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Core Strategy Report of Consultation on Issues, Vision and Objectives

1 BACKGROUND TO THE CONSULTATION

1.1 This report sets out the background to the consultation undertaken by the Council on the Issues, Vision and Objectives for a Core Strategy Development Plan Document for Wirral, as required under Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

1.2 The results of the consultation have now been used to inform the preparation of a Spatial Options Report for the Core Strategy.

1.3 This section sets out the details of the consultation process that was followed. Later sections set out the responses that were received and how the Council has responded to them in the Spatial Options Report.

1.4 The Core Strategy Development Plan Document is intended to set out the long-term vision, objectives and spatial strategy for the Borough, for a period of up to fifteen years.

1.5 The Core Strategy Development Plan Document will replace the majority of the strategic policies set out in the Unitary Development Plan for Wirral, adopted in February 2000, and will have status alongside the Regional Spatial Strategy, as part of the statutory Development Plan for the area. It will be used to guide decisions on individual planning applications and will set the overall framework for the site-specific proposals to be included in a future land allocations Development Plan Documents.

1.6 The timetable for the preparation of the Core Strategy Development Plan Document is set out in the Local Development Scheme for Wirral. A revision to the timetable was submitted to the Secretary of State on 10 August 2009. A copy of the latest Local Development Scheme can be viewed at xxxxxxxxxxxxxxxxxxxx.

The Consultation Process.

1.7 Consultation on the Issues, Vision and Objectives for the Core Strategy began on 2 February 2009 and ended on 27 March 2009. Consultation took place on three documents:

- an Issues, Vision and Objectives Report;
- an Initial Sustainability Appraisal Report; and
- an Initial Equality Impact Statement.

1.8 The consultation documents were accompanied by two reports of previous consultation. Copies of the consultation documents can be viewed at xxxxxxxxxxxxxxxxxxxx

1.9 Comments were invited on any part of these documents. The Issues, Vision and Objectives Report also invited comments on nine Consultation Questions designed to focus attention on specific areas of the document.

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1.10 Letters inviting comments on the Issues, Vision and Objectives were sent to 503 contacts registered on the Council's Local Development Framework database, with free copies of the consultation documents provided on request. A copy of the consultation letter can be viewed at xxxxxxxxxxxxxxxxxxxx. A list of the people and organisations contacted is attached at Appendix 1 to this report.

1.11 Copies of the consultation documents were also placed on deposit for public inspection at the public counter of the Technical Services Department in Birkenhead and at all 24 public libraries across the Borough during normal opening hours.

1.12 Copies of the consultation documents were sent to local Members of Parliament, to elected Councillors and to 59 specific consultation bodies. A list of the bodies included is attached at Appendix 2 to this report.

1.13 Copies of the consultation documents were also provided to members of the Council's eleven Area Forums.

1.14 A presentation by officers, a question and answer session and free copies of the consultation documents were provided at ten of the Area Forums. The offer of a presentation was declined by the Area Forum for Liscard and Seacombe. A list of the Area Forums which took part in the consultation are attached at Appendix 3 to this report.

1.15 The consultation documents were also presented to the meeting of the Youth Parliament on 3 March 2009, attended by approximately 40 young people, aged between 15 to 17 years, selected as representatives from Wirral schools.

1.16 A press release was issued and the availability of the consultation documents was included as a news item on the Council's website home page.

1.17 The consultation drew replies from 50 respondents. A list of respondents is provided at Appendix 4 to this report.

1.18 The majority of respondents commented both on the factual content of the Issues, Vision and Objectives Report and on the Consultation Questions. One comment was directed towards the Initial Equality Impact Statement. Eight comments were directed towards the Initial Sustainability Appraisal. The comments on the Initial Sustainability Appraisal are also addressed within the revised Sustainability Appraisal Report prepared to accompany the Spatial Options Report. All the comments received are set out in the tables below.

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2 ANALYSIS OF THE RESPONSES RECEIVED

2.1 The following sections summarise the comments received under each of the main sections of the Issues, Vision and Objectives Report and sets out a summary of the Council's response so far.

3 INTRODUCTION

3.1 Comments on the Introduction to the Issues, Vision and Objectives Report were mainly directed towards:

- The report is too simplistic in identifying the differences between east and west Wirral
- Recommend the use of strategic Site Allocations to provide a clearer and more certain framework
- The initial sustainability appraisal, including potential conflicts between some of the SA Objectives and the Core Strategy Spatial Objectives.
- The end date of 2025 should be extended to at least 2031 in order to enable continuous delivery of housing for at least 15 years from the date of adoption

3.2 A summary of each of the comments received is set out in the table below.

ID	Summary of Comments Received
283	Statements about sharp contrasts between east and west Wirral, although commonly made, are neither accurate nor helpful. The ward often described as one of the most deprived in England - Bidston St James - is near the centre of Wirral. A more accurate description would result from consideration of the urban core - based on nineteenth and early twentieth century development in Birkenhead and Wallasey - with the rest of Wirral being developed in the inter war and post war periods. Poor families tend to live in cheap houses - including social housing and low rent housing. Cheap houses are concentrated in the urban core, although social housing is scattered round Wirral - as would be expected from the fact that each of the five authorities which came together in 1974 was a housing authority. There is evidence - certainly of an anecdotal nature but also by present tenure - that less social housing has been sold off under right to buy in the urban core as that these areas have houses which are less popular. The reasons for this should be considered when planning for the future. Since one criterion for getting priority for social housing is poor health, it is to be expected that health is found to be worse here. Life expectancy at birth is a measure of mortality and the housing allocation policy is one factor in this.
529	The disparity between east and west Wirral is far from clear-cut, with many, perhaps more hidden needs, existing in west Wirral.

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ID	Summary of Comments Received
145	Glad to see the recognition of the value of Wirral's natural environment and wildlife habitats. The mention of the Open Golf is not helpful, as by the time it might come back here again, rising travel prices are likely to reduce its attendance. It was irrelevant to much of the borough and reference to it should be removed.
299	Pleased to see acknowledgement of the asset that Wirral's natural and built environments provide.
348	The regional leaders board with the RDA, would be jointly responsible for drafting the Single Regional Strategy. 4NW has been established as the Regional Leaders Forum for the North West and initial consultation on a new Regional Strategy is already underway.
194	Clarification is sought on the delay in progressing allocations Document Plan Document (DPDs) until after the final Core Strategy DPD is adopted. Would this mean that there will be a significant delay in realisation of the vision to post 2012 or longer?
349	PPS12 advises that Core Strategies "may allocate strategic sites" where these are considered central to the achievement of the strategy. The allocation of a limited number of key strategic sites would provide a clearer and more 'certain framework for the preparation of DPDs.
488	Welcome the commitment to the aims of the Sustainable Community Strategy.
9	Welcomes acknowledgement that the Core Strategy will be used to determine individual planning applications
114	4NW has produced a Sustainability Appraisal Toolkit for use with a variety of strategies and development plans, to ensure integrated plans and projects create sustainable developments within the North West.
191	The initial scope of the SA occurred in 2006/7. It is not clear that the Framework has been revised in any way to reflect changes over the interim period, leaving it open to challenge by third parties or a Planning Inspector.
475	The initial sustainability appraisal overlooks possible conflicts arising from water demand, air pollution, tourism development and port development. Appendix B should record a possible conflict against SA Objective 11 (to maintain and improve biodiversity and habitats) for Strategic Policy Objectives 3, 6, 8, 9, 10, 19, 21 and 22.
477	Appendix B of the initial sustainability appraisal should recognise a possible conflict between Strategic Policy Objective 6 and SA objectives 15, 21, 22 and 24; the relationship between Strategic Policy Objective 26 and SA objectives 6 and 7 are uncertain not positive; there is a potential conflict

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ID	Summary of Comments Received
	between Strategic Policy Objective 26 and SA objective 10. The relationship between Strategic Policy Objective 26 and SA objective 23 should be uncertain.
23	Three SACs and two SPAs in Wales may be affected directly or indirectly by development in Wirral. Dee Estuary SAC - direct impacts through waste water discharges, foreshore development, port activity, water sports and other intensive recreational activity. The Dee Estuary SPA - as for the Dee Estuary SAC. River Dee and BalaLakeSAC - indirect impacts through water demand for Wirral reducing river flows, potentially affecting water quality. Berwyn and South Clwyd Mountains SAC - indirect impacts through air pollution. Berwyn SPA - as the Berwyn and SouthClwydMountains SAC. The Welsh Assembly Government treats Ramsar sites as if they are SAC or SPA. The Dee Estuary is also a Ramsar site. Management plans and Regulation 33 advice documents for these sites are available for inspection.
195	The Core Strategy is required to be subject to an assessment under the UK Habitats Regulations rather than the EU Habitats Directive.
489	Welcome an assessment under the EU Habitats Directive.
40	The end date of 2025 should be extended to at least 2031. PPS3 states that Local Planning Authorities should set out policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the Regional Spatial Strategy. 15 years should be a minimum, not a maximum. The current Local Development Scheme (2007) is out of date. There has been major slippage in the target dates. The next stage of consultation on the Core Strategy is likely to take place in June 2009. The Core Strategy is likely to be adopted by 2011/2012 at the earliest. If that is the case, the Core Strategy should have a plan period to 2031.
196	The environment should be included within the topics listed.
437	Was this stage advertised in the press - other than in the Area Forum notice? We saw the Area Forum notice in the paper and received an Area Forum notice by post, but other groups may not. Seeks reassurance that the comments made with regard to the proposed updating of the UDP in 2004, are being carried forward as part of the LDF process.
158	There are possible conflicts between PO8 and PO28, and PO8 and PO27. The positive relations marked between PO22 and PO2, and between PO23 and PO11, are uncertain in limited circumstances. PO6/SAO12 is uncertain, as some tourism developments eg sand-yachting need careful control. PO1/SAO22 is positive PO11/SAO11 is uncertain, as a few areas of

ID	Summary of Comments Received
	previously-developed land, and some vacant buildings, have wildlife value. PO27/SAO11 is uncertain, as flooding can be beneficial or detrimental to wildlife, and flood control schemes can harm wildlife.
250	The Initial Equality Impact Statement was almost impossible to understand.
318	It is too early for many of the conclusions in the compatibility matrices in the sustainability appraisal. It is too early to make some of the 'positive' compatibilities. Caution is advised. Appropriate policy wording will be necessary to secure the 'positives' shown and to convert any 'uncertains' and 'conflicts' to 'positives'.

3.3 The Council has responded to these comments by:

- Including more detailed Settlement Area Profiles in the Spatial Options Report
- Identifying the use of strategic allocations and their potential locations as a means of delivering the Core Strategy
- Taking the comments into account in the sustainability appraisal of the Spatial Options
- Changing the Core Strategy timeframe to 2031.

4 SPATIAL PORTRAIT

4.1 The following preliminary comments were directed to the introductory paragraphs presenting the sections on the social, economic, environmental context, natural resources and quality life and to the emerging Spatial Portrait as a whole:

- Key conclusions and issues need to be drawn out and considered in the context of how they relate to future spatial planning for the Borough
- The influence of economic development in Welsh Deeside should be mentioned.

ID	Summary of Comments Received
28	Consultees are asked to comment upon the contextual synopsis under each heading. It is not clear who this is aimed at, given that much of each synopsis is factual. What is the Council trying to elicit? The Council has produced a number of Annual Monitoring Reports which provide a wealth of factual evidence in terms of social, economic and environmental factors. The Council have also concluded a Local Area Agreement and been party to the LCR Multi-Area Agreement, which have highlighted the issues facing the borough. Unless documents such as the AMR have been challenged in the past, it is difficult to see who is likely to mount an objection or provide worthwhile comment. Does this mean that the earlier consultation and its results could be in some way flawed or done without any regard to context? It is difficult to understand why the Council are revisiting old ground which could

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	undermine the results of its earlier consultation? This section contains a lot of useful information but the key conclusions and issues need to be drawn out and considered in the context of how they relate to future spatial planning for the borough. For example, what do the conclusions at para 2.11 mean for improving the employment offer in the Core Strategy; what are the main conclusions of the retail study and what implications do they have for the Strategy? Recent PINS advisory visits to LPAs have emphasised the importance of the evidence base and the presentation of its conclusions. LPAs should show how evidence-based studies have been taken forward to arrive at the chosen options, which can be in an accompanying document, but a proportionate approach to evidence gathering should be adopted.
338	In general agreement with the overall spatial portrait which identifies the need to strengthen the local economy, encourage regeneration, increase employment opportunities for local people and reduce the level of outmigration. Agrees that retailing is a key sector to do this.
577	The plan period should be to 2031, not 2025 as stated.
284	Wirral has another boundary - the Dee, which should be mentioned. The economic development in Welsh Deeside has an influence on the economy of Wirral.

4.2 The Council has responded to these comments by:

- Identifying the issues arising from the Spatial Portrait and further developing the most strategic issues in the Spatial Options
- Acknowledging the influence of the Welsh economy in the Spatial Portrait.

Social Context

4.3 The only comment on the Social Context for the emerging Spatial Portrait was:

ID	Summary of Comments Received
491	"a lower proportion of younger adults and a higher proportion of older people than the averages for the rest of England and the North West" is ambiguous. It would be helpful if the actual figures were stated.

4.4 The Council has responded to this comment by providing additional information in the Spatial Portrait

Responses to Consultation Question 1

4.5 The responses to Consultation Question 1 - *Do you agree that this is an accurate reflection of the Borough's social context? If not, please say why* - were mainly directed towards:

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- Distinctions between the social context of east and west Wirral need to be made more explicit
- Insufficient attention has been paid to the needs of the Borough’s ageing population.

4.6 A summary of each of the comments received is set out in the table below.

ID	Summary of Comments Received
66	No reason to question the analysis.
132	Agree this is an accurate statistical analysis of the Borough's social context. There is not sufficient recognition of the strength of local communities across the Borough. Insufficient attention is paid to the needs of an ageing population.
140	Agree that the document largely covers the key social issues.
197	The very significant differences in wealth, health, deprivation and environmental quality between West and East Wirral need to be much more explicit.
251	Agree.
292	Agree.
320	Partly agree. The highest concentrations of over 65s are in the west and south of the Borough and is projected to increase by 40% from 2003 to 2028. Supported or adapted housing, good access to health, leisure and social facilities and the provision of local shops and community centres will be of major importance. With increasing energy prices, accompanied by a severe economic downturn, will mean that energy poverty and food poverty will become more serious. The vulnerability of some social groups to volatile energy prices and climate change should be analysed, to help communities develop capacity and plans to adapt to possible impacts.
538	The spatial portrait, in broad terms, accurately reflects the social context of the Borough.

4.7 The Council has responded to these comments by:

- Providing additional information in the Spatial Portrait
- Including policy options for affordable and specialist housing

4.8 Further detailed work is still to be completed on responding to the needs of an ageing population.

Economic Context

4.9 Comments on the details contained within the Economic Context were mainly directed towards:

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- Reflecting the review of Strategic Regional Sites and the likely identification of Wirral Waters in the Core Strategy
- The role that tourism plays in the current and potential future economy should be recognised
- A number of local and district centres are in decline; to prevent further decline avoid new out-of-town centre supermarket development and make improvements to existing town centres, including fostering local businesses and improving access via public transport

4.10 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
376	Supports the need to improve the local economy. The retail sector is a key part of the local economy. Birkenhead is the main retail and service centre in the Borough but Liverpool is the key retail location within the wider City Region and the economic driver for the sub-region as a whole. RSS Policy RDF1 identifies the regional centres of Manchester and Liverpool as the first priority for growth and development and the Inner areas surrounding these centres as the second priority. The eastern part of Wirral is within the Outer part of the Liverpool City Region. While supporting the need to regenerate the local economy in Wirral, large scale economic development, in particular retail led development, should be focused in regional centres such as Liverpool.
15	Welcomes the recognition of the potential for further investment in port facilities at Eastham. This is based on predicted growth in freight at a regional and national level and the need to ensure that the port infrastructure at the lower end of the Manchester Ship Canal is suited to future operator needs.
193	It is important to identify how heavily dependant Wirral is on public sector jobs.
252	Generally agree but would query the number of tourism related jobs following the closure of the Woodside Tourist Information Office and the fact that with the impending closure of so many libraries tourist information will not be so readily available.
12	Reference should be made to the review of the Strategic Regional Sites (SRS) and the likely identification of Wirral Waters. Twelve Quays no longer requires SRS status as it has now been built out.
21	Welcomes recognition that the entrance to the Manchester Ship Canal at Eastham is a "key regional facility". The number of jobs quoted is the total number of jobs, both direct and indirect, that are supported by the maritime economy across Wirral. There are not 3,800 people employed at Birkenhead Docks and at the entrance to the Ship Canal. Cammell Laird should be included in any future description of the maritime economy.

350	<p>The North West Operational Programme (NWOP) simply reflects the list of strategic regional sites in the current Regional Economic Strategy. The Northwest ERDF website (www.erdfnw.co.uk/?OBH=597) provides a comprehensive list of regionally significant sites that eligible for support under Action Area 3-2. The list comprises: a "retained" list of 16 of the 25 strategic regional sites, which includes Wirral International Business Park but excludes Twelve Quays; and a supplementary list of regionally significant sites including Birkenhead Docklands. Development of the eligible list for NWOP purposes has influenced the review of strategic regional sites which is currently the subject to consultation. In line with the NWOP, the review proposes that: Wirral International Business Park is retained as a strategic regional site; Twelve Quays is deleted on the basis that it has been successfully delivered with the Agency support; and that Birkenhead Docklands is designated as a new site on the basis of it's potential to: promote a mix of uses including housing, knowledge- based and port-related development in a highly accessible and exceptional quality waterside environment; provide for significant inward investment opportunities; restructure areas adjacent to the Dock Estates; assist in facilitating the economic restructuring of parts of the inner area surrounding Merseyside's regional centre; and bring back into use derelict and under-used land. The strategic regional sites consultation paper shows the proposed Birkenhead Docks area only as a broad location. If this designation is confirmed, a detailed boundary will need to be established in conjunction with the Council. The Council's views on these proposals will be taken into consideration before the Agency takes any firm decisions.</p>
389	<p>The role that tourism plays in job provision currently and the potential for job creation in the future should be recognised.</p>
405	<p>Support the Council seeking new employment proposals.</p>
499	<p>There will never be sufficient jobs in Wirral to employ the working age population.</p>
286	<p>Assumes that "Bromborough" refers to Bromborough Village. Bromborough also has the Croft Retail Park which has Borough wide significance - rivalling Birkenhead Town Centre. An examination of the impact of the Croft Retail Park is important because Peel Holdings are proposing a similar development at Bidston as part of the Wirral Waters proposals. The Bidston scheme would be planned as a unit with good access, including public transport and motorway access, unlike Croft which has poor access. Bidston is at the centre of Wirral and it is important to test the impact of a possible development which is larger and better planned than Croft on North Wirral.</p>
382	<p>The spatial portrait presupposes that development and investment in locations such as Birkenhead, Wallasey, Moreton, Hoylake, West Kirby, Heswall, Bromborough, New Ferry and Prenton will deliver regeneration and that all of the Borough's existing centres are the most sustainable locations for new developments. While many of the Borough's centres are in need of</p>

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	regeneration and are sustainable in terms of their broad location and general profile, some parts of the Borough have no recognised or fully functional centres but would benefit from new development, including retail developments. While a hierarchy of centres has to be established, consideration needs to be given to the wider, 'full' retailing needs of the Borough and where and how development can contribute most towards regeneration and creating sustainable patterns of development and communities. This suggests a more flexible approach would be more appropriate. PPS6 recognises that centres change over time and are not static and there must be flexibility in the advocated hierarchy for centres to move and change.
474	Wallasey surely means Liscard. One would hardly call Prenton a district centre. Is this a reference to the Prenton Dell centre or to the Woodchurch Road area? Both of these are presently seeing a general decline apart from the impact of Sainsbury's/Aldi etc. The New Ferry centre also seems to be in decline.
494	Public realm, shopfront, canopy and promenade improvements are badly needed in various centres to create more attractive town centres and counter the impact of out of town and edge of town supermarkets.
500	The retail sector is facing the challenge of change but much greater emphasis should be placed on fostering district centres and local shopping centres with greater caution in approving any further development of supermarkets at the expense of local traders and more emphasis on developing reliable public transport services to serve local centres.
501	Access to West Kirby by rail is through a station in poor condition and the covered areas in front of some shops are in sore need of repair. There is a need to foster the community feel of town centres through the retention of local businesses and traders. The arrival of supermarket chains in town centres place this at risk
502	District centres complemented by local shopping centres and parades are briefly mentioned. Many of the district centres seem to be in decline, with deteriorating public spaces and buildings and the closing of local shops. This is exacerbated by the proliferation of supermarkets. Supermarkets effectively remove money from the local economy and local businesses, money which would otherwise be spent on local businesses involved in the production, processing and transport of goods.
496	The Retail Strategy needs to take into account the impact of the growth of supermarkets on town centres such as West Kirby. Smaller independent traders are being put out of business. The community feel of these centres is being eroded and jobs lost from the small trader sector. Out of town and edge of centre supermarkets need to be strictly controlled in future.

4.11 The Council has responded to these comments by:

- Emphasising the importance of the ports and the maritime economy to Wirral's economy
- Including additional information on Strategic Regional Sites and the new designation at Birkenhead throughout the Spatial Options Report
- Including additional information about the role of tourism in the Spatial Portrait
- Providing details on the issues relevant to each of the Borough's existing centres and the types of improvements and interventions that could be used to address these issues

Responses to Consultation Question 2

4.12 The responses to Consultation Question 2 - *Do you agree that this is an accurate reflection of the Borough's economic context? If not, please say why* - were mainly directed towards:

- The importance of agriculture to the local economy should be emphasised
- The story of the economic development of Wirral is best understood with reference to its history and geography
- planning policies should be based on an analysis of socio-economic and geographical factors, not simply arbitrary lines on maps e.g. "East of the M53"
- This section should look at how Wirral is placed to make the transition from recession to a low-carbon economy
- Car-based out-of-town centres have resulted in the decline in a number of traditional local centres, limiting choice for local residents who rely on public transport

4.13 A summary of each of the comments received is set out in the table below.

ID	Summary of Comments Received
133	There is no mention of the contribution of agriculture and market gardening .
199	There is a need for the Core Strategy to take account of and guard against factors that have contributed to the current recession and their consequences.
265	Disagree. Agricultural activity remains an important land use and economic activity within the Borough. Agriculture has the potential to increase its contribution to the economy through secondary processes, such as on-farm processing, retail sales; and suitable farm diversification projects, including support for the visitor economy. Agricultural activity is important to safeguarding soil resources, water management, improving bio-diversity, green infrastructure and to improving the image and attractiveness of Wirral.

