivery under Option 3. Further information is available in the Housing Delivery Strategy that accompanies the Submission Plan.</p>	Q2.3, Q2.8, Q2.15, Q3.2, Q3.3, Q4.1, Q4.7, Q4.20, Q5.4, Q5.5, Q6.11, Q10.1
<b>2. Context and Evidence</b>		
Support was expressed for the proposed settlement hierarchy, for focused investment and regeneration in the Urban Conurbation and benefits to the climate through local employment opportunities. Specific recommendations were made for designations to the Settlement Hierarchy, particularly the urban settlement category.	Support noted	Q2.4
The Settlement Hierarchy approach has no basis in planning policy and guidance, and disregards local character. It enables unnecessary development. Smaller townships should be designated individually.	Policy WS 6 addresses requires development proposals to adhere to placemaking principles and respond to the local context and character of areas.	Q2.5

<p>Reasons for opposing the past completions approach to calculating employment land need included current market conditions, COVID-19, Brexit and a shifting economy, as well as a lack of investment interest in the Wirral.</p>	<p>The Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance. The Wirral Employment Land and Premises Study (2021) uses three scenarios to calculate the need for employment land: Market Capacity Scenario, Workforce Capacity Scenario and the Economic Capacity Impact Scenario. The Local Plan Submission Draft discounts all but the Economic Capacity Impact Scenario.</p>	Q2.6
<p>The employment land need figure is too high - employment land and housing targets are fundamentally misaligned. Employment land growth at 80 ha is almost double the amount that can be sustained by 6,900 jobs annually and this could not be sustainably accommodated within the borough.</p>	<p>The draft Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.</p>	Q2.6, Q2.17
<p>The redesignation of surplus employment land for alternative uses was supported, including surplus retail land, where high design standards and green and open spaces are provided for. Suggested alternatives included rewilding. Some respondents felt that surplus employment land should be retained, or is not required as there are sufficient sites for residential uses and other brownfield development should be prioritised instead.</p>	<p>The Council support appropriate alternative uses within employment areas. Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection. The Local Plan Submission Draft is based on the Council's preferred urban intensification option.</p>	Q2.7

<p>Higher densities would be acceptable where needed on a cautionary case-by-case basis, where schemes; are designed well and inclusively based on best practice; accessible to public transport; protect and enhance the environment (EV charging, low carbon, positive biodiversity net gain), green belt, and heritage; provide for play and open spaces.</p>	<p>Areas where higher densities are likely to be appropriate, based on their character, location and access to services are shown on the Local Plan Submission Draft Policies Map.</p>	Q2.8
<p>Reasons for opposition to higher densities included the inability of standardised proposals of higher densities to remain viable while providing for amenities and retaining character and good design / attractiveness, and the lack of local need for increased densities.</p>	<p>The densities set out in Local Plan Policy WS 3.2 are a starting point and will allow site-specific circumstances and local character to be taken into consideration. Policy WS 6 requires development proposals to adhere to placemaking principles and respond to the local context and character of areas. The Plan wide Viability Study has tested viability at various densities.</p>	Q2.8
<p>Higher densities could be acceptable/promoted in brownfield, regeneration and existing urban centres where there is capacity and proximity to local and transport infrastructure and services - specifically east of the M53, Wallasey (and Docks), Birkenhead and Wirral Waters.</p>	<p>Areas where higher densities are likely to be appropriate, based on their character, location and access to services are shown on the Local Plan Submission Draft Policies Map. The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas.</p>	Q2.9

<p>Higher densities would not be appropriate in areas with existing low densities, including on or adjacent to greenbelt/greenfield sites, parks and recreational open spaces or existing residential area, specifically including west of the M53, Greasby, Caldy, Irby, Heswall and Port Sunlight.</p>	<p>Areas where higher densities are likely to be appropriate, based on their character, location and access to services are shown on the Local Plan Submission Draft Policies Map. The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas.</p>	Q2.9
<p>There is disagreement with the Economic Viability Baseline Update 2018 in that it is insufficient to convince developers to build in Zones 1 and 2 and does not determine the funding required for brownfield sites and the evidence base is flawed (a 40% affordable housing requirement is used while the I&amp;O LP indicates a 30% requirement). No consideration given to concentrating delivery into small geographic area or site specific assessments.</p>	<p>The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. Further information is now set out in the Housing Delivery Strategy and the whole plan viability assessment which accompanies the Local Plan Submission Draft.</p>	Q2.10
<p>A number of strategies were proposed in order to address viability gaps for urban brownfield sites, including; channelling CIL funding from other Zones 3 and 4 to Zones 1 and 2, pursuing all available sources of grant funding, re-examining viability with new studies, reducing housing requirements, and working with experts and developers to bring forward brownfield sites for development, such as Wirral Waters.</p>	<p>A whole plan Viability Assessment (2022) has been completed for the Local Plan Submission Draft.</p>	Q2.11

<p>The proposed Birkenhead regeneration approach represents a welcomed and needed 'once in a generation' opportunity to tackle deprivation and decline at the high potential waterfront, and should commit to high quality design, infrastructure and amenities through a bold, proactive strategy and vision.</p>	<p>Support noted. Draft Birkenhead 2040 Framework published for consultation in 2021. Birkenhead Design Guide and Public Realm Strategy to be prepared as supplementary planning document.</p>	<p>Q2.12</p>
<p>There is overreliance on the Wirral Waters to deliver housing needs, which has viability and deliverability issues including a lack of existing infrastructure and access to support housing, and no comprehensive plan for this yet in place. The housing market in Birkenhead cannot absorb this scale and there is a concern over the track record of delivery given the existing and dated planning evidence base and permission for the Wirral Waters site. A more balanced/dispersed approach including urban extensions and green belt release may alleviate the overreliance on Wirral Waters.</p>	<p>Wirral Waters Housing Delivery has commenced with the first phase of the urban splash project nearing completion (March 2022). In addition, the 500 dwelling build to rent Legacy project commenced in March 2022. Wirral Waters is not an isolated project but must now be seen one (albeit of strategic importance) of a range of strategic housing and regeneration projects in Birkenhead which the Council is now working to deliver. The Council is working with Homes England, the LCR CA and developers to bring forward this development. Various funding (FHSF, HSF, Town Deal) secured and remediation works completed. As is explained in the Housing Delivery Strategy the Council has developed a 'five pillar' regeneration strategy for the comprehensive regeneration of Birkenhead which includes the preparation of the Birkenhead 2040 Framework, Place Making, Infrastructure provision and a bespoke delivery vehicle (UDC) to be established to undertake regeneration. The Birkenhead Housing Market Study (2022) has evidenced other</p>	<p>Q2.12</p>

	areas where comprehensive area-based regeneration strategies have enabled similar housing market growth.	
Birkenhead, New Ferry, Hind Street regenerations are supported as these are the areas with the highest need for regeneration, and should be regenerated using a green, low-car but flexible approach that does not prejudice employment opportunities.	Support noted. New low carbon urban village under Policy RA5.	Q2.13
Support for targeted intervention at Birkenhead through a dedicated delivery model to ensure rapid regeneration, which could be facilitated via a well-resourced public-private partnership approach in consultation with residents and neighbouring authorities and enshrined through sound development plan policies/framework.	Support noted. Expected that consultation with residents will form part of delivery vehicle. Draft Birkenhead 2040 Framework published for consultation in 2021. The bespoke delivery vehicle will include requirements for community involvement, consultation and engagement.	Q2.14
Alternative ideas for the regeneration of Birkenhead includes specific proposals such as a Streetcar tram service, a concert hall and arts quarter, tourism and leisure and Garden city.	The Draft Birkenhead 2040 Framework sets out vision of an Urban Garden City, and provision of a new mass transit system to link new and existing neighbourhoods in Birkenhead to existing Merseyrail stations and facilities. Similar cultural development within the Woodside Masterplan Area (Policy RA3 -MA4) to be considered.	Q2.15
A number of submissions challenged the viability and deliverability of key strategic sites including at Wirral	Key sites for delivery of the Local Plan have been assessed through the Wirral Local Plan Viability Assessment. Considerable progress has been made in	Q2.15

<p>Waters, Hind Street, Woodside and Bromborough without the support of significant public funding.</p>	<p>the development of a comprehensive regeneration strategy for Birkenhead since the Issues and Options Consultation in early 2020 as is explained in the Housing Delivery Strategy. Further public sector funding has been received for gap funding for sites in the town centre, and public realm place making infrastructure. Housing delivery has now commenced at Wirral Waters. As is explained in the Housing Delivery Strategy, the Birkenhead Housing Market Study and the Local Plan Viability Study the implementation of the comprehensive regeneration strategy for Birkenhead, existing funding and delivery of housing at Wirral Waters will change the housing market and improve viability and deliverability of housing allocations in Birkenhead.</p>	
<p>There was broad disagreement from respondents as to the classification of Green Belt sites in the Green Belt Review 2019. A number of comments were raised as to specific green belt parcels and sites, which included objections related to the how development would impact on various factors such as protected and designated sites, wildlife corridors and habitats, amenity and tranquillity and the separation of settlements. Some responses argued that certain sites were not highly performing and should be released for development.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.</p>	<p>Q2.16</p>

<p>The Green Belt Review 2019 and classifications are flawed, unsound and against national policy, and has taken a different approach to the 2018 Interim Review and not taken into account the weight of other considerations such as Local Wildlife Sites. A further, more granular and site-specific review should be undertaken.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.</p>	Q2.16
<p>No green belt sites should qualify as weakly performing with justification of exceptional circumstances, and should therefore not be released for development as they bring a range of benefits to the environment, economy and wellbeing and prevent urban sprawl</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.</p>	Q2.16
<p>Respondents felt that some aspects of the Local Plan evidence base was flawed, specifically around infrastructure, retail centres, natural environment, the Green Belt Review and the Density Study, and that the evidence was difficult to understand.</p>	<p>Additional evidence has been prepared in consultation with the public to address these issues and further detail is now included in the Local Plan Submission Draft. No green belt sites are promoted for development in the Local Plan Submission Draft.</p>	Q2.17
<b>3. Our Vision and Objectives for Wirral</b>		
<p>Conservation and enhancement of the historic and natural environment and character of the Wirral should be reflected within the Vision</p>	<p>This is addressed by Strategic Objective 8 and is reflected by paragraph B and J of the Vision.</p>	Q3.1
<p>The climate emergency and reduction of carbon emissions should be included within the vision, including the achievement of a circular economy.</p>	<p>Paragraph B of the vision outlines carbon reduction and budgeting and emphasises the green belt's contribution to climate change mitigation and adaptation. The transition to a low carbon and circular</p>	Q3.1

	economy has been addressed in Strategic Objective 4.	
Social and economic aspirations should be included within the Vision	The Vision includes social and economic aspirations in terms of the Birkenhead regeneration strategy for employment and housing, investment in the Liverpool City Region and its competitiveness at regional, national and international levels, Wirral's visitor economy, and reducing inequality in the Borough.	Q3.1
The objectives are unrealistic, too long and wordy, and the plan for regeneration is ambitious and difficult to realise	Plans should contain a locally specific, evidence-based vision developed in consultation with stakeholders. Paragraph 4.43 - the waterfront is an area of unique and high potential that has lacked the appropriate levels of ambition, development and investment in the past. There is now the opportunity to capture this potential through a comprehensive strategy and vision.	Q3.1
The plan period should be extended beyond 2035, covering 2022-2037	Plan period has been extended to 2037	Q3.1

The focus on the East of the Wirral is too great - housing, infrastructure and services should be invested in for all of the Wirral.	The Local Plan Submission Draft is based on the Council's preferred urban intensification option, focussing development and investment east of the peninsula recognising the need for regeneration in Birkenhead and surrounding areas and the environmental constraints that exist west of the peninsula outside of existing developed areas.	Q3.1
Strategic Objective 1 should focus on (and define) sustainable development and the climate emergency through promotion of sustainable design features, and include net zero carbon targets.	The focus of SO1 is to meet climate agreement and national legally binding net zero carbon targets and supports sustainable design in new development.	Q3.2
Strategic Objective 2 should focus on the promotion of tourism and the protection of coastal and land wildlife	The Vision seeks to create a thriving visitor economy for residents and visitors alike. Wildlife is covered in SO5.	Q3.2
Strategic Objective 3 should focus on building of housing to meet needs through brownfield development and reducing the need to travel, especially via car, through the provision of sustainable public transport	S03 aims to secure sustainable travel and reduce the need to travel and reliance on cars. SO7 addresses housing provision.	Q3.2
Disagreement with Strategic Objective 3 - this may place too much pressure on infrastructure within the existing centres, therefore development should be focussed away existing centres, excluding Birkenhead	The Local Plan Submission Draft is based on the Council's preferred urban intensification option. The impact of this approach has been assessed in a number of relevant evidence base studies, as set out in the accompanying Infrastructure Delivery Plan.	Q3.2

Strategic Objective 4 should include the protection of green belt and agricultural land, parks and open space as and expand on how climate change adaptation and mitigation can be achieved	SO5 aims to protect and improve urban and rural green spaces. Supporting policies WS1 WS5 WS8 expand on climate change approach.	Q3.2
Strategic Objective 5 should clarify how development can ensure the achievement of biodiversity net gain on all new development and ensure protection of the green belt, natural habitats and open spaces	Policy WS5 clarifies biodiversity net gain delivery. It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.	Q3.2
Strategic Objective 6 should support a master planning approach to water management and investment in flood defences	SO6 encourages SuDS and development away from areas of flood risk. Policy WD4 sets out requirements for where flood defence works will be permitted and requires master planning for SuDS design where appropriate.	Q3.2
Strategic Objective 7 is unachievable and undeliverable. Local housing need should be recalculated and reduced, and delivered through brownfield sites and be zero carbon. The objective should aim to "manage" rather than "provide" housing supply.	The Government's standard method of calculation has been applied to the housing land supply, with sites only included where they can be demonstrated as deliverable and developable, in line with national planning policy and guidance. No development is proposed on green belt land. See SO1 and Policy WS8 for net zero carbon achievement for development.	Q3.2
Strategic Objective 8 should seek to conserve and enhance all elements of cultural heritage, referencing all valued landscapes and acknowledging the contribution of the green belt to the character of the borough, ensuring new development does not encroach on this.	Strategic Objective 8 seeks to ensure new development respects the Borough's distinctive character, the protection and enhancement of the historic character of places and buildings, and the protection of valued landscapes. The Green Belt's	Q3.2

	contribution to the character of the Borough is acknowledged in the Vision.	
Strategic Objective 9 should provide more detail on the assessment and provision of local infrastructure and ensure the protection and provision of healthcare services specifically.	More detail is provided on the assessment and provision of infrastructure to meet needs in Policy WS 10 Infrastructure Delivery. Strategic Objective 9 seeks the provision and promotion of emergency services and health infrastructure, and other essential infrastructure for local communities.	Q3.2
Strategic Objective 10 should be the first objective.	Strategic Objective 1 addresses the climate emergency, a priority for the Local Plan.	Q3.2
Strategic Objective 11 should include reference to the achievement of a circular economy and should support existing businesses through improvements in accessible car parking and improved public transport	Strategic Objective 11 seeks to support a competitive and diverse rural economy. Strategic Objective 4 supports a transition to a circular economy. Strategic Objective 3 supports the provision of sustainable, accessible and connected transport.	Q3.2
Strategic Objective 12 should focus on employment and quality of life and be specific to Birkenhead only.	Employment addressed in SO11. The focus for development and investment towards the east of the Borough addresses the need for regeneration in Birkenhead and its surroundings	Q3.2
Strategic Objective 12 should ensure the regeneration of all towns, including Liscard and Moreton.	The Local Plan seeks to maintain and improve the vitality of the centres in all of the Borough.	Q3.2

<p>Strategic Objective 12 should scale retail development to reflect economic needs, encouraging change of use from vacant high street properties to residential dwellings.</p>	<p>Wirral Retail &amp; Centres Study – 2021 Retail Capacity Update assessment for comparison shopping floorspace indicate that there is little or no capacity for allocating sites for additional retail floorspace in any of the centres across Wirral. Policy WS11 reflects changes to the Use Classes Order which significantly broadened the range of town centre uses which no longer need planning permission for change of use under Use Class E.</p>	Q3.2
<p>Suggested additional objectives included the promotion of sustainable design and building, retrofitting and the use of design guides, alignment with the Council's climate change emergency strategy, further protection and enhancement of the natural/rural environment. Social and community infrastructure should be protected.</p>	<p>See Appendix 4 for responses to individual suggested objectives. The Local Plan supports Wirral Council Environment and Climate Emergency Policy Statement 2021 and measures to mitigate and adapt to climate change are threaded throughout the plan, addressed at a range of geographical scales and policy actions. This is explained on page 1 of the plan. Masterplans will be prepared for all key regeneration areas and sites (see Part 3 and 4).</p>	Q3.3
<b>4. Strategic Spatial Options</b>		
<p>Respondents felt that to ensure a sufficient urban land supply, the Council should employ a range of methods such as densification, neighbourhood planning, ensuring the brownfield land register is up to date, exploring all possible funding sources including providing financial incentives for remediation, redesignation of unused land (car parks, empty retail etc.) and underused green space</p>	<p>The Council has considered most of these options to maximise the supply of brownfield supply in the Local Plan Submission Draft. The Council will consider the use of its CPO powers</p>	Q4.1

<p>for residential purposes and the use of Compulsory Purchase Orders.</p>	<p>including where appropriate to enable the delivery of brownfield development.</p>	
<p>Option 1A - The deliverability of the proposed allocations / brownfield sites under the proposed timeframes and delivery rates is unrealistic/overstated given their viability issues, and will need improvements given the constraints (lack of supporting infrastructure and access, remedial works, market issues, no planning permission or developer, etc.)</p>	<p>Sites have only been included in the land supply where they can be shown to be 'deliverable' or 'developable' in terms of the definitions set out in national planning policy and guidance, which includes information provided by relevant developers and landowners. The trajectory has been updated to take account of the most recent available evidence. Further information is set out in the SHLAA 2022 and Housing Delivery Strategy which accompanies the Local Plan Submission Draft.</p>	<p>Q4.2</p>
<p>Option 1A - the proximity and / or functional linkage of urban allocations to designated sites (SPAs, Ramsar, SSSI), problematic neighbouring uses and areas of sensitive character will require strategic mitigation in event of development</p>	<p>Any future planning application(s) will need to comply with any necessary statutory requirements / local plan policies and impact assessments requirements.</p>	<p>Q4.2</p>
<p>Strong support expressed for the Broad Locations of the Preferred Option, particularly the regeneration of Wirral Waters, Hind Street and Birkenhead, and should see greater intensification at these strategic brownfield sites than proposed and a sustainable approach used</p>	<p>Support noted. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Borough's development needs through the development of brownfield land within existing urban areas.</p>	<p>Q4.5</p>

