

Wirral Local Plan 2021-2037 Regulation 22(1)(c) Consultation Statement

October 2022

Contents

1.	Introduction.....	1
1.1	Purpose.....	1
1.2	Background.....	1
1.3	Structure of Statement.....	2
2.	Plan Production Timeline	3
2.2	Key Local Plan Stages	3
3.	Summary of Process and Main Issues	5
3.1	Summary of the overall plan preparation process.....	5
3.2	Regulation 18 Consultation	5
3.3	Publication of the Wirral Local Plan 2021-2037 Submission Draft (Regulation 19).....	10
3.4	Conclusion	31
4.	Appendices	33

1. Introduction

1.1 Purpose

- 1.1.1 This Consultation Statement sets out how the Council has involved statutory consultees, groups, organisations, companies and residents, in preparing the Wirral Local Plan 2021 to 2037 in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI) (2021). In accordance with Regulation 22 (1)(c), this Statement sets out:
- i. which bodies and persons the local planning authority invited to make representations under regulation 18;
 - ii. how those bodies and persons were invited to make representations under regulation 18;
 - iii. a summary of the main issues raised by the representations made pursuant to regulation 18;
 - iv. how any representations made pursuant to regulation 18 have been taken into account;
 - v. if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - vi. if no representations were made in regulation 20, that no such representations were made.
- 1.1.3 The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted SCI can be viewed on the [Council website](#).

1.2 Background

- 1.2.1 This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation representations.
- 1.2.2 The Council began preparing the new Local Plan for the Borough in 2019. The new Local Plan sets out the strategic vision, objectives and spatial strategy for the Borough, and the planning policies which will guide future development. The Plan looks ahead to 2037 and identifies where sustainable development and growth should take place. It establishes policies and guidance to ensure that local development is built in

accordance with the principles set out in the National Planning Policy Framework (NPPF).

- 1.2.3 Upon adoption, the Local Plan will replace the saved policies in the Unitary Development Plan (2000) that currently makes up part of the development plan for the Borough. 'Made' neighbourhood plans and the Joint Waste Local Plan for Merseyside and Halton (2013) are also part of the development plan.
- 1.2.4 The Council's Submission Draft Local Plan and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 for an extended eleven-week publication period lasting from Monday 9th May until Monday 25th July 2022. A variety of consultation techniques were used in accordance with the Statement of Community Involvement. This is set out further in Section 3.

1.3 Structure of Statement

- 1.3.1 This Consultation Statement comprises the following sections:
- Section 1 is an introduction.
 - Section 2 sets out the timeline which has been followed in preparing the Local Plan which is in accordance with the up to date [Local Development Scheme](#).
 - Section 3 summarises the main issues raised during the course of the consultation and publication carried out under Regulations 18/19 and how the comments received have been considered by the Council. Section 3 also details how each consultation and publication was undertaken.
 - Section 4 sets out the Appendices supporting Section 3. The Appendices detail the approach to consultation and publication, the responses received at Regulation 18 in detail and how the comments have been taken into account by the Council.
 - Appendices 1-5: Wirral Local Plan 2020 to 2035 Issues and Options Document
 - Appendix 1-Regulation 18 Local Consultation Focus Group Presentations and Report
 - Appendix 2-Regulation 18 Consultation Media
 - Appendix 3-Regulation 18 Schedule of consultees
 - Appendix 4-Regulation 18 Key issues raised and Council response
 - Appendix 5-Regulation 18 Key issues raised by statutory consultees and Council response
 - Appendices 6-8: Wirral Local Plan 2021-2037 Submission Draft
 - Appendix 6-Regulation 19 Publication Media and Material
 - Appendix 7-Regulation 19 Notification Letters
 - Appendix 8-Regulation 19 Notification of Publication Extension Letter

2. Plan Production Timeline

- 2.1.1 The creation of a new Local Plan needs to be informed by appropriate engagement and consultation. Early and ongoing engagement with the local community, businesses and organisations is required to develop a comprehensive document, tailored to the needs of the Borough in terms of strategy and the policies required.
- 2.1.2 The timetable below briefly summarises the main consultation stages of the emerging Local Plan up until the Submission in October 2022. Full details are set out in Section 3.

2.2 Key Local Plan Stages

1: Identify issues and collect evidence – 2019

- 2.2.1 The Council began work on the new Local Plan in 2019. On 4th April 2019 the Leader of the Council wrote to the Secretary of State for Housing, Communities & Local Government (now Department of Levelling Up Housing and Communities (DLUHC)) to submit an Action Plan for the preparation of a new Local Plan for the Borough. This followed earlier correspondence relating to the potential for intervention in the plan-making process by the Secretary of State. The Action Plan committed the Council to preparing a new Local Plan as expeditiously as possible. Since the submission of the Action Plan regular meetings have taken place with DLUHC to monitor progress of the preparation of the Plan.
- 2.2.2 Previously, the Council worked on the preparation of the Core Strategy Local Plan and consulted on a review of development options between 3rd September and 26th September 2018 ([Development Options Review Statement of Response](#)). Previous Local Development Schemes proposed a two-stage process of Local Plan preparation, initially focused on the completion of the Core Strategy Local Plan (containing mainly strategic policies, which would only partially replace the Unitary Development Plan) which would be followed by the second stage preparation of a site-specific Land Allocations and a Heritage Local Plan.

2: Regulation 18 Wirral Local Plan 2020-2035 Issues and Options consultation document– January/April 2020

- 2.2.3 The Council consulted on the Wirral Local Plan 2020-2035 Issues and Options Consultation Document and Appendices alongside the updated evidence base. Regulation 18 Consultation was extended to an 8 week period due to the Covid 19 pandemic restrictions. This took place between 27th January 2020 and 6th April 2020.

3: Finalising the Submission Draft Local Plan –2020-2022

- 2.2.4 The Council considered representations received during the Regulation 18 draft Local Plan consultation to inform further work on the Plan. Additional consultation was undertaken prior to publication of the Submission Draft Local Plan on evidence base studies throughout June and July 2020, and 2021. Detailed engagement was carried out with statutory consultees in September 2021 on the full working draft of the Submission Plan.