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285	The story of the economic development of Wirral is best understood with reference to its history and geography. Shipbuilding took root in Birkenhead because it is next to a river, in a comparatively sheltered location. Port Sunlight was developed on cheap land, largely marsh, and is now part of an arc of chemical and petrochemical industries which have been developed over the years from Sunlight to Runcorn. There are common factors for this development. Eastham is mentioned but linkages with Cheshire West and Chester are only hinted at. The economy of Wirral can only be understood in the context of the broader region - including Liverpool, Cheshire West and Chester and North Wales. The Wirral International Business Park in Bromborough is a key development but is in competition with similar units in Ellesmere Port. "East of the M53" motorway is not a helpful description and is resulting in planning policies based on arbitrary lines on maps, rather than an analysis of socio economic and geographical factors.
293	Agree.
321	Disagree. The Core Strategy should examine the vulnerability of the Council, individuals and businesses to peak oil. This section should look at the state of the local economy in recession and how it is placed to make the transition from recession to a thriving low-carbon economy.
439	Out-of-town shopping facilities, mostly attracting car drivers, are often responsible for a significant decline in local, traditional town centres, limiting choice for local residents who do not have cars as public transport can be infrequent and expensive.
480	No reason to question the analysis.
484	Agree that the document largely covers the key economic issues.
539	The spatial portrait, in broad terms, accurately reflects the economic context of the Borough.

4.14 The Council has responded to these comments by:

- Including references to the importance of agriculture in the Spatial Portrait
- Including additional information on the historic context in the Spatial Portrait
- Including additional information about the economy
- Including information on the Council's target to reduce emissions and policy options for the delivery of renewable, decentralised and low carbon energy
- Including policy options for the location of retail growth

Environmental Context

4.15 Comments on the details contained within the Environmental Context were mainly directed towards:

- The protection and enhancing of biodiversity

- The importance of natural assets to tourism, and the need to capitalise on this whilst understanding and managing the environmental impact of tourism
- The importance of local heritage assets
- The importance of Landscape Character Assessment
- Reflecting the work being undertaken on a Joint Merseyside Waste DPD

4.16 A summary of each of the comments received is set out in the table below:

ID	Summary of Comments Received
200	Whilst referred to elsewhere in the document, green infrastructure is a multi-functional and essential part of the spatial approach to Wirral and must be clearly and explicitly recognised.
503	The high quality of the environment available to the public and visitors in West Wirral is well recognised but Wirral's environmental strategies and funding do not focus on developing these assets and their tourism value. Major developments such as the Sail Hotel and the Golf Resort do not focus on these needs and the potential of eco-tourism, the countryside, seascape, nature and the parks.
508	Agree that most of Wirral is an area of high environmental quality.
511	The Borough's potential for tourism, leisure and the visitor economy should include a consideration of the likely impacts of climate change. Understanding the interactions between climate change, visitor behaviour and environmental capacity is vital if policies are to respond effectively to the opportunities and challenges that climate change will bring. Wirral's unique seascape, wildlife, countryside, parks, history and heritage offer huge potential for creating an eco-tourist resort of national standing. Such a resort would offer a sustainable tourist economy in the face of recession and peak oil and would be part of a low-carbon economy.
201	The following statement should be added to the end of this paragraph: "The Council has a statutory duty for biodiversity" The portrait would be enhanced by commenting on whether the SSSIs are in favourable condition. If yes, the issue is to maintain that condition. If no, the issue is to bring them into favourable condition as a priority for delivery with monitoring through the LDF AMR.
300	The results of the Audit will need to be fed into the LDF. We note that sites are referred to but more could included, concerning particular species.
504	The biodiversity audit is welcomed and should cover the Birket Valley/Carr Fields area between Hoylake and West Kirby. The area has a significant wildlife role hosting a number of endangered species and linking in with the Dee Estuary RAMSAR site and RSPB and other nature reserves giving the opportunity for a centre of excellence in eco-tourism that will put Wirral in the

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	forefront of this sector. Despite the assets of Wirral, other local authorities and wildlife organisations are now developing these themes and leaving Wirral behind in terms of initiatives and cooperation with wildlife organisations.
509	Welcome recognition of the value of sites of Biological Importance , SSSIs , nature conservation sites and sites important to earth science . Much more emphasis is needed on protecting existing sites and on extending protected open areas particularly in the east of the Borough.
267	The Landscape Character Assessment is welcomed and should be integrated into the next stage of the Core Strategy. The spatial portrait of the Borough could usefully refer to Natural England's work on Tracking Change in Landscape Character (June 2007) and the 'diverging' nature of landscape change on Wirral.
287	Work on Bromborough Dock tip should be mentioned.
301	Pleased to see that a Landscape Character Assessment is underway and look forward to its completion. The use of Landscape Character Assessment as a planning tool is supported. Natural England considers that all landscapes matter. This is supported by the European Landscape Convention. As landscapes change and evolve, they should be sustainably managed; they should be distinctive and highly valued. Landscapes should be conserved and enhanced to contribute to a healthy natural environment; they offer a framework for integrating the planning, management and enjoyment of the natural environment. Supporting text to set out the landscape character types for Wirral should be included in any further stages of the Core Strategy.
505	The Landscape Character Assessment should recognise the role and potential of the Birket Valley.
268	Helpful to record if any Listed Buildings are on the 'at risk' register and to refer to any wider archaeological information, such as Sites and Monuments Records, rather than just the number of Scheduled Monuments.
394	The Historic Character Assessment of Wirral's rural and urban areas will be a significant and essential part of the evidence base to demonstrate what is distinctive about the historic environment of Wirral. The appraisal of existing conservation areas and the designation of new ones will be important in identifying issues and opportunities relating to the historic environment which should be addressed in the Core Strategy. Consideration should be given to the range and type of places considered for designation as conservation areas to ensure that the best examples of Wirral's historic environment are recognised and understood. This might, for example, include areas of traditional high density housing or dock areas. Wirral has significant un-designated, locally important, heritage assets which will need to be addressed as part of the Core Strategy. Protecting the historic environment is a key Government objective for delivering sustainable development, is an

	<p>integral part of the planning system and an essential element of building sustainable communities and contributing toward social well-being. The Core Strategy should shape and sustain the historic environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same. Changes that would harm the the heritage values of a significant place should be avoided as undesirable. The English Heritage publication 'Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment' includes an explanation of heritage values as evidential value, historic value, aesthetic value and communal value. The Core Strategy will need to provide the framework to demonstrate how the historic environment and individual assets will be managed.</p>
440	<p>Wirral has a significant built heritage but it is not being protected sufficiently well. Economic considerations seem to take priority over careful and sympathetic preservation. The LDF needs to be much more proactive in protecting built heritage and providing 'buffer zones' for Sheduled Ancient Monuments, Conservation Areas and Listed Buildings, where not only the places but their settings are considered properly.</p>
506	<p>Historic character is a neglected issue in Wirral, both in terms of Council assets and private ownership. The plan needs to recognise the need for Wirral to maintain its assets effectively rather than allowing them to deteriorate and undermine other strategies and create the need for last minute and expensive renewal such as Birkenhead Central Library. The condition of heritage assets in parks, open spaces and cemeteries need to be addressed to support Wirral's tourism, economic, social, well being and other strategies.</p>
510	<p>Agree that Wirral has a significant built heritage. More emphasis is needed on the requirement to preserve and enhance Conservation Areas . Concern at future of many of Wirral's heritage buildings.</p>
161	<p>There is no mention of the need for an effective, sustainable transport infrastructure to support the economy . Aspirations set out in MPTE's Strategies rightly place great importance on the value of 'park & ride' facilities, but these do not appear to be being borne out in practise.</p>
244	<p>Acknowledgement of improvements is welcomed. Wording should be amended to "Water quality within the Dee and Mersey Estuaries and inland watercourses has improved substantially over recent years, mainly due to the continuing programme of capital works undertaken by United Utilities and Welsh Water and the work of the Environment Agency."</p>
11	<p>The statement that no natural containment sites are currently available in Wirral is incorrect. There are sites at Carr Lane, Moreton (former Barker and Briscoe Brickworks and clay pits) and at Prenton (former Prenton Brick and Tile Works) both areas of clay mineral extraction which provide natural containment. Both sites have recently been identified in the Joint Waste</p>

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	DPD - Spatial Sites and Strategy Report (November 2008) - Appendix D. The Waste DPD is not referred to nor the potential of these sites for landfill/landraise.
202	Use of the phrase "natural containment" is confusing. This paragraph appears to rule out landfill sites in the Borough and seems to imply that landfill is no longer a waste management option. There is at least one site (Carr Lane) which is currently active and which, situated on a clay pit, meets the definition of a "natural containment". The statement that no such sites exist is therefore inaccurate and should be revised to be factually correct. The reference to Bromborough Dock should be removed as this is not a "natural containment" site. The text should make clear that no matter what improvements may occur in recycling and diversion of waste to treatment, the sub-region will have a continuing need for final disposal to landfill. The text should not give the impression that there is no ongoing requirement for landfill. Work to identify the most suitable sites for waste management facilities including landfill is progressing through the development of a Joint Merseyside Waste Development Plan Document. The suitability or otherwise of any site(s) should be resolved through the Waste DPD.
441	A much broader 'buffer zone' needs to be established between any proposed recycling plant and COMAH sites and historic/residential areas.
507	Improvements in recycling rates are mentioned but the wider context of overall waste arising trends and municipal, commercial & industrial waste proportions is not provided, which would add to the environmental context of this paragraph.

4.17 The Council has responded to these comments by:

- Including policy options for Green Infrastructure
- Providing additional information on the Council's Biodiversity Audit and Landscape Character Assessment
- Including additional information on the historic context in the Spatial Portrait
- Placing a greater emphasis on the need to maintain local distinctiveness throughout the Spatial Options Report
- Including a reference to the Joint Merseyside Waste DPD

Responses to Consultation Question 3

4.18 The responses to Consultation Question 3 - *Do you agree that this is an accurate reflection of the Borough's environmental context? If not, please say why* - were mainly directed towards:

- The need for a clearer focus on Green Infrastructure and Green Belt
- The lack of emphasis on global warming and climate change
- The potential for new habitat creation in the Borough

4.19 A summary of each of the comments received is set out in the table below.

ID	Summary of Comments Received
57	The section completely fails to reflect the threats to Wirral from global warming from the sea and the measures we need to take along with governments and other local authorities.
115	The environmental context for waste appears correct with acknowledgement of the role of the Merseyside Joint Waste DPD in making provision for appropriate waste facilities.
134	No mention of need to protect or provide green links or corridors between open sites, particularly in areas subject to development. No mention of Green Belt in this section. No mention of impact of global warming - especially areas under potential threat of flooding, both inland and along the coast.
149	There should be an addition: "It is not possible to capture all Wirral's biodiversity within protected sites, especially wide-ranging species such as bats, barn owl and brown hare. For these it is important to protect corridors linking populations, and between breeding and foraging habitats."
162	Recognition of the importance and value of both natural and built environments is welcomed. There are threats to both of these in terms of failure to ensure the future of locally important buildings The significance of the Green Belt and the pressures for its erosion should be mentioned. The importance of Conservation Areas for the built environment should be mentioned. Longer terms risks due to climate change are not mentioned; this will need cooperative working with national and local authorities.
253	Agree.
266	Disagree. Specific consideration should be given to the current position in respect of climate change. Whilst some elements appear under other headings there is no overall statement about the current position on emissions across the Borough, linked to related issues including the pattern of development/reducing the number and length of journeys, alternatives to car use, reducing energy and water use, current level of renewable energy generation, flood risk issues, and the potential for carbon stores. Related adaptation issues need to be considered, including the ability for plant and animal life to migrate in response to a changed climate, such as resisting habitat fragmentation, new habitat creation and linking existing and new habitats by suitable wildlife corridors.
294	Agree.
322	Disagree. This section should examine the implications for Wirral of climate change. Some of the changes forecast nationally are hotter, drier summers leading to water scarcity, drought and placing greater strain on wildlife and

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	more frequent extreme events such as heatwaves, gales, storms, tidal surges and intense rainfall. Region-specific guidance is available from the UK Climate Impacts Programme and the Northwest Regional Climate Change Partnership.
481	No reason to question the analysis.
485	Agree that the document largely covers the key environmental issues.
514	Reference should be made to the Merseyside Green Infrastructure Strategy and to the Merseyside Ecological Framework as informing the choice of locations and types of development.
515	It is not possible to have an environmental context for the Wirral peninsula that does not explicitly recognise the link and strategic importance of Liverpool Bay in terms of offshore activity, resources and also international trade.
540	The spatial portrait, in broad terms, accurately reflects the environmental context of the Borough.
562	The document recognises the importance of key evidence base studies that will guide the future development of the borough such as the Employment Land Review, the Merseyside Office study and the updated Retail Study. Welcome the need for a strong evidence base as this will be key in building up the robust evidence base required to support the production of accurate policies and a sound Core Strategy.

4.20 The Council has responded to these comments by:

- Including additional references to the Green Belt throughout the Spatial Options Report
- Including policy options for Green Infrastructure
- Strengthening the emphasis on Climate Change throughout the Spatial Options Report
- Providing additional information on the Council's Biodiversity Audit
- Including policy options relating to renewable, decentralised and low carbon energy
- Including policy options relating to sustainable design and construction

Natural Resources

4.21 Comments on the details contained within the Natural Resources section were mainly directed towards:

- Flood risk issues
- The clay cliffs at the Dee Cliffs and New Ferry SSSIs
- The importance of high grade agricultural land in the north of the Peninsula
- Barriers to the development of brownfield land
- The safeguarding of mineral extraction areas

- The role of ground water in providing for Wirral's Water resources
- Opportunities for renewable and low carbon technologies

4.22 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
150	Should mention that the clay cliffs are either within (Dee Cliffs) or adjacent to (New Ferry) SSSIs and that stabilisation is not an option.
323	The Strategic Flood Risk Assessment is welcomed. The Environment Agency identifies large residential areas, such as Leasowe, as being vulnerable to flooding. A report examining the causes and economic and social costs of the 2007 summer floods in Hull recommended that emergency planning for the eventuality of flooding should be undertaken as a matter of urgency by all local authorities.
442	A flood risk assessment must include the fact that displaced water would flood a neighbour's garden, e.g. where a pond or low-lying area exists, or is known to have existed.
516	The strategic flood assessment is strongly welcomed and is overdue. This needs to take into account policies for future development on the coast, sites adjacent to the coast and other low lying areas subject to flooding such as the BirketValley. Use or protection of these sites needs to reflect these issues and must be consistent with these risks.
164	No mention is made of the areas of high-grade agricultural (alluvial) land in the north of the Peninsula, which supports market gardens. This land does not appear to be as comprehensively used for this purpose as it used to be and is thus potentially at risk from development. The current interest in organic foods and the increasing need to reduce 'food miles' by growing local produce suggests this asset needs to be recognised.
203	One of the barriers to regeneration is land values and the costs of contaminated land remediation, an important issue in some of the former industrial areas in the east of the Borough.
295	Sustainable greenfield sites in the east of the borough should not be dismissed at this stage in the consultation process, particularly if available brownfield sites in the borough are not deliverable and sustainable Greenfield sites are available, achievable and deliverable and fall within the Outer Area defined by Policy LCR3 of the RSS.
443	'Brownfield' should not include large gardens or areas of which only a tiny fraction has been developed previously.

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517	Given increasing need for local self sufficiency, greater recognition should be given to the value of agricultural land and the need to protect it from further degradation and erosion.
518	Should mention that a small proportion of brownfield sites have wildlife value, often under National Biodiversity Action Plan Priority Habitat "Open Mosaic Habitats on previously developed land" and may not therefore be appropriate for re-development.
10	The statement that Wirral does not have any significant mineral reserves apart from small amounts of winnable brick clay is incorrect. The land at Carr Lane, Moreton (former Barker and Briscoe Brickworks and clay pit) is designated as a mineral extraction area in the UDP. Areas where mineral are located should be safeguarded. This should include the land at Carr Lane mentioned above and the land at Prenton (former Prenton Brick and Tile Works).
116	The sandstone aquifer and groundwater, providing around 13% of Wirral's water resources, is an important source of water not only for public water supply but also for industrial use. The Manchester Ship Canal is also a significant source of water for cooling purposes for the many industries located close to the Ship Canal at the lower eastern end of the Borough. Historically there has been considerable over-abstraction from the groundwater resource which resulted in depressed groundwater levels and saline intrusion into the aquifer. This trend has been reversed in recent years and groundwater levels have recovered. However, the legacy of poor groundwater quality remains. The Water Framework Directive work that we are currently working upon highlights this problem and that the groundwater resource is at poor status both in terms of quality and chemical quality.
245	The contribution of groundwater to Wirral's drinking water resources is welcomed.
165	Would not support any evidence base studies which would seek to promote the installation of industrial size wind turbines.
204	Needs to refer to the offshore natural resources of aggregates, wind and potentially tidal power.
302	Liverpool Bay is "identified for significant expansion in offshore wind farm development" . There is no specific reference to the International status of the habitat and the species the Bay supports and the balance which will need to be made when considering any schemes.
519	Supported. The study should particularly focus on what is possible in the urban areas, where there is a need to improve energy balance. Micro-generation will be especially relevant.

522	It is disappointing to read that "there is a need to enhance the evidence base on the local feasibility and potential for renewable and low carbon technologies" which is not addressed in the section which considers enhancing the evidence base. If Wirral is to meet Government interim targets for carbon reduction then opportunities for renewable and low carbon technologies must be a major consideration in spatial planning documents.
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4.23 The Council has responded to these comments by:

- Including additional information on the Council's Strategic Flood Risk Assessment
- Including additional information on agricultural land in the Spatial Portrait
- Including policy options for the phasing and location of different types land for development
- Including information on ground water and water quality
- Including policy options for the delivery of renewable, decentralised and low carbon energy

Responses to Consultation Question 4

4.24 The responses to Consultation Question 4 - *Do you agree that this is an accurate reflection of the Borough's natural resource context? If not, please say why* - were mainly directed towards:

- Climate change and renewable energy resources
- The provision of allotments

4.25 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
13	Agree that this is an accurate reflection subject to comments on minerals sites.
58	The section fails to recognise the power available in natural resources associated with the sun in the development of solar power within industry, retail warehouses, farming and market gardening, the local authority and in private households.
135	No mention of allotments.
163	No mention of tidal power
254	Agree.
482	No reason to question the analysis.
486	Agree that the document largely covers the key resource issues.

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536	There is no reference to the Transition Town concept in the consultation document. This concept needs to be developed as a way forward to address peak oil and climate change issues which are underplayed in the consultation document.
541	The spatial portrait, in broad terms, accurately reflects the natural resource context of the Borough.

4.26 The Council has responded to these comments by:

- Increasing the emphasis on Climate Change throughout the Spatial Options Report
- Including policy options for the delivery of renewable, decentralised and low carbon energy
- Including information on the provision of allotments in the section on Green Infrastructure

Quality of Life

4.27 Comments on the details contained within the Quality of Life section were mainly directed towards:

- The quality of public assets for recreation and tourism
- The need for community facilities and the impact of the Council's Strategic Asset Review
- The demand for allotments and green infrastructure and links with health and well being
- The role of Liverpool for leisure
- The importance of local distinctiveness
- The value of the Green Belt
- The need to respond to the housing market
- The need to provide an accessible transport system

4.28 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
39	Culture and leisure facilities are at the heart of maintaining sustainable communities and local distinctiveness and we look forward to this issue being addressed.
54	Fails to recognise the widespread deterioration of public assets such as public realm, toilets, parks, open spaces, heritage, community centres, sailing school and Thurstaston Visitor Centre, which is undermining the tourism potential of Wirral and the quality of life for local residents. The strategy needs to reverse these trends.

152	Recognition of the value of the coastline is appreciated but the Country Parks are suffering from inadequate staffing, maintenance and interpretation, reducing their usefulness to local people, especially those not used to exercise in the open air. The Strategic Asset Review will reduce leisure and cultural opportunities and make people travel further to access facilities. There is a lack of allotments and other land for food production in many wards. There needs to be a long-term plan to put local services in place for local people, probably as more small hubs and less big ones in line with previous consultation which identified the need for "Better provision for local services and community facilities".
166	Please state any distances in miles.
205	Add "biodiversity" after "landscape" to balance this paragraph.
304	Should be cross referenced to the previous environmental section.
377	Extensive leisure facilities are on offer in Liverpool, which currently services the wider City Region.
492	The Borough has a large unmet demand for allotments with 500 families on the waiting list. Fulfilling this demand would offer a socially inclusive, low carbon activity, outdoor exercise and a healthy diet.
497	Insufficient attention is paid to the nature of 'tourism related jobs' which will decline if resources are denied to traditional tourist infrastructure such as public toilets, car parking, a lively heritage portfolio, parks and open spaces.
513	The Core Strategy can aid the provision of recreational opportunities by promoting green infrastructure - a strategic network of parks, woodland, nature reserves and historic sites with links such as river corridors, wildlife corridors and greenways - which can provide important areas for recreation. The links between them could form useful routes for recreation and leisure as well as providing safe routes for alternative means of travel such as cycle or on foot.
535	Wirral's contribution to quality of life is underfunded in many areas such as parks, open spaces, allotments and the coast, where assets are not maintained and given low priority. This needs to be included.
537	A review of Wirral's existing community facilities including places of worship should be undertaken as part of the preparation of the LDF. The review should consider the general adequacy and location of such facilities within the lifetime of the emerging LDF. This could be taken forward as part of the Council's Strategic Asset Review or as part of the Social and Community Infrastructure Requirements Study.