	<p>The regeneration of Birkenhead is set out in the Draft Birkenhead 2040 Framework, Hind Street site is allocated for mixed use residential led development in Policy RA5 of the Local Plan Submission Draft with a supporting masterplan and delivery plan in preparation.</p>	
Other areas suggested for identification of Broad Locations for Growth includes existing urban and brownfield sites on the Mersey waterfront and docklands, New Ferry and Clatterbridge Hospital, as well as general areas where urban infill is possible	<p>Proposals for individual broad locations are now set out in Part 4 of the Local Plan Submission Draft, which include sites within the Mersey waterfront and docklands. Clatterbridge Hospital is within the Green Belt, which is not being altered in the Local Plan and where national Green Belt policies will apply.</p>	Q4.6
A range of sites within the urban area were proposed for future housing development. Some respondents felt that, in general, more sites should be added to the Brownfield register and prioritised. Others felt that there were no additional available sites to suggest, and sufficient land had been identified already.	<p>The Council has allocated all suitable, deliverable and developable sites within the urban areas and a series of broad locations within regeneration areas. There are no other known sites within the urban area that could be considered for future housing development at this time, albeit we recognise that the Council is concurrently carrying out a continuous 'call for sites' exercise and that there will always be new 'windfall sites' emerging.</p>	Q4.7
A number of site-specific comments were received for the proposed employment allocations, covering concerns such as the impact of development of these sites on designated/protected sites, transport infrastructure,	<p>The Local Plan Submission Draft is accompanied by the relevant Habitats Regulations Assessment and provision for appropriate mitigation is now set out in</p>	Q4.8

heritage and the environment and habitats, as well as providing planning information for the sites.	Policy WS 5.5 of the Local Plan Submission Draft.	
Respondents proposed a few additional urban sites for employment allocations, including golf courses, disused and surplus land sites.	Some of the proposed sites were unsuitable due to their green belt location or have been allocated for residential development instead.	Q4.9
Urban intensification is supported as the advantages outweigh the disadvantages and would allow for more affordable and sustainable housing and employment delivery.	Support noted.	Q4.10
Support was expressed for a dispersed, weakly performing green belt release approach, as the urban intensification approach identifies undeliverable sites that will result in a lack of the right mix of housing and investment across the borough and may therefore result in an unsound Local Plan.	It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.	Q4.10
While there was disagreement with the stepped approach from some respondents, stating that sufficient housing should be identified with higher delivery rates earlier in the plan, most respondents agreed that it would be appropriate with long lead in times using brownfield land.	The Local Plan Submission Draft Housing Trajectory sets out the expected realistic delivery timescales for brownfield sites as advised by developers. The Council is working with Homes England and The LCR Combined Authority to identify viability gap funding to ensure that strategic brownfield sites can be delivered in accordance with the trajectory and where possible to accelerate delivery (see Housing Delivery Strategy).	Q4.11

<p>A number of general comments were made in addition to the proposed site specific comments for Dispersed Green Belt release. Many objections were made towards this option, with brownfield site release being preferred. Comments addressed many of the benefits of green belt, such as its ability to prevent flooding, attract tourists, and provide a buffer between urban spaces. Impacts on removing green belt were expressed, such as impacts on biodiversity, health and wellbeing, character and identity, and pollution.</p>	<p>Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs. The Submission Plan does not propose any green belt release.</p>	Q4.12
<p>Respondents felt that there are no weakly performing green belt sites, and none should be released. However, a large number of green belt sites and parcels were proposed for release as well as general areas such as Eastham Village.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.</p>	Q4.13
<p>There were a number of advantages as to dispersed green belt release expressed, such as the increased ability to deliver the housing needs identified in the SHMA. Development and the impacts of development would be dispersed more evenly throughout the Borough. There would be benefits to existing settlements, including increased access to green space and infrastructure improvements.</p>	<p>It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.</p>	Q4.14
<p>Disadvantages of a dispersed green belt release under Option 2A include negative impacts on wildlife, wildlife corridors and biodiversity, health impacts and the creation of urban sprawl / coalescence between settlements. Urban intensification was supported instead.</p>	<p>It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.</p>	Q4.14

<p>A number of general comments were made in addition to the proposed site specific comments for the Single Urban Extension. While some felt this option was preferable to dispersed release, there were many objections and respondents felt that brownfield regeneration was preferable. Comments expressed concern over the impacts of such an approach, such as adverse impacts on heritage, environment, character and identity, pollution and infrastructure. The deliverability was questioned.</p>	<p>Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs. The Local Plan Submission Draft does not promote Green Belt development. The Local Plan Submission Draft does not promote Green Belt development.</p>	Q4.15
<p>A few areas were suggested as to where a single large extension could take place. However, most responses felt that development needs could be accommodated in existing urban areas and an urban extension was not necessary. Regeneration should be prioritised at Wirral Waters instead. Alternatively, a dispersed range of small-medium extensions was proposed as larger scale schemes are more challenging to deliver.</p>	<p>Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs. The Local Plan Submission Draft does not promote Green Belt development.</p>	Q4.16
<p>Development should not concentrate in one area as the impacts would not be dispersed. The approach would be against national policy and Infrastructure in the proposed area would not accommodate the additional traffic and major improvements would be needed first. Concerns over green belt environmental impacts from the approach were stressed - a dispersed release of land for development would be preferable. Financial risks, viability and market absorption concerns were raised also.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored further. The Local Plan Submission Draft does not promote Green Belt development.</p>	Q4.17

<p>A single large extension would enable a transition to low carbon living, with the potential for the creation of a highly desirable garden village in good proximity to infrastructure. The use of a phased approach would enable development to be optimised to changing needs and issues.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored further. The Local Plan Submission Draft does not promote Green Belt development.</p>	Q4.17
<p>Support for urban intensification was strong, expressing the need for the prioritisation of sites with vacant uses and brownfield land, and the need to work with infrastructure partners to ensure infrastructure is in place to deliver development at sustainable locations with green infrastructure.</p>	<p>Support noted. The Council is working with appropriate utility providers, Government Departments and the LCR CA to deliver specific infrastructure.</p>	Q4.18
<p>Disadvantages of urban intensification included criticism that this approach would not meet the required housing needs and mix and result in a shortfall, may impact local and historic character.</p>	<p>The Local Plan Submission Draft seeks to meet the Borough's identified needs within the existing urban area. Further information is set out within the accompanying Housing Delivery Strategy and whole plan Viability Study. Heritage impacts are addressed in the accompanying Heritage Impact Assessment.</p>	Q4.18
<p>Regarding the release of green belt land, no overwhelming support was expressed for either Option 2A: Dispersed Release or Option 2B: Single larger urban extension, with some supporting a hybrid approach with smaller extensions.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.</p>	Q4.19

Alternative options to the proposed approaches focussed mainly on brownfield regeneration strategies and densification, including compulsory purchase orders, combining sites, and converting / reusing abandoned transport links.	The alternatives approaches identified are addressed by the Council's preferred urban intensification option and the proposals now identified in Part 4 of the Local Plan Submission Draft.	Q4.20
<b>5. Our Homes</b>		
A discretionary, flexible approach should be taken, increasing densities where appropriate and more affordable housing should be provided flexibly, where needed, and reflective of local context.	Policy WS3 will be drafted to secure the most appropriate mix of housing taking account of site-specific circumstances, viability and updated national planning guidance & Strategic Housing Market Assessment.	Q5.1, Q5.2
It was suggested that there should be fewer bungalows - the Council's bungalow requirement is unrealistic (18 times the level delivered elsewhere) and should be amended accordingly, with apartment/flat led development instead, given the need for high density developments within urban conurbations, with level-access options for the elderly and disabled. The overall need is mainly for larger house sizes - a particular need for 3 bedroom houses is identified.	Policy WS3 will be drafted to secure the most appropriate mix of housing taking account of site-specific circumstances, viability and updated national planning guidance & SHMA. Policy WS 3.1 provides for accessibility.	Q5.1
Affordable housing need is very high and should be at the level of 1,223 dpa compared to the target of 800 dpa. The overall housing target should be increased as a result. Many of the allocations for affordable housing are located in weaker market areas, resulting in significant viability and deliverability concerns.	The rate of affordable housing to be secured by new build market housing will be set in Policy WS 3.3 taking account viability informed by the Local Plan Viability Study, updated national planning guidance and SHMA. See also the Housing Delivery Strategy.	Q5.2

<p>There should be greater than 30% affordable housing, there should be a substantial allocation with contributions from sites of less than 10 dwellings, ensuring viability will not prevent future provision.</p>	<p>The rate of affordable housing to be secured by new build market housing will be set in Policy WS 3.3 taking account viability informed by the Local Plan Viability Study, updated national planning guidance and SHMA.</p>	Q5.2
<p>There should be less than 30% affordable housing - most development takes place on smaller sites and this figure will reduce viability and therefore the trajectory of affordable housing will be uncertain</p>	<p>The rate of affordable housing to be secured by new build market housing will be set in Policy WS 3.3 taking account viability, updated national planning guidance and SHMA.</p>	Q5.2
<p>Specialist and accessible housing should be provided to prevent putting significant strain on health and social care services, providing for both the elderly and those with physical, social and mental disabilities and their families and ensuring that all provision is wheelchair accessible and in a mixed environment rather than isolated.</p>	<p>Evidence indicates a need for additional residential care and specialist dwellings given relatively high disability levels and an ageing population in Wirral. Policy WS3.6 will make provisions for specialist housing. Policy WS 3.1 provides for accessibility and adaptability incl. wheelchair access.</p>	Q5.3
<p>There was support for the flexible reuse of empty properties across the 3 proposed options, but mainly toward the preferred approach. A higher allowance should be included given the number of remaining empty properties, with at least 200 returned to use annually, aiming for less than 0.5% of stock to be vacant.</p>	<p>A separate allowance for the return of empty homes has been included in the Local Plan Submission Draft, based on the performance of a funded programme which has operated since April 2011 and a tapered delivery under Option 3. Further information is set out in the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.</p>	Q5.4

<p>The current allowance is too high and unjustified, unrealistic and undeliverable given the past performance of reusing empty homes and the national average, and the reuse of empty properties is not a predictable, long-term source of land supply.</p>	<p>A separate allowance for the return of empty homes has been included in the Local Plan Submission Draft, based on the performance of a funded programme which has operated since April 2011 and a tapered delivery under Option 3. Further information is set out in the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.</p>	Q5.4
<p>The council should do more to promote the use of empty homes through the use of compulsory purchase powers, and a range of incentives should</p>	<p>The Council has an existing funded initiative which has recently been extended. CPO is a last resort regulated process for approved areas only.</p>	Q5.5
<p>Future housing needs should be met for Gypsies and Travellers through the Local Plan as the identified needs can be met, including pitches with appropriate amenities and affordable housing allocations for those who want to settle.</p>	<p>National planning policy requires the assessment of local housing needs, including those of travellers to inform planning policy. No specialist needs were identified in the 2019 Gypsy and Traveller Accommodation Assessment.</p>	Q5.6
<p>Some respondents felt that while Gypsies and Travellers should have access to housing, special priority and targeted home building should not be provided for this group.</p>	<p>National planning policy requires the assessment of local housing needs, including those of travellers to inform planning policy. No specialist needs were identified in the 2019 Gypsy and Traveller Accommodation Assessment.</p>	Q5.6

<p>Regarding the Primary Residential Area (PRA) boundary proposals, many respondents felt that these boundaries should not be changed / set to meet planning needs and should reflect existing residential areas while ensuring Green Belt protection. A number of site-specific comments related mainly to Green Belt and Local Green Space sites that should not be included within the PRA.</p>	<p>Primarily Residential Areas within the Borough's urban area have been amended to reflect the policies and proposals within the Local Plan Submission Draft. The Local Plan Submission Draft does not promote Green Belt development.</p>	Q5.7
<p>The number of HMOs should be controlled, with landlords closely monitored and licensed, and should be provided in designated areas and not within areas without HMO precedent. These should offer a safe, healthy and zero carbon living, and the minimum space standards should be revised.</p>	<p>The Borough's housing needs, including HMOs, have been re-assessed in the finalised Strategic Housing Market Assessment (SHMA) 2021. Policy requirements, design standards and the over-concentration of HMOs is addressed in Policy WD 7 Houses in Multiple Occupation. Space standard policy requirements are set out in Policy WS 3.1 Housing Design Standards.</p>	Q5.8
<b>6. Our Economy</b>		
<p>Employment regeneration at Birkenhead and other brownfield sites was supported and sustainable businesses, jobs and graduates should be attracted to the area and retained.</p>	<p>Support noted. Employment and skills are covered in Policies WS 1.2 Employment, WS 2 Social Value and WS 4 Strategy for Economy and Employment.</p>	Q6.1
<p>There is a lack of evidence for employment regeneration approaches and the rural economy has been overlooked. The employment land figures and mix are high in relation to need and Wirral Waters should be excluded. Allocations in southern Wirral may impact on transport.</p>	<p>The Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.</p>	Q6.1

<p>Support for proposed release of some employment land in Bromborough where the loss of employment land use is offset at other sites and does not negatively impact on the green belt, environment and existing operations.</p>	<p>Support noted. The Local Plan Submission Draft now includes relevant proposals at Prices Way (RES-SA4.6) former D1 Oils (RES-SA4.7) former MOD (RES-SA4.2) Riverside Park (RES-SA4.3) and Unilever Research (RES-SA4.11).</p>	Q6.2
<p>Some land at Wirral Waters should be considered for employment use, where it is no longer required for port use and provides for high value employment and local businesses with flexible use designation.</p>	<p>The land allocated for employment use at Wirral Waters is at West Float which is identified for employment uses in Wirral Waters Masterplan and will not impact on potential residential development at East Float. The employment site at MEA park would be able to accommodate port related businesses.</p>	Q6.3
<p>Support was expressed for the proposed boundaries of the Primarily Industrial Areas. Some site-specific issues were raised with some respondents expressing disagreement with the allocations of sites within the PIA boundary, stating that some sites should be identified as a residential (or other use) allocation instead where suitable, or removed from the PIA.</p>	<p>Support noted, sites in the Primarily Industrial Areas were assessed in the Wirral Employment Land and Premises Study 2021. Some land previously allocated or designated as employment Land in the Unitary Development Plan 2000 has been allocated for Housing in the Local Plan Submission Draft. See also Site Selection Paper.</p>	Q6.4
<p>A wide range of alternative uses within PIAs should be supported through policy including sui generis cultural and event spaces, leisure and health and green infrastructure, through a flexible and criteria based policy approach to prevent restricting supply of land for such different uses.</p>	<p>Policy WS 4.2 Designated Employment Areas of the Local Plan Submission Draft sets out the policy requirements for appropriate alternative uses within employment areas including compatibility with existing character and market signals evidence.</p>	Q6.5, 6.6

Employment land for employment use should be protected and maintained with the Council retaining powers to determine the suitable location of land use.	The employment land supply has been reviewed and appropriate land allocations are now identified in the Local Plan Submission Draft. Further information is set out in the accompanying Employment Land and Premises Study 2021.	Q6.6
Out of town retail developments should not be supported, and existing shopping areas, local business and cultural attractions should be regenerated/prioritised. Shopping patterns have changed and all centres should have access to convenience space.	The Plan recognises the changing nature of retail and shopping and the continuing decline of retail floorspace and seeks to direct uses to within the identified town centre boundaries. Where proposals lie outside of or on edge of centre locations, impact assessments will be applied under Policy WS 11.3. Policy WS 11 aims to maintain vitality and viability of existing centres through providing for a range of uses.	Q6.7
There is support for maximising the vitality and viability of town centres, where the strategy addresses the climate emergency and new uses are sensitive in terms of character, needs and density/proportion to their location. Town centres should be diversified, with local services and community uses provided within unused retail space.	Policy WS 11 Strategy for Town, District and Local Centres aims to maintain the vitality and viability by allowing and enabling appropriate meanwhile, pop-up, and residential uses and providing for further cultural and community uses.	Q6.8
The retail hierarchy should be reviewed as core shopping areas have not been identified. The Croft Retail Park should be identified as an out-of-centre location, Hoylake is not recognised as a vibrant centre, Birkenhead is not a sub-regional centre. Local Centres should be listed in the Draft Local Plan.	The Wirral Retail & Centres Study – 2021 Retail Capacity Update April 2021 updates the 2019 study. Sub regional, District and Local Centres are listed in the Local Plan Submission Draft under Policy WS 11 Strategy for Town, District and Retail Centres.	Q6.7, Q6.8, Q6.9

<p>There is support for the preferred approach to locally set retail impact thresholds and local communities should be involved in defining this threshold, and should apply to sites outside of the defined urban centres along with the sequential test - new large outlets should not be supported.</p>	<p>Support noted. thresholds for the size of proposal requiring an impact assessment for the different centres are drawn from the evidence provided by the April 2021 Wirral Retail &amp; Centres Study Capacity update. Proposals for out of or edge of centre development must take into account the sequential test and must demonstrate no suitable alternative sites are available.</p>	Q6.9
<p>Settlement extensions should only be considered where there is robust evidence of growth, with community involvement in defining boundaries. A number of comments suggested minor adjustments to the proposed boundaries and the separation of classifications of a number of towns/villages.</p>	<p>The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Borough's development needs through the development of brownfield land within existing urban areas.</p>	Q6.10
<p>The approach to improve public/tourist access to the coast and countryside is supported however only existing assets should be developed without detriment to the green belt or protected sites.</p>	<p>Support noted. No green belt release is proposed. Proposals for visitor facilities in the Rural Area will be supported where they meet the tests of national Green Belt Policy under Policy WS 4.4.</p>	Q6.11
<b>7. Our Physical and Social Infrastructure</b>		
<p>A comprehensive approach was supported to infrastructure planning, which considers all forms of infrastructure (green infrastructure, sustainable transport, digital infrastructure).</p>	<p>Support noted. A detailed Infrastructure Delivery Plan provides information on the types of infrastructure that will be required, including costs; funding; organisational responsibility and timescales.</p>	Q7.1

<p>Local infrastructure and services do not currently have the capacity to support additional housing and impacts will be felt across highways, drainage/utilities, education and health provision, and housing should only be proposed where there is capacity for this.</p>	<p>£78.5m has been secured towards major regeneration projects in Birkenhead. Policy WS 10 will require appropriate on- and off-site infrastructure provision. A detailed Infrastructure Delivery Plan provides further information set out in set out in area-based and site-specific policies, informed by the viability assessments underlying the Local Plan.</p>	Q7.1
<p>Concerns were raised about the impact/burden of planning obligations / CIL on viability without a robust evidence base or policy clarity, which could undermine the spatial strategy and the delivery of housing - over £500m is still required for Commercial Core transport improvements. It was argued that some green field sites would be more viable. However, some argued that the residents of Wirral should not be required to shoulder the burden of infrastructure costs.</p>	<p>The impact of policies on development viability has been comprehensively assessed through the Local Plan Viability Assessment 2022. Funding has been secured through various central government funding rounds to develop infrastructure and advance other projects, reducing the burden on residents and viability.</p>	Q7.1, Q7.2
<p>Public transport improvements across all modes are currently underdeveloped and should be improved prior to occupation of any new development. However, major new road schemes, unless essential, were not supported due to the impacts on traffic, the environment and the climate. Instead, active travel infrastructure should be prioritised with safe, high-quality and well-maintained routes to Local Centres, supported by the provision of cycling storage/infrastructure within new developments.</p>	<p>The Council plans to remove overengineered roads and create new sustainable transport connections to, between and within regeneration areas. The Local Plan Submission Draft also provides for the delivery of active travel networks for walking and cycling that enable safe access to jobs, leisure and health facilities (Policy WS9.2), a new mass transit system in Birkenhead, to connect new neighbourhoods and key locations (Policy WS9.1 and Appendix 8)</p>	Q7.1, Q7.2

	and a new greenway within central Birkenhead (Policy WS9.1).	
There was agreement with the approach, however it was argued a greater emphasis is required on energy efficiency - a "where possible" approach is inadequate and sustainable building techniques for all new development should ensure that City Region net-zero policies are met.	Policy WS 8 sets out the Council's strategy for minimising energy demand and reducing carbon emissions.	Q7.3
Concerns were raised over the impacts of the communications network expansion on green infrastructure and heritage, as well on the viability of sites. Telecoms coverage should be ensured across the peninsula to support working from home.	Policy WD 13 covers proposals for telecommunication apparatus and these will only be approved where the best environmental solution is found and the impact on the character of the area is minimised. Wirral Council is a strategic partner in a City Region initiative which will deliver a 250km high-speed Local Full Fibre Network by 2023.	Q7.4
Respondents felt that current social infrastructure is inadequate given the scale of development, and the Council should be improving and reviewing social infrastructure on a regular basis. Development should be focused on areas where this already exists. Particularly, open spaces and community and cultural infrastructure should be provided for, protected and enhanced.	An assessment of social infrastructure has been undertaken with key stakeholders. The Infrastructure Delivery Plan provides details of appropriate social infrastructure which is required for particular development. Further information is also set out in the relevant area-based and site-specific policies in Part 4 and Part 5 of the Local Plan, which has been subject to a whole-plan viability study.	Q7.5
8. Our Environment		