4: Wirral Local Plan 2021-2037 Publication (Pre-Submission Publication Reg 19) – May/July 2022

- 2.2.5 The Wirral Local Plan 2021-2037 Submission Draft was published for the receipt of representations on 9th May 2022. The initial deadline for the receipt of representations was 5pm on 24th June 2022. The period for the receipt of representations was subsequently extended until 5pm on the 25th July 2022 after it was identified that two documents, which were published in support of the Local Plan, were incomplete as follows:
- Maps missing from Appendix A of the Pre Submission Local Plan Sustainability Appraisal Report April 2022 (SD2); and
 - Presentation slides missing from Appendix 8 of the CIL & Viability Assessment February 2022 (DV1).
- 2.2.6 In addition, the following changes were made to the CIL & Viability Assessment February 2022 (DV1):
- Appendix 1 “Draft” watermark removed;
 - Appendix 1 text amended on page 1 to clarify version of policies assessed; and
 - Appendix 2 “Draft for consultation” watermark removed.
- 2.2.7 Separately, the Housing Trajectory Annual Breakdown was published on the evidence base webpage as document BP1.1 alongside the Housing Delivery Strategy.
- 2.2.8 In accordance with the Local Plan Regulations, this publication was undertaken in compliance with the SCI, and sought representations specifically on the Plan’s legal compliance and soundness.

5: Submission to the Secretary of State: October 2022

- 2.2.9 The Council assessed the comments received during the Regulation 19 formal publication, and concluded that none of the representations caused it to change its view that the Local Plan as published under Regulation 19 was legally compliant and sound and therefore ready to be submitted for Independent Examination. The Plan was submitted to the Secretary of State in October 2022.

6: Examination – Late 2022 – late 2023 (estimated)

- 2.2.10 The Plan will be examined by an independent Planning Inspector.

7: Adoption – Late 2023 (estimated)

- 2.2.11 The Plan will be adopted and will replace the saved policies of the Unitary Development Plan to form the development plan for Wirral, alongside the Joint Waste Local Plan for Merseyside and Halton and ‘made’ Neighbourhood Plans for Hoylake and Devonshire Park.

3. Summary of Process and Main Issues

3.1 Summary of the overall plan preparation process

- 3.1.1 Section 3 of the Consultation Statement provides a summary of the overall Local Plan preparation process, the consultation and engagement methods and the main issues raised in responses to Regulation 18 Consultation and representations to Regulation 19 Publication.
- 3.1.2 This section sets out the overall approach to the preparation of the Wirral Local Plan at the Regulation 18 consultation stage and subsequent Regulation 19 publication.

3.2 Regulation 18 Consultation

- 3.2.1 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.
- 3.2.2 The Regulation 18 Consultation generated 25,992 comments from 1,396 consultees for the main Issues and Options Document and 482 comments from 161 consultees who responded to the site allocation consultation event.
- 3.2.3 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 all libraries throughout the borough.
- 3.2.4 A formal Notice of Consultation was issued on 27th January 2020 and published on the Council website. In accordance with the adopted SCI, all persons, agents and organisations on the Local Plan Contact Database as well as statutory organisations were notified by email or letter of the consultation, which outlined how to find out more information, how to comment, and the deadline for comments to be received.
- 3.2.5 In addition, extensive publicity was given to the consultation via the following methods:
- A formal advert in the Wirral Globe on 29th January 2020.
 - 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 (Appendix 2).
 - 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.
- 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.

3.2.6 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. 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.

3.2.7 A series of 12 drop in events were held in each constituency to allow the public to see the Plan proposals and discuss them with staff as set out in Table 3.1 below.

Table 3.1 Regulation 18 Drop in events

Date	Location	Number 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

3.2.8 Five focus groups were also facilitated to discuss the various options for housing and employment land allocation set out in the Local Plan. Due to the Covid-19 pandemic, the focus groups were held virtually via Microsoft Teams from 17th March 2020 onwards. The objectives and content remained the same for the virtual focus groups. All participants who were expected to attend the in person focus groups were provided with invitations to the online events. The five focus groups are set out in Table 3.2 below. Additional details, the full presentation and report on the outcomes from the focus groups are in Appendix 1.

Table 3.2 Regulation 18 Focus Groups

Focus Group	Date	Venue	Number of participants
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

3.2.9 The Council made efforts to engage with hard-to-reach groups with a focus group arranged for those with disabilities, an additional walk in event arranged for people who are in an ethnic minority and the distribution of copies of the simplified Issues and Options Document and Questionnaires to homeless persons centres in Birkenhead.

3.2.10 Representations could be submitted by email, through Objective or by post. 25,992 responses were received from 1,396 consultees.

Main Issues raised pursuant to Regulation 18

3.2.11 The following is a list of the main issues raised by the Regulation 18 Consultation. A detailed summary of the key issues raised by consultation questions is presented in Appendix 4. A summary of all the issues raised by the Regulation 18 Consultation is presented in Appendix 4 of the Wirral Local Plan Consultation Statement March 2022 (SD5).

- Support for brownfield development and the urban regeneration of Birkenhead.
- Opposition to the preferred spatial strategy which should prioritise Green Belt release instead. Respondents felt Green Belt release would meet housing need, including assessed affordable housing need.
- Concern that allocated brownfield sites will not be viable, worsened by higher densities, and will therefore be insufficient to meet housing and employment need.
- Opposition to any Green Belt release and the desire to protect and enhance open space, biodiversity and green and blue infrastructure.
- Many respondents stated 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.
- Support for affordable housing delivery, for bringing empty homes back into use and for higher densities.
- Lack of supporting infrastructure to support new development / need for infrastructure improvement.
- Concern new development will have a negative impact on local / historic character and the identity of the Borough.

- Concern new development will have a negative impact on the natural environment and wildlife.
- Support for policies to address, protect, or mitigate against climate change.

How Regulation 18 Representations were taken into account

3.2.12 Following the Issues and Options Consultation, the Council sought to respond appropriately to the representations received through the Regulation 18 Consultation. This also involved extensive discussion and joint working with statutory consultees and key delivery partners. Where necessary, further evidence was produced to ensure that issues raised were satisfactorily addressed.

3.2.13 The comments made at Regulation 18 Consultation influenced the structure and content of the Submission Draft Local Plan in the following ways:

- The Council extended the plan period to 2021-2037 from the Issues and Options Plan which was 2020-2035.
- Refinement of the spatial strategy with a clear focus on urban intensification. The spatial strategy focusses on the regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the River Mersey stretching from New Brighton to Bromborough.
- Detailed policy was developed for all aspects of the plan and some policies evolved with the continued engagement of statutory bodies.
- Eleven Regeneration Areas were designated in addition to the Settlement Areas. The approach is set out in site specific policies and further supported by the Draft Birkenhead 2040 Framework 2021 (BR1).
- The approach to delivering high density was further refined and set out in policy requirements using the latest available evidence.
- Future housing land supply was reconsidered in light of the comments received and the latest available evidence and that the Green Belt options consulted on at Regulation 18 for addressing a potential shortfall in housing supply relating to the Urban Intensification preferred option were no longer required.
- The Council determined that exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do not exist, and releasing Green Belt land for development would be contrary to the spatial strategy of the Plan and national planning policy.
- The four Viability Zones across the Borough, identified in the whole plan viability study (DV1), informed policy requirements in the Plan.
- Further detail was added on infrastructure requirements, with requirements set out in area-based and site-specific policies. Further information on how costs and contributions will be calculated was set out within Appendix 10 Developer Contributions.