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549	The value of open spaces, parks and allotments should be mentioned. The Council's Allotment Strategy acknowledges long waiting lists and seeks to "identify any future need with a view to addressing and reducing the waiting list". The large, unmet demand for allotments will have spatial implications as the Council has a statutory duty to provide sufficient allotments.
167	Recognition of the value of the Green Belt and the distinctiveness of Wirral are welcomed.
190	The issue of whether Green Belt review is needed during the lifetime of the Core Strategy needs to be addressed if Wirral is to meet its RSS figures.
444	A most important consideration. Support the Green Belt.
524	Agree with the importance of maintaining local character and distinctiveness and with the importance of the Green Belt.
531	The recognition of the quality and distinctiveness of West Wirral is strongly welcomed as is the recognition of the role of the Green Belt. The plan needs to maintain a strict presumption of preventing development in all the Green Belt. Regeneration initiatives are welcomed but the plan needs to recognise regeneration should not be at the expense of the character and scale of town centres and involve developments of excessive scale. The key issues for people are the quality of public realm and everyday facilities in town centres, on the coast and in the countryside.
542	Agree with the need to maintain local character and distinctiveness . Agree with the recognition given to the importance of the Green Belt.
445	Question the 'need' to demolish older, 'but perfectly capable of being refurbished' houses. It is important to preserve historic character, while upgrading homes.
55	Protecting the character of Devonshire Park was the subject of a recent dismissed appeal. Can the Core Strategy ensure that Devonshire Park does not have any further attempted conversions of traditional family homes into single unit flats and apartments.
69	The housing market referred to was that in existence in 2007, which bears no resemblance to that in 2009. I trust that this will be taken into account.
372	The Taylor Review proposes a fundamental review of planning and affordable housing policy at all levels to create rural renaissance and breathe new life and prosperity into rural communities. This should be a paramount consideration in the Core Strategy.
543	Agree with the need to provide more affordable housing.

545	The comments on house prices should be reviewed in the light of current conditions. The problem is trying to predict what will happen on a few years time.
206	Outputs for sites, locations, sizes and opportunities from a ecological viewpoint should be considered before accepting the results of the SHLAA to ensure that biodiversity considerations have been built in at the outset. MEAS could undertake this evaluation.
256	Agree but question the need for so many new apartments across the Borough
296	Agree that the Core Strategy will need to show how to accommodate the new higher RSS housing figures while retaining regeneration in the east and restraint in the west. It is, however, premature to prepare a Vision, Issues and Objectives report which restricts house building on greenfield sites until the SHLAA is completed; particularly if there are sustainable greenfield sites which are more deliverable than brownfield sites which are not deliverable and are constrained by ground problems.
351	The RSS housing requirement figure should not be regarded as a ceiling. As a net requirement, further provision will need to be made to replace any dwellings lost through clearance over the Plan period.
525	Agree with the continuation of the policy of regeneration in the east and restraint on house building in the west.
528	The document was prepared when we all lived in a different economic climate. References to new developments, economic expansion etc, are highly unlikely still to be relevant. The need to focus attention on the more deprived areas of the Borough goes without saying, though any neglect of the supposedly less deprived areas could rebound if more affluent and potentially more educated and professional people chose to move away from Wirral.
532	The restraint of house building in west Wirral, especially flats, is important to maintain the scale and character of these areas. Traditional streetscapes and buildings need to be protected including more or the extension of Conservation Areas.
270	It would be helpful to link health issues with the opportunities and related health benefits of access to countryside and coast for their restorative qualities and opportunities to 'de-stress'.
288	People who have bad health have priority for social housing, so it is inevitable tenants in social housing will, on average, have worse than average health. The shortage of well paid jobs in Wirral results in many high achieving young people, raised in Wirral, leaving for better paid jobs elsewhere. The ONS figures for life expectancy are mortality figures and refer to people who die in a ward, not those born there. This does not mean that the data on the inheritance of poverty should be ignored but this research is a more valuable

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	<p>tool in planning that the raw ONS data. Since the higher attaining young people who move out of Wirral for career reasons are likely to be in good health, we would expect a higher proportion of the population in Wirral to be chronically sick or disabled. This is important when looking at the overall community needs.</p>
521	<p>Concern has been expressed over the impact of the night economy on West Wirral townships.</p>
207	<p>Health and well-being of communities and individuals could be raised here linked to the delivery of sustainable and healthy communities later on in the paper. This could also provide an opportunity for GI & ecological framework delivery and partnership with health organisations.</p>
289	<p>This illustrates the problems caused by developments such as the Wirral International Business Park in Bromborough. Most of it is difficult to get to by public transport from anywhere in Wirral, even Bromborough. The journey by car is easy from most of Wirral - hence employees tend to try to use their cars. The same comments apply to proposed developments on the Manchester Ship Canal at Eastham and Hooton.</p>
520	<p>A sustainable transport network that is well used is important.</p>
527	<p>Sustainable travel should provide routes to leisure and recreation assets, as well as hospitals and schools. It is essential that the Core Strategy provides a framework to give people a real alternative to the use of the car.</p>
533	<p>The dismissive comment that the use of public transport is down to lifestyle choice is a real concern. The bus services on some routes is poor especially at night. The comment also fails to recognise the high level of rail use especially for travel to Liverpool and the quality of the network in Wirral and across Merseyside. An education and information agenda should be followed which will encourage more public transport use rather accept that this cannot be influenced.</p>
544	<p>Disagree that the high dependency on cars is entirely a lifestyle choice . Many areas of Wirral lack a reliable, sustainable form of public transport.</p>
548	<p>This section says that the issue of car use is "not one of accessibility but one of lifestyle choice". This statement of apparent acceptance is a major concern to us. People only choose the car because it is more accessible than public transport. The issue of improved public transport was repeatedly identified in the 2006 consultation and the Council should listen to this.</p>
447	<p>Vehicles on all roads should not exceed the speed limit; our trunk roads experience extremely large volumes of traffic, some of which appears to be driven at excessive speed.</p>

534	Traffic levels are an increasing problem as trip times, especially in the peaks, are further extended by the congestion from the school run. There is an impact on town centres and communities in many areas. Local gridlock already occurs and will increase. Measures to reduce this need to be introduced, including investment in the rail network. The case for new main or distributor roads must be questioned reflecting the generating effect of new roads which is not recognised in this section.
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4.29 The Council has responded to these comments by:

- Including policy options for green infrastructure and developer contributions
- Increasing the emphasis on the need to maintain local distinctiveness throughout the Spatial Options Report and including policy options for the control of design
- Including additional references to the Green Belt throughout the Spatial Options Report
- Including additional information on the role of Liverpool in the leisure, evening and night time economy
- Including policy options for the distribution and phasing of new housing development
- Increasing the emphasis on accessibility and public transport throughout the Spatial Options Report

Responses to Consultation Question 5

4.30 The responses to Consultation Question 5 - *Do you agree that this is an accurate reflection of the Borough's quality of life context? If not, please say why* - were mainly directed towards:

- Anti-social behaviour in town centres
- Disability and specialist housing
- Sustainable transport and improvements to rail and walking and cycling
- A greater emphasis on the public realm and green infrastructure
- Provision for the arts and places of worship
- The impact of John Lennon Airport

4.31 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
59	The text does not raise the separate issue of crime in terms of anti social behaviour, especially in town centres such as Hoylake from over provision of licenced outlets and cheap alcohol. There is no mention of rail development opportunities, in particular the Wrexham-Bidston line, with major park and ride opportunities at Woodchurch and Bidston and the need to serve the

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	Wirral Waters development effectively. There is no mention of the shortage of allotments within Wirral and the high waiting lists. There is no mention of the impact of disability on quality of life and measures to address this.
129	The section on Quality of Life should recognise that the pursuit of faith, religion or belief plays a vital role in the community, assisting the development of safe and healthy communities and improving quality of life, supporting the aims of sustainable development. This would demonstrate and confirm Wirral's ongoing commitment to offer a high quality of life to all its residents and visitors and would relate well with the six pillars of the equality standard, consistent the Government's stance on sustainability and equality.
136	Concern that no mention made of supported or life-time housing . Concern at failure to address sufficiently the need for a sustainable transport network. Access to existing railway stations by disabled users difficult. No mention of further electrification of Merseyrail or the provision of more railway stations, for example at Moreton and Woodchurch.
159	The Borough badly needs an all-purpose Arts Centre. The potential closure of Pacific Road Arts Centre is a major loss, given that the facilities at the Floral Pavilion Theatre do not provide a satisfactory substitute.
160	The general deterioration in the public realm including open spaces, heritage, community centres and toilets etc is not recognised. Failure to deal with these issues will negate any bigger plans that may be appropriate.
255	Agree.
324	This section should also look at walking and cycling, as cheap, healthy and low carbon options for travel, along with current road safety data. The speed and volume of traffic and road safety are all barriers to walking and cycling. Policy should require all new development to be designed in a way that gives priority to people over ease of traffic movement and provides priority road space for pedestrians and cyclists. Walking/cycling routes should link residential areas, employment centres, town centres, schools, colleges, and other key destinations; and link smaller settlements and district centres to main town centres. and public transport.
483	No reason to question the analysis.
487	Agree that the document largely covers the key quality of life issues.
490	The poorest areas of Wirral all lack urban greenspace, both quantity and quality. Improving this would contribute towards improving quality of life in these areas, including physical and mental health. English Nature's "Space for Nature" includes guidelines for quantities. A commitment to this would be welcome.

498	Insufficient emphasis is placed on the importance of Wirral as ‘ a pleasant place to live. The residential potential of the Borough could be made more of.
526	Further text is required on the Borough's recreation resource, such as green space and green infrastructure, that contributes to the quality of life for both residents and visitors, including opportunities for public access to parks, the countryside and coast.
530	There is no mention of the increasing impact that the growth of low-flying air traffic in and out of Liverpool John Lennon Airport is having on the lives of those who live in the southerly half of the Borough. Plans by the owners still propose a continuing increase in both passenger & freight movements, to take effect during the period of this document, which will commensurately increase the aural (and air) pollution for those living over or near flightpaths.

4.32 The Council has responded to these comments by:

- Including additional information on the issues relevant to each of the Borough's existing centres in the Spatial Portrait
- Including policy options for green infrastructure and developer contributions
- Including policy options for the provision of specialist housing
- Increasing the emphasis on accessibility throughout the Spatial Options Report

4.33 Further detailed work is still to be completed on responding to the need for community infrastructure.

5 PREVIOUS CONSULTATION

5.1 Comments on the section on Previous Consultation were mainly directed towards:

- Protecting local distinctiveness
- Strengthening the tourism offer in the Borough

5.2 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
36	The term local character is used, which is open to interpretation. A full definition is needed as the opinion of the Planning Inspectorate has been different to local councils. There has been a proliferation of flats being built. A large number remain empty and will become magnets for vandalism, theft, squatting and drug dens. They seem to be based on the maximum number of units that can be achieved on a site rather than on the needs of the area. A limitation on the number of flat developments would be beneficial in established areas based upon the needs of the area in question and

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	existing housing patterns. An analysis of local house types would be needed for each area with average densities. Consultation with local residents would be prudent. A specific "tipping point" or maximum percentage should be identified, to prevent planning applications for specific types of property in certain areas, to only provide for redevelopment of properties on a like for like basis. These comments relate to all areas where the predominant house stock is over 100 years old.
41	Agree that the poor image of the urban environment and town centres is a weakness but would also point to the importance of the approaches to the various communities and the degrading of these important gateways by excessive signage, telecoms and other street furniture, advertising and the gradual transition and degradation of horticultural and market garden sites at the urban fringe and inappropriate building inside the urban boundary.
392	The consultation report underlines the importance which local people attach to the historic environment, citing local history and heritage and the Victorian and Edwardian legacy of the Borough as one of its principal strengths and the loss of local character and distinctiveness, including heritage and open land as the main threat. Capitalising upon this clearly valued heritage is one way that the identified weakness of the poor image of the urban environment and town centres can be tackled. A greater emphasis on the conversion and re-use of existing buildings and the protection of local character and heritage is identified as one of the top five needs of the Borough. The historic environment and the protection and enhancement of heritage also featured highly as part of the vision and objectives.
393	There are weaknesses in tourism provision in the Borough and the threat of competition from tourist areas outside of the Borough should be recognised.
183	Support for improvement to the Bidston-Wrexham railway line is welcomed.
131	Places of worship should be included.

5.3 The Council has responded to these comments by:

- Placing a greater emphasis on the need to maintain local distinctiveness throughout the Spatial Options Report
- Including policy options for the control of design
- Including additional information on the role of tourism

6 REGIONAL CONTEXT

6.1 Comments on the section on the Regional Planning Context were mainly directed towards:

- The approach to rural areas
- The scope of the references to regional policies

6.2 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
147	The Key Issues, Visions and Objectives for rural areas should be produced in tandem with national and regional policies. National policies consist of the full range of planning policy guidance notes and statements. Regional policies are set out within the Regional Spatial Strategy.
208	The list of RSS policies is very selective and there are other relevant policies such as the EM suite of policies some of which set out requirements on Districts. Is it the intention to link the RSS policies cited to the issues identified?
368	The Council should have particular regard to RSS Policies DP1, DP2, DP3, DP4, DP8, RDF 2, RDF 4, L4 and L5 when considering the Key Issues, Vision and Objectives for Wirral's rural areas.
30	Reference should be made to Policy W2 "locations for regionally significant economic development" which are to be located close to sustainable transport nodes within the urban areas of the Manchester, Liverpool and Central Lancashire City Regions. Parts of Wirral, including Wirral Waters meet these criteria. Reference should be also made to Policy RT8 which refers to the potential of an intermodal freight terminal at Eastham Docks and Birkenhead Waterfront through the reinstatement of rail freight capacity into West Float. Reference should also be made to the emphasis which Policies EM17 and EM18 place on the need for renewable energy generation and the associated targets which are contained within Tables 9.7(a-c).

6.3 The Council has responded to these comments by:

- Including additional information on Wirral's rural areas in the Spatial Portrait and policy options for the distribution of development across the Borough
- Including additional information on the fit with regional policy throughout the Spatial Options Report
- Including additional information on the designation of Strategic Regional Sites and maritime facilities throughout the Spatial Options Report
- Including policy options for the delivery of renewable energy

7 CORPORATE CONTEXT

7.1 Comments on the section on the Corporate Policy Context were mainly directed towards:

- An integrated approach to sustainable development
- The provision of community facilities
- The need to increase the number of higher value jobs

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7.2 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
271	This version of the Vision does not demonstrate an integrated approach to sustainable development. It lacks an environmental dimension which is essential not only intrinsically but for its benefits to the economy (e.g. image, tourism) and to social needs (e.g. health and well-being).
448	Community facilities such as libraries and schools and One-Stop-Shops need to be where communities live.
546	The Mersey Waterfront Regional Park is due to finish in 2010.
406	The need to retain and increase the number of higher value jobs is particularly relevant in relation to the older established industrial areas within the Borough.

7.3 The Council has responded to these comments by:

- Providing an expanded explanation of the role of corporate policies in developing the Spatial Vision for the Core Strategy

8 EVIDENCE BASE

8.1 Comments on the section on Enhancing the Evidence Base were mainly directed towards:

- The evidence base needing to reflect PPG17, Waste DPD, Merseyside GI Strategy & Merseyside Ecological Framework
- The challenges to address peak oil
- The tourism strategy for the borough
- Urban and rural character assessments
- No evidence base from Peel Holdings
- Retail floorspace for Wirral Waters should be tested through emerging RSS
- The additional consultation on the evidence base
- Important for area profiles to be included in the document

8.2 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
32	Support and welcome the recognition of the Wirral Waters evidence base. For future clarity this should refer to the 'Wirral Waters Strategic Regeneration Framework (Peel Holdings)'.
60	The evidence base fails to reflect the PPG17 study undertaken to input into the plan. There are other studies and strategies such as the Allotment Strategy that need to be reflected. The Mersey Rural Study also needs to be reflected.

209	The evidence base also needs to refer to the Waste DPD, Merseyside GI Strategy and Merseyside Ecological Framework as three separate studies.
326	Recent reports predict an energy crunch within the next five years. Wirral Council should seek expert advice to examine the evidence for the challenges which will be posed by peak oil and climate change to develop an understanding of their impact on the future of the Council, the local economy and the local community. It should plan for, and begin to move towards a future without cheap oil. This section should also refer to the evidence contained within the Council's Allotment Strategy. It should refer to PPG17 which "sets out the policies needed to be taken into account . . . by local planning authorities in the preparation of development plans (or their successors); they may also be material to decisions on individual planning applications".
390	There is a need to further address tourism issues as part of the evidence base. The current Tourism Strategy is dated and should be updated to reflect new developments, particularly in New Brighton, the opportunities that may now be available and the threats to the success of tourism within Wirral. Identification of these issues at this early stage will allow the proper planning of tourism facilities for the future and will establish whether some sites currently in tourism use or allocated for such a purpose may now serve the area better by being allocated or developed in whole or in part for alternative uses to compliment and support the main functions of the wider area.
402	The section on enhancing the evidence base does not include the urban and rural historic character assessments referred to earlier or conservation area appraisals and the consideration of new conservation areas. This omission should be rectified.
470	Agree that the LDF must be based upon a robust and agreed evidence base but a number of the additional studies would not support this assertion. It is very doubtful that that a robust or impartial evidence base will be produced for Wirral Waters by the developer - Peel Holdings. No evidence base has yet been produced for either the Wirral Waters scheme or Wirral's Retail Capacity Study 2008/9. These are essential to inform representations on the Issues, Vision and Objectives. The absence of this evidence raises questions of soundness. The Core Strategy may be viewed as contrived if it is seen to be developed without full and proper regard to a robust evidence base. PPS 12 stipulates that 'in devising its strategy...the LPA should be consistent with national policy and in general conformity with the RSS. This means that the choices made regarding, for example, where growth should take place should follow national and regional policy'. Evidence must be shown that the choices made are backed up by the background facts. To be 'sound' a Core Strategy must be justified, effective and consistent with national policy. Being 'justified' means that the document must be founded on a robust and credible evidence base.

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585	Objects to the use of the Wirral Waters SRF as an evidence base for the Core Strategy. Substantial investment has been made in Liverpool City Centre on the basis that the City Centre will remain the priority for major comparison shopping development in the region. A development of additional comparison retail floorspace on the scale envisaged in the Wirral Waters SRF should be tested through emerging RSS and be subject to the necessary independent studies and examination to determine whether the size and scale of proposed schemes would be appropriate in a sub-regional location before this document is used as an evidence base for the Core Strategy.
478	Why will a further consultation of six weeks duration be undertaken when each evidence base study is completed? The important issue is the use to which the evidence is put and this should inform the stages of the Core Strategy. At each stage consultees will have the opportunity to question the evidence base if they feel the need. Views of stakeholders may be important, for example, in the development of a SHLAA, but PINS general advice from recent advisory visits is that there is no need to "consult" on individual components of the evidence base as they are published. It is sufficient to make them available for public inspection, on and off-line. The document talks of a number of studies due for completion before end of 2008. Some of these are crucial, e.g. SFRA. If they were completed before the end of 2008 it would have been better to reflect their findings in this document in order to save time. This is important as the DPD moves to the next stages, as the earlier any key conclusions are included the better.
210	The document makes repeated reference to ongoing studies but it would be helpful if it was made clear how the results and implications will be communicated to stakeholders.
42	Welcome the preparation of detailed area profiles and would ask to be consulted in the preparation of the profile for Heswall.
49	This exercise should prove useful in developing your spatial portrait for the borough.
211	Merseyside EAS is able to review detailed area profiles on behalf of Wirral Council.
449	Pleased to know more about the Bromborough 'Area Profile'.
523	It will be important for the detailed area profiles to include information on the historic environment and cover both designated and locally important heritage assets together with the wider character of the place.
550	The widening of the evidence base for main settlement areas is welcomed but this needs to reflect community views drawn from local community questionnaires rather than the imposition of Wirral views and plans on the local community.

8.3 The Council has responded to these comments by:

- Including additional information on the findings of completed evidence base studies that have been relied upon throughout the Spatial Options Report
- Including additional information on evidence base studies that are still to be completed which will be used to inform the assessment of the available Spatial Options
- Making copies of completed evidence base studies alongside the Spatial Options Report
- Including more detailed profiles of individual Settlement Area in the Spatial Portrait
- Making the Spatial Options Report available for public consultation

9 REGENERATION ACTIVITY

9.1 The following preliminary comments were directed to the introductory paragraphs presenting the section on Current and Emerging Regeneration Activity:

- The need to test rather than accept the suitability of emerging development proposals
- The need to demonstrate that the impact of cross-cutting themes has been properly assessed
- The need for maps to illustrate the location of development opportunities

ID	Summary of Responses Received
45	A number of proposals/schemes are listed as either underway or coming forward. At the end of each brief description of the scheme/proposal, the Council states that the Core Strategy will have to take account of these proposals. Presumably this means that the need/desirability of some of these proposals will need to be tested in the glare of public consultation. If so, when is that to happen, if not now? The issue of whether the people of Wirral want a high-rise mixed use development on the dockland of the magnitude proposed should be debated at this stage. The issues around Port Wirral, Woodside etc., fall to be considered in the same way. PPS12 states that the Core Strategy should contain an overall vision, which sets out how the area and the places within it, should develop. This document implies that many of the proposals are a given which the Core Strategy has merely to accommodate, rather than that the Core Strategy should be setting the strategic framework for these and other potential developments. This should include having a stratagem in place to cover the situation where either the proposals do not come forward or are developed in a far more modest form. In relation to several of these proposals there is a reference to developing informal masterplans. PPS12 states quite clearly that Councils should not

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	produce guidance other than through the medium of LDDs where the guidance is designed to be used either in decision making or the co-ordination of development.
272	A long list of potential development proposals is included following the words " the Core Strategy will need to guide and support the delivery of a range of physical regeneration and publicly funded intervention activity in the Borough:" It is appropriate for existing strategies and initiatives or major committed schemes with planning permission to be included but the Strategy should not act as an advocacy document for specific proposals. It is inappropriate to adopt schemes that have not been subject to relevant public scrutiny as commitments. The impacts of cross cutting issues such as climate change and an integrated approach to sustainable development, including matters such as the prudent use of natural resources and safeguarding/enhancing environmental assets, need to be demonstrated if the DPD is to meet the legislative test of pursuing sustainable development. It may be that proposals outlined here will be demonstrated in due course to be entirely appropriate and can be supported, for example though the Site Allocations DPD, but the basis of the Core Strategy should not be the acceptance and facilitation of site specific proposals.
407	Plans would be helpful to understand the locations of current and emerging regeneration activities. It is understood that the Council does not start with a clean slate but it is necessary for the Core Strategy to test alternative ways of achieving the Vision and delivering development taking a strategic approach. Phrases like the CS will need to "take account of these proposals, in the event of planning consent being granted" is contrary to the determination of planning applications in accordance with the development plan unless material considerations indicate otherwise.