<p>The level of ambition should be greater and policy must be more robust and proactive, with Climate Change and the protection and enhancement of natural capital as the main consideration of all planning decisions.</p>	<p>Addressing climate change is a key part of the Local Plan. Strategic Objectives 1, 3 and 4 of the Local Plan address climate change. The Council recognise however that to meet our target for Zero Carbon targets it will require action by Government. This is a main consideration of planning decisions with WBC holding a statutory duty to do this - Policy WS 5 of the Local Plan Submission Draft sets out a Strategy for green and blue Infrastructure, biodiversity. The Environment Act 2021 will require a mandatory net gain in biodiversity on all development.</p>	Q8.1, Q8.3
<p>Public transport must be improved to reduce the carbon footprint and car reliance. Assets such as green roofs, solar panels and EV charging points should be used with all new development being properly insulated and existing development retrofitted to meet environmental standards.</p>	<p>The Local Plan Submission Draft promotes public transport in Policy WS 9 Transport Strategy and the use of various renewable energy technologies and high levels of energy efficiency on new development- see Policy WS 8 Strategy for Sustainable Construction, Renewable and Low Carbon Energy of the Local Plan Submission Draft and seeks to achieve zero carbon development whilst measures such as green roofs and sustainable drainage are supported in policies WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity and Landscape Protection and WD 1 Landscape and WD 4 Coastal Protection, Flood Risk,</p>	Q8.1, Q8.3

	Sustainable Drainage and Water Management	
Support and agreement expressed for the preferred GBIS approach and the recognition of the importance of GBIS in achieving sustainable development, and these sites and provisions should be protected - development should not disrupt ecological network and a 50m buffer should be applied to sites with natural assets. Biodiversity net gains should be delivered where possible, following the mitigation hierarchy and offsetting where loss to habitats has occurred using a verified metric.	Support noted. Policy WS 5 Strategy for green and blue Infrastructure, biodiversity, open space and landscape protection of the Local Plan Submission Draft sets out a number of policies to protect and enhance important ecological sites and networks	Q8.4
Current assessments throughout the evidence base are deficient and the Green and Blue Infrastructure Strategy and ecological network reviews have been commissioned too late to inform the allocation of land.	The Local Plan Submission Draft preparation has been informed by a wide range of environmental related studies.	Q8.4
Support expressed for the Tree Planting strategy using careful species and methods selection and community involvement, however the importance of natural regeneration and prioritising preservation / protection of the existing stock was stressed, as this would protect local character and wildlife.	Local Plan Submission Draft Policies WD 1.1 and WD 1.2 set out the strategy for the protection and replacement of trees.	Q8.5
Support expressed for tree planting to extend parks and woodlands however many respondents discussed the use of tree planting in specific and general urban environments. The infilling of grass / road verges,	Proposals have been passed to the Council's Environment and Parks Teams for consideration as part of the Council's Tree Planting Strategy implementation.	Q8.6

roadside planting and hedging, and planting outside shop fronts was suggested.		
Existing open space including agricultural land should be protected as it brings multiple benefits and the existing stock should be maintained. Additional accessible open space such as allotments, playing pitches etc, public footpaths is required in a range of locations (Wirral Waters, Seacombe, Rock Ferry, Birkenhead) including areas of high density, deficiency in provision, and all new development. Smaller sites should be required to contribute financially to provision but disagreement where this would render development unviable.	Generally open space is protected through Policy WS5.1 of the Submission Plan. No development on Green Belt or agricultural land is proposed. It may be necessary to restructure existing open spaces to facilitate the proper planning of new residential neighbourhoods consistent with Policy WS 5.1 Open space provision of the Local Plan.	Q8.7
A number of site specific comments were raised for the list of open spaces and their boundaries. Many responses expressed support for the protection of sites, or suggested spaces that should be added to the list for protection. It was suggested that some sites had been omitted from the list of open spaces. A smaller number of comments suggested alternative uses for the sites.	Some of the suggested sites had been identified as Local Green Spaces. Other suggested sites were added to the Policies Map for protection. Other sites were in the Green Belt and therefore do not require additional protection.	Q8.8
The majority of responses supported the designation of the Glebe land at West Kirby as Local Green Space. Those who opposed the ownership suggested that the designation was unnecessary as Conservation Area controls are already present, and that the site was in private ownership with no public access. The site could be used for development instead.	The site has been independently assessed (Document GI5) and an appropriate area has been recommended for designation as a Local Green Space under NPPF paragraph 103. See also Local Green Space Designations Review of Sites (October 2021).	Q8.9

<p>A wide range of sites, including open spaces, green belt sites and omitted sites, were suggested for designation as Local Green Spaces.</p>	<p>Many of the sites suggested are proposed to be designated as a Local Green Space. Some suggested did not meet the NPPF criteria but were in the Green Belt and further protection is not required. Some that did not meet the LGS criteria but were designated for other protections in the Policies Map, for example as open space. See also Local Green Space Designations Review of Sites (October 2021).</p>	Q8.10
<p>Respondents felt that all landscapes and their character should be protected by evidence-based and strongly worded policy from unnecessary development in line with the NPPF. Wirral's landscapes bring benefits to wellbeing and attracts tourists, and are part of the Wirral's historic, visual and cultural character and policy should be sympathetic to this. Biodiversity will be enhanced by natural landscape protection - the protection and expansion of important hedgerows, trees and woodland should be addressed in the policy.</p>	<p>Policy WS 5 of the Local Plan Submission Draft sets out a strategy for green and blue Infrastructure, biodiversity, open space and landscape protection, Policy WD 1.2 Trees sets out policy requirements for development proposals regarding the retention of trees and Policy WS 7 Principles of Design sets out a strategy for design, including the protection of views and hedgerows.</p>	Q8.11
<p>Assess and mitigate flood risk. Limit development on land with flood risk and ensure new development does not increase flood risk.</p>	<p>Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage &amp; Natural Water Management sets out the strategy for the reduction and mitigation of flooding and coastal protection. Site allocations in the Local Plan have been informed by the Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2. The Sequential and Exception Test report sets out the process by which the proposed Local Plan</p>	Q8.12

	allocations have been selected in terms of flood risk	
Prioritise climate change, and prevent flooding in urban areas and coastal erosion from rising sea levels. Manage surface water flooding in urban areas.	Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management addresses flood risk, surface water flooding and coastal change. The Local Plan reflects the Shoreline Management Plan and Wirral Coastal Strategy which set out the policy framework for the future management of Wirral's coastline in relation to coastal erosion and protection against tidal flooding.	Q8.13
Biodiversity should be addressed at all times and expected from all new development at a 10% net gain, and policy should be clearer and stronger to support decision making. Not enough consideration has been given to Local Wildlife Sites, especially in the Green Belt Review.	Policy WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection from the Local Plan Submission Draft sets out the strategy for the protection, enhancement and delivery of biodiversity, including the requirement for all development to deliver 10% biodiversity net gain, measured using the DEFRA metric. Local Wildlife Sites are provided protection in the Local Plan, referenced in Policy WD 3 and are recognised as Sites of Local Importance. The Policy requires a suitable mitigation or	Q8.14

	compensation strategy in the event of development.	
Health and wellbeing should be paramount and the protection, enhancement and provision and maintenance of green and open spaces through developer contributions and strategies to green urban areas and implement pocket parks will contribute to health and wellbeing, and also climate change. Active travel should be prioritised over vehicle use to supplement this.	The Council recognises that access to quality open space is key to the health and well-being of residents. Policy WS 5.1 of the Local Plan Submission Draft which deals with Open space provision sets out the standards for open space and children's play on new development. Securing sustainable travel and reducing reliance on private cars is a Strategic Objective of the Local Plan. Under the Council's Strategy for Transport, Policy WS 9.2, development proposals should provide access to existing or planned sustainable travel options and infrastructure projects to reduce private car usage. Policy WD 18 of the Submission Plan requires Health Impact Assessments for all developments over a threshold size.	Q8.15
To improve health and wellbeing, it was suggested that the Council should focus on ensuring protection of green and blue infrastructure and the provision of adequate community infrastructure to existing communities including healthcare and leisure centres. Additionally, improvements to public transport were suggested which would connect communities and enable and improve access to the benefits of the suggested facilities and infrastructure provisions. Housing stock improvements were also suggested.	Policy WS 5.2 requires the protection and enhancement of green and blue infrastructure for all development. Birkenhead 2040 Framework and Local Plan Policy WS 1.3 Infrastructure is the provision of a new mass transit system to link new and existing neighbourhoods in Birkenhead to existing Merseyrail stations and facilities.	Q8.16

<p>Further work is needed to explore Conservation Areas and proactive and supportive policies are needed to ensure the sufficient protection of designated and non-designated buildings in the Wirral and the overall special character and identity of areas. Further focus and priority should be given to sites of international and national importance (Birkenhead Park, Hamilton Square and Port Sunlight).</p>	<p>It is the Council's intention to commence a review and update of existing Conservation Areas commencing in 2022 and subject to resources. The Council is working with other Merseyside Authority's on Pilot Project funded by Historic England to develop a local listing strategy. Consultation will take place in 2022. Part 5 of the Local Plan Submission Draft sets out a specific policy for each conservation area by settlement. The Council has consulted with CAW on the specific wording of the various Conservation Area Policies set out in Part 5 of the Local Plan Submission Draft.</p>	Q8.17
<p>Respondents expressed that more should be done to preserve and enhance heritage generally, including undesignated assets. All of Wirral's natural heritage such as wildlife, ancient fields, sandstone walls and green infrastructure needs to be prioritised in policy with references made as to the benefits of this, and the impact of any new development should be explored and scrutinised through Heritage Impact Assessments.</p>	<p>The Local Plan Submission Draft contains a series of policies which reflect the significant importance which the Council gives to our heritage. Culture and Heritage Strategy for Birkenhead commissioned to be published in 2022. Council intends to develop a heritage strategy for the Borough starting in 2022 subject to resources. Policy WD 2 of the Local Plan Submission Draft sets out a comprehensive approach to the protection of Heritage Assets.</p>	Q8.18

<p>Extraction / fracking and underground coal related activities should be prevented or tightly controlled in marine (coastal, offshore) environments. Any approach taken should not detriment wildlife or conflict with climate change or carbon goals and should regard the regional context / Local Aggregates Assessment.</p>	<p>Issues related to minerals are addressed in the Wirral Minerals Report 2020 (Document EE4.1) and Local Plan Policies WM1 Proposals for Minerals Development, WM 2 Maintaining a supply of aggregates, Policy WM3 Safeguarding mineral reserves and infrastructure, Policy WM 4 Oil and gas development, Policy WM 5 Restoration.</p>	Q8.19
<p>The current waste and recycling approach in Wirral is currently inadequate and underperforming. An improved strategy aligned with other authorities is required which widens the scope of recyclables, provides greater clarity, and sets and promotes greater targets to reduce waste production / prevent landfill.</p>	<p>Policy WW 1 Waste Management of the Local Plan Submission Draft seeks to improve recycling. Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.</p>	Q8.20
<b>9. Detailed Local Plan Policies</b>		
<p>Comments related to</p> <ul style="list-style-type: none"> <li>• Ensuring development is designed or retrofitted for the climate emergency, to reach net zero goals.</li> <li>• Climate change should be addressed in all sections of the Plan</li> <li>• Regulation 18 questions are too complicated for residents</li> <li>• Right to comment reserved until further policy and details are available</li> <li>• Strategic port interests are not taken into account</li> <li>• No rural exceptions sites policy is present</li> <li>• No detailed brownfield and urban regeneration policy is present</li> </ul>	<p>See Appendix 4 for responses to individual suggestions.</p>	Q9.1

<p>Suggested additional development management policies included:</p> <ul style="list-style-type: none"> <li>• Include policy on supported flexible commercial uses for each site</li> <li>• Policy should refer to existing retail warehouse parks</li> <li>• A biosecurity strategy and protocols for development should be included</li> <li>• Water efficiency policy, health infrastructure policy</li> </ul> <p>Greater regard needed as to air quality</p> <ul style="list-style-type: none"> <li>• Detailed landscape character protection policy</li> <li>• Proposed port-related policy</li> <li>• Ground water and surface water policy proposals</li> <li>• Safeguarded land policy</li> </ul>	<p>See Appendix 4 for responses to individual suggestions.</p>	<b>Q9.2</b>
<p>Aside from objection to the proposed housing figure, comments related mainly financial and regulatory schemes - such as the use of planning mechanisms to implement a workplace car parking levy and fund climate and environment projects, and the licensing of the private rented sector - and were not relevant to the question/planning considerations</p>	<p>See Appendix 4 for responses to individual suggestions.</p>	<b>Q9.3</b>
<b>10. Other Comments or Questions</b>		
<p>Comments raised issues covered in previous questions relating to housing delivery, green belt release, infrastructure pressures and local green space designation. A number of comments raised objections to the clarity and length of the Regulation 18 Consultation.</p>	<p>Feedback on the Regulation 18 Consultation will be considered for future consultations.</p>	<b>Q10.1</b>

## Appendix 6: Key Issues Raised by Consultees and Statutory Bodies

<b>Statutory Consultee</b>	<b>Key Issues</b>	<b>Council Response</b>
Sefton Council	<p>Sefton Council noted they were not in a position to meet any of Wirral Council's housing and employment needs. Sefton Council recommended the Local Plan reference internationally important sites on Sefton Coast. The Council expressed support for the approach to retail centres.</p>	<p>Noted. The internationally important sites on Sefton Coast will be dealt with through the Habitat Regulation Assessment as appropriate.</p>
Cheshire West and Chester Council	<p>Cheshire West and Chester Council expressed satisfaction that previous concerns with Green Belt release and the risk of coalescence were addressed in the Issues and Options Local Plan. The Council expressed support for urban intensification and indicated it was not in a position to meet any of Wirral Council's housing needs. Cheshire West and Chester Council also raised queries and recommendations around minerals, waste, transport and employment, including impacts to Hooton Park. The following issues were raised:</p> <ul style="list-style-type: none"> <li>• Uncertainty regarding the historic take up approach to calculate employment land need;</li> <li>• avoiding impact to the development of Hooton Park to maintain its status as a key employment location;</li> </ul>	<p>The Local Plan Submission Draft is based on the Council's preferred option of urban intensification. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries in Wirral and is therefore not proposing any release of Green Belt for any purpose in the Local Plan Submission Draft. The Wirral Employment Land and Premises Study 2021 includes a new assessment of the need for employment land and the requirement in the Local Plan is not based on past take up rates. Transport modelling has been undertaken in consultation with Cheshire West and Chester Council and National Highways. The Local Plan Submission Draft safeguards facilities for landing marine-won sand and gravel at Riverbank Road, Bromborough (MSA-SA4.1).</p>

	<ul style="list-style-type: none"> <li>• increased traffic pressures on the M53, A41 corridor, A550 and Merseyrail Electric network;</li> <li>• assessing waste management capacity; and</li> <li>the potential for marine aggregates and landings.</li> </ul>	
<b>Statutory Body</b>	<b>Key Issues</b>	<b>Council Response</b>
Sport England	<p>Sport England expressed concern over the use of local standards for outdoor sport or sports facilities. Sport England also recommended all sites identified in the Council's Playing Pitch Strategy should be included in the list of open spaces and 'Active Design' principles should be integrated in the Local Plan.</p>	<p>Local standards are not now proposed to be included in the Local Plan Submission Draft. Reference is now made to the findings of the Playing Pitch and Outdoor Sports Strategy 2021 and the list of urban open spaces and sports facilities for protection has been revised accordingly (proposed Local Plan Policy WS 5.3 Outdoor sports provision, Policy WS 10.5 Community, sport, leisure and cultural facilities, and Policy WS 10.6 Open space now refer).</p>
Wirral Wildlife	<p>Wirral Wildlife raised an objection to Green Belt release and expressed support for urban intensification with a lower housing figure than proposed in the Issues and Options Local Plan. Wirral Wildlife raised issues and recommendations with a number of sites within the Green Belt in regards to the risk of development on wildlife, habitats, wildlife corridors, biodiversity, high quality agricultural land and protected sites. The recommendations raised included:</p> <ul style="list-style-type: none"> <li>• Designing bat friendly development;</li> </ul>	<p>The Local Plan Submission Draft is based on the Council's preferred option of urban intensification. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries in Wirral and is therefore not proposing any release of Green Belt for any purpose in the Local Plan Submission Draft. Local Plan Policy WD3 sets out the approach to biodiversity and geodiversity in new developments.</p>

	<ul style="list-style-type: none"> <li>• avoiding harm to the habitats of Great Crested Newts;</li> <li>• avoiding the loss of bat foraging land;</li> <li>• conserving wildlife corridors;</li> <li>• avoiding harm to Local Wildlife Sites and international designated sites; and</li> <li>• retaining high value agricultural land.</li> </ul> <p>Wirral Wildlife recommended the design of a 50 metre buffer around all natural assets.</p> <p>Wirral Wildlife expressed concerns that the Green and Blue Infrastructure study would only be completed after the site selection process and would therefore not inform development allocations.</p> <p>Wirral Wildlife recommended Ditton Lane be designated as open space.</p>	
Marine Management Organisation	The Marine Management Organisation recommended the Local Plan reference the Draft North West Marine Plan.	Appropriate references to the now-adopted North West Marine Plan have been included in the Local Plan Submission Draft.
The Canal and River Trust	The Canal and River Trust confirmed they had no comment to make on the consultation documents at the Regulation 18 stage.	Noted.
Network Rail	Network Rail recommended the Local Plan include a policy setting out requirements for level crossings.	WS9.4 clause J states that where appropriate, development proposals will be required to demonstrate how they will not result in a material

		increase or significant change in the character of traffic using a rail crossing, unless it can be demonstrated that safety will not be compromised in consultation with Network Rail.
Highways England	Highways England stressed the need to mitigate pressures on the Strategic Road Network (SRN) from the spatial strategy and highlighted potential impacts on the SRN, particularly the M53 from spatial options 1B, 2A and 2B. In terms of urban intensification, Highways England noted the potential impacts from development at Wirral Waters and Hind Street on Junction 1 and Junction 2 and development at Bromborough on Junction 5. It was also noted that infrastructure to access sites off the A41 may need considerable transport infrastructure improvements to counteract residual impacts on Junction 4 of the M53.	Transport model assessments have been scrutinised and agreed with National Highways with regards to the motorway network and further junction analysis undertaken. Analysis is noted to generally show marginal additional impact on junction operation with regard to Local Plan growth. However, capacity issues are noted, and therefore improvements to junction lane markings and signalisation have been identified to enhance the operation of M53 junctions 3, 4 and 5 junctions.
Cheshire Wildlife Trust	Cheshire Wildlife Trust recommended the spatial option not be determined until the Green Infrastructure and Ecological Network studies were completed. The Trust raised issues with a number of sites within the Green Belt in regards to the impact of development on Local Wildlife Sites and protected sites for hydrology, wildlife, habitat fragmentation and pollution. The Trust raised an objection to the Green Belt review on the basis that there was insufficient consideration of environmental issues. The Trust also provided recommendations to include a biodiversity policy, to use a Biodiversity Net Gain calculation, and to revise wording on biodiversity to reflect the 2018 NPPF, and	The Local Plan Submission Draft is based on the Council's preferred option of urban intensification. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries in Wirral and is therefore not proposing any release of Green Belt for any purpose in the Local Plan Submission Draft. Local Plan Policy WD3 sets out the approach to biodiversity and geodiversity in new developments.