- Strategic, site specific and detailed policies were shaped in alignment with comments received by Statutory Consultees and Bodies.
- There were a number of evidence base updates and additions:
 - The Borough's housing needs were re-assessed in the finalised and independently verified Strategic Housing Market Assessment (SHMA) 2021.
 - Local Green Space designation recommendations from the Wirral Local Green Space Designations: Review of Sites (GI5) were taken forward in Appendix 13 of the Submission Draft Local Plan.
 - Additional evidence base documents and updates were prepared in consultation with the public, including the Wirral Housing Density Study (H5), Wirral Green and Blue Infrastructure Study Parts One, Two and Three (GI4.1-GI4.3), Employment Land and Premises Study (EE5), Wirral Retail and Centres Study – 2021 Retail Capacity Update (EE6), Wirral Environmental Sensitivity Study (ECC16) and Draft Birkenhead 2040 Framework 2021 (BR1).

3.3 Publication of the Wirral Local Plan 2021-2037 Submission Draft (Regulation 19)

- 3.3.1 The Wirral Local Plan 2021-2037 Submission Draft was published for the receipt of representations on 9th May 2022. The initial deadline for the receipt of representations was 5pm on 24th June 2022. The period for receipt of representations was subsequently extended until 5pm on 25th July 2022 after it was identified that two documents, which were published in support of the Local Plan were incomplete.
- 3.3.2 The Local Plan and all supporting evidence were made available on the Council website. Hard copies of the Local Plan, Policies Maps, supporting documents and evidence studies were made available for inspection at the Council's Principal Office, which for the purposes of the Local Plan Publication, was Birkenhead Central Library. Hard copies of the Local Plan, Sustainability Appraisal and Habitats Regulations Assessment were made available at all other libraries in the Borough and access to library computers was available to inspect all other proposed submission documents and evidence studies online.
- 3.3.3 Representations were invited online via forms included within the online Local Plan Submission Document on the Council consultation portal on "Objective" software. Representations were also invited by email or post using a representation form available to download from the Council website and to collect from all local libraries (Appendix 6).
- 3.3.4 A Statement of Representation Procedure was available to consult at all local libraries and set out the proposed documents available for inspection and the places and times at which they could be inspected (Appendix 6). Guidance Notes on Making a Representation provided guidance on submitting representations and Regulation 19 Publication (Appendix 6). The guidance note was made available on the Council website.
- 3.3.5 A letter was sent to households adjacent to employment and housing allocations and in Masterplan Areas in the Local Plan Submission Draft to notify them of the Regulation 19 Publication (Appendix 7). A letter and mailout was circulated to all contacts on the Local Plan Contact Database to notify them of Regulation 19 Publication (Appendix 7). The Local Plan Contact Database includes statutory consultees, individuals involved in the Development Options Review and Issues and Options Regulation 18 Consultation as set out in Section 2, and all contacts registered on "Objective" software. A Notice of Extension of Regulation 19 Publication Period was sent to the same contacts (Appendix 8).
- 3.3.6 The Local Plan Team ran a series of exhibitions as part of the Publication of the Wirral Local Plan. The aim of the exhibitions was to provide an overview of the Wirral Local Plan strategic policies and development strategy and to explain to people how to make a representation on the Local Plan. Officers were on hand at each event to answer any questions and direct attendees to relevant methods for making representations, where applicable.

3.3.7 Table 3.3 indicates the locations, times and number of attendees for the Local Plan exhibitions.

Table 3.3 Local Plan Exhibitions

Date	Time	Location	Attendees
Tuesday 17 May	2pm-8pm	Wallasey Central Library	33
Thursday 19 May	2pm-8pm	West Kirby Concourse	60
Tuesday 24 May	2pm-8pm	Birkenhead Central Library	14
Thursday 26 May	2pm-8pm	Bebington Central Library	33

3.3.8 Hard copies of the following resources were available at the exhibitions:

- Local Plan information boards (Appendix 6);
- Local Plan summary document (Appendix 6). Copies were made available for people to take away;
- Representation forms (Appendix 6);
- Statement of Representation Procedure (Appendix 6);
- Wirral Submission Draft Local Plan; and
- Sustainability Appraisal, Habitats Regulation Assessment and Policies Maps.

3.3.9 In addition, extensive publicity was given to the publication via the following methods:

- A formal advert in the Wirral Globe on 1st May and 18th May. A formal advert relating to the extension of the consultation period appeared in the Wirral Globe on 29th June (Appendix 6).
- 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 19 Publication (Appendix 6).
- Regular features were posted on the Wirral View website setting out updates on the Regulation 19 Local Plan.

Main Issues raised pursuant to Regulation 19/20

- 3.3.10 A total of 1,332 representations made by 193 individual representors were received to the Local Plan Submission Draft. 1,028 (77.2%) representations were made by email, 286 (21.5%) made by web submission, and 18 (1.4%) made by hard copy letter or form submissions.

Methodology

- 3.3.11 'Representors' are individuals who submitted representation(s) to the Regulation 19 Publication. Representors to the Regulation 19 Publication include statutory consultees, groups, organisations and companies, and residents of Wirral, sometimes using agents such as planning consultants to assist. Representors were able to submit multiple representations on a range of specific points (sites, paragraphs, evidence base documents, see paragraph below) in the Plan, meaning one representor could make multiple representations across the Plan.
- 3.3.12 Representations received were redacted of personal contact information in line with Data Protection Rules and processed by Council officers and staff. Where necessary, representations which were submitted by email or in hard copy were inputted by officers into the Council consultation portal on Objective. To assist with the identification and sorting of key issues raised a 'codeframe' was developed, enabling Officers to assign codes to each representation based on the key issues raised by the representor. Where the key issues raised in the representation related to a site, the site reference was also recorded. The full list of codes assigned to representations can be seen at Table 3.8. Analysis of the Regulation 19 Publication representations was performed in Microsoft Excel to count and summarise the representations and key issues raised by representors on a range of themes. All representations received to the Regulation 19 Publication Plan can be accessed on the Council website.
- 3.3.13 One representation was submitted late by National Grid and it constituted some standard information, rather than any substantive objection to the plan. This representation was not processed and is therefore not included the analysis of representations.