9.2 The Council has responded to these comments by:

- Including additional information on the status and nature of major development proposals and opportunities and the evidence base that underlies them
- Including a series of policy options for various types and distributions of development
- Including a summary of the likely implications of each policy option for the Spatial Vision and Spatial Objectives and a summary of the findings of the sustainability appraisal
- Including maps showing the boundaries of locations mentioned in the text of the Spatial Options Report

Newheartlands

9.3 Only one comment was received in response to the section on Newheartlands:

ID	Summary of Responses Received
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212	This section could benefit from updating in terms of recent Government announcements on future regeneration funding including succession to HMRI.
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9.4 The Council has responded to this comment by providing more up-to-date information within the Spatial Options Report.

Wirral Waters

9.5 Comments on the details contained within the section on Wirral Waters were mainly directed towards:

- The ability to identify strategic sites in the Core Strategy
- The need to keep information on Wirral Waters up-to-date
- The impact and justification of various elements of the proposals
- The extent of reliance on a single development
- The need to integrate the proposals with the wider area

9.6 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
26	It is now possible for the Core Strategy to identify strategic sites. The docklands area could be just such a site. Whether the site is 'central to the achievement of the strategy' should be addressed at the outset. Recent PINS feedback visits to LPAs indicate that the Core Strategy or supporting evidence would need to consider how much development is proposed at the site, the mix of land uses, main constraints, who will deliver it, when will it be delivered and anticipated phasing: the earlier the start in the plan period the more detailed the evidence needs to be. The Core Strategy would also need to spell out the way the site would subsequently be handled e.g. through AAP or SPD.
33	Peel broadly welcomes the description and prominence given to Wirral Waters. This will need to be updated and refreshed as the Core Strategy and Wirral Waters evolve. The key spatial planning principles of the emerging Vision and Development Framework will need to be explained and embedded in the Core Strategy. Comments submitted by Peel to the Sustainable Community Strategy may also be helpful for future descriptions of Wirral Waters.
34	Very keen to see investment on the peninsula but need to look at higher grade luxury housing stock, particularly around the docklands area. Don't feel Peel Holdings have got it right with their own projections. Most of the high rise towers in Manchester were never sold to their target markets. Manchester City Council is faced with a growing problem of organisations sub letting luxury housing stock to the lower client market with a knock on effect on those that purchased their luxury pent houses. Peel "owns" Wirral's

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	<p>docklands but Peel are land speculators. Do not believe that volume building on both sides of the water is the right way to go. The peninsula should be looking at high quality luxury housing along the docklands that would fetch a premium return on Council Tax and bring the target area up as a whole. If we could get millionaires to invest in luxury housing they would bring a new class of client to the peninsula, which could support facilities such as marinas and high class restaurants. If Peels current plans go ahead who will pick up the bill in years to come should any of the super towers require demolition? How is the Council going to match the levels of building proposed with healthcare needs, fire, police, schools? The Council should seek smaller scale luxury homes to build a future for the peninsula as a desirable place to live.</p>
61	<p>While the Wirral Waters concept is supported, there is a concern that the development will be visible from all across Wirral and in North Wales because of the excessive height of the buildings proposed and that it will lack adequate public transport, reinforcing growing traffic problems.</p>
137	<p>Concern at the potential impact of the proposed Wirral Waters development.</p>
146	<p>We are not qualified to comment on this, but it does seem obvious that in the present and future economic conditions, jobs will have to be in place before housing, and it would be unwise to place too much dependence on one private company, even one so big as Peel Holdings.</p>
153	<p>Concerned at the heavy reliance on one private company which is responsible for both the Wirral Waters and Ellesmere Port waterfront developments and which may be unable to deliver in the current and foreseeable economic climate. At present, they seem to be putting in housing before jobs, which is likely to be the wrong way round, and can only increase the number of Wirral residents commuting out of the borough to work.</p>
170	<p>Given the likelihood of the financial climate remaining as it is for some time ahead, the Society would counsel caution in factoring in large numbers of planned dwellings based on the proposed Wirral Waters development.</p>
352	<p>The regeneration opportunity provided by Wirral Waters will have a relationship with the NWDA's objectives for the proposed Birkenhead Docklands strategic regional site.</p>
379	<p>Objects to the future urban regeneration proposals for Wirral Waters being based on the developers Strategic Regeneration Framework (SRF) and the Mersey Heartlands Programme of Development as these documents do not form part of the adopted Development Plan and the proposals are being developed outside the emerging policy framework. These documents have not been subject to the standard procedural regulations and robust review required for Council documents. Also object to the size and location of Wirral Waters. Development should be complementary to programmes within</p>

	the Regional Centre and Inner Areas, as promoted in RSS. The scale of development proposed at Wirral Waters is contrary to RSS and and inappropriate for the outer part of a city region.
408	Whilst the Wirral Waters scheme is fully supported in principle, it cannot be seen in isolation and the Council should think carefully about areas immediately adjacent, where a flexible approach to is needed to complement Wirral Waters and achieve the wider regeneration of the area.
469	Key issues related to need, impact, sequential approach, scale and accessibility need to be addressed by the Core Strategy, if the impact of Wirral Waters is to be properly assessed by Wirral Council. It is not acceptable for the retail study to conclude that there is a need, quantitative or qualitative, for further retail development within the Borough without regard to the central locational principle of 'town centre first'.
471	The future vitality and viability of Birkenhead Town Centre is being placed under serious threat by the emerging Masterplan proposals advanced by Peel Holdings for 'Wirral Waters' . Discussions with Roger Tym & Partners have underlined these concerns. The level of detailed information contained within the Masterplan is extremely thin at present. Very limited information has been made available by Peel regarding the exact retail component of Wirral Waters. However, they appear to start from the premise that any future development strategy for the dock estate depends upon a significant diversity of land uses, inclusive of a very large retail / commercial leisure element. The mix of convenience and comparison retail provision is unknown at present. The relative retail and leisure composition is similarly unspecified. No retail or leisure anchors have been named. The Masterplan is devoid of any information regarding the overall viability of the Masterplan, aside from the suggestion that it will be retail / leisure led. There is no information concerning the anticipated start on site, the phasing of the retail / commercial leisure mix, or end delivery of the wider Masterplan benefits centred on East and West Floats. The Wirral Waters Masterplan has no planning policy status or implied policy support at present. It is fundamentally contrary to the adopted Wirral UDP and North West Regional Spatial Strategy. Any planning application for the phased development of Wirral Waters, as part of a wider scheme, should be automatically refused until a sufficient evidence base has been published and consulted upon, and the contents endorsed by Wirral Council and the Government Office for the North-West - such is the likely magnitude of retail impact on established town centres such as Birkenhead. A Wirral Waters evidence base and the 2008/9 retail study should be made available to stakeholders before the Core Strategy is progressed. The main issues concerning the impact of Wirral Waters are: impact on Birkenhead Town Centre; access and sustainability; regeneration and employment. Peel's masterplan identifies a significant sized out-of-centre shopping centre at Bidston Dock. The planning policy context for retail firmly and unambiguously precludes out-of-centre development on this scale and indicates a need for

investment and development in or on the edge of existing centres instead: National policy aims to safeguard town centres and promote their vitality and viability by planning for their growth and development. Allocations for new town centres should be made through the plan making process where the need for them has been established, such as in areas of significant growth or where there are deficiencies in the existing network of centres. Planning authorities should not regard out-of-centre developments as town centres."New out-of-centre...shopping centres have a substantial impact over a wide area and can harm the vitality and viability of existing centres within the catchment of the proposed development". It is unlikely that the new development of an out-of-centre regional or sub-regional shopping centre will meet the needs of the Government's town centre policy. Regional policy resists new out of centre regional or sub regional shopping facilities. Policy W5 advises that proposals should not undermine the vitality and viability of any other centre or result in the creation of unsustainable shopping patterns. Local Policy a similar stance is taken offering no tangible UDP support for large-scale retail or commercial development on the dock estate. Policy SH9 resists proposals for out-of-centre retail development and states that this will only be permitted where it can be satisfied that the proposal...will not undermine the vitality and viability of any key town centre or have any adverse effect on overall travel and car use. Any retail development at Wirral Waters will not satisfy either of these criteria. The only reasonable prediction is that Wirral Waters will have a seriously harmful impact upon Birkenhead Town Centre. It will have a detrimental impact upon the future vitality and viability of the Pyramids / Grange Shopping Centres including; a reduction in Birkenhead's market share; a reduction in footfall with a resultant loss of main retail anchors; future retail demand in Wirral will be diverted towards Wirral Waters; the diversity of retailer representation will diminish and with it expenditure retention; a resultant increase in the number of vacant units within Birkenhead town centre; and the major office component of East Float will compete with and reduce the attractiveness of the town centre office market. In terms of access and sustainability: National policy in PPS6 seeks to improve accessibility by ensuring that new development will be accessible and well served by a choice of means of transport. Delivering more sustainable patterns of development is equally key by ensuring sustainable transport choices are available and by providing alternatives to car use. As an out-of-centre shopping centre, Wirral Waters will inevitably attract a primarily unsustainable car borne dependant traffic base, therefore contradicting planning policy. Regional policy . The principles underpinning RSS are outlined in Policy DP1. RSS highlights the importance of concentrating development within and on the edge of existing town centres where public transport hubs already exist and resisting pressure for out of centre retail/leisure facilities which are otherwise highly dependant on unsustainable car borne travel. Wirral Waters is therefore unacceptable due to its requirement to attract car borne dependant customers, increasing the overall need to travel by private transport. The Wirral Waters scheme will

also have a detrimental impact upon Birkenhead Town Centre, as well as neighbouring housing market renewal areas by promoting a 'garden wall' effect which in no way promotes sustainable communities or economic development and does not accord with regional planning guidance. In terms of regeneration and employment: National policy PPS6 seeks to encourage investment to regenerate deprived areas, creating additional employment opportunities and an improved physical environment. Promoting the economic growth of regional, sub-regional and local economies is also key. Wirral Waters will divert investment from existing regional and sub-regional town centres. Birkenhead town centre will experience a significant impact upon future investment and development. The threat of it alone is enough to stem investment into the town centre. Peel's proposal will also become a 'walled garden' with limited benefits to neighbouring housing market renewal areas or other principle regeneration schemes. Regional policy for the Liverpool City Region is intended to secure a high level of growth and address regeneration needs. Policy LCR2 states that the focus will be on the economic, social and environmental revival of the area through the development of Housing Market Renewal Pathfinder areas; supporting the development of the Mersey Ports; and the development of the Wirral Waterfront Strategic Investment Area. There is no suggestion that the Birkenhead Dock Estate has a pivotal role to play in the revival of the area or indeed that effective uses for the Mersey Ports should be encouraged to secure this regeneration. Policy LCR3 highlights the importance of maintaining and enhancing the role of Birkenhead to provide community facilities, services and employment. Policy W2 states that locations for Regionally Significant Economic Development should not be used for development that could equally well be accommodated elsewhere. Sites for regionally significant office development should be focused in or adjacent to the regional centres and town/city centres and be consistent with the sequential approach in PPS6. The Wirral Waters proposal, if implemented, will have significant regeneration implications for Birkenhead Town Centre, including: retail impacts will immediately place at risk the private sector investment needed from Warner and other stakeholders to invest in the town centre; the likely quantum of retail / leisure development at Bidston Moss will absorb the available retail capacity in Wirral for many years to come, subsequently diminishing the longer term prospects for new investment and regeneration within or on the edge of the town centre; a late evening retail / leisure offer at Wirral Waters will diminish the prospect of creating an evening economy in Birkenhead town centre; any major out-of-centre development at Wirral Waters will undermine the regeneration and urban renewal initiatives in neighbouring 'Housing Market Renewal Initiative' areas by creating a 'walled garden effect'. Funding from 'Growth Point Status' will be diverted to unwanted apartment led schemes on established port land, away from the HMRI Areas it was primarily designated for; the superior working environment of a new retail / leisure quarter at Bidston Moss will prejudice the availability of a local workforce to support the town centre uses; the resultant downturn in the town centre's retail and service

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	<p>provision will undermine its role as the economic and social hub for local communities within the Borough; Wirral Waters and the associated development of the docks, will replace plans for the regeneration of Wirral Waterfront; a high density scheme of tall buildings will severely impact upon the skyline and subsequently detract from Liverpool Waterfront's World Heritage Status.</p>
493	<p>The Wirral Waters project offers the opportunity to transform the economic profile of Wirral and address a number of the key weaknesses identified in the Economic Context.</p>
552	<p>Although the Council's desire to see the Birkenhead Docks estate regenerated is understandable, it is imperative that a retail allocation in the forthcoming LDF is resisted to avoid the irreparable damage to existing centres within the Wirral Waters catchment, including the sub-regional centre of Birkenhead. Such an allocation would suppress retailers from investing in existing centres and threaten their on-going viability. Strongly urge Wirral Council to critically evaluate the impact of the overall Wirral Waters scheme, both in terms of its contravention of planning policy and its detrimental effect upon Birkenhead Town Centre.</p>
555	<p>We have recently responded to consultation on the Wirral Waters Northbank East applications, where there will be impacts on several key historic assets. A more thorough analysis is needed to more clearly understand these impacts alongside the significance of the historic assets themselves. The CS provides the opportunity to thoroughly consider alternative ways of delivering development to ensure that proposals contribute to the achievement of sustainable development. The Urban Panel visited Liverpool and Wirral in October 2007 and in the context of Peel's proposals advised that "only development which could show that it would make a serious contribution to the sustainability of the whole sub-region would be acceptable". The Urban Panel also offered further advice to Peel in a letter dated 4th August 2008. The Core Strategy should refer to the English Heritage CABE Guidance on Tall Buildings (July 2007), endorsed by Government as a material consideration in the determination of planning applications, in particular that "The Government encourages local planning authorities to identify suitable locations where tall buildings are, and are not appropriate, in areas where such developments are a possibility". This should be done on the basis of a detailed urban design study which takes account of the historic context of the wider area using historic characterisation methods and a character appraisal of the immediate context.</p>
37	<p>There is strong support through the RSS for Wirral Waters, in terms of the focus on housing through Policy LCR2 and the focus on economic development through Policy W2 and the emerging Strategic Regional Site designation.</p>

215	Needs updating on the basis of the recent planning application for North Shore.
446	Question the 'wisdom' of building family accommodation near open water at Wirral Waters as water attracts young people who wish to swim in it and vulnerable adults.
246	It is important to keep in touch with infrastructure providers including utility companies to advise of the progress of the Growth Point bid and we look forward to further consultation on the bid.
547	Birkenhead did not obtain eco-town status.
38	It would be useful to explain that the Strategic Regeneration Framework is a vehicle for taking forward and delivering Wirral Waters, being led by Peel Holdings in partnership with Wirral Council and a range of stakeholders, as a non-statutory framework that will inform the Core Strategy and other planning documents over its lifetime. It will be important that the Council explains through the next consultation that the SRF is being used as the primary vehicle for two key reasons. The first is that Wirral Waters is a private (not public) led initiative being driven by the private sector, in partnership, and with the support of the public sector. The second is that the scale and time horizons for Wirral Waters mean that is likely to stretch at least twice as long as the life of the Core Strategy itself (and indeed the RSS), hence the overarching vehicle requires a flexible approach that can inform and be informed by statutory planning documents and their timescales, rather than requires the whole framework to be a statutory document.
450	Seeks assurance that policies based on this section will not be steam-rolled through, but will be genuinely open to discussion, criticism and scrutiny.
468	A significant amount of information needs to be provided before any Core Strategy Document is finalised. Wirral Waters is highlighted throughout the Document yet very little information is provided by either Wirral Council, or Peel Holdings to inform any representations on it. Sufficient time must be allowed to digest and make comment upon the Wirral Retail Study 2008. The 'Wirral Waters Evidence Base (produced by Peel Holdings)', should be made publicly available if constitutes part of the evidence base for this Core Strategy. An evidence base, used to inform a Core Strategy should not be produced after the Core Strategy is drafted. To properly inform the Wirral Retail Study 2008 and the Core Strategy, detailed information should be provided on the following: the local and regional retail / commercial leisure market; the local and regional housing market; the local and regional office market; current and future market trends influencing the viability and phased delivery of Wirral Waters; a detailed masterplan and supporting information for the whole site, outlining key strategies and approaches in particular to development zones, mix of uses, retail / commercial leisure mix (including proposed Anchor stores / operators), retail / commercial leisure floorspace

schedule; evidence of how Wirral Waters conforms to national and regional planning policy objectives, noting the RSS position on new out of centre regional shopping complexes, including a survey based demonstration of need, sequential approach, retail/ economic impact, accessibility and scale; a detailed development strategy; development appraisal and evidence of any enabling case to be relied upon for retail / commercial leisure uses; phasing strategy including targeted start and completion of retail/commercial leisure uses and phasing of East/West float areas to follow. Due to a severe deficiency of information, there has been a shortfall in transparency and public / stakeholder consultation when considering the Wirral Waters proposal. It is essential that a period of public / stakeholder consultation is held upon the production of a draft Retail Study 2008 for a minimum period of six weeks. Any progress on the Core Strategy should be postponed until a relevant and finalised evidence base has been completed, so as to properly inform consultation on the Issues, Vision and Objectives document. This is in line with the Government's key objective to ensure an open and fair planning system which involves local people and key stakeholders to have a say in what happens in their local area. Undoubtedly a document which is being prepared to inform major retail/leisure development in Wirral over the next 15 years is sufficiently significant to justify a period of public consultation. A further point relating to the development of a revised Retail Study is the lack of direct liaison with Jones Lang LaSalle (acting on behalf of Warner) by Roger Tyms and Partners. This is especially relevant due to Warner's placement as a major stakeholder. A brief meeting took place on the 20 May 2008 between Roger Tyms and Jones Lang LaSalle, however, regular update/progress meetings did not occur.

9.7 The Council has responded to these comments by:

- Including additional information on Wirral Waters, the Mersey Heartlands Growth Point and the Strategic Regional Site at the Birkenhead Docklands throughout the Spatial Options Report
- Indicating the potential for the identification of a strategic allocation in the Core Strategy in the Spatial Options Report
- Commissioning an additional evidence base study - the Integrated Regeneration Study for Birkenhead and Wirral Waters - to ensure the integration of the proposals with other initiatives within the surrounding area
- Including a range of alternative policy options within the Spatial Options Report

Woodside Regeneration Area

9.8 No comments were received in response to the section on Woodside.

Hind Street Regeneration Area

9.9 No comments were received in response to the section on Hind Street.

New Brighton

9.10 Only one comment was received in response to the section on New Brighton:

ID	Summary of Responses Received
391	<p>Redevelopment proposals for the Marine Promenade area including the Floral Pavilion have been presented. The level of support given to these proposals by the Council should be extended to other similar sites within the area with similar principles applied. A key element of the success of emerging proposals for the Marine Promenade is the recognition of the need to allow complimentary non-tourism uses to facilitate modern tourist related facilities. The redevelopment of appropriate adjoining sites in whole or part for complementary uses should be supported in a similar manner. The principle of enabling development has been established and should be extended to other landowners to facilitate modernisation and redevelopment. The role and function of New Brighton has changed. In granting planning permission for the emerging Marine Promenade regeneration proposals, its role and function will change yet further. The Council should recognise the need for complementary uses, outside the traditional description of tourism, which would not prejudice the primary role of New Brighton as a tourist destination. The Core Strategy should encourage landowners within New Brighton to modernise and diversify. Emerging policy should present a more flexible approach in recognition of the challenges the sector faces and should state that a wider range of uses would be acceptable in tourist areas. This would provide certainty and allow landowners to plan and compete in a changing market and would fall better into line with emerging regeneration strategies and proposals for New Brighton than existing policies allow.</p>

9.11 The Council has responded to this comment by recognising the role of New Brighton as a key tourism destination throughout the Spatial Options Report.