	<p>noted BNG cannot be adequately gained offsite. The Trust recommended taking a strategic approach to green and blue infrastructure.</p>	
Environment Agency	<p>The Environment Agency raised the following environmental constraints for several Green Belt parcels: Source Protection Zone 3, flood Zones 2 and 3, Greasby Brook and Arrowe Brook. The EA recommended the Local Plan employ stronger policy language regarding green and blue infrastructure and biodiversity net gain, and draw on the Liverpool City Region Natural Capital study. The EA also recommended the inclusion of a biosecurity strategy in the Local Plan.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred option of urban intensification. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries in Wirral and is therefore not proposing any release of Green Belt for any purpose in the Local Plan Submission Draft. Local Plan Policy WD3 sets out the approach to biodiversity and geodiversity in new developments. The approach to green and blue infrastructure is set out in Policy WS 5.</p>
Natural England	<p>Natural England raised environmental constraints for housing and employment allocations in regards to recreational disturbance. Natural England noted sites which were in proximity to or adjacent to the following designated sites: Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA, Dee Estuary SPA, Ramsar and SSSI, Mersey Estuary SSSI, SPA, Ramsar and New Ferry SSSI. In particular, Natural England recommended development at Wirral Waters mitigate potential impacts on bird habitats at the docks.</p>	<p>The Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. The approach to recreational disturbance in new development is set out in Policy WS5.5</p>
United Utilities	<p>United Utilities expressed support for urban intensification.</p>	<p>The approach towards water management, flood risk and drainage (including sustainable drainage) are set out in Local Plan Submission Draft Policy WS1.4 and</p>

	<p>United Utilities made the following recommendations in regards to water management and flooding:</p> <ul style="list-style-type: none"> <li>• avoid development in groundwater Source Protection Zones 1;</li> <li>• encourage SuDS and water efficiency;</li> <li>• require an infrastructure phasing plan for strategic development;</li> <li>• avoid surface water discharge in the public sewerage network; and</li> <li>• include a surface water management policy.</li> </ul>	Policy WD4 with WD4.3 specifically addressing these matters.
Historic England	<p>Historic England recommended the Local Plan take a positive and balanced approach to the historic environment and recommended the inclusion of strategic and detailed policies on the historic environment and the acknowledgement of the historic, cultural and natural significance of green infrastructure.</p> <p>Historic England recommended the historic environment should be assessed as part of the site selection process. In terms of the climate emergency, Historic England cautioned resilience, energy efficiency and flood risk management measures should not harm the historic environment.</p>	The Council has prepared a Heritage Impact Assessment which has considered all potential housing and employment sites and has been taken into account in finalising the Local Plan.
Hoylake Vision (Hoylake Neighbourhood Forum)	<p>The Hoylake Neighbourhood Forum agreed with the overall vision and strategy of the Local Plan. The HNF proposed the housing methodology should include a calculation considering land availability constraints</p>	The Local Plan Submission Draft sets out an appropriate housing requirement for the Hoylake NF area (table 3.3 refers) this sets out the additional new build dwellings currently expected to be delivered

	<p>from coastal locations. The HNF expressed concern that the reclassification of Hoylake from a town to a district centre might impact the regeneration of Hoylake. The HNF also expressed support for the Green Belt release of the Ellerman Lines Site and set out the benefits of a Wildfowl and Wetlands Centre.</p>	<p>within each Neighbourhood Area within the Plan period, based on existing commitments and land allocations. Hoylake remains a district centre in the Local Plan Submission Draft.</p>
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# LOCAL PLAN

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## **Appendices**

- 1-Local Consultation Focus Group Presentations and Report
- 2-Consultation Media
- 3-Schedule of consultees
- 4-Summary of all comments received and Council response.
- 5-Key issues raised and Council response
- 6-Key issues raised by statutory consultees and Council response



## **Wirral Local Plan Issues and Options Consultation (Regulation 18)**

### **1.0 Introduction**

- 1.1 The Council undertook consultation on the Wirral Local Plan 2020 to 2035 Issues and Options Document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 27th January 2020 and 6th April 2020. This includes an extension of two weeks to take account of difficulties faced by consultees in responding due the unfolding national Covid 19 Pandemic restrictions.
- 1.2 This consultation statement sets out:
  - a. How the Consultation was undertaken; and
  - b. A summary of the Key Issues Raised and the Council's response.

### **2.0 What we consulted on**

- 2.1 Consultation took place on the following documents:
  - Wirral Local Plan 2020 - 2035: Issues and Options 2020;
  - Potential Allocations;
  - Interim Sustainability Appraisal & Habitats Regulations Assessment 2019;
  - Interim Equalities Impact Assessment;
  - Various Local Plan Evidence Base Documents as set out in [Appendix 1.1 of the Issues and Options Document](#).

### **3.0 How we consulted**

- 3.1 The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SCI) adopted in March 2014 -see [Microsoft Word - Final Revised SCI 10 March 2014.doc \(wirral.gov.uk\)](#).
- 3.2 In accordance with the adopted SCI, the Issues and Options Document, the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) were made available for inspection at Council offices and Libraries throughout the borough.
- 3.3 Full details of how to comment on the Local Plan Issues and Options Document were set out on the [Council web page](#). This included a video guide on how to register on and use the online planning portal.

#### [Online Issues and Options Draft Policies Map](#)

- 3.5 Consultees could also view draft proposals and allocations via an online [Issues and Options Proposals Map](#).

#### [Housing and Employment Site Proposals](#)

- 3.6 Notification letters were sent to neighbours of all proposed housing allocations and for those consultees who only wanted to comment on specific sites were able to use an [online mapping tool](#).
- 3.7 This mapping tool showed potential site allocations to meet the Borough's housing, mixed-use and employment needs over the timescale of the emerging Local Plan for Wirral.
- 3.8 Users were able to find a particular site or to view their local neighbourhood by area by entering their address, postcode or an individual site reference number into the search bar above the online map and which then navigated the user directly to the desired site.
- 3.8 By clicking on an individual site, users were able to access the details relating to the site. For housing and employment sites, a link was displayed to the 'Potential Allocations' consultation on the Council's online consultation portal. Users were then able to add their comments about each potential site.

[Simplified version](#)

- 3.10 A 24 page, easy-read and [simplified version of the Issues and Options Local Plan Consultation Summary Document](#) was also published and made available on the Council's website.
- 3.11 The easy read version was also made available at walk in events and at local libraries. A simplified questionnaire was also available at the walk in events and document deposit locations.

[Interim Sustainability Appraisal and Habitats Regulations Assessment](#)

- 3.12 Comments on the Interim Sustainability and Habitat Regulations Assessment could also be made via the Council's online consultation portal: See [Sustainability Appraisal | www.wirral.gov.uk](#)

### Drop In Events

- 3.13 Drop in sessions with display panels for the public to view took place during the consultation period so the public could see the proposals and discuss them with planning staff. Drop in events took place in each constituency – 12 in total (see Table 3.1). The events, which were extensively publicised through posters and media, ran from 12-8pm allowing people to drop in at lunch time or after work. Support was available to show people how to use the online portal.

**Table 3.1: Walk In Event Locations**

Date	Location	No of Visitors
Monday 27 January	Heswall Library	144
Wednesday 29 January	Bromborough Civic Centre	61
Thursday 30 January	West Kirby Concourse	147
Monday 3 February	Birkenhead Town Hall	57
Wednesday 5 February	Wallasey Town Hall	34
Tuesday 11 February	Wirral Change, Birkenhead (11:30am to 3pm)	49
Tuesday 18 February	Bromborough Civic Centre	83
Wednesday 19 February	West Kirby Concourse	111
Thursday 20 February	Heswall Library	134
Tuesday 25 February	Leasowe Millennium Centre	36
Wednesday 26 February	Birkenhead Town Hall	56
Thursday 27 February	Wallasey Town Hall	58

- 3.14 In addition to the display panels explaining the Issues and Options proposals, large format copies of the draft proposals maps were made available. Copies of the Issues and Options Document, SA and HRA were also available. Assistance was provided to attendees to register on the online Planning Portal, to view and to submit comments.
- 3.15 As set out in Table 3.1 the events were well attended with several of the events at full capacity.
- 3.16 A copy of the publicity for the sessions and the presentation is included in Appendix 2.

### Local Plan Focus Groups

- 3.17 In accordance with the adopted SCI, five focus groups (see Table 3.2) were also facilitated to discuss the various options for housing and employment land allocation set out in Options and Issues report. Wirral Council commissioned Ove Arup and Partners Ltd (Arup) to support the Council in their delivery of focus groups during the Local Plan Regulation 18 Issues and Options consultation, which ran from February to April 2020.

**Table 3.2: Focus Groups**

<b>Focus Group</b>	<b>Date</b>	<b>Venue</b>	<b>Number of participants</b>
Youth	17 February 2020	Pilgrim St Arts Centre	24
Disability focus	24 February 2020	The Grange, Wallasey	8
Wallasey	17 March 2020	Microsoft Teams	4
Birkenhead	18 March 2020	Microsoft Teams	5
South & West Wirral	20 March 2020	Microsoft Teams	3

- 3.18 Initially, all the focus groups were planned as face-to-face sessions in different locations across the Wirral. However, with the emergence of Covid-19 and associated Government guidance, the Council and Arup concluded face-to-face meetings presented too high a risk to the health and safety of participants and facilitators. Therefore, on 17<sup>th</sup> March 2020, the decision was taken to hold the remaining focus groups virtually, via the Microsoft Teams platform. Despite changing the approach to focus group delivery, the objectives and content remained the same enabling consistent analysis across all focus groups. The approach to digital engagement is set out in the methodology.
- 3.19 All participants who were expected to attend the face-to-face focus groups were offered invitations to the online events. This ranged from 9 (Wallasey & Birkenhead groups) to 19 (the combined Wirral West/South group) participants. However, possibly due to the impact of Covid, only the numbers detailed in Table 3.2 attended each session. The decision was made to run each session if three participants joined – a criteria that was met in each focus group.
- 3.20 Despite the comparatively smaller number of people in attendance, each of the online focus groups was still very successful. The output was of a high standard and, with some adaption of the format, conversations were of a much greater depth than what would have been possible with a larger group. To that end, all virtual groups ran for just under three hours due to the detailed conversations being held, despite the events being anticipated to run for less time due to the change in format.
- 3.21 Details of the focus groups and the full presentation and report are included in Appendix 1.

#### Hard to Reach Groups

- 3.22 The Council made efforts to engage with hard to reach groups as follows:
- A focus group was arranged for those with disabilities (see Table 3.2 above);
  - An additional walk in event was arranged for ethnic minorities; and
  - Copies of the simplified Issues and Options Document and Questionnaires were distributed to homeless persons centres in Birkenhead.

### Frequently Asked Questions

- 3.24 A schedule of [frequently asked questions](#) on the Local Plan and Regulation 18 Consultation was available online on the Council website.

#### Consultation Media

- 3.25 Copies of various hard copy media used in the consultation such as leaflets, questionnaires, exhibition panels and adverts are set out in Appendix 2.

#### Publicity

- 3.26 A formal [Notice of Consultation](#) was issued on 27 January 2020 and published on the Council website.

- 3.27 In accordance with the adopted Statement of Community Involvement, all persons, agents and organisations as well as statutory organisations were notified by email or, where appropriate, by letter of the consultation, how to find out more information, how to comment, and the deadline for comments to be received. A list of the people and organisations contacted is provided in Appendix 3.

- 3.28 In addition, extensive publicity was given to the consultation via:

- A formal advert in the Wirral Globe on 29<sup>th</sup> January 2020 (see Appendix 2).
- Local media content and paid adverts to encourage sign up to portal and dates/locations of drop in events.
- Social media posts on Twitter and Facebook.
- Consultation explanation leaflet and posters distributed to key locations throughout the borough during Regulation 18 consultation.
- A [user guide](#) for the portal was made available on the Regulation 18 Consultation webpage and respondents were required to register providing name and contact details if they wanted to submit comments. Explanation was provided that comments would be published online anonymously.
- A [Local Plan explainer video](#) was produced for use on social media channels, alongside simple and shareable infographic and visual content. The video was posted on the Council's YouTube page. The video explains what the Local Plan is, why it is needed, the Local Plan production process, the situation for Wirral, and what the Consultation is asking.
- Regular features were posted on the Wirral View website setting out [facts on the Local Plan](#), including regeneration and development, and [encouraging feedback](#) through the Regulation 18 Consultation.
- Additional electronic notifications, containing a link to the consultation documents on the Council's website, were also sent to members of the Council's four Constituency Area Committees; the Wirral Partnership and

Wirral Plan Delivery Group; and the Council's Corporate Mail Chimp database.

- It was also included in the Community Action Wirral monthly e-newsletter to third sector contacts.

#### **4.0 Issues and Options Consultation Outcomes – Key Issues**

- 4.1 To assist consultees and the Council the Issues and Options Document set out a series of questions across each of its sections together with an additional question to give an opportunity for consultees to submit other comments. The Council encouraged comments to be made via its online Planning Consultation Portal but also accepted comments submitted in writing
- 4.2 The consultation generated 25,992 comments from 1396 consultees for the main Issues and Options Document and 482 comments from 161 consultees who responded to the site allocation consultation event. The number of respondents is smaller than the total number of responses received as the majority of the responses submitted made multiple from the same respondents.
- 4.3 The comments received with names and details redacted in accordance with the Council's privacy policy are available on the Council's [Consultation Portal](#) and also in PDF version on the Council's [web site](#).
- 4.3 The comments received and the Council's response including how the Local Plan Submission Draft Plan has responded to them is set out in the following appendices:
- **Appendix 4**-Sets out a **detailed summary of all the comments** received by question together with the Council's response. It should be noted that due to the number of comments received it has not been possible to provide a response to each individual comment received.
  - **Appendix 5**-Sets out a **summary of the Key Issues Raised** and the Council's response.
  - **Appendix 6**-Sets out a **summary of the Key Issues Raised by Statutory Consultees and Bodies** and the Council's response.

#### **5.0 Further consultation undertaken prior to publication of the Local Plan Submission Draft**

##### Evidence Studies

- 5.1 Consultation on the following evidence base documents and updates to existing evidence took place in June and July 2020:
- Agricultural Economy and Land Study Addendum;
  - Wirral Landscape Sensitivity Assessment Addendum;
  - Wirral Local Landscape Designations Review 2020; and
  - Exploring The Computation of Housing Need in Wirral 2020.
- 5.2 During 2021 a number of new evidence base documents and updates to existing evidence were also subject to public consultation:
- Draft Wirral Environmental Sensitivity Study: 6-week consultation ended 29 March 2021;

- Draft Employment Land and Premises Study: 6-week consultation ended 31 March 2021;
- Draft Green and Blue Infrastructure Strategy: 6-week consultation ended 5 April 2021;
- Wirral Housing Density Study 2021: 6-week consultation ended 27 April 2021;
- Birkenhead 2040 Framework: consultation March - June 2021; and
- Local Green Space Designations: Review of Sites: 8-week consultation ended 6 August 2021.

5.3 Comments received on these consultations were passed to the relevant consultants and considered when finalising the studies as appropriate.

**Further consultation with Statutory Consultees**

5.3 The Council undertook further detailed engagement with statutory consultees in September 2021 with a full working draft of the Local Plan Submission Plan circulated for comment. Comments received from this consultation fed into the final version of the Submission Plan.