Analysis

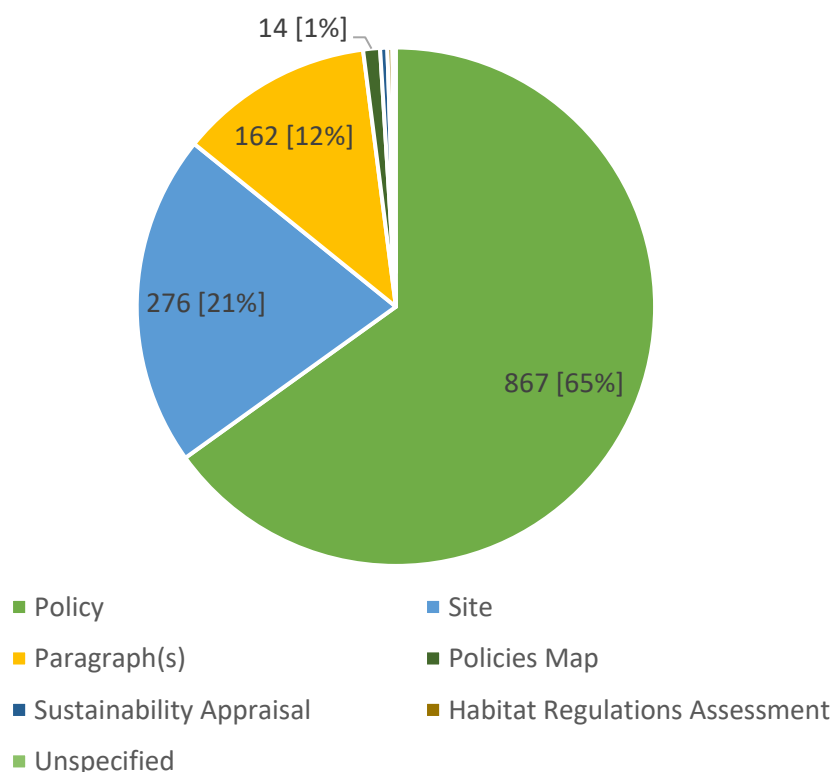
- 3.3.14 Of the representations made on the soundness of the Local Plan, 1,103 representations considered the Plan not sound, and 203 representations considered the Plan sound.
- 3.3.15 Of the 979 representations that indicated the reasons why the Plan was not sound, the following reasons were selected:

Soundness issues	Number of representations
Not Positively Prepared	424
Not Justified	697
Not Effective	675
Not Consistent with National Policy	537

No specific reason indicated ¹	124
---	-----

- 3.3.16 Of those representations made on the legal compliance of the Submission Draft Local Plan, 325 representations considered the Plan legally compliant, and 101 representations considered the Plan not legally compliant.
- 3.3.17 Of those representations made on the compliance of the Submission Draft Local Plan with the Duty to Cooperate, 278 representations considered the Plan to be in compliance with the Duty to Co-operate, and 75 representations considered the Plan to not be in compliance with the Duty to Co-operate.
- 3.3.18 The chart in Figure 1 below illustrates the parts of the Plan to which representations related. 867 representations related directly to the policies of the Plan, with an additional 162 related to the paragraphs that support and justify the policies of the Local Plan. 276 representations were directed towards site-specific policies within the Plan.

Figure 1 Split of representations across parts of the Plan



¹ In some instances, representors did not indicate the reasons why the Plan was not sound. This figure shows the numbers of representations where it was not possible for officers to allocate a reason. Where this was possible (for example made explicit in the representation text), officers allocated a reason.

Sustainability Appraisal (SA) representations

- 3.3.19 6 representations were received in relation to the Wirral Local Plan: Pre Submission Local Plan Sustainability Appraisal (SA) Report (June 2022) (SD2).
- 3.3.20 Representations regarding the SA contended that the failure to assess and explore the release of Green Belt sites and higher levels of housing growth as a reasonable alternative resulted in the Submission Draft Local Plan being unsound. Additionally, Historic England considered that the Submission Draft Local Plan would not meet the legal tests due to the SA not providing an appropriate level of details with regards to the topic of Heritage.

Habitats Regulations Assessment (HRA) representations

- 3.3.21 4 representations were received in relation to the Habitats Regulations Assessment (HRA) of the Wirral Local Plan 2021-2037 (April 2022) (SD3).
- 3.3.22 Representations regarding the HRA cover a number of issues, such as that brownfield sites should have been subject to assessment, the lack of justification for screening out some European sites, and the need for further information and clarification on how impacts of development can be avoided on some European sites. The inclusion of amendments suggested in the HRA in the plan was suggested as well as the inclusion of further studies on European sites and other wildlife.

Local Plan policy and site specific representations

- 3.3.23 As shown in Figure 1 above, 1,029 representations were raised specifically relating to the policies and the paragraphs supporting the policies of the Submission Draft Local Plan. The top ten² policies based on the number of representors across the whole plan can be seen in Table 3.4 below. A high-level breakdown of the types of issues raised in the representations is also provided in the table³.

Table 3.4 Top 10 policies and paragraphs supporting the policy by number of representors

Policy	Number of representors	Number of representations	Of which had issues with the soundness of the plan	Of which supported the policy	Of which suggested a modification*
WS 1	87	155	125	15	80
WS 3	51	158	142	23	112
WS 5	38	114	93	26	74
WS 10	29	54	42	8	35
Part 2 ⁴	25	55	43	9	39

² 15 representors referred to Part 3 Strategic Policies as a whole, multiple policies or paragraphs or the introductory text of Part 3 of the plan. These have been omitted from this table.

³ Representations that may have issues with the soundness of policies or other parts of the plan and requested modifications may also have expressed support for some of the policy or part of the plan, which was recorded. This applies to the subsequent Tables 3.6 and 3.7 also.

⁴ Refers to Part 2 of the Local Plan Submission Draft, including representations made in relation to the Vision and Strategic Objectives and supporting paragraphs and text.

WS 8	23	68	64	15	51
WS 7	22	37	28	10	24
WS 4	20	30	21	6	25
WP 8	16	23	21	2	16
WS 11	10	13	10	4	10

*Major and minor

3.3.24 As shown in Figure 1 above, 276 representations were raised specifically relating to the sites included in the policies of the Submission Draft Local Plan. A number of representations regarding other parts of the plan included references to sites also. The top ten sites referred to across all representations by stakeholders are shown in Table 3.5 below.

Table 3.5 Top 10 Sites by number of representors

Site Reference	Number of representors	Number of representations received
RES-SA6.4 - Land at Grange Hill Farm, Grange Old Road, West Kirby [Residential]	18	40
LGS-SA6.3 – Greenfield Estate [Local Green Space]	12	13
RES-SA4.7 / MPA-SA4.1 – Former D1 Oils, Dock Road South, Bromborough [Residential]	11	26
RES-SA4.11 – Unilever Research, Quarry Road East, Bebington [Residential]	10	12
RES-RA6.2 - Wirral Waters - Vittoria Studios and Sky City, Duke Street, Birkenhead [Residential]	8	8
RES-RA6.3 - Wirral Waters - Northbank East 1, Dock Road, Seacombe [Residential]	7	7
RES-RA6.6 - Wirral Waters - Northbank West 1, Dock Road, Seacombe [Residential]	6	6
RES-SA5.1 - Moreton Family Centre, Pasture Road [Residential]	6	6
RES-SA4.6 - Former Croda, Prices Way, Bromborough Pool [Residential]	6	6
RES-SA1.3 - Rear of Gibson House, Maddock Road, Egremont [Residential]	6	6

Regeneration Area Policies

3.3.25 126 representations were raised in relation to the Regeneration Area policies of the Submission Draft Local Plan by 33 representors. Table 3.6 below shows the number of representations received in relation to the eleven Regeneration Areas.