Birkenhead Town Centre

9.12 Comments received on the section on Birkenhead Town Centre were mainly directed towards:

- The lack of recent investment in the Town Centre
- The potential impact of Wirral Waters
- The need for an interventionist approach, in accordance with PPS6

9.13 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
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467	<p>Wirral Retail Strategy 2004 makes a number of conclusions and recommendations regarding the present and future prospects for Birkenhead Town Centre. It notes that there has been very little recent investment but advocates a reversal of trends by taking a proactive stance to the assembly of development sites. Warner Estate Holdings Ltd has begun to hold discussions with Wirral Council, the Homes and Communities Agency and other stakeholders, in order to begin the formulation of a retail plan and subsequent regeneration masterplan for Birkenhead Town Centre. If proposals for Wirral Waters are allowed to progress a serious derailment of this investment could occur, leading to the collapse of this sub-regional centre. The benefits of continued, supported investment in the Town Centre extend to retail mix and anchors, town centre environment, competition and economic and social impacts. Investment and development focus in Birkenhead Town Centre will offer confidence to the market, subsequently supporting and increasing the presence of national multiples, independent retailers and anchor stores; an emphasis on Birkenhead town centre will lead to an improved shopping and working environment which would in turn lead to an increase in footfall and a subsequent increase in expenditure; a boost to the town centre's ability to attract and retain investment would have a positive impact on job creation and the development of an evening economy, including both retail and leisure; increased investment and development will enable Birkenhead town centre to react strongly to competition within its catchment area to achieve and retain a higher market share in light of an already strong competition from Liverpool, Chester and Cheshire Oaks. Policy at all levels aims to safeguard existing and traditional town centres, and advocates investment and regeneration in these towns. UDP Policy SHO1 says that 'the Local Planning Authority will seek to sustain and enhance the vitality and viability of key town centres and other shopping provision in the Borough'. RSS states that 'comparison retailing facilities should be enhanced and encouraged in a number of centres, including Birkenhead'. PPS 6 reiterates this key objective by promoting the vitality and viability of existing centres, primarily by; planning for the growth and development of existing centres and promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all. The Core Strategy should reinforce the need for the protection and investment in Birkenhead Town Centre. There is no material justification to depart from the position of Wirral UDP when considering policy for the Local Development Framework. It should be made explicit, in no uncertain terms that Birkenhead is the sub-regional centre within Wirral and no scheme should compete with it in terms of scale, location or type of offer. Investment and development should be encouraged and promoted in Birkenhead town centre through the Local Development Framework.</p>
551	<p>The retail study should adopt a positive and, if necessary, interventionist approach to Birkenhead Town Centre in line with PPS6. It should not discriminate against the town centre because of its existing deficiencies, fully</p>

	recognise its strengths and opportunities and build upon these to formulate a strategy which foremost seeks to accommodate available retail expenditure within the town centre or its immediate edge, before considering other alternatives. RSS policy should also be considered in the retail study. In terms of retail provision, the emerging RSS is wholly supportive of new retail investment opportunities being directed to existing town centres. It highlights Liverpool and Manchester as the two regional shopping centres within the North West and identifies Birkenhead in the second tier of the regional retail hierarchy. RSS is centred on the 'town centre first' approach and furthermore states that proposals for out of centre development will be resisted.
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9.14 The Council's response to these comments:

- Including additional information on the emerging findings of the Wirral Town Centres, Retail and Commercial Leisure Study in the Spatial Options Report
- Including an assessment of the options for accommodating additional retail development within the Town Centre within the Spatial Options Report
- Commissioning an additional evidence base study - the Integrated Regeneration Study for Birkenhead and Wirral Waters - to ensure the integration of proposals within the surrounding area

Wirral International Business Park

9.15 Only one comment was received in response to the section on Wirral International Business Park:

ID	Summary of Responses Received
451	We are not satisfied with the apparent side-lining of historic and environmental matters in the planning process. They are not given due weight and the result can be damaging and marginalising our heritage.

9.16 The Council has responded to this comment by:

- Retaining a commitment to the future development of Wirral International Business Park as a high quality employment location
- Including a greater emphasis on maintaining local distinctiveness throughout the Spatial Options Report and policy options for the control of design

Port Wirral

9.17 Comments received on the content of the section of Port Wirral were mainly directed towards:

- Support for the potential expansion of the port at Eastham
- The need to refer to the wider strategic regeneration aspirations for SuperPort
- The potential impact on local residents

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9.18 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
56	Welcomes the recognition of the potential for the further expansion of port and associated facilities at Eastham. A more accurate brief description of the project would be: "Peel Holdings have identified potential for significant investment in and expansion of port and associated facilities at Eastham and alongside the Manchester Ship Canal as part of a long term strategy to enhance port facilities and increase port throughput in the locality - in a scheme to be known as Port Wirral. Port Wirral has potential to be a new world class multi-modal port facility. In the medium term it is anticipated that existing port activity at Ellesmere Port Docks would be relocated to Port Wirral enabling the later phases of the redevelopment of that site". The Port Wirral scheme has the potential to directly contribute towards meeting Strategic Policy Objectives 1, 2, 3, 17, 19 and 21.
216	Reference should be made to SuperPort and the wider strategic regeneration aspirations along the whole port area from Wirral to Manchester. This is likely to be one of the key regeneration drivers for Wirral and should be strongly reflected within the Core Strategy and re-enforces the importance of the spatial context of Wirral in terms of docks and development in Liverpool bay.
452	Local residents are apprehensive about current and future plans which could significantly alter their quality of life. Local consultation of a meaningful kind, must be a priority. COMAH sites, Conservation Areas, residential property and Green Belt must all be considered seriously in any planning process.

9.19 The Council has responded to these comments by:

- Including additional information on SuperPort and Port Wirral within the Spatial Options Report
- Making specific reference to concerns about local environmental impacts and public safety

Cammell Lairds

9.20 Only one comment was received in response to the section on Cammell Lairds:

ID	Summary of Responses Received
63	The description given to the remainder of the site to the south, including the main construction hall, should not refer to "regeneration". At this stage a more appropriate description would be "significant opportunity" with no further detail. If the Council wishes to reference the potential for future deep sea port facilities, this should be qualified with a statement that technical and financial feasibility work would need to be done, rather than requiring such a project to be brought

	forward through a Port Masterplan. Peel intends to prepare a Port Masterplan. However it is a major and complex piece of work and there is no mandatory requirement in either RSS or national guidance to produce one - it is recommended. It is not yet clear whether the Port Masterplan would be completed in time to inform the Wirral LDF.
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9.21 The Council has responded to this comment by including details of the Cammell Lairds site as a development opportunity within the Spatial Portrait.

Hoylake and West Kirby

9.22 Comments on the details contained within the section on the Hoylake and West Kirby Masterplan were mainly directed towards:

- The impact of development on the unique tourist value of West Kirby and Hoylake
- The impact of the Golf Resort on biodiversity

9.23 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
327	The development proposals for West Kirby and Hoylake do not adequately consider their unique tourist value in the face of recession, and peak oil. Neither do they consider the wishes or needs of local residents. These resorts are day-tripping resorts of regional importance at a time when more people are taking holidays closer to home. Local development should aim to capture this opportunity. The unique seascape, wildlife, countryside, parks, history and heritage offer huge potential for the creation of a unique eco-tourist resort of national importance. Such a resort would offer a valuable, sustainable tourist economy in the face of recession, peak oil and a low carbon economy. Care should be taken that decisions made now in the development of West Kirby and Hoylake do not destroy the unique nature of this area and its future potential as an eco-tourist resort.
495	West Kirby needs attention but not major developments, such as the Sail Hotel, that will change the character of the community.
512	Care should be taken that decisions made now in the development of West Kirby and Hoylake, do not destroy the future potential of these areas as an eco-tourist resort.
553	There is a widespread concern within these communities about how these plans have been developed. There was no research directly with the community, traders and businesses covering the problems the communities have and their vision for the future. As a result there are a number of development proposals that are out of scale with the local community, threatening to undermine the traditional town centres and traders and intrude into the Green Belt. The plan seems to be based on the concept that Hoylake

	<p>and West Kirby are tourism resorts in the conventional sense -which they are not. They are strong residential communities with a day tripping role focusing on water sports, countryside and coast and wildlife. The strategies should be built on these strengths, developing them not subjecting the towns to over development and development out of scale with the centres and threatening their character. These proposals have not been the subject of direct individual consultation with the community outside the master plan consultation which did not penetrate the community. No alternatives to these developments have been considered such as the use of a community trust or external grants to redevelop West Kirby Sailing School, the development of eco-tourism along the West Wirral coast including a combined nature, organic agricultural, local production and allotments and public access development on the Birket Valley / Carr Fields area which has important wildlife value linking into other natural areas.</p>
554	<p>Object to the continued inclusion of the Golf Resort on behalf of several wildlife groups including Wirral Wildlife, RSPB and Wirral Barn Owl Trust. This does not conform with the investment priorities set out in the RSS. There is no great need for low-pay jobs, which is what it would mostly provide, in north-west Wirral. The western third of the proposed area is a proposed SBI. It is a major roost for wildfowl and waders from the Dee Estuary SPA for birds and supports protected species such as water vole and bats and Biodiversity Action Plan species such as skylark, lapwing and brown hare. Potential for eco-tourism should be explored, as a far more sustainable option than golf. While some wildlife is compatible with golf courses such as the sand dune flora of Wallasey Golf Course or the heathland on Wirral Ladies GC, wildfowl and waders do not like human disturbance, need wet fields and will not be compatible with golf. Several local golf courses are struggling to retain sufficient members and such an expensive sport is bound to suffer during the next decade with less money around.</p>

9.24 The Council has responded to these comments by:

- Acknowledging the importance of tourism to West Kirby and Hoylake in the Spatial Portrait
- Retaining a reference to the Golf Resort in the Broad Spatial Options
- Placing a greater emphasis on the need to maintain local distinctiveness throughout the Spatial Options Report

10 ISSUES

10.1 No general comments were submitted on the section on Emerging Issues and Challenges. The more specific comments on each of the twenty-nine issues are set out below.

Cross-Cutting Issues

Issue 1 - Supporting Urban Regeneration

10.2 The comments received on Issue 1 were mainly directed towards:

- The importance of the Green Belt
- Support for regeneration in east Wirral
- The role of retailing in regeneration
- The need to balance regeneration against the housing figures in the Regional Spatial Strategy

10.3 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
64	Urban regeneration is essential for Wirral allied to maintaining a rigid control of the Green Belt. The use of brownfield sites is to be welcomed. Urban regeneration needs to focus on the east of the peninsula while care is taken with west Wirral initiatives to promote developments that do not threaten the vitality and viability of existing centres. The West Wirral Master Plan threatens to pursue this rather than measures to renew deteriorating community assets and focus on the revitalisation of the core town centres and their small traders. The tourism offer should focus on the coast, countryside, wildlife allied to the day tripping market revealed by the two Tourism Studies.
339	Strongly support regeneration schemes across Wirral particularly in relation to the improvement of the quality of the more deprived eastern areas. Croft Retail and Leisure Park should be treated as an ongoing regeneration activity alongside other regeneration initiatives across the Borough.
383	Specific reference should be made to retail, which has a key role to play in helping to promote regeneration, particularly in socially and economically deprived areas, and where there is a dearth of existing facilities. Retail is a major employer. Supermarkets can help attract visitors and other forms of development.
395	Supported in principle.
409	Supported in principle.
579	Agree with the need to encourage urban regeneration but this must be balanced against the need to meet higher housing requirements in the RSS which may require the urban area to be redefined where there is a logical extension to the urban area, on land which is currently greenfield.

10.4 The Council has responded to these comments by:

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- Including Strategic Objectives to focus development towards regeneration priority areas
- Including additional information on the Green Belt throughout the Spatial Options Report
- Including policy options for retailing in the Spatial Options Report
- Including a series of alternative policy options for the distribution of development in the Spatial Options Report

Issue 2 - Achieving Sustainable Development

10.5 The comments received on Issue 2 were mainly directed towards:

- Increasing the emphasis on sustainable development
- Responding to the challenge of climate change

10.6 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
70	The plan needs to move on from paying lip service to the concept of sustainability and adopt and fund strong measures and policies to drive forward sustainability.
154	Responding to the challenge of climate change should be top of the item, not an afterthought at the end. The climate is already changing and within the plan period will have increasing effects on lifestyles.
221	It is essential to remove barriers to sustainable development and regeneration.
275	Achieving 'sustainable development' is fully supported and reflects statutory requirements. However, it appears to be being addressed solely as a back stop in terms of sustainability appraisal processes. Sustainable development is more than the use of sustainability appraisal as an evaluation tool and needs to underpin the whole approach to the development of Core Strategy options.
305	The broad need to secure sustainable development is supported.
340	Croft Retail and Leisure Park is well-placed to deliver this, as an established retail and leisure destination, sustaining the local economy and stemming unsustainable patterns of trade to centres outside Wirral.

10.7 The Council has responded to these comments by:

- Providing additional information in the Spatial Portrait
- Revising the Spatial Vision
- Strengthening the emphasis on Climate Change throughout the Spatial Options Report

- Including policy options for the generation of renewable, decentralised and low carbon energy
- Including policy options for sustainable design and construction

Issue 3 - Ensuring High Quality Development Across the Borough

10.8 The comments received on Issue 3 demonstrated strong support for controls over better design.

10.9 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
71	Strongly supported but past history suggests that Wirral Council has paid insufficient attention to this. Some key planning decisions have not delivered this and the recent experience of the Sail in West Kirby suggests this is a real problem. The design is poor and the impact on the town centre in terms of car parking a real concern. This policy is not translating itself into Wirral Council major scheme initiatives.
276	Fully supported. The approach to 'quality' in new development is increasingly encompassing the role of sustainable construction including the approach to matters such as energy, water and waste and these wider considerations should also be included. Could be combined with Issue 15?
306	The desire to achieve high quality development is supported. The promotion of high quality should include design and materials that are locally distinctive and contribute to local character and quality.
396	Support the promotion of high quality design. Design proposals of higher quality and appropriateness than a building which it may replace should be supported, particularly where the lifetime of the building to be replaced has expired in design terms.
420	Agrees that ensuring high quality development is a cross-cutting issue. This can only be achieved by first examining the context for any proposed development and by undertaking a character appraisal. Appendix 1 of EH guidance on conservation area appraisals suggests a checklist for assessing the special interest of an area.
428	Council officers should refuse overdeveloped, badly designed buildings that spoil the character of our community.
453	There needs to be consistent insistence on good lay-out with proper, really adequate green spaces, including gardens, for new developments, not the 'cramming-in of as many dwellings as possible'. Individual gardens as well as communal spaces are ideal for families. Is so much demolition of older properties really necessary - surely refurbishment of many would be a better objective?

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10.10 The Council has responded to these comments by:

- Strengthening the emphasis on local distinctiveness throughout the Spatial Options Report
- Including policy options for the control of design in the Spatial Options Report

A Stronger Economy

10.11 The following general comments were received on the section titled A Stronger Economy:

ID	Summary of Responses Received
50	This section includes a helpful analysis of problems facing the Borough in this area. Addressing these will be an important aspect of the Core Strategy.
102	The issues relate well to RSS Policy DP3 and Policy W1 and the need to strengthen the regional economy. Interested to see how Wirral will take forward these issues in a spatial framework.
331	"A Stronger Economy" should be renamed "A more resilient low-carbon economy" to reflect the need for a fundamental shift in the basis of the local economy, as has been recognised by other Councils.
347	There is a need to identify existing facilities, such as the Croft and Retail Park, which have a vital role to play in contributing to the local economy.
354	Generally welcome and support the economic issues identified, with the exception of Issue 6.
385	Agree the importance of encouraging economic activity to increase the range and quality of employment opportunities for local residents and reduce worklessness. Specific reference should be made to retail as an employment provider. Draft PPS6 indicates the importance of the retail sector in delivering economic, physical and infrastructure regeneration. There is a suggestion that a new combined PPG4 and PPS6 will be formulated to reflect the similarities between retail and standard employment uses when it comes to economic regeneration.

10.12 The Council has responded to these comments by:

- Including additional information in the Spatial Portrait
- Including economic aspirations within the Spatial Vision
- Including policy options for retailing in the Spatial Options Report

Issue 4 - Improving Economic Performance

10.13 The comments received on Issue 4 were mainly directed towards:

- The importance of retailing and tourism in assisting economic performance
- The need to promote a more resilient and low carbon economy

10.14 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
171	Needs to link with strategies in education and employment.
342	Strongly supports policies that will contribute to the Borough's overall economic performance. Croft Retail and Leisure Park has an important role in achieving this through ongoing investment and a commitment to developing the existing retailing and leisure offer, sustaining the local economy and stemming unsustainable patterns of trade to centres outside Wirral.
355	The low level of entrepreneurial activity in Wirral closely reflects Action 3 of the Regional Economic Strategy which seeks to ensure that business start-up and survival provision is targeted at a number of under-performing sectors of the region including Wirral.
397	Supported in principle. The importance of tourism in assisting with the improvement of economic performance should be recognised. The positive change in character of tourism areas to the benefit of the local economy should be encouraged, particularly where an entrepreneurial spirit among landowners is apparent. Landowners who are proactively seeking to embrace change and modernise their sites should be encouraged by allowing a wider range of uses within tourist areas to support their regeneration. This is particularly relevant in New Brighton where significant development is coming forward which should be expanded upon in a planned fashion.
565	Consideration also needs to be given to the positioning of the Borough in terms of responding to new opportunities such as digital connectivity and manufacturing to help re-structure a more resilient economy post-recession.
581	Our economy needs to undergo a structural transformation to become low-carbon. Energy and carbon intensive sectors such as air and land transport, face particular risks from new carbon emission reducing legislation and regulation. This structural transformation offers a route out of the recession. Places with a strong environmental technology sector will be a stronger position to recover quickly, with advantages for economies that lead the way in developing a low-carbon economy through new markets, jobs and export opportunities.
24	We act for two companies who have land totalling 17.5 acres at Bromborough Pool fronting onto the A41. The attached aerial photograph and site layout plan, indicate that this is a major development opportunity which could provide substantial employment, subject to planning. We had a retail operator very keen to negotiate for a development on the site who would have provided in excess of 400 full time permanent jobs. Due to the current

planning criteria in the location, this was at the time considered potentially inappropriate due to the sites current limited zoning for employment uses only. The developers are keen to maximise the opportunity of the site and in the current depressed property market are realistic in their approach to the medium/long term prospects for development. Due to reduced rental and investment values of commercial properties, most commercial schemes on this site would not be viable unless substantial grant aid was available for access infrastructure and reclamation costs. Several large potential joint venture funding partners are now in discussion with regard to the future potential of the site but their first criterion will be the planning potential in both the short term and medium term. The site is approximately 200 yards from the new Volkswagen garage at the junction of Pool Lane and A41 and equally close to the Village Hotel development. There is a planning application at Pool Lane for a new budget hotel. The operators had been very keen to take a plot on our clients site but we were unable to commit on a formal programme for the completion of the development. They have negotiated on the Pool Lane site, which they concede is not as prominent or attractive but is potentially more deliverable, subject to planning. We appreciate that retail planning is limited where the site is in close or reasonable proximity to an established town centre but with respect to Rock Ferry and New Ferry, the calibre of retail shops and the attraction of those centres to provide further retail opportunities is extremely limited and the majority of those units will probably be well suited to some form of service facility such as health, social services, convenience stores etc. It is accepted that any planning for large retail on our clients site will potentially involve a substantial contribution towards the improvement and re-development of both New Ferry and Rock Ferry centres to improve the public facilities they currently offer and possibly to enhance new or existing educational/community facilities. Discussions with the Council could take place that would be beneficial to both local employment and the local community in all respects.

10.15 The Council has responded to these comments by:

- Including additional information in the Spatial Portrait
- Including economic aspirations within the Spatial Vision
- Including policy options for retailing in the Spatial Options Report
- Including additional information on tourism throughout the Spatial Options Report
- Increasing the emphasis on Climate Change throughout the Spatial Options Report

Issue 5 - Addressing Worklessness

10.16 The only comment received on Issue 5 was:

ID	Summary of Responses Received
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343	Developments such as the Croft Retail and Leisure Park should be recognised for their current and potential role as employment providers.
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10.17 The Council has responded to this comment by including policy options for retailing in the Spatial Options Report.

Issue 6 - Reducing Out-Commuting

10.18 The comments received on Issue 6 were mainly directed towards:

- Support for the need to address out-commuting and patterns of travel to work
- The need to diversify the Wirral economy and improve the employment offer within the Borough
- The need to improve public transport across the Borough

10.19 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
222	Needs to address how schemes such as Wirral Waters will provide a sustainable employment base to reduce out-commuting.
335	The needs of the resident population and the need to stem the flow of out migration in terms of travel to work patterns should be aligned with the improvement of established residential areas.
344	Developments such as the Croft Retail and Leisure Park should be recognised for their role as employers in reducing outcommuting.
356	Reducing out-commuting is not an economic objective as it addresses a symptom rather than the underlying issue. The underlying issue is the higher value employment opportunities outside the Borough being taken up by Wirral residents, largely a reflection of Wirral's proximity to Liverpool and Chester and low paid and low quality employment in the Borough. The issue should be diversifying Wirral's economy and encouraging higher quality employment opportunities, in particular.
556	If the majority of Wirral commuters outside the Borough come from west Wirral, they presumably mostly do it by car. Should there be a priority for improving public transport from west Wirral to Chester, Birkenhead and Liverpool?

10.20 The Council has responded to these comments by:

- Including additional information in the Spatial Portrait
- Including economic aspirations within the Spatial Vision

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- Including policy options for retailing in the Spatial Options Report
- Including a greater emphasis on transport accessibility throughout the Spatial Options Report

Issue 7 - Addressing Low Paid and Low Quality Employment

10.21 The comments received on Issue 7 were mainly directed towards:

- Improving Wirral's position in the North West as a high tech manufacturing industry
- The current and future role of the Croft Retail and Leisure Park

10.22 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
172	Wirral also under-represented in high tech manufacture. The North West is a centre for environmental technology in the UK.
345	Developments such as the Croft Retail and Leisure Park should be recognised for their current and future role as employment providers.