## **Appendices**

- 1-Local Consultation Focus Group Presentations and Report
- 2-Consultation Media
- 3-Schedule of consultees
- 4-Summary of all comments received and Council response.
- 5-Key issues raised and Council response
- 6-Key issues raised by statutory consultees and Council response

## Appendix 1-Local Consultation Focus Groups

1. Focus Group Presentations
2. Focus Group Report

## Appendix 2: Consultation Media

1. Have Your Say Consultation and Registration Advert
2. Have Your Say Consultation Advert
3. Consultation Registration Poster
4. Display Panels Content
5. Consultation Leaflet
6. Translated Consultation Posters
7. Local Plan Pop Up Banners
8. Issues and Options Local Plan Summary
9. Issues and Options Local Plan Summary Easy Read
10. Issues and Options Local Plan Summary Easy Read and Comment Form
11. Local Plan Questionnaire

## Appendix 5: Key issues raised and Council response

	<b>Issues</b>	<b>Council Response</b>	<b>Chapters / Questions referenced</b>
<b>Ref</b>	<b>1. Issues raised across all sections</b>		
1.	Support brownfield development/urban intensification/regeneration.	The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Borough's development needs through the development of brownfield land within existing urban areas.	Q2.3, Q2.4, Q2.5, Q2.6, Q2.7, Q2.8, Q2.10, Q2.12, Q2.13, Q2.14, Q2.15, Q2.16, Q2.17, Q3.1, Q3.2, Q3.3, Q4.1, Q4.2, Q4.5, Q4.6, Q4.7, Q4.10, Q4.11, Q4.14, Q4.18, Q4.19, Q4.20, Q6.1, Q6.8, Q7.3, Q7.5, Q8.1, Q8.3, Q8.11, Q9.1, Q9.2, Q10.1
2.	Oppose urban intensification / densification	The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Borough's development needs through the development of brownfield land within existing urban areas.	Q4.10, Q4.18, Q10.1
3.	Open spaces and parks should be protected / enhanced / provided	Policy WS 5 of the Local Plan Submission Draft sets out a strategy for green and blue infrastructure, biodiversity, open space, and landscape protection. The Local Plan Submission Draft is based on the Council's preferred urban intensification option.	Q2.8, Q2.15, Q2.9, Q3.2, Q4.5, Q4.8, Q4.12, Q4.15, Q4.18, Q6.4, Q6.5, Q7.1, Q7.2, Q7.3, Q7.4, Q7.5, Q8.1, Q8.2, Q8.6, Q8.7, Q8.8, Q8.11, Q8.15, Q8.16, Q8.19
4.	Support Green Belt development - to meet housing needs and general employment land needs	The Local Plan Submission Draft does not promote Green Belt development.	Q2.4, Q2.5, Q2.10, Q2.12, Q2.13, Q2.16, Q4.1, Q4.2, Q4.5, Q4.6, Q4.10, Q4.14, Q4.18, Q4.19, Q4.20, Q5.3a, Q6.1, Q6.3, Q8.6, Q10.1

5.	<p>Oppose Green Belt development. Site specific issues were raised for a number of Green Belt sites. Recurring issues raised include: flood risk, loss of agricultural land, impact to wildlife and wildlife habitats, proximity to green and blue infrastructure, preventing sprawl and coalescence, loss of character and identity.</p>	<p>The Local Plan Submission Draft does not promote Green Belt development.</p>	<p>Q2.2, Q2.3, Q2.4, Q2.5, Q2.6, Q2.7, Q2.8, Q2.11, Q2.12, Q2.13, Q2.14, Q2.16, Q3.1, Q3.2, Q3.3, Q4.1, Q4.2, Q4.3, Q4.5, Q4.7, Q4.9, Q4.10, Q4.13, Q4.14, Q4.18, Q4.19, Q4.20, Q5.6, Q5.7, Q6.1, Q6.4, Q6.11, Q7.2, Q7.3, Q7.5, Q8.1, Q8.3, Q8.4, Q8.6, Q8.7, Q8.11, Q.12, Q.13, Q8.14, Q8.15, Q8.17, Q8.18, Q10.1</p>
6.	<p>The housing requirement is too high and should be lower. The standard methodology is inaccurate and proposed alternative methodologies for calculating the housing requirement figure should be used. This would prevent the need for green belt release. Most respondents felt that the housing requirement is too high and with the levels being unproven, stating that the standard method is flawed, uses old data and is not mandatory.</p> <p>Respondents felt that Wirral is not an area of high housing pressure. Further assessment that includes levels of homelessness, local evidence, Brexit, Covid-19 and climate change factors is needed.</p>	<p>The Borough's housing needs have been re-assessed in the finalised and independently verified Strategic Housing Market Assessment (SHMA) 2021 including the latest economic forecasts for the City Region. The Council has applied the standard method in accordance with national policy and guidance, which requires the continued use of the older 2014-based household projections. The appropriateness of an alternative calculation, has been addressed in two reports by Liverpool University.</p>	<p>Q2.1, Q2.2, Q2.3, Q2.7, Q2.8, Q2.10, Q2.12, Q2.13, Q2.15, Q2.17, Q3.1, Q3.3, Q4.1, Q4.5, Q4.7, Q4.10, Q4.13, Q4.14, Q4.18, Q4.19, Q4.20, Q5.1a, Q6.1, Q7.5, Q8.1, Q8.2,Q8.3, Q8.17, Q10.1</p>

7.	<p>The housing requirement is too low/should be greater. A smaller number of respondents felt that the housing requirement is too low, and the issues raised in the SHMA can only be addressed by a higher figure - 960 pa was suggested to reflect previous under-delivery. Demographic modelling to reflect growth aspirations indicate a need for between 1,045 dpa and 1,300 dpa. It was argued that the standard method is a minimum requirement and further assessment is needed, which takes into account growth strategies, affordable housing needs and strategic infrastructure impacts.</p>	<p>The Council has applied the standard method in accordance with national policy and guidance. The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (SHMA, 2021) including the latest economic forecasts for the City Region and has been updated to take account of relevant Regulation 18 responses. An uplift for economic growth has been included in the housing requirement. The Local Plan Submission Draft policies are based on a wide range of up-to-date evidence studies.</p>	Q2.1
8.	<p>Potential exceptional circumstances for a deviation from the standard methodology indicating a lower housing requirement include Green Belt protection, lower population than projected, low housing need and low economic growth.</p>	<p>The Borough's housing needs have been re-assessed in the finalised Strategic Housing Market Assessment (SHMA) 2021 including the latest economic forecasts for the City Region. The Local Plan Submission Draft does not promote Green Belt development.</p>	Q2.2
9.	<p>Potential exceptional circumstances for a deviation / uplift from the standard methodology indicating a higher housing requirement include Wirral's high affordable housing need identified in the SHMA and the need for additional development to support economic growth and WLP employment land delivery. There is a need to encourage higher levels of net inward migration amongst economically active age groups. Housing delivery has been suppressed due to a lack of</p>	<p>The Borough's housing needs have been re-assessed in the finalised SHMA 2021 including the latest economic forecasts for the City Region.</p>	Q2.2

	sites and new deliverable sites if it is to avoid failing the HDT altogether in the years ahead.		
10.	Alternative approaches to calculating the housing requirement figure include different ONS data, Council statistics, population figures reflective of actual trends and reassessed housing need for a lower/higher figure.	The Borough's housing needs have been re-assessed in the finalised SHMA 2021 including the latest economic forecasts for the City Region. The appropriateness of alternative calculations has been addressed in the reports by Liverpool University.	Q2.3
11.	Flawed / Lack of evidence base to support policy - retail evidence base is out of date (Retail and Centres Study), Density Study, Green Belt Review	Studies were completed in line with national policy and guidance. Some studies have been updated to reflect more recent data.	Q2.1, Q2.3, Q2.5, Q2.7, Q2.8, Q2.10, Q2.12, Q2.13, Q2.16, Q2.17, Q3.1, Q3.2, Q4.1, Q4.2, Q4.3, Q4.5, Q4.9, Q4.12, Q4.13, Q4.15, Q4.16, Q4.17, Q4.18, Q4.19, Q4.20, Q4.1a, Q5.1, Q5.3, Q6.1, Q6.7, Q6.9, Q7.1, Q7.5, Q8.4, Q8.18, Q10.1
12.	Impact of requirements/policy on site viability/deliverability	Viability of policies has been assessed in the Viability Study.	Q2.2, Q2.8, Q2.12, Q2.13, Q2.15, Q4.3, Q4.5, Q4.15, Q5.1, Q5.2, Q7.1, Q7.2, Q7.3, Q7.4, Q7.5, Q8.1, Q8.2, Q8.3 Q8.4 Q8.7, Q8.11, Q8.14, Q8.15, Q8.17, Q10.1
13.	Lack of supporting infrastructure to support new development / need for infrastructure improvement	The Infrastructure Delivery Plan will set out all appropriate infrastructure required to support the delivery of new development.	Q2.2, Q2.4, Q2.5, Q2.6, Q2.8, Q2.12, Q2.13, Q2.15, Q2.16, Q2.17, Q3.1, Q3.2, Q3.3, Q4.1, Q4.2, Q4.3, Q4.5, Q4.8, Q4.10, Q4.14, Q4.15, Q4.16, Q4.17, Q4.18, Q4.19, Q6.1, Q6.5, Q7.1, Q7.2, Q7.3, Q7.5, Q8.1, Q8.3, Q8.16, Q10.1

14.	Development / policies would / should not impact on the character or identity of areas / the Borough / maintain character and identity. This should be protected / enhanced.	The Local Plan Submission Draft includes relevant criteria in a wide range of policies for example in Policy WS 6 Place Making for Wirral, Policy WS 7 Principles for Design, Policy WS 3.2 Housing Density, in policies for individual land allocations in Part 4 and Part 5 and in the detailed policies in Part 6.	Q2.4, Q2.8, Q2.9, Q2.16, Q3.1, Q3.2, Q3.3, Q4.2, Q4.3, Q4.4, Q4.5, Q4.12, Q4.15, Q4.16, Q4.17, Q4.18, Q5.8, Q6.8, Q8.1, Q8.11, Q8.14, Q8.17, Q8.18, Q9.2
15.	Impact of approach / policy on wildlife / biodiversity / environment / green and blue infrastructure	Policy WS 5 of the Local Plan Submission Draft sets out a strategy for green and blue infrastructure, biodiversity, open space and landscape protection which includes provision for biodiversity net gain for all new development and sets out a number of policies to protect and enhance important ecological sites and networks. Part 6 of the Local Plan Submission Draft includes detailed policies for landscaping (Policy WD 1), heritage assets (Policy WD 2) and biodiversity and geodiversity (Policy WD 3).	Q2.2, Q2.7, Q2.8, Q2.15, Q2.16, Q3.2, Q3.3, Q4.1, Q4.2, Q4.5, Q4.8, Q4.12, Q4.14, Q4.17, Q4.18, Q6.1?, Q6.2, Q6.4, Q7.1, Q7.2, Q7.3, Q7.4, Q8.1, Q8.2, Q8.3, Q8.4, Q8.5, Q8.11, Q8.14, Q8.20, Q9.2, Q10.1
16.	Policy / approach must address, protect, or mitigate against climate change / emergency	The Local Plan supports the Wirral Council Environment and Climate Emergency Policy Statement 2021. Measures to mitigate and adapt to climate change are threaded throughout the plan and addressed at a range of geographical scales and policy actions. This is explained in the introduction to the Local Plan.	Q2.1, Q2.2, Q2.7, Q2.8, Q2.15, Q2.17, Q3.1, Q3.2, Q3.3, Q4.3, Q4.5, Q4.12, Q4.15, Q4.17, Q6.8, Q7.1, Q7.2, Q7.3, Q7.5, Q8.1, Q8.19, Q8.2, Q8.3, Q8.6, Q.13, Q8.15, Q9.1, Q10.1

17.	Vacant properties in the Borough should be brought back into use	A separate allowance for the return of empty homes has been included in the Local Plan Submission Draft, based on the performance of a funded programme which has operated since April 2011 and a tapered delivery under Option 3. Further information is available in the Housing Delivery Strategy that accompanies the Submission Plan.	Q2.3, Q2.8, Q2.15, Q3.2, Q3.3, Q4.1, Q4.7, Q4.20, Q5.4, Q5.5, Q6.11, Q10.1
<b>2. Context and Evidence</b>			
18.	Support was expressed for the proposed settlement hierarchy, for focused investment and regeneration in the Urban Conurbation and benefits to the climate through local employment opportunities. Specific recommendations were made for designations to the Settlement Hierarchy, particularly the urban settlement category.	Support noted	Q2.4
19.	The Settlement Hierarchy approach has no basis in planning policy and guidance, and disregards local character. It enables unnecessary development. Smaller townships should be designated individually.	Policy WS 6 requires development proposals to adhere to placemaking principles and respond to the local context and character of areas.	Q2.5

20.	<p>Reasons for opposing the past completions approach to calculating employment land need included current market conditions, Covid-19, Brexit and a shifting economy, as well as a lack of investment interest in the Wirral.</p>	<p>The Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance. The Employment Land and Premises Study uses three scenarios to calculate the need for employment land: Market Capacity Scenario, Workforce Capacity Scenario and the Economic Capacity Impact Scenario. The Local Plan Submission Draft discounts all but the Economic Capacity Impact Scenario.</p>	Q2.6
21.	<p>The employment land need figure is too high - employment land and housing targets are fundamentally misaligned. Employment land growth at 80 ha is almost double the amount that can be sustained by 6,900 jobs annually and this could not be sustainably accommodated within the borough.</p>	<p>The Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance.</p>	Q2.6, Q2.17
22.	<p>The redesignation of surplus employment land for alternative uses was supported, including surplus retail land, where high design standards and green and open spaces are provided for. Suggested alternatives included rewilding. Some respondents felt that surplus employment land should be retained, or is not required as there are sufficient sites for residential uses and other brownfield development should be prioritised instead.</p>	<p>The Council support appropriate alternative uses within employment areas. Policy WS 5 of the Local Plan Submission Draft sets out a strategy for green and blue infrastructure, biodiversity, open space and landscape protection. The Local Plan Submission Draft is based on the Council's preferred urban intensification option.</p>	Q2.7

23.	<p>Higher densities would be acceptable where needed on a cautionary case-by-case basis, where schemes; are designed well and inclusively based on best practice; accessible to public transport; protect and enhance the environment (EV charging, low carbon, positive biodiversity net gain), green belt, and heritage; provide for play and open spaces.</p>	<p>Areas where higher densities are likely to be appropriate, based on their character, location and access to services are shown on the Local Plan Submission Draft Policies Map.</p>	Q2.8
24.	<p>Reasons for opposition to higher densities included the inability of standardised proposals of higher densities to remain viable while providing for amenities and retaining character and good design / attractiveness, and the lack of local need for increased densities.</p>	<p>The densities set out in Local Plan Policy WS 3.2 are a starting point and will allow site-specific circumstances and local character to be taken into consideration. Policy WS 6 requires development proposals to adhere to placemaking principles and respond to the local context and character of areas. The Viability Study has tested viability at various densities.</p>	Q2.8
25.	<p>Higher densities could be acceptable/promoted in brownfield, regeneration and existing urban centres where there is capacity and proximity to local and transport infrastructure and services - specifically east of the M53, Wallasey (and Docks), Birkenhead and Wirral Waters.</p>	<p>Areas where higher densities are likely to be appropriate, based on their character, location and access to services are shown on the Local Plan Submission Draft Policies Map. The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas.</p>	Q2.9

26.	<p>Higher densities would not be appropriate in areas with existing low densities, including on or adjacent to greenbelt/greenfield sites, parks and recreational open spaces or existing residential area, specifically including west of the M53, Greasby, Caldy, Irby, Heswall and Port Sunlight.</p>	<p>Areas where higher densities are likely to be appropriate, based on their character, location and access to services are shown on the Local Plan Submission Draft Policies Map. The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas.</p>	Q2.9
27.	<p>There is disagreement with the Economic Viability Baseline Update 2018 in that it is insufficient to convince developers to build in Zones 1 and 2 and does not determine the funding required for brownfield sites and the evidence base is flawed (a 40% affordable housing requirement is used while the I&amp;O LP indicates a 30% requirement). No consideration given to concentrating delivery into small geographic area or site specific assessments.</p>	<p>The future housing land supply has been reconsidered in the light of the comments received and the latest available evidence. The Plan requirement for affordable housing is at 10% or 20% depending on the viability zone (Policy WS 3) . Further information is now set out in the Housing Delivery Strategy and the Viability Study which accompanies the Local Plan Submission Draft.</p>	Q2.10
28.	<p>A number of strategies were proposed in order to address viability gaps for urban brownfield sites, including; channelling CIL funding from other Zones 3 and 4 to Zones 1 and 2, pursuing all available sources of grant funding, re-examining viability with new studies, reducing housing requirements, and working with experts and developers to bring forward brownfield sites for development, such as Wirral Waters.</p>	<p>A Viability Study (2022) has been completed for the Local Plan Submission Draft. Further information is set out in the Housing Delivery Strategy.</p>	Q2.11

29.	<p>The proposed Birkenhead regeneration approach represents a welcomed and needed 'once in a generation' opportunity to tackle deprivation and decline at the high potential waterfront, and should commit to high quality design, infrastructure and amenities through a bold, proactive strategy and vision.</p>	<p>Support noted. The Draft Birkenhead 2040 Framework was published for consultation in 2021. The Birkenhead Design Guide and Public Realm Strategy will be prepared as a supplementary planning document. Many policies in the Local Plan Submission Draft support these aims.</p>	Q2.12
30.	<p>There is overreliance on the Wirral Waters to deliver housing needs, which has viability and deliverability issues including a lack of existing infrastructure and access to support housing, and no comprehensive plan for this yet in place. The housing market in Birkenhead cannot absorb this scale and there is a concern over the track record of delivery given the existing and dated planning evidence base and permission for the Wirral Waters site. A more balanced/dispersed approach including urban extensions and green belt release may alleviate the overreliance on Wirral Waters.</p>	<p>Wirral Waters Housing Delivery has commenced with the first phase of the urban splash project nearing completion (March 2022). In addition, the 500 dwelling build to rent Legacy project commenced in March 2022. Wirral Waters is not an isolated project but must now be seen as one (albeit of strategic importance) of a range of strategic housing and regeneration projects in Birkenhead which the Council is now working to deliver. The Council is working with Homes England, the LCR CA and developers to bring forward this development. Various funding (FHSF, HSF, Town Deal) has been secured and remediation works completed. As is explained in the Housing Delivery Strategy, the Council has developed a 'five pillar' regeneration strategy for the comprehensive regeneration of Birkenhead which includes the preparation of the Birkenhead 2040 Framework, Place Making, Infrastructure provision and a bespoke delivery vehicle (UDC) to be established to undertake regeneration. The Birkenhead Housing</p>	Q2.12

		Market Study (2022) has evidenced other areas where comprehensive area-based regeneration strategies have enabled similar housing market growth.	
31.	Birkenhead, New Ferry, Hind Street regenerations are supported as these are the areas with the highest need for regeneration, and should be regenerated using a green, low-car but flexible approach that does not prejudice employment opportunities.	Support noted. A new low carbon urban village is detailed under Policy RA 5.	Q2.13
32.	Support for targeted intervention at Birkenhead through a dedicated delivery model to ensure rapid regeneration, which could be facilitated via a well-resourced public-private partnership approach in consultation with residents and neighbouring authorities and enshrined through sound development plan policies/framework.	Support noted. It is expected that consultation with residents will form part of a delivery vehicle. The bespoke delivery vehicle will include requirements for community involvement, consultation and engagement. The draft Birkenhead 2040 Framework was published for consultation in 2021.	Q2.14
33.	Alternative ideas for the regeneration of Birkenhead includes specific proposals such as a Streetcar tram service, a concert hall and arts quarter, tourism and leisure and Garden city.	The Draft Birkenhead 2040 Framework sets out the vision of an Urban Garden City, and the provision of a new mass transit system to link new and existing neighbourhoods in Birkenhead to existing Merseyrail stations and facilities. Similar cultural development within the Woodside Masterplan Area (Policy RA3 -MA4) to be considered.	Q2.15
34.	A number of submissions challenged the viability and deliverability of key strategic sites including at Wirral Waters, Hind Street,	Key sites for delivery of the Local Plan Submission Draft have been assessed through the Viability Assessment (2022). Considerable progress has been made in the	Q2.15

	<p>Woodside and Bromborough without the support of significant public funding.</p>	<p>development of a comprehensive regeneration strategy for Birkenhead since the Issues and Options Consultation in early 2020 as is explained in the Housing Delivery Strategy. Further public sector funding has been received for gap funding for sites in the town centre, and public realm place making infrastructure. Housing delivery has now commenced at Wirral Waters. As is explained in the Housing Delivery Strategy, the Birkenhead Housing Market Study and the Viability Study, the implementation of the comprehensive regeneration strategy for Birkenhead, and existing funding and delivery of housing at Wirral Waters will change the housing market and improve viability and deliverability of housing allocations in Birkenhead.</p>	
35.	<p>There was broad disagreement from respondents as to the classification of Green Belt sites in the Green Belt Review 2019. A number of comments were raised as to specific green belt parcels and sites, which included objections related to the how development would impact on various factors such as protected and designated sites, wildlife corridors and habitats, amenity and tranquillity and the separation of settlements. Some responses argued that certain sites were not highly performing and should be released for development.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.</p>	Q2.16