Table 3.6 Number of representations received by Regeneration Area

Regeneration Area	Number of representors	Number of representations received	Of which raised issues with soundness	Of which supported the policy	Of which suggested a modification*

RA 1	6	6	6	0	3
RA 2	9	17	15	0	10
RA 3	9	14	13	1	9
RA 4	8	16	14	2	6
RA 5	7	11	11	3	5
RA 6	16	25	17	1	11
RA 7	4	7	6	1	2
RA 8	1	1	1	0	1
RA 9	3	4	4	0	1
RA 10	12	17	16	0	10
RA 11	5	8	8	0	4

*Major and minor

Settlement Area Policies

3.3.26 187 representations were raised in relation to the Settlement Area policies of the Submission Draft Local Plan by 80 representors. Table 3.7 below shows the number of representations received in relation to the eight Settlement Areas.

Table 3.7 Number of representations received by Settlement Area

Settlement Area	Number of representors	Number of representations received	Of which raised issues with soundness	Of which supported the policy	Of which suggested a modification*
WP 1	11	14	12	1	9
WP 2	6	7	6	2	5
WP 3	11	15	15	0	11
WP 4	28	39	31	5	18
WP 5	14	20	18	1	11
WP 6	24	46	40	4	31
WP 7	15	18	17	0	13
WP 8	21	28	25	2	20

*Major and minor

3.3.27 A number of omission sites were promoted by landowners and site promoters seeking to promote alternate growth strategies for the Plan, including an increase to the housing requirement and the release of Green Belt sites. A number of representations were also received from individuals, local groups and organisations which suggested development should be restricted and that the housing requirement should be lower.

3.3.28 The following is a list of the key issues raised in response to the Regulation 19 Publication across all representations made.

Table 3.8 Key issues Regulation 20 (receiving 5 or more representations)

Key Issue	Council Response	Number of comments on the issue
Legal Compliance		
The Plan has not been produced in accordance with the Duty to Cooperate.	The Submission Draft Local Plan has been produced in accordance with the Duty to Cooperate, as set out in national planning policy and legislation. The Council has produced a Duty to Co-operate Statement of Compliance (SGD1) that provides a detailed account of how the Plan has been produced in accordance with the Duty to Cooperate. Section 5 of SGD1 explains that a number of Statements of Common Ground either have been agreed, or are in the process of being agreed, with relevant bodies. In addition, the production of the Local Plan has been underpinned by the Liverpool City Region Spatial Planning Statement of Common Ground 2019 (SGD2).	5
The HRA has not been produced in accordance with legislation.	The Habitats Regulations Assessment (SD2) has been produced in accordance with national planning policy and legislation. The report explains how the Habitats Regulations Assessment process has followed the approach prescribed through the Conservation of Habitats and Species Regulations 2017 (as amended), in line with the guidance set out in the national Planning Practice Guidance.	6
The housing requirement is too low.	The Borough's housing needs have been assessed in accordance with the evidence including work carried out by the University of Liverpool (H6) and national planning policy and guidance in the Strategic Housing Market Assessment (H8). The Council is confident that the housing requirement within the Submission Draft Local Plan is in accordance with national planning policy and guidance.	55
Quantum of Development		

Key Issue	Council Response	Number of comments on the issue
The housing requirement is too high / inaccurate.	The Borough's housing needs have been assessed in accordance with the evidence including work carried out by the University of Liverpool (H6) and national planning policy and guidance in the Strategic Housing Market Assessment (H8). The Council is confident that the housing requirement within the Submission Draft Local Plan is in accordance with national planning policy and guidance.	39
The housing requirement is correct.	Noted.	6
Spatial Strategy		
Sites in the Green Belt should be released.	The Wirral Submission Draft Local Plan meets all of the Borough's development needs through the redevelopment and reuse of land within existing urban areas of the Borough. The spatial strategy focusses on the regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the River Mersey stretching from New Brighton to Bromborough. The exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do not exist, and releasing Green Belt land for development would be contrary to the spatial strategy of the Plan and national planning policy. The spatial strategy and approach of the Plan has been subject to considerable assessment, including Sustainability Appraisal (SD2), and is justified by the extensive evidence base which has informed the Plan. Further details are provided in the Housing Delivery Strategy (BP1) and Site Selection Report (BP2).	117
There is too much emphasis on the regeneration of Birkenhead.	The Submission Draft Local Plan meets all of the Borough's development needs through the redevelopment and reuse of land within existing urban areas of the Borough. The spatial strategy focusses on the regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the	57

Key Issue	Council Response	Number of comments on the issue
	River Mersey stretching from New Brighton to Bromborough. The Council is confident that the spatial strategy fully accords with national planning policy and the corporate vision and objectives of the Council. The spatial strategy and approach of the Plan has been subject to considerable assessment, including Sustainability Appraisal (SD2), and is justified by the extensive evidence base which has informed the Plan. Further details are provided in the Housing Delivery Strategy (BP1) and Site Selection Report (BP2).	
The spatial strategy is supported.	Noted.	64
Site allocation is supported.	Noted.	17
The spatial strategy is not supported.	The Submission Draft Local Plan meets all of the Borough's development needs through the redevelopment and reuse of land within existing urban areas of the Borough. The spatial strategy focusses on the regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the River Mersey stretching from New Brighton to Bromborough. The Council is confident that the spatial strategy fully accords with national planning policy and the corporate vision and objectives of the Council. The spatial strategy and approach of the Plan has been subject to considerable assessment, including Sustainability Appraisal (SD2), and is justified by the extensive evidence base which has informed the Plan. Further details are provided in the Housing Delivery Strategy (BP1) and Site Selection Report (BP2).	100
Housing		
The Plan will not provide for the right types / sizes of housing.	Policy WS 3 seeks to secure the most appropriate mix of housing, taking account of site specific circumstances, viability, updated national planning guidance and the Strategic Housing Market Assessment (H14).	79