10.23 The Council has responded to these comments by:

- Including additional information within the Spatial Portrait
- Including economic aspirations within the Spatial Vision
- Including policy options for retailing in the Spatial Options Report

Issue 8 - Maintaining an Adequate Supply of Immediately Available Employment Land

10.24 The comments received on Issue 8 were mainly directed towards:

- Removing barriers to the availability of employment land
- The need to focus on sites capable of meeting modern business needs
- The need to regenerate older industrial areas

10.25 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
223	Reference needs to be made to removing barriers to availability of employment land especially in terms of utilities and infrastructure barriers as well as remediation of contaminated land, particularly in east Wirral.
333	There is a plethora of constrained, outdated and unviable employment land, particularly in east Wirral. The Council should focus on directing employment development to sites which are best able to meet the needs of modern

	businesses. Other sites should be favourably considered for release for other purposes to support regeneration. Success in securing significant inward investment will only be achieved by focusing resources on sites which can deliver suitable land for employment needs. The Council should also broaden the definition of employment development beyond Use Classes B1, B2 and B8. Other uses such as retail, financial and professional services, food, drink, leisure, care and a multitude of sui generis uses are all important generators of employment and should be considered in any future strategy.
410	Supported in principle. The modernisation and diversification of acceptable uses within older economic areas will add value to the environmental quality of the areas, the standard of jobs available and the value of the economy.
411	The Core Strategy should encourage the redevelopment of older industrial areas for higher value employment uses to increase employment and identify sites which may no longer be suitable for employment use. Access to higher value jobs and alternative forms of employment may assist with reducing the level of out commuting.
412	The Core Strategy should seek to support the redevelopment of older industrial sites for higher value employment uses. The merits associated with bringing older industrial sites back into employment use should be fully assessed and higher value alternative uses should be supported where appropriate.
413	The supply of readily available employment land should be carefully assessed. Some older sites in established industrial areas continue to be unattractive to investment and will remain so unless a creative approach to their redevelopment is adopted. The Core Strategy should support the reuse of such sites, in part or in whole, for alternative uses in line with national policy rather than preventing regeneration in the hope that at some point in the future they will be redeveloped for their current allocated employment use.
454	In a number of different areas of East Wirral, newly-built industrial units and office-type accommodation is not being used. This is not a new phenomenon. Greenfield sites are being taken up, quite unnecessarily, a great waste and of great detriment to the environment, particularly when it affects ancient woodland and Green Belt land.
563	What are the Council doing to try to address the problem of older premises?

10.26 The Council has responded to these comments by:

- Including additional information in the Spatial Portrait
- Including additional information on the findings of the Wirral Employment Land and Premise Study throughout the Spatial Options Report

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- Including policy options for employment in the Spatial Options Report
- Publishing the Wirral Employment Land and Premises Study alongside the Spatial Options Report

Issue 9 - Promoting and Supporting the Tourism Economy

10.27 The comments received on Issue 9 were mainly directed towards:

- The need to focus on natural, environmental and coastal assets
- The need for improvements to the public realm
- The Core Strategy recognising that tourism plays a vital role across the borough and has changed beyond all recognition since the UDP
- Allowing tourism diversification

10.28 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
73	The importance of tourism is agreed as is the statement that the coast and countryside are key local assets. The focus of this needs to be on expanding the coastal, wildlife and environmental activities through the encouragement of environmental, wildlife and activities associated with nature. Wirral needs to address means to achieve this - including the development of a beacon of excellence in terms of a nature reserve, sustainable agriculture and community allotment development in the Birket Valley operating in a wildlife terms with the Dee Ramsar area. The West Kirby Sailing School is being rebuilt without vision for the future and the means and objectives of the development need re-examining.
173	There is a need for basic improvements to the public realm.
307	Recognition of the contribution that Wirral's countryside and coastal assets can make to not only the tourism economy but also to people's quality of life is welcomed.
398	Tourism should play a key role in Wirral's economy. One paragraph does not fully recognise its importance. The Core Strategy should recognise that tourism in the Borough has changed beyond all recognition, since the formulation of the Unitary Development Plan. To perpetuate the current policy stance in a new Core Strategy could prove fatal to the tourism industry in the Borough. The Core Strategy should embrace and plan for change by expanding upon the acceptable range of uses within tourism areas to allow diversification and encourage activity within tourist areas whilst preserving the fundamental role of a given area as a tourist destination.

10.29 The Council has responded to these comments by:

- Including additional information on role of tourism within the Spatial Portrait

- Including a statement on the type of tourism to be promoted within the revised Spatial Vision
- Including provision for a linked network of high quality coastal destinations and attractions under each of the Broad Spatial Options

Issue 10 - Supporting the Vitality and Viability of the Borough's Existing Town and Local Centres

10.30 The comments received on Issue 10 were mainly directed towards:

- Concern over the decline of existing centres and the impact of out-of-centre developments
- The need to proactively identify new development opportunities
- The need for diversification in New Brighton

10.31 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
74	The decline of the vitality and viability of existing town and district centres is a real concern and policies have allowed the over development of out of town supermarkets and edge of town stores which have undermined traditional high streets and independent traders and destroyed their character - this process is still continuing with the development of the New Brighton supermarket and is threatened with the inclusion of a quality foodstore in the Greater Concourse development in West Kirby which will undermine the traditional high street of the town and independent traders. This policy needs to be enforced and recognised in Wirral planning decisions. The Borough is already heavily populated with supermarkets which compete with town centres and also generate road traffic on congested roads. The Retail Study needs to state clearly that further out of town and edge of town supermarkets should not be allowed. A policy to encourage farmers markets and sustainable trading is needed.
174	Endorse the issues raised but it is not clear what action the Council will take to influence the trend.
290	Wirral Waters is, according to Peel Holdings, based on early gains with a shopping centre at Bidston - with some housing at Seacombe. Further developments are aspirational, ill defined and in the distant future. The impact of a retail and leisure development at Bidston would be large and needs to be built into any planning.
357	Issue 10 could equally be regarded as part of the building sustainable communities agenda.

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380	While town centre regeneration is supported, Wirral is not listed as a regional retail centre and the Regional Spatial Strategy makes it clear that retail development in existing town and local centres must be of a suitable size and scale.
386	Agree that further facilities are needed to improve the vitality and viability of centres but it is unfair to blame supermarkets for their decline. The decline of a centre like Liscard, was caused by many different factors, combined over a long period of time. The Local Development Framework should proactively identify development opportunities to deliver vital and viable centres. The presence of supermarkets within or on the edge of centres will encourage linked trips. The difference in offer to a traditional shopping centre means that they are rarely in direct competition. A wide geographical distribution, including those not directly associated with existing centres, can result in a sustainable pattern of development as the distribution of centres does not always equate to key concentrations of population.
399	The Core Strategy should recognise the implications of decisions at New Brighton. The redevelopment proposals at Marine Promenade will give rise to a need for improved local facilities which should be encouraged through the diversification of acceptable uses within the area. Whilst New Brighton should continue to be a tourism destination in the main, the range of facilities available should be diversified to improve the long term viability of the area as a tourist destination and to prevent the need for trips from the area to access essential facilities. The Core Strategy should facilitate such diversification.
472	The Roger Tym Retail Study 2004 confirmed Birkenhead Town Centre's importance as the largest comparison centre within the Borough. The relatively low market share shows a need to improve the comparison sector retention levels through quality development and redevelopment within the town centre. Birkenhead Town Centre had lost ground in the wider regional retail hierarchy since the mid 1990's. This decline, in part, reflects the greater progress made by Chester and Liverpool and the competition from large out-of-centre developments such as Cheshire Oaks. The Retail Study recommended that new floorspace should be directed foremost to Birkenhead Town Centre as the sub-regional centre, with no ceiling on the level of additional floorspace on the basis that quality developments will create their own capacity by reducing the outflow of spending to competing centres outside Wirral. The Study also considered that additional convenience sector floorspace should be directed to Birkenhead Town Centre. A key recommendation was that new retail development should be of a quality that will boost the overall attractiveness of Wirral's comparison retail offer and that the Council should adopt an interventionist approach. Wirral Council's March 2007 Cabinet Report identified a need to update the 2004 Wirral Retail Strategy. Since then, the scope has widened beyond a simple updating exercise, in part, as a response to the emerging proposals for Wirral Waters.

	The Council's brief identifies the need for a more 'wide-ranging strategy' to respond more proactively to the leakage of non-food retail expenditure outside the Borough.
564	How will the Core Strategy tackle the problems with the town centre/out-of-town retail offer?

10.32 The Council has responded to these comments by:

- Including additional information on the issues relevant to each of the Borough's existing centres in the Spatial Portrait
- Including additional information on the emerging findings of Town Centres, Retail and Commercial Leisure Study in the policy options for retailing
- Commissioning an Integrated Regeneration Study for Birkenhead and Wirral Waters to ensure the integration of regeneration proposals within the area
- Including New Brighton as a priority for regeneration under each of the Broad Spatial Options

Housing

Issue 11 - Providing Housing to Meet Identified Needs

10.33 The comments received on Issue 11 were mainly directed towards:

- The scale of Wirral's housing needs
- The viability of targets for the provision of affordable housing
- Affordable housing needs in West Wirral
- Rural housing needs

10.34 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
51	The viability of affordable housing targets will be a key issue. Recent PINS feedback indicates that it is essential that any affordable housing targets are underpinned by an assessment of their economic viability.
90	The new economic realities, with new apartments in the Pathfinder now selling for around £75,000 and town houses for £100,000, there is little chance of developers being able to build affordable housing to be included.
91	The reasoning for affordable housing requirements in east Wirral should be explained. Whilst prices are generally lower in east Wirral in absolute terms, incomes are also substantially lower. It is the lower level of economic participation that should be addressed, with additional levels of affordable housing being a lower priority requirement. The Council will need to undertake a viability analysis to support any affordable housing targets in the Core Strategy.

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103	An economic viability assessment will need to be undertaken to support an affordable housing policy in the Core Strategy. This is not listed in the evidence base being developed. The Council need to recognise that the Regional Housing Strategy (RHS) sits alongside the Regional Spatial Strategy. The document could also reflect the changing structures at regional level in terms of the emerging Regional Strategy 2010. There is no reference to the Liverpool City Region Housing Strategy. The revised Regional Housing Strategy will put greater emphasis on the role of sub regional housing strategies. It would be useful to refer to the Regional Funding Allocation process, as this will also have an effect on delivery.
358	The Strategic Housing Market Assessment identifies needs significantly higher than the minimum requirements of the Regional Spatial Strategy and the delivery aspirations of the Mersey Heartlands Growth Point. The Council will need to consider these findings in the context of Issue 13 and Issue 16.
367	It is essential to increase the mix of tenure within Wirral's rural settlements, to accord with PPS3, which can only be achieved by providing new homes to cater for the full range of local needs. The alternative is unsustainable out-migration as people are forced to move away to other areas, which may be outside the sub-region, which cater for their demand. Lack of new housing will deny local people the opportunity to locate in an area where they want to live, which they can afford. The Council must plan for the full range of market housing, taking account of the need to deliver low-cost market housing as part of the overall housing mix. Needs in rural areas will only continue to widen if housing regeneration is continued to be prioritised to urban areas.
400	The Core Strategy must address how the needs identified will be met. Reliance on two or more major redevelopment schemes will provide a skewed supply of house types in one or two specific locations to the detriment of the remainder of the Borough. The provision of the correct type of dwellings in appropriate locations, should not exclude the partial redevelopment of tourist areas for housing, where appropriate, in line with the Regional Spatial Strategy. The resistance of available and deliverable proposals based on past development patterns should be avoided. The Council must be creative about delivery and how demand will be met. The introduction of residential uses in tourist areas could support seasonal businesses and underpin wider strategies, including new spending power, to the benefit of the wider area.
567	Houses built for one generation do not necessarily suit the following generation. Many of young people from west Wirral cannot afford or find appropriate accommodation in the area they were brought up in. If these areas are to remain viable adaption to changing housing requirements is needed. There is a very low chance of achieving the Council's stated aim of 40% affordable housing.

10.35 The Council has responded to these comments by:

- Undertaking an update to the Council's Strategic Market Housing Assessment, including an up-to-date economic viability assessment, to take account of changes in the housing market
- Including policy options for the delivery of affordable housing
- Including a range of alternative policy options for the distribution of housing in the Spatial Options Report

Issue 12 - Delivering Appropriate Specialist Housing

10.36 The comments received were mainly directed towards:

- The need for additional specialist housing
- The need for partnership with Registered Social Landlords

ID	Summary of Responses Received
144	Wirral Partnership Homes should be seen as an active and valued partner in helping address these issues.
175	Needs for supported housing for people with mental health problems or learning difficulties is not mentioned.
570	There is a lack of suitable housing for the elderly and special needs categories in areas in which they have previously lived. Flexible housing stock including renewal of sheltered accommodation is vital for people to be able to stay in the communities in which they have lived. A McCarthy & Stone style sheltered scheme can provide company and security for around 30 elderly people who can then vacate their own homes for family low carbon living.

10.37 The Council has responded to these comments by:

- Including additional information in the Spatial Portrait
- Including policy options for the provision of affordable and specialist housing in the Spatial Options Report

Issues 13 - Maintaining a Continuous Supply of Deliverable Housing Sites

10.38 The comments received on Issue 13 were mainly directed towards:

- The viability of delivering the required level of housing within the Growth Point, the Newheartlands Pathfinder and the existing urban area
- The impact of the Council's existing restrictions on housing development
- The need for additional housing in rural areas
- The need to take account of the impact of the current economic climate

ID	Summary of Responses Received
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44	<p>Government household projections to 2031 show an increase of 14,000 households or 500 per annum in the Wirral. The Local Development Framework should, therefore, be planning for at least 14,000 new homes to 2031. Regional Spatial Strategy figures should be considered as an absolute minimum, to respond to the household projections; Growth Point status; and non-delivery of commitments. National Housing and Planning Advisory Unit have now recommended an increased delivery of between 16% and 26% above the current Regional Spatial Strategy. It is not clear whether the figure of 400 dwellings pa within the Growth Point is net or gross or takes account of demolitions. Despite being private sector led, the delivery of such high levels of residential development within the Growth Point is questionable and will require significant public sector investment. The development must be viable and in the current financial climate. As no figures have been published, the viability of the delivery rate proposed must be questioned. Provision needs to be made for sites that may not come forward for development, as well as for reductions in the housing stock through demolitions. Representations on the deliverability of committed sites will follow the publication of the Strategic Housing Land Availability Assessment.</p>
53	<p>The Local Development Framework should plan for at least 600 new homes per annum, between 2003 and 2031 in light of the Growth Point Status. There is clear statistical and policy justification for an upward trend in housing delivery. The review of the Regional Spatial Strategy is expected to significantly increase the current requirement of 500. The delivery of the urban regeneration sites is questionable. There will be a need to release greenfield and Green Belt sites to meet Regional Spatial Strategy requirements.</p>
92	<p>The Growth Point has been accepted by the Government. The additional growth is not yet part of the formal Development Plan. The additional growth to 2016/17 needs to be embedded in the Local Development Framework. The Programme of Development has already shown how the Growth Point will complement Housing Market Renewal. The Council must continue to reiterate this complementary relationship in the Core Strategy.</p>
125	<p>It is questionable whether the Mersey Heartlands and the regeneration of the inner areas on the eastern side of the Borough will deliver the level of new homes required by the Regional Spatial Strategy. A realistic approach should be taken towards the identification and delivery of sites for new homes. The poor state of the apartment market is likely to continue well into the plan period and will impact on densities, placing greater pressure to identify additional land for lower density developments. Lower residential values will also impact on development viability discouraging land owners from releasing previously development land sites, harming the delivery of new homes. There is a need to meet local needs, including affordable homes, outside the regeneration priority areas and the delivery of infrastructure and the availability of public funding for regeneration will need to be considered.</p>

	<p>The Core Strategy should consider the potential for settlement extensions to accommodate sustainable communities. the delivery of infrastructure within the regeneration areas will be an important consideration and the availability of public funding will need to be considered.</p>
225	<p>The need for environmental quality should be included as a lead in to the delivery of green infrastructure integrated within the regeneration aspirations of the Borough. The issue of whether a review of Wirral's Green Belt is needed to meet the Regional Spatial Strategy housing figures and the recommendations of the Strategic Housing Land Availability Assessment should be included. There may be a need to review the Green Belt in later stages of the plan period.</p>
297	<p>Maintaining a continuous supply of deliverable housing sites to meet the new housing requirements set out in the Regional Spatial Strategy is a key challenge for the Core Strategy. It is important to reiterate that the new parameter for new housing land is deliverability. There will be a need to test delivery within the proposed Growth Point and to consider alternative strategies should delivery fall below expected levels. There is not sufficient emphasis on development in the south east of the Borough and edge of Green Belt sites should be considered, if they are sustainable, available, achievable and more deliverable than brownfield sites constrained by ground problems. An example is land on the edge of the Green Belt at Eastham, close to the A41/M53 Motorway junction, which would be a logical extension to the built up area, accessed from Clifton Avenue and its junction with Kingsley Avenue. The site is highly sustainable, close to town centre, services and facilities, with good accessibility to public transport, the highway network and Eastham Rake train station. The hard edge of the M53 Motorway would provide a more defined boundary between the Green Belt and the urban area. The search for suitable RSS Policy LCR3 sites to meet the delivery of higher housing numbers should consider this type of Green Belt site, which could be released through an appropriate phasing policy.</p>
336	<p>While bold and ambitious plans for significant regeneration projects at Wirral Waters and other major sites are commendable it is important that the Council secures better quality housing particularly within the east of the Borough which will be attractive to families and does not over-rely on very high density development to secure regeneration objectives.</p>
371	<p>The supply of new housing in rural areas should not solely be directed towards local service centres. Increased provision within other villages is also vital to enhance and maintain the sustainability of these settlements. Local Planning Authorities are directed to consider the expansion of existing settlements when considering options for accommodating new housing in rural villages. National policy indicates that land should be made available within or adjoining</p>

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	existing villages to meet the needs of local people. These issues should not be ignored just because the settlements affected fall within the Green Belt.
401	Alternative strategies must be considered should delivery levels fall below expected levels. Question whether the delivery of new housing concentrated within regeneration priority areas alone will provide sufficient range of land and quality of site in time to meet the delivery targets year upon year.
421	The section on Wirral Waters indicates the delivery of up to 25,000 new dwellings. It will be important that development of this scale is phased so that heritage protection and enhancement objectives are met throughout the development process at appropriate stages.
423	The emphasis on redeveloping the Mersey Seaboard part of Wirral to bring new life into these districts is fully supported but when the moratorium covering most of Wirral was introduced, the UK was experiencing the beginning of a property boom which, in particular, attracted developers and investors, who chose inner city areas where the land was relatively cheap and with a buoyant rental market investors could receive a satisfactory return. This boom fuelled the redevelopment of many sites in the Pathfinder Area but the boom has now bust. New housing starts are at record low levels and many schemes in our pathfinder area are having to be mothballed or cancelled due to the current economic climate. Some of the long term effects of this will be very low levels of new housing starts for Wirral, probably followed in a few years by higher than average house prices as the shortage of quality new homes becomes apparent. At a time of unprecedented cuts in the numbers of new houses being built, one way of alleviating this would be to take the brakes off the housing moratorium in other parts of the Wirral. The current moratorium preventing residential development throughout most of Wirral has now run its course and its continuation will have serious detrimental effects on the Borough. The unprecedented collapse of new housing starts has led to considerable distress for builders, trades people and professional firms who cannot find work. The release of the moratorium would allow employment prospects to brighten considerably in the building professions. The residential housing stock, residential areas and urban centres is deteriorating over time. Whilst housing can be repaired and refurbished many times in its lifetime, some properties because they are either too big or too small or badly built or in the wrong place need to be redeveloped. One for one replacement is sometimes not economically viable. It is more sensible to achieve the maximum density within a properly thought out planning scheme. The moratorium can cause blight, even in more prosperous areas. A reduction in the choice of quality new housing is reducing the attractiveness of the Borough to executives bringing new investment leading to reduced Council tax receipts and reduced income to local services and businesses.

10.39 The Council has responded to these comments by:

- Including additional background information and statistics within the Spatial Portrait and the policy options for housing
- Including a target of at least 600 additional dwellings each year within each of the the Broad Spatial Options
- Including a range of alternative policy options for the distribution of housing within the Spatial Options Report
- Undertaking a Strategic Housing Land Availability Assessment to assess the capacity of the existing urban areas
- Undertaking an update to the Borough's Strategic Housing Needs Assessment to take account of changes in the housing market

Issue 14 - Maximising the Use of Previously Developed Land

10.40 The comments on Issue 14 were mainly directed towards:

- The need to assess the capacity of previously developed land within the urban area
- The need to protect local distinctiveness and green infrastructure
- The need to consider wider sustainability issues

ID	Summary of Responses Received
52	Wirral cannot meet its housing requirements solely on previously developed land. The Council are advocating the majority of development within the Growth Point/Newheartlands. We do not question the principle of urban regeneration but question the predetermined view that the Green Belt boundary is to remain. Policy L4 of the RSS sets a target of 80% of housing to be built on previously developed land. Even if this was achieved, 20% would be on greenfield land. Applying a requirement of 14,000 over the plan period would equate to 2,800 homes, which in our view would require the release of Green Belt sites. The need for Green Belt release should not be pre-judged at this early stage and should be one of a range of options for future consultation.
76	There is a need to protect traditional housing areas of character from flats and other inappropriate and poorly designed buildings. Flat developments that destroy the traditional streetscape of areas such as west Wirral, Oxton, Bebington and similar areas should be restrained. There is also concern that housing development is being pursued at the expense of employment reinforcing the trend for external employment outside Wirral. Housing should not be allowed to intrude on the Green Belt.
226	Agree the re-use of land is essential for sustainable economic regeneration and renaissance and reflects the importance of adequately dealing with contamination issues as a barrier to development.