36.	The Green Belt Review 2019 and classifications are flawed, unsound and against national policy, and has taken a different approach to the 2018 Interim Review and not taken into account the weight of other considerations such as Local Wildlife Sites. A further, more granular and site-specific review should be undertaken.	The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.	Q2.16
37.	No green belt sites should qualify as weakly performing with justification of exceptional circumstances, and should therefore not be released for development as they bring a range of benefits to the environment, economy and wellbeing and prevent urban sprawl	The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.	Q2.16
38.	Respondents felt that some aspects of the Local Plan evidence base were flawed, specifically around infrastructure, retail centres, natural environment, the Green Belt Review and the Density Study, and that the evidence was difficult to understand.	Additional evidence has been prepared in consultation with the public to address these issues and further detail is now included in the Local Plan Submission Draft. No green belt sites are promoted for development in the Local Plan Submission Draft.	Q2.17
<b>3. Our Vision and Objectives for Wirral</b>			
39.	Conservation and enhancement of the historic and natural environment and character of the Wirral should be reflected within the Vision	This is addressed by Strategic Objective 8 and is reflected by paragraph B and J of the Vision.	Q3.1
40.	The climate emergency and reduction of carbon emissions should be included within the vision, including the achievement of a circular economy.	Paragraph B of the vision outlines carbon reduction and budgeting and emphasises the green belt's contribution to climate change mitigation and adaptation. The transition to a	Q3.1

		low carbon and circular economy has been addressed in Strategic Objective 4.	
41.	Social and economic aspirations should be included within the Vision	The Vision includes social and economic aspirations in terms of the Birkenhead regeneration strategy for employment and housing, investment in the Liverpool City Region and its competitiveness at regional, national and international levels, Wirral's visitor economy, and reducing inequality in the Borough.	Q3.1
42.	The objectives are unrealistic, too long and wordy, and the plan for regeneration is ambitious and difficult to realise	Plans should contain a locally specific, evidence-based vision developed in consultation with stakeholders. Paragraph 4.43 - the waterfront is an area of unique and high potential that has lacked the appropriate levels of ambition, development and investment in the past. There is now the opportunity to capture this potential through a comprehensive strategy and vision.	Q3.1
43.	The plan period should be extended beyond 2035, covering 2022-2037	The Plan period has been extended to 2037.	Q3.1
44.	The focus on the East of the Wirral is too great - housing, infrastructure and services should be invested in for all of the Wirral.	The Local Plan Submission Draft is based on the Council's preferred urban intensification option, focussing development and investment east of the peninsula and recognising the need for regeneration in Birkenhead and surrounding areas and the environmental constraints that exist west of	Q3.1

		the peninsula outside of existing developed areas.	
45.	Strategic Objective 1 should focus on (and define) sustainable development and the climate emergency through promotion of sustainable design features, and include net zero carbon targets.	The focus of SO1 is to meet climate agreement and national legally binding net zero carbon targets and support sustainable design in new development.	Q3.2
46.	Strategic Objective 2 should focus on the promotion of tourism and the protection of coastal and land wildlife	The Vision seeks to create a thriving visitor economy for residents and visitors alike. Wildlife is covered in SO5.	Q3.2
47.	Strategic Objective 3 should focus on building of housing to meet needs through brownfield development and reducing the need to travel, especially via car, through the provision of sustainable public transport	SO3 aims to secure sustainable travel and reduce the need to travel and reliance on cars. SO7 addresses housing provision.	Q3.2
48.	Disagreement with Strategic Objective 3 - this may place too much pressure on infrastructure within the existing centres, therefore development should be focussed away from existing centres, excluding Birkenhead	The Local Plan Submission Draft is based on the Council's preferred urban intensification option. The impact of this approach has been assessed in a number of relevant evidence base studies, as set out in the accompanying Infrastructure Delivery Plan.	Q3.2
49.	Strategic Objective 4 should include the protection of green belt and agricultural land, parks and open space as and expand on how	SO5 aims to protect and improve urban and rural green spaces. The approach to climate change is explained in the Introduction of the Local Plan Submission Draft. Supporting	Q3.2

	climate change adaptation and mitigation can be achieved	policies WS 1, WS 5 and WS 8 expand on the climate change approach.	
50.	Strategic Objective 5 should clarify how development can ensure the achievement of biodiversity net gain on all new development and ensure protection of the green belt, natural habitats and open spaces	Policy WS 5 clarifies biodiversity net gain delivery. It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.	Q3.2
51.	Strategic Objective 6 should support a master planning approach to water management and investment in flood defences	SO6 encourages SuDS and development away from areas of flood risk. Policy WD 4 sets out requirements for where flood defence works will be permitted and requires master planning for SuDS design where appropriate.	Q3.2
52.	Strategic Objective 7 is unachievable and undeliverable. Local housing need should be recalculated and reduced, and delivered through brownfield sites and be zero carbon. The objective should aim to "manage" rather than "provide" housing supply.	The Government's standard method of calculation has been applied to the housing land supply, with sites only included where they can be demonstrated as deliverable and developable, in line with national planning policy and guidance. No development is proposed on green belt land. See SO1 and Policy WS 8 for net zero carbon achievement for development.	Q3.2
53.	Strategic Objective 8 should seek to conserve and enhance all elements of cultural heritage, referencing all valued landscapes and acknowledging the contribution of the green belt to the character of the borough, ensuring new development does not encroach on this.	Strategic Objective 8 seeks to ensure new development respects the Borough's distinctive character, the protection and enhancement of the historic character of places and buildings, and the protection of valued landscapes. The Green Belt's	Q3.2

		contribution to the character of the Borough is acknowledged in the Vision.	
54.	Strategic Objective 9 should provide more detail on the assessment and provision of local infrastructure and ensure the protection and provision of healthcare services specifically.	More detail is provided on the assessment and provision of infrastructure to meet needs in Policy WS 10 Infrastructure Delivery. Strategic Objective 9 seeks the provision and promotion of emergency services and health infrastructure, and other essential infrastructure for local communities.	Q3.2
55.	Strategic Objective 10 should be the first objective.	Strategic Objective 1 addresses the climate emergency, a priority for the Local Plan but they are not listed in an order of preference.	Q3.2
56.	Strategic Objective 11 should include reference to the achievement of a circular economy and should support existing businesses through improvements in accessible car parking and improved public transport	Strategic Objective 11 seeks to support a competitive and diverse rural economy. Strategic Objective 4 supports a transition to a circular economy. Strategic Objective 3 supports the provision of sustainable, accessible and connected transport.	Q3.2
57.	Strategic Objective 12 should focus on employment and quality of life and be specific to Birkenhead only.	Employment is addressed in SO11. The focus for development and investment towards the east of the Borough addresses the need for regeneration in Birkenhead and its surroundings. Strategic Objective 2 highlights Birkenhead in this regard.	Q3.2
58.	Strategic Objective 12 should ensure the regeneration of all towns, including Liscard and Moreton.	The Local Plan Submission Draft seeks to maintain and improve the vitality of the centres in all of the Borough.	Q3.2

59.	Strategic Objective 12 should scale retail development to reflect economic needs, encouraging change of use from vacant high street properties to residential dwellings.	Wirral Retail & Centres Study – 2021 Retail Capacity Update assessment for comparison shopping floorspace indicates that there is little or no capacity to allocate sites for additional retail floorspace in any of the centres across Wirral. Policy WS 11 reflects changes to the Use Classes Order which significantly broadened the range of town centre uses which no longer need planning permission for change of use under Use Class E.	Q3.2
60.	Suggested additional objectives included the promotion of sustainable design and building, retrofitting and the use of design guides, alignment with the Council's climate change emergency strategy, further protection and enhancement of the natural/rural environment. Social and community infrastructure should be protected.	See Appendix 4 for responses to individual suggested objectives. The Local Plan Submission Draft supports Wirral Council Environment and Climate Emergency Policy Statement 2021 and measures to mitigate and adapt to climate change are threaded throughout the plan, and addressed at a range of geographical scales and policy actions. This is explained on page 1 of the plan. Masterplans will be prepared for all key regeneration areas and sites (see Part 3 and 4).	Q3.3
<b>4. Strategic Spatial Options</b>			
61.	Respondents felt that to ensure a sufficient urban land supply, the Council should employ a range of methods such as densification, neighbourhood planning, ensuring the brownfield land register is up to date, exploring all possible funding sources including providing financial incentives for remediation,	The Council has considered most of these options to maximise the supply of brownfield supply in the Local Plan Submission Draft. The Council will consider the use of its CPO powers including where appropriate to	Q4.1

	<p>redesignation of unused land (car parks, empty retail etc.) and underused green space for residential purposes and the use of Compulsory Purchase Orders.</p>	<p>enable the delivery of brownfield development.</p>	
62.	<p>Option 1A - The deliverability of the proposed allocations / brownfield sites under the proposed timeframes and delivery rates is unrealistic/overstated given their viability issues, and will need improvements given the constraints (lack of supporting infrastructure and access, remedial works, market issues, no planning permission or developer, etc.)</p>	<p>Sites have only been included in the land supply where they can be shown to be 'deliverable' or 'developable' in terms of the definitions set out in national planning policy and guidance, which includes information provided by relevant developers and landowners. The trajectory has been updated to take account of the most recent available evidence. Further information is set out in the Strategic Housing Land Availability Assessment (SHLAA) (2022) and Housing Delivery Strategy which accompany the Local Plan Submission Draft.</p>	Q4.2
63.	<p>Option 1A - the proximity and / or functional linkage of urban allocations to designated sites (SPAs, Ramsar, SSSI), problematic neighbouring uses and areas of sensitive character will require strategic mitigation in event of development</p>	<p>Any future planning application(s) will need to comply with any necessary statutory requirements / local plan policies and impact assessments requirements.</p>	Q4.2
64.	<p>Strong support expressed for the Broad Locations of the Preferred Option, particularly the regeneration of Wirral Waters, Hind Street and Birkenhead, and should see greater intensification at these strategic brownfield</p>	<p>Support noted. The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the Borough's development needs through the development of brownfield land</p>	Q4.5

	sites than proposed and a sustainable approach used	within existing urban areas. The regeneration of Birkenhead is set out in the Draft Birkenhead 2040 Framework, Hind Street site is allocated for mixed use residential led development in Policy RA 5 of the Local Plan Submission Draft with a supporting masterplan and delivery plan in preparation.	
65.	Other areas suggested for identification of Broad Locations for Growth includes existing urban and brownfield sites on the Mersey waterfront and docklands, New Ferry and Clatterbridge Hospital, as well as general areas where urban infill is possible	Proposals for individual broad locations are now set out in Part 4 of the Local Plan Submission Draft, which include sites within the Mersey waterfront and docklands. Clatterbridge Hospital is within the Green Belt, which is not being altered in the Local Plan and where national Green Belt policies will apply.	Q4.6
66.	A range of sites within the urban area were proposed for future housing development. Some respondents felt that, in general, more sites should be added to the Brownfield register and prioritised. Others felt that there were no additional available sites to suggest, and sufficient land had been identified already.	The Council has allocated all suitable, deliverable and developable sites within the urban areas and a series of broad locations within regeneration areas. There are no other known sites within the urban area that could be considered for future housing development at this time, albeit we recognise that the Council is concurrently carrying out a continuous 'call for sites' exercise and that there will always be new 'windfall sites' emerging.	Q4.7
67.	A number of site-specific comments were received for the proposed employment allocations, covering concerns such as the impact of development of these sites on designated/protected sites, transport	The Local Plan Submission Draft is accompanied by the relevant Habitats Regulations Assessment and provision for appropriate mitigation for protected sites is now set out in Policy WS 5.5 of the Local	Q4.8

	infrastructure, heritage and the environment and habitats, as well as providing planning information for the sites.	Plan Submission Draft. Part 5 contains place Policies that include specific requirements for allocated sites.	
68.	Respondents proposed a few additional urban sites for employment allocations, including golf courses, disused and surplus land sites.	Some of the proposed sites were unsuitable due to their green belt location or have been allocated for residential development instead.	Q4.9
69.	Urban intensification is supported as the advantages outweigh the disadvantages and would allow for more affordable and sustainable housing and employment delivery.	Support noted.	Q4.10
70.	Support was expressed for a dispersed, weakly performing green belt release approach, as the urban intensification approach identifies undeliverable sites that will result in a lack of the right mix of housing and investment across the borough and may therefore result in an unsound Local Plan.	It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.	Q4.10
71.	While there was disagreement with the stepped approach from some respondents, stating that sufficient housing should be identified with higher delivery rates earlier in the plan, most respondents agreed that it would be appropriate with long lead in times using brownfield land.	The Local Plan Submission Draft Housing Trajectory sets out the expected realistic delivery timescales for brownfield sites as advised by developers. The Council is working with Homes England and The LCR Combined Authority to identify viability gap funding to ensure that strategic brownfield sites can be delivered in accordance with the trajectory and where possible to accelerate delivery (see Housing Delivery Strategy).	Q4.11

72.	<p>A number of general comments were made in addition to the proposed site specific comments for Dispersed Green Belt release. Many objections were made towards this option, with brownfield site release being preferred. Comments addressed many of the benefits of green belt, such as its ability to prevent flooding, attract tourists, and provide a buffer between urban spaces. Impacts on removing green belt were expressed, such as impacts on biodiversity, health and wellbeing, character and identity, and pollution.</p>	<p>Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs. The Submission Plan does not propose any green belt release.</p>	Q4.12
73.	<p>Respondents felt that there are no weakly performing green belt sites, and none should be released. However, a large number of green belt sites and parcels were proposed for release as well as general areas such as Eastham Village.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and no green belt sites have been promoted for development.</p>	Q4.13
74.	<p>There were a number of advantages as to dispersed green belt release expressed, such as the increased ability to deliver the housing needs identified in the SHMA. Development and the impacts of development would be dispersed more evenly throughout the Borough. There would be benefits to existing settlements, including increased access to green space and infrastructure improvements.</p>	<p>It has been concluded that there is no evidence to justify the changing the boundaries of or releasing Green Belt land to meet the need for housing.</p>	Q4.14
75.	<p>Disadvantages of a dispersed green belt release under Option 2A include negative impacts on wildlife, wildlife corridors and biodiversity, health impacts and the creation of</p>	<p>It has been concluded that there is no evidence to justify the changing the</p>	Q4.14

	urban sprawl / coalescence between settlements. Urban intensification was supported instead.	boundaries of or releasing Green Belt land to meet the need for housing.	
76.	A number of general comments were made in addition to the proposed site specific comments for the Single Urban Extension. While some felt this option was preferable to dispersed release, there were many objections and respondents felt that brownfield regeneration was preferable. Comments expressed concern over the impacts of such an approach, such as adverse impacts on heritage, environment, character and identity, pollution and infrastructure. The deliverability was questioned.	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs. The Local Plan Submission Draft does not promote Green Belt development.	Q4.15
77.	A few areas were suggested as to where a single large extension could take place. However, most responses felt that development needs could be accommodated in existing urban areas and an urban extension was not necessary. Regeneration should be prioritised at Wirral Waters instead. Alternatively, a dispersed range of small-medium extensions was proposed as larger scale schemes are more challenging to deliver.	Noted. The Council's preferred spatial option, which has been taken forward into the Local Plan Submission Draft, is Urban Intensification which involves the redevelopment of brownfield and other urban land in existing urban areas to meet the Borough's development needs. The Local Plan Submission Draft does not promote Green Belt development.	Q4.16
78.	Development should not concentrate in one area as the impacts would not be dispersed. The approach would be against national policy and Infrastructure in the proposed area would not accommodate the additional traffic and	The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored	Q4.17

	<p>major improvements would be needed first. Concerns over green belt environmental impacts from the approach were stressed - a dispersed release of land for development would be preferable. Financial risks, viability and market absorption concerns were raised also.</p>	<p>further. The Local Plan Submission Draft does not promote Green Belt development.</p>	
79.	<p>A single large extension would enable a transition to low carbon living, with the potential for the creation of a highly desirable garden village in good proximity to infrastructure. The use of a phased approach would enable development to be optimised to changing needs and issues.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred urban intensification option and the single large urban extension option is not being pursued or explored further. The Local Plan Submission Draft does not promote Green Belt development.</p>	Q4.17
80.	<p>Support for urban intensification was strong, expressing the need for the prioritisation of sites with vacant uses and brownfield land, and the need to work with infrastructure partners to ensure infrastructure is in place to deliver development at sustainable locations with green infrastructure.</p>	<p>Support noted. The Council is working with appropriate utility providers, Government Departments and the LCR CA to deliver specific infrastructure.</p>	Q4.18
81.	<p>Disadvantages of urban intensification included criticism that this approach would not meet the required housing needs and mix and result in a shortfall, may impact local and historic character.</p>	<p>The Local Plan Submission Draft seeks to meet the Borough's identified needs within the existing urban area. Further information is set out within the accompanying Housing Delivery Strategy and Viability Study. Heritage impacts are addressed in the accompanying Heritage Impact Assessment.</p>	Q4.18

82.	Regarding the release of green belt land, no overwhelming support was expressed for either Option 2A: Dispersed Release or Option 2B: Single larger urban extension, with some supporting a hybrid approach with smaller extensions.	The Local Plan Submission Draft is based on the Council's preferred urban intensification option which meets all of the Borough's development needs within existing urban areas. No green belt release is proposed.	Q4.19
83.	Alternative options to the proposed approaches focussed mainly on brownfield regeneration strategies and densification, including compulsory purchase orders, combining sites, and converting / reusing abandoned transport links.	The alternative approaches identified are addressed by the Council's preferred urban intensification option and the proposals now identified in Part 4 of the Local Plan Submission Draft.	Q4.20
<b>5. Our Homes</b>			
84.	A discretionary, flexible approach should be taken, increasing densities where appropriate and more affordable housing should be provided flexibly, where needed, and reflective of local context.	Policy WS 3 has been drafted to secure the most appropriate mix of housing taking account of site-specific circumstances, viability, updated national planning guidance and Strategic Housing Market Assessment.	Q5.1, Q5.2
85.	It was suggested that there should be fewer bungalows - the Council's bungalow requirement is unrealistic (18 times the level delivered elsewhere) and should be amended accordingly, with apartment/flat led development instead, given the need for high density developments within urban conurbations, with level-access options for the elderly and disabled. The overall need is mainly for larger house sizes - a particular need for 3 bedroom houses is identified.	Policy WS 3 has been drafted to secure the most appropriate mix of housing taking account of site-specific circumstances, viability, updated national planning guidance and SHMA. Policy WS 3.1 provides for accessibility.	Q5.1