Key Issue	Council Response	Number of comments on the issue
The Plan will not provide for housing in the right locations.	The Submission Draft Local Plan 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 land within existing urban areas. These areas represent the most sustainable locations in the Borough, and will provide housing in areas at an appropriate density which are close to public transport and existing services and facilities. The spatial strategy and approach of the Plan has been subject to considerable assessment, including Sustainability Appraisal (SD2), and is justified by the extensive evidence base which has informed the Plan. Further details are provided in the Housing Delivery Strategy (BP1) and Site Selection Report (BP2).	42
The Plan will not provide sufficient affordable housing.	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 informed by the Submission Draft Local Plan Viability Study (DV1), national planning policy and guidance and the Strategic Housing Market Assessment (H14). Further details are provided in the Housing Delivery Strategy (BP1).	48
Density requirements and housing mix are incompatible.	The density requirements and housing mix sought during the plan period are informed by the Local Plan evidence base, including the Strategic Housing Market Assessment (H14) and Wirral Density Study Final Report (H5). The viability of the Submission Draft Local Plan policies has been assessed in the Viability Assessment (DV1). Further details are provided in the Housing Delivery Strategy (BP1).	24
Economy & Employment		
The Plan makes too much provision for employment needs.	The Council is confident that the quantum of employment land provided for by the plan is appropriate and accords with national planning policy. The approach to employment land has been informed by up to date evidence including the Employment Land and Premises Study (EE1).	5

Key Issue	Council Response	Number of comments on the issue
The Plan does not make sufficient provision for employment needs.	The Council is confident that the quantum of employment land provided for by the plan is appropriate and accords with national planning policy. The approach to employment land has been informed by up to date evidence including the Employment Land and Premises Study (EE1).	12
The Plan will not protect the retail economy.	Policy WS 11 Strategy for Town, District and Local Centres aims to maintain the vitality and viability by: applying impact assessments to proposals for uses that are edge of centre and outside centres, the thresholds for these assessments are evidenced in the Retail and Centres Study (EE3); by allowing and enabling appropriate town centre, meanwhile, pop-up, and residential uses; and providing for further cultural and community uses.	5
The Plan makes correct provision for employment needs.	Noted.	5
Infrastructure		
Development will not be adequately supported by infrastructure.	Policy WS 10 requires proposals to make appropriate provision for infrastructure to support development, and to have regard to the Infrastructure Delivery Plan (KSD1) that supports the Local Plan. Further requirements are set out in area-based and site-specific policies, and further information on how costs and contributions will be calculated is set out within Appendix 10 Developer Contributions.	18
Development will worsen infrastructure capacity.	Policy WS 10 requires proposals to make appropriate provision for infrastructure to support development, and to have regard to the Infrastructure Delivery Plan (KSD1) that supports the Local Plan. Further requirements are set out in area-based and site-specific policies, and further information on how costs and contributions will be calculated is set out within Appendix 10 Developer Contributions.	10

Key Issue	Council Response	Number of comments on the issue
Development contributions are not suitable.	Policy WS 10 requires proposals to make appropriate provision for infrastructure to support development, and to have regard to the Infrastructure Delivery Plan (KSD1) that supports the Local Plan. Policy requirements accord with national planning policy set out within paragraph 57 of the National Planning Policy Framework and local evidence provided by the Viability Study (DV1). Further requirements are set out in area-based and site-specific policies, and further information on how costs and contributions will be calculated is set out within Appendix 10 Developer Contributions.	23
The Plan does not deliver sufficient sustainable transport infrastructure.	Policy WS 9 requires proposals to make appropriate provision for sustainable transport infrastructure to support development. Policy requirements accord with national planning policy set out within paragraph 57 of the National Planning Policy Framework and local evidence provided by the Viability Study (DV1). Further requirements are set out in area-based and site-specific policies, and further information on how costs and contributions will be calculated is set out within Appendix 10 Developer Contributions, and have been informed by the evidence base including the Infrastructure Delivery Plan (KSD1).	10
Deliverability		
The Plan is not viable / deliverable.	The viability of the Submission Draft Local Plan policies has been appropriately assessed in the Viability Assessment (DV1).	122
The market will not deliver homes at the rates anticipated.	The Council has carefully considered anticipated delivery rates for sites identified for allocation. The approach is explained and justified within the Housing Delivery Strategy (BP1) and other relevant supporting evidence, including the Birkenhead Housing Market Study (H9).	8
Environment		

Key Issue	Council Response	Number of comments on the issue
The Plan does not sufficiently address climate change mitigation and adaptation.	Paragraphs 1.6 - 1.12 explain how the plan seeks to address climate change. This is a key thread of the Submission Draft Local Plan. The Development and Regeneration Strategy (Policy WS 1) supported by the Green and Blue Infrastructure Strategy (Policy WS 5) and sustainable Strategy for Transport (WS 9) provide a low carbon, high biodiversity backdrop to the whole plan whilst the Strategy for Sustainable Construction, Renewable and Low Carbon Energy (Policy WS 8) address construction and energy supply.	24
The Plan does not sufficiently protect Wildlife/ wildlife corridors / green and blue infrastructure.	These are key objectives of the Submission Draft Local Plan. The Development and Regeneration Strategy (Policy WS 1) is supported by the Green and Blue Infrastructure Strategy (Policy WS 5) which addresses (together with Policies WD 1 and WD 3 in particular) the protection of biodiversity and green and blue infrastructure. The suite of policies protect sites of biodiversity value from international to local and seek Biodiversity Net Gain. Improvements to the condition of sites and connections between them are sought through the plan.	91
The Plan does not sufficiently address carbon neutrality.	Carbon neutrality is a key objective of the Submission Draft Local Plan. The Development and Regeneration Strategy (Policy WS 1) represents a low carbon spatial strategy for the Borough by reusing land and enabling sustainable transport modes to be used. This is supported by the Green and Blue Infrastructure Strategy (Policy WS 5) providing carbon sinks, and the sustainable Strategy for Transport (Policy WS 9) seeking low carbon transport. The Strategy for Sustainable Construction, Renewable and Low Carbon Energy (Policy WS 8) promotes the use of renewable energy technologies in new development and seeks to achieve zero carbon ready dwellings where possible.	17

Key Issue	Council Response	Number of comments on the issue
The Plan is positively prepared to support climate change.	Noted.	10
The plan protects wildlife/ wildlife corridors/ green and blue infrastructure.	Noted.	16
The site should be designated as Local Green Space.	Appendix 13 of the Submission Draft Local Plan designates a number of Local Green Spaces in the Borough informed by the Wirral Local Green Space Designations: Review of Sites (GI5) following two rounds of public consultation. Sites which have been assessed as meeting the criteria defined by the National Planning Policy Framework are to be designated within the Plan.	24
A stepped approach is needed for Passivhaus standards.	Policy WS 8.2 seeks 'zero carbon ready by design' to minimise retrofit. Where possible and viable certification to a Passivhaus or equivalent space heating demand and Energy Use Intensity is sought depending upon the type of building. It is not therefore considered necessary to introduce a stepped approach due to the viability and possibility clauses.	6
Further clarity is needed for Biodiversity Net Gain on sites.	Policy WS 5.4 sets out the requirements for the delivery of Biodiversity Net Gain using the biodiversity harm avoidance, mitigation and compensation hierarchy (set out in Policy WD 3 Biodiversity and Geodiversity) and DEFRA metric. Paragraphs 3.142-3.144 explain the process and mechanisms the Council expects to use to ensure Biodiversity Net Gain. The Council is ready to respond to any additional guidance and secondary legislation which may emerge during the course of the Examination process.	8
Design & Heritage		
The Plan will adversely impact local character.	Policy WS 6 requires development proposals to adhere to placemaking principles and Policy WS 3.2 requires the local context and character of areas to be taken into account.	21