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247	Supported in principle, as existing utility infrastructure is likely to be available. It is still important to consult utility providers on major planning applications (more than 10 properties) as the capacity which served un-occupied or demolished sites may have been used for other development.
308	Brownfield sites can make a valuable contribution to biodiversity. The protection, conservation and enhancement of biodiversity should be included alongside local character and heritage.
370	Sustainability issues need to be considered alongside the use of previously developed land for housing. Some brownfield sites are not developable because of their availability, previous use, surrounding amenity, proximity to other uses, contamination and flooding etc. Alternative sustainable sites in rural areas should be considered instead.
403	Support the maximum use of previously developed land but areas outside established housing areas should also be considered. Some tourism sites may benefit from a small element of residential use to bolster demand, contribute to previously developed land targets and improve the viability of tourism redevelopment schemes.
416	Support the maximum use of previously developed land but the potential of areas outside established housing areas should also be considered. Some employment sites may benefit from a small element of residential use to bolster demand and contribute to previously developed land targets.
422	The pressures facing areas of older housing and the potential for loss of character and harm to heritage will need to be addressed.
426	The current Green Belt; sports fields, parks and urban green spaces should be preserved. Development in conservation areas should be controlled, although the replacement of inappropriate buildings should be considered on merit. Over development, such as apartments away from shopping areas, should be restricted.
455	The protection of local character and heritage are important local priorities and the protection of local distinctiveness is a major issue for Wirral people.
569	There is no reason why the character of the western two-thirds of Wirral should change if the planning process is properly controlled.
580	It is important to note that whilst PPS3 encourages development on previously developed land it also allows greenfield sites. On the grounds that the RSS housing requirements are no longer regarded as a ceiling and the numbers to achieved in the RSS are only a minimum, if greenfield sites are available and are deliverable and supported by RSS Policy LCR3, they should also be considered for development, provided that the mix of housing will not harm the objectives of Housing Market Renewal.

10.41 The Council has responded to these comments by:

- Including additional information on vacant urban land within the Spatial Portrait
- Including a Spatial Objective for Vacant Urban Land
- Including a range of alternative policy options for the location and type of land to be identified for development within the Spatial Options Report
- Undertaking a Strategic Housing Land Availability Assessment to assess the capacity of the existing urban areas
- Placing a greater emphasis on local distinctiveness throughout the Spatial Options Report
- Including policy options for the control of design and the protection of green infrastructure

Issue 15 - Securing Sustainable Design and Construction

10.42 The comments received on issue 15 were mainly directed towards:

- The need for accelerated progress
- The regional policy framework
- The need for improvements within the existing housing stock

ID	Summary of Responses Received
79	Strongly supported but the pace is too slow and the levers used too weak. Wirral should aim to be a front runner in this area but this is not clear from the commentary.
113	RSS policies EM5, EM15, EM16 and EM18 establish a framework for sustainable design and construction, including water management, energy efficiency and the use of decentralised, renewable or low carbon energy. It is important to ensure that new development incorporates sustainable design measures, for example, by setting of targets for the amount of energy to come from decentralised and renewable or low carbon energy sources. The Sustainable Energy Strategy for the region reinforces the relevant policies from RSS and offers practical advice and information on taking these issues forward.
117	Issue 15 is too light. A stronger emphasis needs to be placed on ensuring that new buildings are of the most sustainable design and construction possible. On average, Wirral uses around 150 litres of water a day per person. Ten years ago, this was 136 litres. Across the NW, this is equivalent to 68 million more litres of water being used every day. Design should ensure facilities to segregate/store recyclable/re-usable wastes, use secondary aggregates and sustainable/recycled products alongside Issue 28.
176	There is a need to improve the existing housing stock as a significant proportion of the total energy consumption in the lifetime of a house is the energy "sunk" in construction materials.

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227	Needs to be more visionary for both housing and employment uses, in line with national zero carbon and Code for Sustainable Home targets.
309	This should include support for the use of sustainable drainage, reclaimed materials, low carbon technologies and micro renewables.
430	The life of the average house is 100 years. Over a 20 year period one could assume a 20% churn of the housing stock. New housing is far more energy efficient and over time should lead to substantially reduced carbon emissions.
568	Little contribution is being made to reducing carbon emissions on housing.

10.43 The Council has responded to these comments by:

- Including a Strategic Objective for Climate Change
- Including policy options for sustainable design and construction
- Including policy options for the delivery of renewable, decentralised and low carbon energy

Building Sustainable Communities

10.44 The following general comment was received on the section titled Building Sustainable Communities:

ID	Summary of Responses Received
182	"Building Sustainable Communities" is a dangerous and misleading title for Objectives 13 to 15. The whole document should have this objective. "Building Fairer Communities" would be more appropriate as it would be quite possible to achieve these objectives in a quite unsustainable manner.

10.45 The Council has responded to this comment by including a Strategic Objective for Social Inclusion in the Spatial Options Report.

Issue 16 - Creating Sustainable Communities through Housing Market Renewal

10.46 The comments received on Issue 16 were mainly directed towards:

- The need for sustainable communities within the rural areas
- The need for environmental quality and green infrastructure

10.47 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
148	Local Planning Authorities must promote development which creates socially inclusive communities by including a suitable mix of development. The Council should plan for growth within existing rural settlements such as Raby,

	Thornton Hough, Brimstage, Storeton and Barnston to sustain existing local services and create extra demand for additional services, to lead to a socially cohesive community, in line with PPS1.
177	Housing renewal does not create sustainable communities; "contributing" would be better.
228	Environmental quality should be included under this issue as a lead into delivery of green infrastructure integrated within the regeneration aspirations of the Borough.
431	Reference should be made to access to sport and recreation facilities. The protection, enhancement and provision of informal and formal facilities is a fundamental part of delivering sustainable communities and will make an important contribution to securing other aspirations such as a health improvement.

10.48 The Council has responded to these comments by:

- Including additional information within the Spatial Portrait
- Including an option for increasing provision within the rural areas within the Broad Spatial Options
- Including areas of likely shortfall in policy options for green infrastructure

10.49 No comment was submitted on Issue 17 - Tackling Nationally Significant Deprivation

Issue 18 - Reducing Health Inequalities

10.50 The comments received on issue 18 were mainly directed towards:

- The need for wider measures to address health issues
- The link between health and green infrastructure
- The importance of local health facilities
- The importance of ongoing discussions with the local Primary Care Trust

ID	Summary of Responses Received
277	The measures addressed are too limited. Access to quality open spaces and the wider countryside are important considerations. Improving access, enhancing quality and initiatives with PCTs to promote walking groups are also appropriate responses.
310	Built infrastructure is only one way of encouraging more healthy lifestyles. The role of green infrastructure, green spaces and access to the countryside provide opportunities to facilitate healthy lifestyles.

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458	People need facilities near their own communities not super-clinics to which they have to travel further and which take up Green Belt land.
557	While we recognise the limitations of a spatial land-use plan, the role of quality urban greenspace in improving mental and physical health should be recognised and the plan should ensure that sufficient is provided when development opportunities occur. This includes the need for a proportion of naturalistic habitats, which are particularly beneficial to mental health.
566	Pleased that the importance of health issues is recognised. Talks with the PCT to discuss future development plans will be an important aspect.
582	Disagree that "the scope for a spatial land-use plan to directly change personal lifestyle choices is limited". Spatial land-use planning has everything to do with creating an accessible, pleasant outdoor environment. Parks, footpaths, cycleways, and allotments, promote exercise, healthy eating and social interaction. It is crucial that local people can access adequate and affordable sports and leisure facilities within a reasonable distance of where they live or work.

10.51 The Council has responded to these comments by:

- Including additional information on areas of greatest need within the Spatial Portrait
- Including walking and cycling in the Strategic Objective for Transport Accessibility
- Linking the impact on health with the policy options for green infrastructure in the Spatial Options Report
- Including the need for any new facilities within the schedule of infrastructure requirements to be published alongside the Preferred Options Report

Issue 19 - Addressing Inequalities in Skills, Education, Training and Life Chances

10.52 The comments received in issue 19 were mainly directed towards:

- The economic issues
- Location and proximity to the people

ID	Summary of Responses Received
359	Could be treated as an economic issue.
459	Proximity to people is important to encourage good attendance and a sense of local belonging.

10.53 The Council has responded to these comments by identifying the areas of greatest need within the Spatial Portrait.

Issue 20 - Reducing Crime and Anti-Social Behaviour

10.54 The comments received were mainly directed towards:

- Controlling the growth of bars and restaurants in town centres
- Reducing the opportunity for crime and anti-social behaviour

ID	Summary of Responses Received
80	In Hoylake, the uncontrolled expansion of bars, cafes, restaurants and off licenses focusing retail activities on excessive consumption of alcohol, affects the whole safe, comfortable and attractive environment of the town centres and its residents. Means to control these trends are needed.
141	Initiatives to reduce the opportunity for crime/anti-social behaviour as part of refurbishment/replacement schemes should also be included.
257	Agreed but wording seems too complacent.

10.55 The Council has responded to these comments by:

- Including additional information on the issues relevant to each of the Borough's existing centres in the Spatial Portrait
- Including policy options for better design to include crime prevention

An Accessible Borough

Issue 21 - Reducing Dependency on the Private Car

10.56 The comments received on Issue 21 were mainly directed towards:

- The importance of accessibility to a wide range of local services and facilities
- The need to promote more sustainable transport choices
- The capacity of the M53 Motorway

10.57 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
1	A key issue in Wirral. Despite good options for travel into Liverpool, there remains much car commuting. This must be a matter of education as well as raising the quality of public transport and development of lines such as the Bidston - Wrexham line, with park and ride at Bidston and Woodchurch. The construction of new main or link roads should be avoided. The school run should be included with policies and measures to contain it and improve the health of children.

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104	Addresses RSS Policies DP5 and RT2. Sustainable modes should be promoted to address Policy RT9. The location of new development in line with Policies DP2 and DP3 and enhancing existing public transport infrastructure, such as the Borderlands railway in line with Policy DP4 can also help to reduce private car travel.
178	The need to increase the availability of park & ride and the upgrading of the Bidston-Wrexham line should be included.
184	The implications of development for the current and future capacity of the M53 Motorway should be included. An Integrated Transport Study is currently being undertaken for Cheshire West and Chester Council which will include work relating to the M53 Motorway and involve the Highways Agency.
229	Low levels of walking and cycling should be linked to health and the Green Infrastructure agenda. Wirral is extremely well placed in terms of recreational infrastructure, such as coastal paths, cycleways and the Wirral Way.
258	The Bidston-Wrexham railway is the vision of a small group of enthusiasts. Merseytravel and the Welsh Assembly Government seem no nearer to any immediate agreement as to funding for improving that route.
311	Establishing a sustainable transport network is supported. Routes to leisure and recreation opportunities should be included as well as to employment areas.
360	Should expressed more positively as "Improving and promoting sustainable transport".
384	Ensuring accessibility to services will improve the viability of the Borough and create socially inclusive communities. Specific reference should be made to retail provision, with a focus on the need for a network of viable, well served local centres to provide easily accessible shopping to meet people's day-to-day needs, to assist in reducing dependency on the private car. Weekly bulk food shopping can contribute to this process by reducing the overall number of convenience goods shopping trips and the need to depend on the private car to transport goods home should be considered in line with PPS6.

10.58 The Council has responded to these comments by:

- Including additional information within the Spatial Portrait
- Including a Strategic Objective for Transport Accessibility within the Spatial Options Report
- Increasing the emphasis on transport accessibility throughout the Spatial Options Report
- Beginning to prepare a schedule of infrastructure requirements to be published alongside the Preferred Options Report

Issue 22 - Minimising the Environmental Impact of Transport

10.59 The comments received on Issue 22 were mainly directed towards:

- The impact of traffic and congestion especially on town centres
- The need for improvements to rail services and park and ride

ID	Summary of Responses Received
82	Journey times are rising and examples of serious delay and congestion are increasing - challenging policies are needed to maintain free flow on the road network. The issue of congestion charging needs to be considered. Also needs to address the impact of traffic on town centres in terms of noise, severance, car parking and poor environment. Measures to improve town centre environment and the comfort of pedestrians should be prioritised.
105	That future development, along key corridors such as the A41, could lead to air quality issues shows an awareness of RSS Policies DP7 and DP9. Reference to the Airport addresses RSS Policy RT5.
179	The need to increase the availability of park & ride and upgrade the Bidston-Wrexham line is not mentioned.
259	Congestion management needs grasping sooner rather than later. The issues around Sainsbury's Prenton and local residential parking etc are of some real concern. The number of traffic lights and their time settings (especially at the junctions by Holmlands shops and the Swan) are seriously delaying journey times.

10.60 The Council has responded to these comments by

- Including additional information within the Spatial Portrait
- Including a reference to the need for a transport strategy to manage the impact of traffic and congestion on Birkenhead Town Centre
- Increasing the emphasis on transport accessibility throughout the Spatial Options Report
- Including a Strategic Objective for Public Safety

Issue 23 - Supporting the Port and Maritime Issues

10.61 The comments received were mainly directed towards:

- Importance of the ports in the local and regional context
- The production of a Port Master Plan
- The reuse of land within the Dock Estates
- The impact of the ports on local communities
- The role of renewable and low carbon energy

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ID	Summary of Responses Received
93	Supports the aspiration for more sustainable transport through the ports and the potential for new/improved facilities at Eastham. The wording as implies a Port Masterplan is mandatory. Lack of reference to the port operator could be interpreted as meaning the Council will be undertaking the Port Masterplan. This is not the case and decisions on if and when to proceed, and on what basis, will be made by Peel Ports.
106	The importance of Wirral's ports to the local and regional economy and the need for adequate road and rail access and a Port Masterplan addresses RSS Policy RT6.
127	Industrial development at Eastham appears to contradict Issue 24. Does the natural beauty of the coastline not apply to Eastham? The Eastham coastline is being harmed. Confused as to why UDP Policy EM10 was withdrawn. A "buffer zone" (of 600m+) should be retained between industrial development and Eastham residents and existing industries, such as the dangerous chemical storage tanks at Nustar Site 2 in case of any incidents at these sites as there have been a number of incidents involving evacuation of staff and decontamination at local hospitals. Peel Holdings appear to have overall development permission without consultation or detailed plans. They have had no dialogue with residents of Eastham. They are encouraging unpleasant obnoxious developments to come to Eastham such as Biossence and Agri Energy. Moving the docks from Ellesmere Port to Eastham can only lead to a further deterioration in air quality and health. Eastham Village, a Conservation Area with a number of Listed Buildings, the waterfront and Eastham Country Park are visitor attractions that should not be blighted by more industries.
231	The importance of the port and maritime industries go beyond the aspirations of Peel. Meeting the UK's energy needs through low carbon wind and tidal energy is likely to be a significant economic driver for the port and maritime sector, as well making a substantial contribution to energy security. The future development of offshore oil and gas is also important in the UK Offshore Energy Strategy. These matters need greater prominence in the Core Strategy and have potential to deliver major benefits to Wirral.
361	Strongly supported. The importance extends beyond accessibility. This issue should be included in the economic section.
417	The future of the docks must be viable, taking full account of any cost implications and competition. The role of alternative uses in such areas should not be ignored. The success of Wirral Waters should not prevent the redevelopment of potentially suitable and complementary alternative sites for a range of uses, including housing, to the benefit of the wider area.

10.62 The Council has responded to these comments by:

- Including additional information within the Spatial Portrait
- Including a Spatial Objective for Public Safety
- Referring to the importance of the ports in the Broad Spatial Options
- Including policy options for the delivery of renewable, decentralised and low carbon energy

Environmental Quality and Protection

Issue 24 - Safeguarding and Enhancing the Natural Environment

10.63 The comments received on Issue 24 were mainly directed towards:

- The availability of resources to maintain key assets
- The potential for further beneficial improvements
- The importance of local Friends Groups
- The importance of green infrastructure and biodiversity

10.64 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
83	Strongly supported but there has been a lack of initiative and funding in developing the potential of the coast, countryside, biodiversity and natural beauty. Thurstaston Visitor Centre has not been redeveloped, there is still no Hilbre/coastal Interpretation Centre in West Kirby, funding of parks and open spaces has been severely cut over many years and there is a lack of vision and initiative in developing these natural assets as a whole. The Dee RAMSAR site, Hilbre, the coastal strip and inland areas that provide refuge for animals, plants and bird life especially at high tides could be developed into a beacon of excellence, major tourism assets and a commercial eco-enterprise, as other local authorities are doing. The statement about "provision, protection and enhancement" is very welcome and should extend to the Carr Fields/Birket Valley area which needs surveying to establish the current biodiversity population and the potential for eco-development and the protection of nature.
108	There is a need to ensure that growth has a limited impact on biodiversity and green areas, including open space and Green Belt, through a more integrated approach to delivering a better environment within the Borough. RSS policies DP1, DP7, EM1 and EM3 would lend further support.
128	Wirral Country Park and Wirral Way, a significant area of natural habitat used annually by an estimated 250,000 visitors including the local population, had suffered 30 years of neglect until the formation of a Friends Group when a small group of volunteers working with Park Rangers and a small but significant number of Council Managers and Employees began raising funds and embarking on cleaning up the track, reducing overgrowth, strategic tree felling and clearing debris, so successfully that Wirral Country Park was

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	granted a Green Flag in 2008. All this work and effort has led to a considerable number of people undertaking good healthy exercise in clean maintained outdoor locations, off road and involving minimal road traffic. This sort of initiative should feature highly the Council's agenda, yet hardly gets a mention.
224	Needs to refer to the Habitats Regulations Assessment process as one of the mechanisms for mitigating impacts on European sites as a consequence of the Core Strategy.
232	It would be prudent to state that "The Council has a legal duty to ensure that the European nature conservation sites are not subject to adverse effects through the exercise of any of its functions including planning" rather than a general duty of conservation and enhancement. Green Infrastructure and Ecological Frameworks must be viewed in an integrated way. Many of the designated sites on Wirral form essential elements of Green Infrastructure and provide the "green, blue and brown-print" upon which a Green Infrastructure approach could be adopted.
312	The text concentrates mainly on biodiversity. Landscape character and quality and geodiversity should be included. Reference to sites that provide recreation opportunities for existing communities are welcome but there may be a need to improve accessibility to enhance opportunities for enjoyment. The role of green infrastructure should be included.
373	Without substantial capital input and rationalisation, the Wirral Leverhulme Estate is likely to move towards extensive arable production. Current boundaries and field sizes lend themselves to dairy farming. Profitable farming is vital to maintain the landscape as part of farming's contribution to Wirral. The single ownership of the Estate offers an opportunity to secure environmental improvements and maximise beneficial use of land, including public access and sport/recreation facilities. Tree planting could contribute to reducing carbon footprints, enhance the sustainability of rural development and add to the amenity of the area.
456	'Protection of local character and heritage' are important 'local priorities' and the protection of local distinctiveness is a major issue for Wirral people.
473	Biodiversity is a core component of sustainable development, underpinning economic development and prosperity, and has an important role to play in developing locally distinctive and sustainable communities. Local authorities now have a legal duty to have regard to the conservation of biodiversity. We would expect to see a reference to it in all relevant planning documents. Guidance is available in the DEFRA Guidance for Local Authorities in Implementing the Biodiversity Duty.

558	Support the paragraphs on safeguarding and enhancing the natural environment. Around a third of designated sites including SSSI and SBI are owned or managed by Wirral MBC, including the SSSIs at Dibbinsdale, Heswall Dales and large stretches of the coast. Funding for the care of these is a constant problem.
561	The protection of the Green Belt has been successful but Wirral has failed to promote and fund green activities such as wildlife, walking, coastal visits and prize assets such as Hilbre Island and has failed to pursue measures to develop the Green Belt for agriculture, allotments, wildlife, walking and other true rural activities. A centre of excellence for agriculture, community allotments and wildlife / natural studies should be progressed for the Birket Valley between West Kirby and Hoylake. The Merseyside Rural Study is welcomed as a means to pursue this.

10.65 The Council has responded to these comments by:

- Including additional information within the Spatial Portrait
- Including policy options for green infrastructure and developer contributions within the Spatial Options Report
- Increasing the emphasis on local distinctiveness throughout the Spatial Options Report

Issues 25 - Protecting and Enhancing the Urban Environment

10.66 The comments received on Issue 25 were mainly directed towards:

- Importance of green infrastructure for social cohesion, health and wildlife
- The need to maintain local distinctiveness

ID	Summary of Responses Received
84	Recognition of the importance of green infrastructure is welcomed but the greening of towns including streets, parks, open spaces and allotments, is neglected, under funded and given low priority. Areas such as the Carr Fields/Birket Valley have great potential for careful development on green, biodiversity and wildlife themes to allow better access for people, a more balanced habitat for wildlife and the chance to stimulate eco-tourism and jobs.
109	Growth should have a positive impact on protecting, conserving and enhancing the historic assets of the Borough. The inclusion of a fully established network of urban green infrastructure is welcome but must continued throughout the future preparation of the Strategy. The Green Infrastructure Guide for the North West provides a detailed definition of green infrastructure, in line with RSS Policy EM3 and offers broad advice on how

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	to plan and enhance green networks. Consideration will need to be given to the Borough's two Regional Parks - the Mersey Waterfront and the North West Coastal Trail in line with RSS Policy EM4.
180	There is a need to recognise the predominantly low rise nature of the Wirral skyline. Developments like Wirral Waters, whilst potentially beneficial in regeneration terms could be visually overwhelming. If they have to happen, they should not be allowed to stray up river towards Hamilton Square and the Woodside Ferry. The continued and appropriate use of locally important buildings (e.g. Town Hall, Pacific Road, Central Library) needs to be ensured to contribute to the quality of life of Wirral residents.
234	This section should be stronger. Green Infrastructure presents major opportunities for social cohesion, health and well being and is an important mechanism to mitigate and adapt to climate change. There is a clear role for the provision of Green Infrastructure alongside urban regeneration.
274	There should be explicit recognition of the Borough's archaeological resources.
278	Issue 25 does not address heritage issues in rural areas and does not demonstrate an integrated approach to sustainable development. The approach should not balance regeneration against safeguarding local distinctiveness or securing environmental improvements but pursue an integrated approach that achieves both.
313	Support the promotion of local character, quality and distinctiveness throughout the Borough not just in areas of special environmental quality. Pleased to see green infrastructure included in urban areas as well as rural. Text should also recognise that biodiversity exists in urban and rural areas.
362	Underplays the need to protect and enhance the built environment.
424	Should be re-titled Protecting and Enhancing the Historic Environment, both rural and urban to cover designated assets and everyday surroundings. The challenge is to integrate protection and enhancement of the Borough's historic environment with economic development and housing growth through the promotion of heritage led regeneration. The Core Strategy will need to set out how the historic environment will be managed.
460	Local consultation is very important e.g. at Area Forum meetings.
559	These points are supported. Agrees that the "role of greenspace as part of green infrastructure has yet to be fully recognised". There is a great need to designate corridors, better manage existing greenspace and create habitat. Road verges in Wirral are unfortunately of low value to wildlife. The only significant site is the roundabout at M53 J5, on which it was impossible to get suitable management.