86.	Affordable housing need is very high and should be at the level of 1,223 dpa compared to the target of 800 dpa. The overall housing target should be increased as a result. Many of the allocations for affordable housing are located in weaker market areas, resulting in significant viability and deliverability concerns.	The rate of affordable housing to be secured by new build market housing is set out in Policy WS 3.3, informed by the Viability Study, updated national planning guidance and the SHMA. See also the Housing Delivery Strategy.	Q5.2
87.	There should be greater than 30% affordable housing, there should be a substantial allocation with contributions from sites of less than 10 dwellings, ensuring viability will not prevent future provision.	The rate of affordable housing to be secured by new build market housing is set out in Policy WS 3.3, informed by the Local Plan Viability Study, updated national planning guidance and the SHMA.	Q5.2
88.	There should be less than 30% affordable housing - most development takes place on smaller sites and this figure will reduce viability and therefore the trajectory of affordable housing will be uncertain	The rate of affordable housing to be secured by new build market housing is set out in Policy WS 3.3 taking account of viability, updated national planning guidance and the SHMA.	Q5.2
89.	Specialist and accessible housing should be provided to prevent putting significant strain on health and social care services, providing for both the elderly and those with physical, social and mental disabilities and their families and ensuring that all provision is wheelchair accessible and in a mixed environment rather than isolated.	Evidence indicates a need for additional residential care and specialist dwellings given relatively high disability levels and an ageing population in Wirral. Policy WS 3.6 makes provisions for specialist housing. Policy WS 3.1 provides for accessibility and adaptability including wheelchair access.	Q5.3

90.	<p>There was support for the flexible reuse of empty properties across the 3 proposed options, but mainly toward the preferred approach. A higher allowance should be included given the number of remaining empty properties, with at least 200 returned to use annually, aiming for less than 0.5% of stock to be vacant.</p>	<p>A separate allowance for the return of empty homes has been included in the Local Plan Submission Draft, based on the performance of a funded programme which has operated since April 2011 and a tapered delivery under Option 3. Further information is set out in the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.</p>	Q5.4
91.	<p>The current allowance is too high and unjustified, unrealistic and undeliverable given the past performance of reusing empty homes and the national average, and the reuse of empty properties is not a predictable, long-term source of land supply.</p>	<p>A separate allowance for the return of empty homes has been included in the Local Plan Submission Draft, based on the performance of a funded programme which has operated since April 2011 and a tapered delivery under Option 3. Further information is set out in the Housing Delivery Strategy that accompanies the Local Plan Submission Draft.</p>	Q5.4
92.	<p>The council should do more to promote the use of empty homes through the use of compulsory purchase powers, and a range of incentives should</p>	<p>The Council has an existing funded initiative which has recently been extended. CPO is a last resort regulated process for approved areas only.</p>	Q5.5
93.	<p>Future housing needs should be met for Gypsies and Travellers through the Local Plan as the identified needs can be met, including pitches with appropriate amenities and affordable housing allocations for those who want to settle.</p>	<p>National planning policy requires the assessment of local housing needs, including those of travellers to inform planning policy. No specialist needs were identified in the 2019 Gypsy and Traveller Accommodation Assessment. In line with national policy, Policy WD 9 provides criteria for dealing with applications for accommodation for Gypsies, Travellers and Travelling Showpeople.</p>	Q5.6

94.	Some respondents felt that while Gypsies and Travellers should have access to housing, special priority and targeted home building should not be provided for this group.	National planning policy requires the assessment of local housing needs, including those of travellers to inform planning policy. No specialist needs were identified in the 2019 Gypsy and Traveller Accommodation Assessment.	Q5.6
95.	Regarding the Primary Residential Area (PRA) boundary proposals, many respondents felt that these boundaries should not be changed / set to meet planning needs and should reflect existing residential areas while ensuring Green Belt protection. A number of site-specific comments related mainly to Green Belt and Local Green Space sites that should not be included within the PRA.	Primarily Residential Areas within the Borough's urban area have been amended to reflect the policies and proposals within the Local Plan Submission Draft. The Local Plan Submission Draft does not promote Green Belt development.	Q5.7
96.	The number of HMOs should be controlled, with landlords closely monitored and licensed, and should be provided in designated areas and not within areas without HMO precedent. These should offer a safe, healthy and zero carbon living, and the minimum space standards should be revised.	The Borough's housing needs, including HMOs, have been re-assessed in the finalised Strategic Housing Market Assessment (SHMA, 2021). Policy requirements, design standards and the over-concentration of HMOs is addressed in Policy WD 7 Houses in Multiple Occupation. Space standard policy requirements are set out in Policy WS 3.1 Housing Design Standards, and Policy WS 6 Principles of Design also applies.	Q5.8
<b>6. Our Economy</b>			
97.	Employment regeneration at Birkenhead and other brownfield sites was supported and	Support noted. Employment and skills are covered in Policies WS 1.2 Employment, WS	Q6.1

	sustainable businesses, jobs and graduates should be attracted to the area and retained.	2 Social Value and WS 4 Strategy for Economy and Employment.	
98.	There is a lack of evidence for employment regeneration approaches and the rural economy has been overlooked. The employment land figures and mix are high in relation to need and Wirral Waters should be excluded. Allocations in southern Wirral may impact on transport.	The Employment Land and Premises Study 2021 updates the 2017 study to take account of the previous consultation and takes into account more up to date growth forecasts from the LCR. This was undertaken in line with national policy and guidance. Policy WP 8 Policy for Rural Areas seeks to support the rural economy within the bounds of national policy.	Q6.1
99.	Support for proposed release of some employment land in Bromborough where the loss of employment land use is offset at other sites and does not negatively impact on the green belt, environment and existing operations.	Support noted. The Local Plan Submission Draft now includes relevant proposals at Former Corda, Prices Way (RES-SA4.6), former D1 Oils (RES-SA4.7), Land south of Riverwood Road and Old Hall Road (RES-SA4.2 and RES- SA4.3) and Unilever Research (RES-SA4.11).	Q6.2
100.	Some land at Wirral Waters should be considered for employment use, where it is no longer required for port use and provides for high value employment and local businesses with flexible use designation.	The land allocated for employment use at Wirral Waters is at West Float which is identified for employment uses in Wirral Waters Masterplan and will not impact on potential residential development at East Float. The employment site at MEA park would be able to accommodate port related businesses.	Q6.3

101.	<p>Support was expressed for the proposed boundaries of the Primarily Industrial Areas. Some site-specific issues were raised with some respondents expressing disagreement with the allocations of sites within the PIA boundary, stating that some sites should be identified as a residential (or other use) allocation instead where suitable, or removed from the PIA.</p>	<p>Support noted, sites in the Primarily Industrial Areas were assessed in the Wirral Employment Land and Premises Study 2021. Some land previously allocated or designated as employment Land in the Unitary Development Plan 2000 has been allocated for Housing in the Local Plan Submission Draft. See also the Site Selection Paper.</p>	Q6.4
102.	<p>A wide range of alternative uses within PIAs should be supported through policy including <i>sui generis</i> cultural and event spaces, leisure and health and green infrastructure, through a flexible and criteria based policy approach to prevent restricting supply of land for such different uses.</p>	<p>Policy WS 4.2 Designated Employment Areas of the Local Plan Submission Draft sets out the policy requirements for appropriate alternative uses within employment areas including compatibility with existing character and market signals evidence.</p>	Q6.5, Q6.6
103.	<p>Employment land for employment use should be protected and maintained with the Council retaining powers to determine the suitable location of land use.</p>	<p>The employment land supply has been reviewed and appropriate land allocations are now identified in the Local Plan Submission Draft. Further information is set out in the accompanying Wirral Employment Land and Premises Study 2021.</p>	Q6.6
104.	<p>Out of town retail developments should not be supported, and existing shopping areas, local business and cultural attractions should be regenerated/prioritised. Shopping patterns have changed and all centres should have access to convenience space.</p>	<p>The Local Plan Submission Draft recognises the changing nature of retail and shopping and the continuing decline of retail floorspace and seeks to direct uses to within the identified town centre boundaries. Where proposals lie outside of or on edge of centre locations, impact assessments will be applied under Policy WS 11.3. Policy WS 11 aims to maintain vitality and viability of existing</p>	Q6.7

		centres through providing for a range of uses.	
105.	There is support for maximising the vitality and viability of town centres, where the strategy addresses the climate emergency and new uses are sensitive in terms of character, needs and density/proportion to their location. Town centres should be diversified, with local services and community uses provided within unused retail space.	Policy WS 11 Strategy for Town, District and Local Centres aims to maintain the vitality and viability by allowing and enabling appropriate meanwhile, pop-up, and residential uses and providing for further cultural and community uses.	Q6.8
106.	The retail hierarchy should be reviewed as core shopping areas have not been identified. The Croft Retail Park should be identified as an out-of-centre location, Hoylake is not recognised as a vibrant centre, Birkenhead is not a sub-regional centre. Local Centres should be listed in the Draft Local Plan.	The Wirral Retail & Centres Study – 2021 Retail Capacity Update April 2021 updates the 2019 study. Sub regional, District and Local Centres are listed in the Local Plan Submission Draft under Policy WS 11 Strategy for Town, District and Retail Centres. This policy also identifies Primary Shopping Areas for selected centres.	Q6.7, Q6.8, Q6.9
107.	There is support for the preferred approach to locally set retail impact thresholds and local communities should be involved in defining this threshold, and should apply to sites outside of the defined urban centres along with the sequential test - new large outlets should not be supported.	Support noted. Thresholds for the size of proposal requiring an impact assessment for the different centres are drawn from the evidence provided by the April 2021 Wirral Retail & Centres Study Capacity update. Proposals for out of or edge of centre development must take into account the sequential test and must demonstrate no suitable alternative sites are available.	Q6.9
108.	Settlement extensions should only be considered where there is robust evidence of growth, with community involvement in	The Local Plan Submission Draft is based on the Council's Preferred Urban Intensification option which seeks to meet all of the	Q6.10

	<p>defining boundaries. A number of comments suggested minor adjustments to the proposed boundaries and the separation of classifications of a number of towns/villages.</p>	Borough's development needs through the development of brownfield land within existing urban areas.	
109.	<p>The approach to improve public/tourist access to the coast and countryside is supported however only existing assets should be developed without detriment to the green belt or protected sites.</p>	<p>Support noted. No green belt release is proposed. Proposals for visitor facilities in the Rural Area will be supported where they meet the tests of national Green Belt Policy under Policy WS 4.4.</p>	Q6.11
<b>7. Our Physical and Social Infrastructure</b>			
110.	<p>A comprehensive approach was supported to infrastructure planning, which considers all forms of infrastructure (green infrastructure, sustainable transport, digital infrastructure).</p>	<p>Support noted. A detailed Infrastructure Delivery Plan provides information on the types of infrastructure that will be required, including costs, funding, organisational responsibility and timescales.</p>	Q7.1
111.	<p>Local infrastructure and services do not currently have the capacity to support additional housing and impacts will be felt across highways, drainage/utilities, education and health provision, and housing should only be proposed where there is capacity for this.</p>	<p>£78.5m has been secured towards major regeneration projects in Birkenhead. Policy WS 10 requires appropriate on- and off- site infrastructure provision. A detailed Infrastructure Delivery Plan provides further information set out in area-based and site-specific policies, informed by the viability assessments underlying the Local Plan Submission Draft.</p>	Q7.1
112.	<p>Concerns were raised about the impact/burden of planning obligations / CIL on viability without a robust evidence base or policy clarity, which could undermine the spatial strategy and the delivery of housing -</p>	<p>The impact of policies on development viability has been comprehensively assessed through the Viability Assessment (2022). Funding has been secured through various central government funding rounds to</p>	Q7.1, Q7.2

	<p>over £500m is still required for Commercial Core transport improvements. It was argued that some green field sites would be more viable. However, some argued that the residents of Wirral should not be required to shoulder the burden of infrastructure costs.</p>	<p>develop infrastructure and advance other projects, reducing the burden on residents and viability.</p>	
113.	<p>Public transport improvements across all modes are currently underdeveloped and should be improved prior to occupation of any new development. However, major new road schemes, unless essential, were not supported due to the impacts on traffic, the environment and the climate. Instead, active travel infrastructure should be prioritised with safe, high-quality and well-maintained routes to Local Centres, supported by the provision of cycling storage/infrastructure within new developments.</p>	<p>The Council plans to remove overengineered roads and create new sustainable transport connections to, between and within regeneration areas. The Local Plan Submission Draft also provides for the delivery of active travel networks for walking and cycling that enable safe access to jobs, leisure and health facilities (Policy WS 9.2), a new mass transit system in Birkenhead, to connect new neighbourhoods and key locations (Policy WS 9.1 and Appendix 8) and a new greenway (Dock Branch Park) within central Birkenhead (Policy WS 9.1).</p>	Q7.1, Q7.2
114.	<p>There was agreement with the approach, however it was argued a greater emphasis is required on energy efficiency - a "where possible" approach is inadequate and sustainable building techniques for all new development should ensure that City Region net-zero policies are met.</p>	<p>Policy WS 8 sets out the Council's strategy for minimising energy demand and reducing carbon emissions.</p>	Q7.3
115.	<p>Concerns were raised over the impacts of the communications network expansion on green infrastructure and heritage, as well on the viability of sites. Telecoms coverage should be</p>	<p>Policy WD 13 covers proposals for telecommunication apparatus and these will only be approved where the best environmental solution is found and the impact on the character of the area is</p>	Q7.4

	<p>ensured across the peninsula to support working from home.</p>	<p>minimised. Wirral Council is a strategic partner in a City Region initiative which will deliver a 250km high-speed Local Full Fibre Network by 2023.</p>	
116.	<p>Respondents felt that current social infrastructure is inadequate given the scale of development, and the Council should be improving and reviewing social infrastructure on a regular basis. Development should be focused on areas where this already exists. Particularly, open spaces and community and cultural infrastructure should be provided for, protected and enhanced.</p>	<p>An assessment of social infrastructure has been undertaken with key stakeholders. The Infrastructure Delivery Plan provides details of appropriate social infrastructure which is required for particular development. Further information is also set out in the relevant area-based and site-specific policies in Part 4 and Part 5 of the Local Plan, which has been subject to a Viability Study.</p>	Q7.5
<b>8. Our Environment</b>			
117.	<p>The level of ambition should be greater and policy must be more robust and proactive, with Climate Change and the protection and enhancement of natural capital as the main consideration of all planning decisions.</p>	<p>Addressing climate change is a key part of the Local Plan. Strategic Objectives 1, 3 and 4 of the Local Plan address climate change and the approach is set out in the Introduction of the plan. The Council recognise however that to meet our target for Zero Carbon targets it will require action by Government. This is a main consideration of planning decisions with WBC holding a statutory duty to do this - Policy WS 5 of the Local Plan Submission Draft sets out a strategy for green and blue infrastructure, biodiversity, including the Environment Act 2021 requirement for a mandatory net gain in biodiversity on all development. Policy WS 8</p>	Q8.1, Q8.3

		seeks to address low carbon energy and energy efficiency.	
118.	Public transport must be improved to reduce the carbon footprint and car reliance. Assets such as green roofs, solar panels and EV charging points should be used with all new development being properly insulated and existing development retrofitted to meet environmental standards.	The Local Plan Submission Draft promotes public transport in Policy WS 9 Transport Strategy and the use of various renewable energy technologies and high levels of energy efficiency on new development- see Policy WS 8 Strategy for Sustainable Construction, Renewable and Low Carbon Energy of the Local Plan Submission Draft and seeks to achieve zero carbon development whilst measures such as green roofs and sustainable drainage are supported in policies WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity and Landscape Protection and WD 1 Landscape and WD 4 Coastal Protection, Flood Risk, Sustainable Drainage and Water Management	Q8.1, Q8.3
119.	Support and agreement expressed for the preferred GBIS approach and the recognition of the importance of GBIS in achieving sustainable development, and these sites and provisions should be protected - development should not disrupt ecological network and a 50m buffer should be applied to sites with natural assets. Biodiversity net gains should be delivered where possible, following the mitigation hierarchy and offsetting where loss	Support noted. Policy WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity and Landscape Protection of the Local Plan Submission Draft sets out a number of policies to protect and enhance important ecological sites and networks.	Q8.4

	to habitats has occurred using a verified metric.		
120.	Current assessments throughout the evidence base are deficient and the Green and Blue Infrastructure Strategy and ecological network reviews have been commissioned too late to inform the allocation of land.	The Local Plan Submission Draft preparation has been informed by a wide range of environmental related studies. Policy WS 5 identifies recipient locations for improvements to the network including longstanding networks at local and sub regional level.	Q8.4
121.	Support expressed for the Tree Planting strategy using careful species and methods selection and community involvement, however the importance of natural regeneration and prioritising preservation / protection of the existing stock was stressed, as this would protect local character and wildlife.	Local Plan Submission Draft Policies WD 1.1 and WD 1.2 set out the strategy for the protection and replacement of trees.	Q8.5
122.	Support expressed for tree planting to extend parks and woodlands however many respondents discussed the use of tree planting in specific and general urban environments. The infilling of grass / road verges, roadside planting and hedging, and planting outside shop fronts was suggested.	Proposals have been passed to the Council's Environment and Parks Teams for consideration as part of the Council's Tree Planting Strategy implementation. The Local Plan Submission Draft contains policies supporting such measures including Policy WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity and Landscape Protection and WD 1 Landscaping.	Q8.6

123.	<p>Existing open space including agricultural land should be protected as it brings multiple benefits and the existing stock should be maintained. Additional accessible open space such as allotments, playing pitches etc, public footpaths is required in a range of locations (Wirral Waters, Seacombe, Rock Ferry, Birkenhead) including areas of high density, deficiency in provision, and all new development. Smaller sites should be required to contribute financially to provision but disagreement where this would render development unviable.</p>	<p>Generally open space is protected through Policy WS 5.1 of the Submission Plan. No development on Green Belt or agricultural land is proposed. It may be necessary to restructure existing open spaces to facilitate the proper planning of new residential neighbourhoods consistent with Policy WS 5.1 Open space provision of the Local Plan.</p>	Q8.7
124.	<p>A number of site specific comments were raised for the list of open spaces and their boundaries. Many responses expressed support for the protection of sites, or suggested spaces that should be added to the list for protection. It was suggested that some sites had been omitted from the list of open spaces. A smaller number of comments suggested alternative uses for the sites.</p>	<p>Some of the suggested sites had been identified as Local Green Spaces. Other suggested sites were added to the Policies Map for protection. Other sites were in the Green Belt and therefore do not require additional protection.</p>	Q8.8
125.	<p>The majority of responses supported the designation of the Glebe land at West Kirby as Local Green Space. Those who opposed the ownership suggested that the designation was unnecessary as Conservation Area controls are already present, and that the site was in private ownership with no public access. The site could be used for development instead.</p>	<p>The site has been independently assessed and an appropriate area has been recommended for designation as a Local Green Space under NPPF paragraph 103. See also Local Green Space Designations Review of Sites (October 2021).</p>	Q8.9