Key Issue	Council Response	Number of comments on the issue
The Plan will not ensure the delivery of high quality design.	Policies WS 6 and WS 7 will ensure that placemaking and high quality design will be integral to new development. The policy requirements have been informed by the Viability Study (DV1).	23
Development will adversely impact the historic environment.	The Submission Draft Local Plan has a key objective of protecting and enhancing the historic character of places and buildings in the Wirral. It contains a series of policies which reflect the significant importance which the Council gives to the Borough's heritage. Policy WD 2 sets out a comprehensive approach to the protection of heritage assets whilst the place policies in Part 5 of the plan contain policies specific to each Conservation Area where they exist. In addition, the national protections afforded to heritage assets also apply.	48
The Plan will not support a high quality of life.	The Submission Draft Local Plan will promote and require future development to support a high quality of life through a range of policies and objectives. The promotion of a high quality of life for all is central to the vision of the Plan.	15
Housing design standards not evidenced.	The Housing Design standards, as set out in Policy WS 3.1 are based on local evidence including the Strategic Housing Market Assessment (H8), explained and justified in the supporting text, and are in accordance with the National Planning Policy Framework, national Planning Practice Guidance, Building Regulations and other relevant legislation and national guidance.	7
Zero carbon ready is not viable.	The viability of the Submission Draft Local Plan policies has been appropriately assessed in the Viability Assessment (DV1). Associated costs will differ depending upon the site, design, and construction method.	18
Other		

Key Issue	Council Response	Number of comments on the issue
Evidence base documents are flawed.	The Council is confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate.	153
Minor modification proposed.	Noted.	38
Change to Proposals Map proposed.	Noted.	18
Main Modification Proposed.	Noted.	826
No Objections to the Plan.	Noted.	33
Supports Policy / paragraph.	Noted.	196
Policy Omission.	Noted. However, the Council is confident that the policies in the Submission Draft Local Plan provide adequate coverage to manage future development proposals in the Borough.	108
Objection to area designation.	Noted. However, the Council is confident that the area designations in the Submission Draft Local Plan are appropriate and adequately justified.	7
Policy unrealistic.	Noted. However, the Council is confident that policies are realistic, justified and effective.	25
Site Based		
The site is not deliverable.	The site is allocated for development in the Submission Draft Local Plan. 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. Further information is set out in the Strategic Housing Land Availability Assessment (H7) and Housing Delivery Strategy (BP1).	42
The allocation of the site has not been adequately justified.	The site is allocated for development in the Submission Draft Local Plan. 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. Further information is set out in the	65

Key Issue	Council Response	Number of comments on the issue
	Strategic Housing Land Availability Assessment (H7), Site Selection Report (BP2) and Housing Delivery Strategy (BP1).	
The phasing of delivery on site is unrealistic.	The Council has carefully considered anticipated delivery rates for sites identified for allocation. The approach is explained and justified without the Housing Delivery Strategy (BP1) and other relevant supporting evidence, including statements of common ground where available.	24
The quantity of deliverable housing in the Regeneration Area/Settlement Area is unrealistic.	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. Further information is set out in the Strategic Housing Land Availability Assessment (H7) and Housing Delivery Strategy (BP1).	29
Omission Site	The Submission Draft Local Plan meets all of the Borough's development needs through the redevelopment and reuse of land within existing urban areas of the Borough. The spatial strategy focusses on the regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the River Mersey stretching from New Brighton to Bromborough. The exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do not exist and releasing Green Belt land for development would be contrary to the spatial strategy of the Plan and national planning policy. The spatial strategy and approach of the Plan has been subject to considerable assessment, including Sustainability Appraisal (SD2), and is justified by the extensive evidence base which has informed the Plan. The Plan makes more than adequate provision to meet the development needs of the Borough and incorporates sufficient flexibility. Further details are provided in the Housing Delivery Strategy (BP1) and Site Selection Report (BP2).	105

Key Issue	Council Response	Number of comments on the issue
The masterplan is not supported.	The Council requires site specific proposals to be submitted in accordance with Masterplans which consider and demonstrate how the regeneration of the Masterplan Area as a whole should take place in a coordinated, cohesive and comprehensive manner. A number of different landowners and delivery agents exist within the Masterplan Areas meaning that in many cases, the Council anticipates that planning applications are likely to be submitted by a number of different developer interests within the confines of each Masterplan Area.	5
Details of site access	Noted, detailed arrangements for site access will be determined at the planning application stage.	7
Object to use classes designation.	Noted.	11

3.3.29 121 representations were received by the Council that made detailed points that could not be attributed to any of the codes above. Detailed points raised included:

- The plan has not been produced in accordance with the Statement of Community Involvement
- The Sustainability Appraisal has not been produced in accordance with legislation
- The Plan will not cover a 15 year period upon adoption
- Household projections are flawed
- There are exceptional circumstances to not use the standard methodology for calculating housing need
- The Strategic Objectives are not measurable
- The need for new accessible housing is overstated
- The plan does not adequately justify custom and self build need in sites over 0 units
- Density requirements are not required
- The plan makes correct provision for retail and town centres
- Public open space provisions or contributions on all developments is not practicable

- Do not support requirements for / standards for green and blue infrastructure provision on developments where viability and deliverability are impacted
- Achievable densities are overestimated on sites within urban areas/ or will not be compliant with other policies
- Negative impact on human health, no evidence that potential noise problems can be overcome
- Strong objection to oil and gas policy
- Importance of food production not sufficiently emphasised
- Requirement for 20% biodiversity net gain on Council owned sites not sound
- Disproportionate approach to masterplanning
- Omission of reference to air quality monitoring capacity
- The Council should include a trigger mechanism for review of the Local Plan

Statutory consultees

3.3.1 The following is a list of the issues raised by statutory consultees in response to the Regulation 19 Publication. No representations were received from Halton Council, Flintshire County Council, West Lancashire Council, the Marine Management Organisation, Civil Aviation Authority, and Office of Rail Regulation, and Nature Connected.