126.	<p>A wide range of sites, including open spaces, green belt sites and omitted sites, were suggested for designation as Local Green Spaces.</p>	<p>Many of the sites suggested are proposed to be designated as a Local Green Space. Some suggested did not meet the NPPF criteria but were in the Green Belt and further protection is not required. Some that did not meet the LGS criteria but were designated for other protections in the Policies Map, for example as open space. See also Local Green Space Designations Review of Sites (October 2021).</p>	Q8.10
127.	<p>Respondents felt that all landscapes and their character should be protected by evidence-based and strongly worded policy from unnecessary development in line with the NPPF. Wirral's landscapes bring benefits to wellbeing and attracts tourists, and are part of the Wirral's historic, visual and cultural character and policy should be sympathetic to this. Biodiversity will be enhanced by natural landscape protection - the protection and expansion of important hedgerows, trees and woodland should be addressed in the policy.</p>	<p>Policy WS 5 of the Local Plan Submission Draft sets out a strategy for green and blue Infrastructure, biodiversity, open space and landscape protection, Policy WD 1.2 Trees sets out policy requirements for development proposals regarding the retention of trees and Policy WS 7 Principles of Design sets out a strategy for design, including the protection of views and hedgerows.</p>	Q8.11
128.	<p>Assess and mitigate flood risk. Limit development on land with flood risk and ensure new development does not increase flood risk.</p>	<p>Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage &amp; Natural Water Management sets out the strategy for the reduction and mitigation of flooding and coastal protection. Site allocations in the Local Plan have been informed by the Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2. The Sequential and Exception Test report sets out the process by</p>	Q8.12

		which the proposed Local Plan allocations have been selected in terms of flood risk.	
129.	Prioritise climate change, and prevent flooding in urban areas and coastal erosion from rising sea levels. Manage surface water flooding in urban areas.	Local Plan Policy WD 4 Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management addresses flood risk, surface water flooding and coastal change. The Local Plan Submission Draft reflects the Shoreline Management Plan and Wirral Coastal Strategy which set out the policy framework for the future management of Wirral's coastline in relation to coastal erosion and protection against tidal flooding.	Q8.13
130.	Biodiversity should be addressed at all times and expected from all new development at a 10% net gain, and policy should be clearer and stronger to support decision making. Not enough consideration has been given to Local Wildlife Sites, especially in the Green Belt Review.	Policy WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection from the Local Plan Submission Draft sets out the strategy for the protection, enhancement and delivery of biodiversity, including the requirement for all development to deliver 10% biodiversity net gain, measured using the DEFRA metric. Local Wildlife Sites are provided protection in the Submission Draft, referenced in Policy WD 3 and are recognised as Sites of Local Importance. The policy requires a suitable mitigation or compensation strategy in the event of development.	Q8.14
131.	Health and wellbeing should be paramount and the protection, enhancement and provision and maintenance of green and open spaces through developer contributions and strategies to green urban areas and implement	The Council recognises that access to quality open space is key to the health and well-being of residents. Policy WS 5.1 of the Local Plan Submission Draft which deals with open space provision sets out the standards	Q8.15

	<p>pocket parks will contribute to health and wellbeing, and also climate change. Active travel should be prioritised over vehicle use to supplement this.</p>	<p>for open space and children's play on new development. Securing sustainable travel and reducing reliance on private cars is a Strategic Objective of the Local Plan. Under the Council's Strategy for Transport, Policy WS 9.2, development proposals should provide access to existing or planned sustainable travel options and infrastructure projects to reduce private car usage. Policy WD 18 of the Submission Plan requires Health Impact Assessments for all developments over a threshold size.</p>	
132.	<p>To improve health and wellbeing, it was suggested that the Council should focus on ensuring protection of green and blue infrastructure and the provision of adequate community infrastructure to existing communities including healthcare and leisure centres. Additionally, improvements to public transport were suggested which would connect communities and enable and improve access to the benefits of the suggested facilities and infrastructure provisions. Housing stock improvements were also suggested.</p>	<p>Policy WS 5.2 requires the protection and enhancement of green and blue infrastructure for all development. Birkenhead 2040 Framework and Policy WS 1.3 Infrastructure sets out the provision of a new mass transit system to link new and existing neighbourhoods in Birkenhead to existing Merseyrail stations and facilities.</p>	Q8.16
133.	<p>Further work is needed to explore Conservation Areas and proactive and supportive policies are needed to ensure the sufficient protection of designated and non-designated buildings in the Wirral and the overall special character and identity of areas. Further focus and priority should be given to</p>	<p>It is the Council's intention to commence a review and update of existing Conservation Areas commencing in 2022, subject to resources. The Council is working with other Merseyside Authority's on Pilot Project funded by Historic England to develop a local listing strategy. Consultation will take place in</p>	Q8.17

	sites of international and national importance (Birkenhead Park, Hamilton Square and Port Sunlight).	2022. Part 5 of the Local Plan Submission Draft sets out a specific policy for each conservation area by settlement. The Council has consulted with CAW on the specific wording of the various Conservation Area Policies set out in Part 5 of the Local Plan Submission Draft.	
134.	Respondents expressed that more should be done to preserve and enhance heritage generally, including undesignated assets. All of Wirral's natural heritage such as wildlife, ancient fields, sandstone walls and green infrastructure needs to be prioritised in policy with references made as to the benefits of this, and the impact of any new development should be explored and scrutinised through Heritage Impact Assessments.	The Local Plan Submission Draft contains a series of policies which reflect the significant importance which the Council gives to our heritage. Culture and Heritage Strategy for Birkenhead commissioned to be published in 2022. Council intends to develop a heritage strategy for the Borough starting in 2022 subject to resources. Site allocation has been subject to Heritage Impact Assessment and Policy WD 2 of the Local Plan Submission Draft sets out a comprehensive approach to the protection of heritage assets.	Q8.18
135.	Extraction / fracking and underground coal related activities should be prevented or tightly controlled in marine (coastal, offshore) environments. Any approach taken should not detriment wildlife or conflict with climate change or carbon goals and should regard the regional context / Local Aggregates Assessment.	Issues related to minerals are addressed in the Wirral Minerals Report 2020 (Document EE4.1) and Local Plan Submission Draft Policies WM1 Proposals for Minerals Development, WM 2 Maintaining a supply of aggregates, Policy WM3 Safeguarding mineral reserves and infrastructure, Policy WM 4 Oil and gas development, Policy WM 5 Restoration.	Q8.19

136.	<p>The current waste and recycling approach in Wirral is currently inadequate and underperforming. An improved strategy aligned with other authorities is required which widens the scope of recyclables, provides greater clarity, and sets and promotes greater targets to reduce waste production / prevent landfill.</p>	<p>Policy WW 1 Waste Management of the Local Plan Submission Draft seeks to improve recycling. Waste management for the Wirral is addressed in the Joint Waste Plan for Merseyside and Halton.</p>	Q8.20
<b>9. Detailed Local Plan Policies</b>			
137.	<p>Comments related to:</p> <ul style="list-style-type: none"> <li>• Ensuring development is designed or retrofitted for the climate emergency, to reach net zero goals.</li> <li>• Climate change should be addressed in all sections of the Plan</li> <li>• Regulation 18 questions are too complicated for residents</li> <li>• Right to comment reserved until further policy and details are available</li> <li>• Strategic port interests are not taken into account</li> <li>• No rural exceptions sites policy is present</li> <li>• No detailed brownfield and urban regeneration policy is present</li> </ul>	<p>See Appendix 4 for responses to individual suggestions.</p>	Q9.1

138.	<p>Suggested additional development management policies included:</p> <ul style="list-style-type: none"> <li>• Include policy on supported flexible commercial uses for each site</li> <li>• Policy should refer to existing retail warehouse parks</li> <li>• A biosecurity strategy and protocols for development should be included</li> <li>• Water efficiency policy, health infrastructure policy</li> </ul> <p>Greater regard needed as to air quality</p> <ul style="list-style-type: none"> <li>• Detailed landscape character protection policy</li> <li>• Proposed port-related policy</li> <li>• Ground water and surface water policy proposals</li> <li>• Safeguarded land policy</li> </ul>	<p>See Appendix 4 for responses to individual suggestions.</p>	Q9.2
139.	<p>Aside from objection to the proposed housing figure, comments related mainly financial and regulatory schemes - such as the use of planning mechanisms to implement a workplace car parking levy and fund climate and environment projects, and the licensing of the private rented sector - and were not relevant to the question/planning considerations</p>	<p>See Appendix 4 for responses to individual suggestions.</p>	Q9.3
	<b>10. Other Comments or Questions</b>		

140.	Comments raised issues covered in previous questions relating to housing delivery, green belt release, infrastructure pressures and local green space designation. A number of comments raised objections to the clarity and length of the Regulation 18 Consultation.	Feedback on the Regulation 18 Consultation issues will be considered for future consultation activities.	Q10.1
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## Appendix 6: Key Issues Raised by Consultees and Statutory Bodies

<b>Ref</b>	<b>Statutory Consultee</b>	<b>Key Issues</b>	<b>Council Response</b>
1.	Sefton Council	<p>Sefton Council noted they were not in a position to meet any of Wirral Council's housing and employment needs. Sefton Council recommended the Local Plan reference internationally important sites on Sefton Coast. The Council expressed support for the approach to retail centres.</p>	<p>Noted. The internationally important sites on Sefton Coast are dealt with through the Habitat Regulation Assessment as appropriate.</p>
2.	Cheshire West and Chester Council	<p>Cheshire West and Chester Council expressed satisfaction that previous concerns with Green Belt release and the risk of coalescence were addressed in the Issues and Options Local Plan. The Council expressed support for urban intensification and indicated it was not in a position to meet any of Wirral Council's housing needs. Cheshire West and Chester Council also raised queries and recommendations around minerals, waste, transport and employment, including impacts to Hooton Park. The following issues were raised:</p> <ul style="list-style-type: none"> <li>• uncertainty regarding the historic take up approach to calculate employment land need;</li> <li>• avoiding impact to the development of Hooton Park to maintain its status as a key employment location;</li> </ul>	<p>The Local Plan Submission Draft is based on the Council's preferred option of urban intensification. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries in Wirral and is therefore not proposing any release of Green Belt for any purpose in the Local Plan Submission Draft. The Wirral Employment land and Premises Study 2021 includes a new assessment of the need for employment land and the requirement in the Local Plan is not based on past take up rates. Transport modelling has been undertaken in consultation with Cheshire West and Chester Council and National Highways. The Local Plan Submission Draft safeguards facilities for landing marine-won sand and gravel at Riverbank Road, Bromborough (MSA-SA4.1).</p>

		<ul style="list-style-type: none"> <li>• increased traffic pressures on the M53, A41 corridor, A550 and Merseyrail Electric network;</li> <li>• assessing waste management capacity; and</li> <li>the potential for marine aggregates and landings.</li> </ul>	
	<b>Statutory Body</b>	<b>Key Issues</b>	<b>Council Response</b>
3.	Sport England	<p>Sport England expressed concern over the use of local standards for outdoor sport or sports facilities. Sport England also recommended all sites identified in the Council's Playing Pitch Strategy should be included in the list of open spaces and 'Active Design' principles should be integrated in the Local Plan.</p>	<p>Local standards are not now proposed to be included in the Local Plan Submission Draft. Reference is now made to the findings of the Playing Pitch and Outdoor Sports Strategy 2021 and the list of urban open spaces and sports facilities for protection has been revised accordingly (proposed Local Plan Policy WS 5.3 Outdoor sports provision, Policy WS 10.5 Community, sport, leisure and cultural facilities, and Policy WS 10.6 Open space now refer).</p>
4.	Wirral Wildlife	<p>Wirral Wildlife raised an objection to Green Belt release and expressed support for urban intensification with a lower housing figure than proposed in the Issues and Options Local Plan. Wirral Wildlife raised issues and recommendations with a number of sites within the Green Belt in regards to the risk of development on wildlife, habitats, wildlife corridors, biodiversity, high quality agricultural land and protected sites. The recommendations raised included:</p>	<p>The Local Plan Submission Draft is based on the Council's preferred option of urban intensification. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries in Wirral and is therefore not proposing any release of Green Belt for any purpose in the Local Plan Submission Draft. Local Plan Policy WS 5 protects green and blue infrastructure and ecological networks and seeks their extension whilst Policy WD 3 sets out the approach to</p>

		<ul style="list-style-type: none"> <li>• Designing bat friendly development;</li> <li>• avoiding harm to the habitats of Great Crested Newts;</li> <li>• avoiding the loss of bat foraging land;</li> <li>• conserving wildlife corridors;</li> <li>• avoiding harm to Local Wildlife Sites and international designated sites; and</li> <li>• retaining high value agricultural land.</li> </ul> <p>Wirral Wildlife recommended the design of a 50 metre buffer around all natural assets.</p> <p>Wirral Wildlife expressed concerns that the Green and Blue Infrastructure study would only be completed after the site selection process and would therefore not inform development allocations.</p> <p>Wirral Wildlife recommended Ditton Lane be designated as open space.</p>	protection of biodiversity and geodiversity in relation to development. The policies are based on a wide range of evidence.
5.	Marine Management Organisation	The Marine Management Organisation recommended the Local Plan reference the Draft North West Marine Plan.	Appropriate references to the now-adopted North West Marine Plan have been included in the Local Plan Submission Draft.
6.	The Canal and River Trust	The Canal and River Trust confirmed they had no comment to make on the consultation documents at the Regulation 18 stage.	Noted.

7.	Network Rail	<p>Network Rail recommended the Local Plan include a policy setting out requirements for level crossings.</p>	<p>Policy WS 9.4 clause J states that where appropriate, development proposals will be required to demonstrate how they will not result in a material increase or significant change in the character of traffic using a rail crossing, unless it can be demonstrated that safety will not be compromised in consultation with Network Rail.</p>
8.	Highways England	<p>Highways England stressed the need to mitigate pressures on the Strategic Road Network (SRN) from the spatial strategy and highlighted potential impacts on the SRN, particularly the M53 from spatial options 1B, 2A and 2B. In terms of urban intensification, Highways England noted the potential impacts from development at Wirral Waters and Hind Street on Junction 1 and Junction 2 and development at Bromborough on Junction 5. It was also noted that infrastructure to access sites off the A41 may need considerable transport infrastructure improvements to counteract residual impacts on Junction 4 of the M53.</p>	<p>Transport model assessments have been scrutinised and agreed with National Highways with regards to the motorway network and further junction analysis undertaken. Analysis is noted to generally show marginal additional impact on junction operation with regard to Local Plan growth. However, capacity issues are noted, and therefore improvements to junction lane markings and signalisation have been identified to enhance the operation of M53 junctions 3, 4 and 5 junctions.</p>
9.	Cheshire Wildlife Trust	<p>Cheshire Wildlife Trust recommended the spatial option not be determined until the Green Infrastructure and Ecological Network studies were completed. The Trust raised issues with a number of sites within the Green Belt in regards to the impact of development on Local Wildlife Sites and protected sites for hydrology, wildlife, habitat fragmentation and pollution. The Trust raised an objection to the Green Belt review on the basis that there was insufficient consideration of environmental issues. The Trust also</p>	<p>The Local Plan Submission Draft is based on the Council's preferred option of urban intensification. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries in Wirral and is therefore not proposing any release of Green Belt for any purpose in the Local Plan Submission Draft. Local Plan Policy WS 5 protects green and blue infrastructure and ecological networks and seeks their extension as</p>

		<p>provided recommendations to include a biodiversity policy, to use a Biodiversity Net Gain calculation, and to revise wording on biodiversity to reflect the 2018 NPPF, and noted BNG cannot be adequately gained offsite. The Trust recommended taking a strategic approach to green and blue infrastructure.</p>	<p>well as Biodiversity Net Gain, whilst Local Plan Policy WD 3 sets out the approach to biodiversity and geodiversity in new developments. Policies have been influenced by comments made by the Trust during plan making.</p>
10.	Environment Agency	<p>The Environment Agency raised the following environmental constraints for several Green Belt parcels: Source Protection Zone 3, flood Zones 2 and 3, Greasby Brook and Arrowe Brook. The EA recommended the Local Plan employ stronger policy language regarding green and blue infrastructure and biodiversity net gain, and draw on the Liverpool City Region Natural Capita study. The EA also recommended the inclusion of a biosecurity strategy in the Local Plan.</p>	<p>The Local Plan Submission Draft is based on the Council's preferred option of urban intensification. The Council does not believe that exceptional circumstances exist to justify changes to Green Belt boundaries in Wirral and is therefore not proposing any release of Green Belt for any purpose in the Local Plan Submission Draft. Local Plan Policy WD3 sets out the approach to biodiversity and geodiversity in new developments. The approach to green and blue infrastructure is set out in Policy WS 5. These policies have been influenced by comments made by the Environment Agency during plan making.</p>
11.	Natural England	<p>Natural England raised environmental constraints for housing and employment allocations in regards to recreational disturbance. Natural England noted sites which were in proximity to or adjacent to the following designated sites: Mersey Narrows and North Wirral Foreshore SPA, Ramsar, Mersey Narrows SSSI and Liverpool Bay SPA, Dee Estuary SPA, Ramsar and SSSI, Mersey Estuary SSSI, SPA, Ramsar and New</p>	<p>The Potential impacts of Local Plan allocations on European sites have been assessed in the Habitats Regulations Assessment. The approach to recreational disturbance in new development is set out in Policy WS 5.5. The policies of the plan have been influenced by comments made by Natural England during plan making.</p>

		Ferry SSSI. In particular, Natural England recommended development at Wirral Waters mitigate potential impacts on bird habitats at the docks.	
12.	United Utilities	<p>United Utilities expressed support for urban intensification.</p> <p>United Utilities made the following recommendations in regards to water management and flooding:</p> <ul style="list-style-type: none"> <li>• avoid development in groundwater Source Protection Zones 1;</li> <li>• encourage SuDS and water efficiency;</li> <li>• require an infrastructure phasing plan for strategic development;</li> <li>• avoid surface water discharge in the public sewerage network; and</li> <li>• include a surface water management policy.</li> </ul>	<p>The approach towards water management, flood risk and drainage (including sustainable drainage) are set out in Local Plan Submission Draft Policy WS 1.4 and Policy WD 4 with WD 4.3 specifically addressing these matters. Policies have been influenced by comments made by United Utilities during plan making.</p>
13.	Historic England	<p>Historic England recommended the Local Plan take a positive and balanced approach to the historic environment and recommended the inclusion of strategic and detailed policies on the historic environment and the acknowledgement of the historic, cultural and natural significance of green infrastructure.</p> <p>Historic England recommended the historic environment should be assessed as part of the site selection process. In terms of the climate emergency, Historic England cautioned resilience, energy</p>	<p>The Council has prepared a Heritage Impact Assessment which has considered all potential housing and employment sites and has been taken into account in finalising the Local Plan. Policies have been influenced by comments made by Historic England during plan making.</p>

		efficiency and flood risk management measures should not harm the historic environment.	
14.	Hoylake Vision (Hoylake Neighbourhood Forum)	The Hoylake Neighbourhood Forum agreed with the overall vision and strategy of the Local Plan. The HNF proposed the housing methodology should include a calculation considering land availability constraints from coastal locations. The HNF expressed concern that the reclassification of Hoylake from a town to a district centre might impact the regeneration of Hoylake. The HNF also expressed support for the Green Belt release of the Ellerman Lines Site and set out the benefits of a Wildfowl and Wetlands Centre.	The Local Plan Submission Draft sets out an appropriate housing requirement for the Hoylake NF area (table 3.3 refers) this sets out the additional new build dwellings currently expected to be delivered within each Neighbourhood Area within the Plan period, based on existing commitments and land allocations. Hoylake remains a district centre in the Local Plan Submission Draft.

# LOCAL PLAN

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