Table 3.9 Main issues raised by statutory consultee to Regulation 20

Statutory Consultee	Summary of response
Canal River Trust	No comments on the Wirral Local Plan.
Cheshire West and Chester Council	Cheshire West and Chester Council expressed support for the overall strategy proposed in the Wirral Local Plan and recommended a potential amendment to the wording of Policy WM 6.
Cheshire Wildlife Trust	Cheshire Wildlife Trust recommended potential amendments to policy wording for strategic, site specific and detailed policies, including applying adequate buffer zones to allocations, and to update policies and evidence base documents to reflect the latest national guidance. Cheshire Wildlife Trust also recommended that the LCR Recreational Disturbance Avoidance & Mitigation Strategy should be finalised as soon as possible and regularly monitored.
Coal Authority	No comments on the Wirral Local Plan.

Statutory Consultee	Summary of response
Environment Agency	The Environment Agency found the Local Plan to be sound, and found the process to comply with the Duty to Cooperate. The EA confirmed that a robust assessment of flood risk and the impacts of climate change was undertaken. The EA recommended the use of the most up to date climate change allowance protections and to check egress/ access with emergency services and emergency planners for site allocations.
Historic England	<p>Historic England found the Wirral Local Plan to be unsound on the grounds that it does not comply with the NPPF and recommend changes to strategic, site specific policies and detailed policies to strengthen protection of the historic environment and for policies to incorporate the recommendations of the HIA and/ or specific mitigation/ enhancement measures. Historic England recommend Policy WD 2 is amended to ensure that it provides a strategic framework for the historic environment, that is locally specific to Wirral. Historic England considered that the Sustainability Appraisal is not legally compliant on the grounds that it did not demonstrate that each of the policies and proposals have been fully assessed in order to determine the likely significant effects on heritage.</p> <p>Further engagement with Historic England has led to meetings to discuss the concerns raised in the Regulation 19 representation. It was agreed to produce a Statement of Common Ground (SoCG) to address the issues raised, and to continue to work together and share information.</p>
Homes England	Homes England acknowledged ongoing collaboration with Wirral Council to deliver the regeneration of Birkenhead and provided site specific comments relating to the Land South of Clatterbridge Hospital.
Knowsley Council	No comments on the Wirral Local Plan.
Liverpool City Council	Liverpool City Council expressed support for the Wirral Local Plan and the provision in the Plan for the Wirral to meet its housing and employment needs within its boundaries. The Council recommended a potential amendment to policy wording for MPA-RA6.3.
LLFA/ Coast Protection Authority	The LLFA/ Coast Protection Authority recommended potential amendments to the wording of supporting text and Policy WD 4.3.
National Grid	No comments on the Wirral Local Plan.
National Highways	National Highways expressed support for the Wirral Local Plan.
Natural England	Natural England recommended revised wording in the Wirral Local Plan relating to the Local Nature Recovery Strategy and biodiversity net gain, and recommended amendments to monitoring indicators relating to biodiversity and green infrastructure. Natural England were satisfied with the Habitats Regulations Assessment (HRA), but recommended amendments to parts of the HRA to reflect the appropriate designated sites and areas,

Statutory Consultee	Summary of response
	to clarify the outcomes of the assessment on some designations, and to consider impacts on both greenfield and brownfield sites. Natural England confirmed that they were generally satisfied with the information within the Sustainability Appraisal.
Natural Resources Wales	Natural Resources Wales concurred with the assessment and conclusions of the HRA, but recommended further detail be included to parts of the HRA relating to cross boundary matters.
NHS/Clinical Commissioning Group	The NHS recommended amendments to the wording of the Wirral Local Plan to provide greater flexibility in seeking the provision of new on-site healthcare infrastructure, and flexibility in the approach to calculating the population of new development proposals. The NHS also commented on the approach within the Plan to establish GP floorspace cost benchmarks and to consider the change of use of community facilities and assets.
Sefton Council	Sefton Council found the Wirral Local Plan to be sound and noted it will have no material impact on Sefton Council.
Sport England	Sport England found the Wirral Local Plan to be sound and expressed support for the references to Active Design, Sport England's Playing Fields Policy, the Council's Playing Pitch and Outdoor Sport Strategy and the requirements of the NPPF.
St Helens Council	St Helens Council noted that the issue of strategic B8 needs was insufficiently addressed in the Liverpool City Region Statement of Common Ground. The Council considered the Liverpool Spatial Development Strategy to be the appropriate place to consider and resolve the provision of strategic B8 employment land.
United Utilities	United Utilities recommended potential amendments to policy wording, including the need for flexibility to the delivery of Biodiversity Net Gain, support for future investment in infrastructure, flood risk, drainage, groundwater source protection zones, sites in multiple ownership, development next to wastewater treatment works and pumping stations, residential extensions. United Utilities discussed the need to model on-site sewer flood risk and to co-ordinate the timing for the delivery of development with the timing for the delivery of infrastructure improvements.
Welsh Water	Welsh Water acknowledged the site allocations within Welsh Waters operational area.

3.4 Conclusion

- 3.4.1 In carrying out its consultation processes, the Council considers that it has complied with both the Town and Country Planning (Local Planning) (England) Regulations 2012 and with the provisions of its Statement of Community Involvement.

4. Appendices

Appendix 1-Regulation 18 Local Consultation Focus Group Presentations and Report

Appendix 2-Regulation 18 Consultation Media

- a. Have Your Say Consultation and Registration Advert
- b. Have Your Say Consultation Advert
- c. Consultation Registration Poster
- d. Display Panels Content
- e. Consultation Leaflet
- f. Translated Consultation Posters
- g. Local Plan Pop Up Banners
- h. Issues and Options Local Plan Summary
- i. Issues and Options Local Plan Summary Easy Read
- j. Issues and Options Local Plan Summary Easy Read and Comment Form
- k. Local Plan Questionnaire

Appendix 3-Regulation 18 Schedule of consultees

Appendix 4-Regulation 18 Key issues raised and Council response

Appendix 5-Regulation 18 Key issues raised by statutory consultees and Council response

Appendix 6-Regulation 19 Publication Media and Material

- a. Wirral Local Plan 2021-2037 Summary
- b. Local Plan Posters
- c. Local Plan Pop Up Banners
- d. Display Panels Content
- e. Wirral Globe Notice Regulation 19 Publication 11 May 2022
- f. Wirral Globe Notice Notification of Publication Extension 29 June 2022
- g. Guidance Notes on Submitting Online Representations
- h. Statement of Representations Procedure
- i. Representations Form

Appendix 7-Regulation 19 Notification Letters

- a. Potential Employment Allocations Regulation 19 Notification Letter
- b. Potential Housing Allocations Regulation 19 Notification Letter
- c. Masterplan Regulation 19 Notification Letter
- d. Local Plan Contact Database Regulation 19 Notification Letter

Appendix 8-Regulation 19 Notification of Publication Extension Letter