578	Concern at the likely deleterious impact of the implementation of the Council's Strategic Asset Review on local communities and on Wirral's heritage buildings.
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10.67 The Council has responded to comments by:

- Including additional information within the Spatial Portrait
- Including policy options for green infrastructure within the Spatial Options Report
- Including policy options for design within the Spatial Options Report
- Including a greater emphasis on local distinctiveness throughout the Spatial Options Report

Issues 26 - Adapting to Climate Change

10.68 The comments received on Issue 26 were mainly directed towards:

- The need to strengthen measures to address Climate Change
- The need for Climate Change to be a cross-cutting theme throughout the Core Strategy
- Concerns about Peak Oil
- Carbon reduction and energy security

ID	Summary of Responses Received
85	This section is disappointing, lacks recognition of the threats of climate change and offers no action. A higher degree of urgency needs to be introduced.
94	Reference should be made to the Mersey Tidal Power (MTP) opportunity, which could place Wirral at the forefront of energy technology and transform the Borough's ability to secure future energy needs from renewable sources. Peel Energy intend to deliver this project before the end of the Core Strategy period. A feasibility study supported by NWDA will identify a preferred scheme to take forward to planning by the end of 2011. The largest scheme has the potential to supply enough energy to meet the average needs of 260,000 homes. We would encourage a broad and long term perspective for energy projects, to set the Borough on a path to achieve the longer term target of 80% carbon reduction by 2050 as well as shorter term targets that account for cumulative requirements arising from the Carbon Reduction Commitment, RSS renewable energy targets, BREEAM building standards and emerging Zero Carbon Homes policies. This will require consideration of all renewable and low carbon technologies including wind, biomass, tidal, carbon capture and storage of a scale ranging from a few kilowatts to several hundred megawatts.

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110	New development should integrate features of sustainable design such as Sustainable Urban Drainage Systems (SUDs) and the use of Green Infrastructure to tackle and adapt to climate change effects in line with RSS policies DP9 and EM5.
235	Climate change is a big issue for Wirral in terms of its low lying and coastal location and needs greater prominence within the document. Maximising the opportunity for energy security through the generation of low carbon energy including combined heat and power should go beyond micro-generation and should discuss some of the major opportunities that might be realised within the lifetime of the Core Strategy in terms of offshore wind, tidal power, biomass and energy from waste. The energy conservation agenda also needs to be referred to.
279	Climate change should be a cross-cutting theme rather than a separate issue. This should not just include adaptation but also the approach to reducing emissions. Issues raised under each of the separate headings should be drawn together as part of an overall approach to addressing climate change.
314	This is a key priority, which should be expanded beyond renewable energy.
363	Should include mitigation. Should be treated as a cross-cutting theme, rather than an environmental issue. Encouraging renewable and low carbon energy supplies should be identified as separate issues, rather than being subsumed within the wider climate change agenda.
560	This should be the major over-arching issue for the whole plan. A major omission is any mention of Peak Oil and the effects of permanently raised oil and gas prices, which has relevance to many issues including reducing the need to travel, local food production, sustainable jobs and local services etc.

10.69 The Council has responded to the issues raised by:

- Including additional information within the Spatial Portrait
- Including a Spatial Objective for Climate Change
- Including policy options relating to the delivery of renewable, decentralised and low carbon energy
- Including policy options relating to sustainable design and construction
- Including a greater emphasis on accessibility throughout the Spatial Options Report

Issue 27 - Controlling Flood Risk

10.70 The comments received on Issue 27 were mainly directed towards:

- Controlling development in flood risk areas

- Promoting sustainable drainage systems in new developments
- Incorporating the findings of the Strategic Flood Risk Assessment

ID	Summary of Responses Received
86	Needs to prevent new development in locations that will be exposed to flooding risks in accordance with Environment Agency guidelines.
111	New development should be located in areas where flood risk is low and include measures to minimise the risk of flooding. The Core Strategy must take account of the actual calculated risk of flooding and levels of mitigation when deciding where development should and should not take place. Sequential tests / Strategic Flood Risk Assessments (SFRA) should highlight areas of flooding and the potential levels of risk in terms of probability analysis. Development should be guided by a technical support document and the SFRA.
118	New development should only be considered in locations where it can be demonstrated that the risk of flooding is considered acceptable in accordance with PPS25. The wording should be amended to include the acceptability of the development itself in terms of flood risk. Measures to reduce run-off including sustainable urban drainage systems are welcome.
248	Some properties are at risk of foul flooding from public sewers. The control of surface water is also important in reducing flood risk. It is important to consult infrastructure providers on major planning applications (more than 10 properties).
315	Welcomed. SUDS may also be used to conserve and enhance biodiversity and landscape character and quality.
461	Agreed.
576	This needs to be driven by the review of the Shoreline Management Plan and the results of the SFRA to demonstrate conformity with the evidence base.

10.71 The Council has responded to these comments by:

- Including additional information within the Spatial Portrait
- Including flood risk in the Strategic Objective for Climate Change
- Including flood risk as an overriding issue within each of the Broad Spatial Options
- Including policy options for the promotion of sustainable design and construction

Issue 28 - Sustainable Waste management

10.72 The comments received on Issue 28 were mainly directed towards:

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- The promotion of sustainable waste management
- The emerging Joint Merseyside Waste Development Plan Document

ID	Summary of Responses Received
95	Increasing the amount of waste that is recycled and diverted from landfill is supported. The Core Strategy and Joint Waste DPD will need to be complementary to ensure key objectives can be achieved.
119	Diverting waste from landfill may need the use of new technologies. The Joint Merseyside Waste DPD is looking at new technology and other facilities to be provided. RSS looks to Authorities to promote the minimisation of waste and maximise the use of recycled materials to manage waste higher up the hierarchy.
214	All major new regeneration activity must take account of and deliver sustainable waste management in line with PPS10. For major development this may include new facilities for sustainable waste management as an integral part of the scheme.
236	All new major development must demonstrate that it caters for sustainable waste management including provision of facilities. Residual disposal, addressed by the Waste DPD, needs to be mentioned. It should be clear that Wirral is collaborating with the other authorities to define a pattern of shared facilities which will manage wastes from across the Merseyside sub-region to balance the provision of waste infrastructure across all the partner authorities. The Core Strategy should take account of site allocations within the Waste DPD.

10.73 The Council has responded to these comments by:

- Including additional information within the Spatial Portrait
- Including policy options for the promotion of sustainable design and construction

Issue 29 - Control of Pollution and Hazards

10.74 The comments received on Issue 29 were mainly directed towards:

- Concerns over air and water quality
- Concerns over the location of a recycling facility

ID	Summary of Responses Received
112	Wirral should ensure that the borough supports sustainable development in terms of air pollution and energy issues. Access to jobs and services near homes will have a positive affect on climate change. RSS Policies DP2, DP4 and DP5 provide a framework for sustainable patterns of development.

120	Rivers on Wirral are categorised as having Poor or Bad Ecological Status/Potential, well below the Good Status/Potential required by the Water Framework Directive. Rivers on Wirral have a long history of poor quality and non compliance with their water quality objectives and European Directive requirements.
126	Air quality in Eastham is not measured despite the Chemical Storage Tanks and Eastham Refinery. The community appears to be carrying the burden of anything unpleasant and obnoxious with no protection.
237	A stronger commitment to a pro-active approach in tackling the stock of contaminated or potentially contaminated land is needed. The Water Framework Directive requires the achievement of Good ecological status rather than maintaining current status.
249	Preventing adverse effects on surface and ground waters is welcomed and is important to protect sources of drinking water.
462	Bromborough and Eastham residents do not want a recycling facility in their wards, are already anxious about the prospect and have enough 'risk' industries already.

10.75 The Council has responded to these comments by:

- Including additional information within the Spatial Portrait
- Including a Strategic Objective for Public Safety

Responses to Consultation Question 6

10.76 The responses to Consultation Question 6 - *Do you agree that the key issues, problems and challenges identified accurately reflect those facing the Borough? Are there any other issues which you think should be included?* - were mainly directed towards:

- The lack of a spatial approach to the identification of issues
- The need to prioritise the long list of issues identified
- The lack of options for dealing with the issues raised
- Pollution and hazards
- The need for additional infrastructure
- The supply and management of water resources
- The rural economy
- The evidence base
- The importance of Climate Change
- Provision for sport, recreation and culture
- The importance of transport and accessibility

10.77 A summary of each of the comments received is set out in the table below:

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ID	Summary of Responses Received
22	The indirect effects of increased water demand and air pollution have not been identified. The water supply issue is acute, given the conclusion of RSS that there will be a deficit of water supply on Merseyside after 2014.
27	In the absence of options for dealing with the issues identified, the City Council is not able to assess what impact the emerging Wirral Core Strategy may have on Liverpool. Further information is needed as options are developed. The City Council reserves the right to make further comments at subsequent stages, as further detail emerges.
29	A strong cultural sector is key to the development of a vibrant town centre. The Sustainable Community Strategy states that the Borough has a high quality cultural offer and the Core Strategy document states that there are a significant number of leisure and cultural facilities in both your urban and rural areas. We would therefore expect this topic to appear in one of the Issues, especially in Issue 10 to reflect PPS6. Cultural, leisure and tourism facilities that are likely to attract large numbers of visitors should in the first instance be clustered within the strategic and other town centres and should have good accessibility to the public transport network. Locally important cultural facilities should be protected and enhanced where they contribute to wider regeneration. However, Issue 10 barely mention facilities other than shops - it is a balanced leisure and shopping environment that provides vitality and viability to entertain and stimulate visitors, residents and local businesses with the surrounding areas being enlivened in the evening by the provision of local bars and restaurants outside normal working and shopping hours. The Trust requests that the document provides sufficient protection to ensure continued theatre use within the area, particularly where buildings for performance arts, may not be covered by listing or conservation area designations, or may be affected by proposals which come forward for development sites. This should include performing arts facilities that stand-alone, are part of other facilities, or are contained within educational or community buildings.
31	An additional issue should be added to relate to the provision of adequate infrastructure. Development proposed in Wirral will require additional electricity network infrastructure, which needs to be allowed for in emerging policy frameworks in line with RSS Policy EM16.
35	The Council should take steps to ensure that people who oppose future development live in the areas being developed. Companies will not invest in an area where constant objections are raised on no sound basis other than to cause delay, which will mean greater costs to the investor. The Council should look into the political stance and objectives of these groups.

121	<p>There should be a greater emphasis on the future management of water resources in terms of RSS housing provision for Wirral and the Mersey Heartlands Growth Point in line with RSS Policy EM5. Recommendations for managing water resources include: Reducing per capita consumption of water to an average of 130 litres per person per day by 2030 or possibly even 120 litres per person per day depending on new technological developments and innovation; Ensuring that all residential development proposals demonstrate compliance with the 2 star rating for water use in the Code for Sustainable Homes and preferably achieve 3 star rating or more; Water efficiency playing a prominent role in achieving a sustainable supply demand balance, with high standards of water efficiency in new homes and water-efficient products and technologies in existing buildings; Development should be located where there is spare capacity in the existing water supply and waste water treatment, sewer and strategic surface water mains capacity, insofar as this would be consistent with other planning objectives. Where this is not possible, development must be phased so that new infrastructure capacity can be provided without environmental harm; Requiring new development, including residential, commercial and transport development, to incorporate sustainable drainage systems and water conservation and efficiency measures to the highest contemporary standard; To achieve integrated water management and delivery of the EU Water Framework Directive, plans and strategies should have regard to River Basin Management Plans, Water Company Asset Management Plans, Catchment Flood Management Plans, and the Regional Flood Risk Appraisal. Not enough emphasis is placed on the enhancement of the coastline, countryside, biodiversity and controlled waters in line with RSS Policy EM1(B).</p>
130	<p>The competing priorities of preserving local distinctiveness, character, heritage and Green Belt must be considered against the need for additional homes and readily available land for modern businesses. The dynamic nature of modern business and the anticipated lifetime of the emerging LDF, requires flexibility in the use of employment land to allow appropriate D1 uses including places of worship close to residential areas, broadly expressed as a potential for 'mixed-uses' to harmonise with good practice acknowledged by the Government. A main priority should be to deliver mixed and sustainable communities, with housing developed in sustainable locations, with a range of community facilities, achieved via mixed-use development. An increased use of Section 106 agreements could afford opportunities to faith and other community groups to obtain land when housing developments are being planned.</p>
185	<p>A telecommunications policy must be included within the LDF. Telecommunications play a vital role in both the economic and social fabric of communities. PPG8 provides clear guidance. LDDs should set out criteria based policies to guide telecommunications development. Operational efficiency should not be inhibited. Criteria should be flexible enough to allow for the efficient development of the network and the demands imposed by</p>

	<p>the technology. A Code of Best Practice ensures that the industry is alive to the concerns of local communities and the need for consultation. A concise and flexible policy should be within a statutory LDD to give all stakeholders a clear indication of the issues that development will be assessed against. We would suggest a policy which reads: Proposals for telecommunications development will be permitted provided that the following criteria are met: (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority; (iv) if proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology. Background information on electromagnetic fields (EMF's) and public health should be contained within SPD. Alternatively the Core Strategy could state that modern telecommunications systems have grown rapidly in recent years with more than two thirds of the populations now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document..."</p>
188	<p>The Core Strategy evidence base is rather dated and is in need of a detailed review. The review should extend not only to the evidence base but also to the issues and challenges and the strategic objectives proposed. The broad scope of the Core Strategy means that policy and legislation on some matters will have moved on since the initial scoping exercise in 2006/7. The currency of the evidence base and the conclusions (objectives) drawn from it is an issue. The publication of the Climate Change supplement to PPS1, and other policies which have evolved with regard to renewable energy and energy security does not seem to have filtered through to inform this document. The document fails to present a logical and systematic approach to the identification and prioritisation of issues. Whilst it is stated that the spatial</p>

	policy objectives have taken account of the available evidence base, the evidence base and logic presented in the report would benefit from strengthening.
189	Presents a long list of issues with a lot of duplication. The issues and challenges should be prioritised to focus resources on the most important issues over the next 15 years. Less strategic or lower priority issues should be addressed in other DPDs and SPDs.
217	More consideration should be given to addressing infrastructure limitations. Connectivity to appropriate infrastructure including electricity should be considered.
220	The rural economy and large areas of best and most versatile agricultural land within Wirral has very little prominence. The rural economy and relationship with urban fringes needs to be more explicitly addressed.
291	This consultation is premature. PPS12 sets out the tests of soundness that are to be considered. Plans and strategies must be founded upon a robust and credible evidence base. The Lichfield Core Strategy was found unsound because of a weak evidence base. This document has been prepared without an appropriate evidence base. The document dismisses the need for a release of Green Belt land, particularly in the east of the district to satisfy RSS housing requirements as a result of the districts Growth Point status. These assumptions should be based on the findings of the Strategic Housing Land Availability Assessment and the revised Interim Planning Policy for New Housing Development which are not yet complete. There is little evidence of any testing to demonstrate that there is not a need for any Green Belt release to satisfy housing requirements in the east of the district. It is illogical to devise strategic issues, vision and objectives without the SHLAA being completed as the SHLAA should determine many of the spatial and growth requirements for the Wirral for the next 15 to 20 years. Not doing so will generate a set of false issues and options that will raise procedural issues under soundness tests iv and vii. The Core Strategy is, at present, unsound.
319	Important new conditions have emerged since the LDF process was set in motion. We have already moved from an unprecedented era of economic growth into an uncharted era of volatile energy prices, an accelerating housing crash and the beginnings of recession. We would argue that any forecasts or plans based on historic growth trends are no longer relevant. There is little consideration of the challenges and opportunities which will be presented by peak oil, energy security, climate change and carbon reduction. These issues will present a major challenge to local communities: worldwide energy demand continues to increase with demand in 2030 predicted to be 50% higher; global oil production is predicted to peak within the next few years and then decline steadily; energy prices will inevitably rise and continue to rise; Britain has changed from being a net exporter to a net importer of oil and gas; much of

the UK's energy infrastructure will need to be renewed over the next decade if national supplies are to be maintained; nuclear power accounts for 18% of our electricity generation and 7.5% of total UK energy supplies but most of the existing power stations are due to close within the next 15 years or so; the LGA recommends that Councils "place tackling climate change, both mitigation and adaptation, at the centre of their vision for their communities and enshrine it in their strategic statements including the sustainable community strategy, local development framework, local transport plan and LAA"; climatic events can have a major impact on households (including people's health), businesses, critical infrastructure (such as roads, railways, water treatment works or electricity generation) and vulnerable sections of society (such as the poor or elderly) as well as having a major economic impact; the new Climate Change Act sets out an interim carbon reduction target of 26% from 1990 levels by 2020; the Comprehensive Area Assessment will assess against NI 188 regardless of whether or not it has been chosen in the LAA (The NI188 indicator sets out a four stage process for climate change adaptation, including risk assessment of service delivery, infrastructure and local communities, and an action plan to address the risks); a low-carbon economy offers the potential to create new businesses, provide new opportunities for existing businesses and in doing so create and support jobs and the LGA calls for targeted area-based initiatives to promote a green pathway out of recession. The imminent peaking of world oil extraction (referred to as "peak oil") is not yet considered in Wirral's strategy documents but some other local authorities are well down the path of doing just that. In December 2008 Nottingham City Council unanimously passed a measure acknowledging "the forthcoming impact of peak oil," and listing actions it plans to take to help Nottingham "rise to the challenge of peak oil but also encourage the city to grasp the opportunities which peak oil offers". Wirral Council should seek expert advice to examine the evidence for the challenges which may be posed by peak oil and climate change to develop an understanding of their impact on the future of the Council, the local economy and the local community. These issues should be incorporated into the Core Strategy DPD and the sustainability appraisal process. Each issue identified needs to take into account the impact of economic recession, volatile energy prices and the necessary move to a low-carbon economy. Climate change, peak oil and local resilience but should be fully integrated into the discussion. Another key issue is food security. Current methods of food production and retail are hugely dependent on the availability of cheap oil, and moving to a more resilient system will have implications for spatial planning. Current agriculture is mainly based on selling commodities such as meat and milk to the national supply chain. There is little diversity of produce, poor financial return to farmers and very little produce consumed locally. Large supermarkets use high levels of energy in-store, in packaging, transport and manufacture; 'just in time' supply chains are totally dependent on an uninterrupted supply of fuel. Most customers drive to the supermarket. Relevant issues include: direct farmer-consumer food links such as farmers markets; provision of allotments and community

	gardens. The Council should not give permission to any planning applications such as new supermarkets which involve high food miles especially on out-of-town sites, which encourage more car use. The Council should do everything possible to value local food as a mainstay of our future food security.
353	The Agency generally concurs with the list of issues identified. Many reflect aspects of national planning policy. Some of the issues do not, however, appear under the most appropriate heading.
374	Policies need to address the following challenges for the rural area: the need for key long term farmsteads to expand with modern facilities to meet livestock, welfare, produce and waste requirements which could incorporate renewable energy, such as anaerobic digestion technology; the use of redundant farm buildings in an economically viable manner to combine residential and commercial uses to contribute to the rural economy; the need for all rural settlements to have proportionate development for housing, employment and leisure to meet the issues identified in the Taylor Report. Maintaining a sound rural economy is vital if the rural area is to continue to provide a "green lung" for the enjoyment of the adjoining urban communities.
419	There may be conflict between the development policies and the presence of any dangerous substance establishments or major accident hazard pipelines within the plan area. Any proposed developments should take their presence into account. You are strongly advised to consult the hazardous pipeline operators, to confirm the exact location and route of their pipelines in the area covered by the plan and to ensure that your records are kept up to date. In view of the possible presence of dangerous substance establishments in the area covered by the plan, it would be helpful to potential developers if the constraints likely to be imposed by their presence were indicated in a policy statement in the plan. If such a policy statement is not included in your plan, the paragraphs below could form the basis of such a statement, which may avoid the submission of planning applications containing inappropriate proposals: " Certain sites and pipelines are designated as dangerous substance establishments by virtue of the quantities of hazardous substance present. The siting of such installations will be subject to planning controls, for example under the Planning (Control of Major- Accidents Hazards) Regulations 1999, with the objective, in the long term, to maintain appropriate distances between establishments and residential areas and areas of public use. In accordance with DETR Circular 04/2000 the Local Authority will consult the Health & Safety Executive, as appropriate, about the siting of any proposed dangerous substance establishments. The area covered by this Local Plan already contains a number of dangerous substances establishments and major accident pipelines. Whilst they are subject to stringent controls under existing health and safety legislation, it is considered prudent to control the kinds of development permitted in the

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	<p>vicinity of these installations. For this reason the planning authority has been advised by the Health and Safety Executive of consultation distances for each of these installations. In determining whether or not to grant planning permission for a proposed development within these consultation distances the planning authority will consult the Health and Safety Executive about risks to the proposed development from the dangerous substance establishment in accordance with DETR circular 04/2000. " Proposals maps should be marked to show the locations of dangerous establishments and hazardous pipelines in line with paragraph 6.23 of PPG12.</p>
435	<p>The Core Strategy Options should include consideration of: open space provision and protection; facility provision; access for all/equality of access; quality of provision; the needs of specific sports and user groups; and opportunities for countryside recreation and will need to demonstrate how land use is connected with wider policy considerations and the development of sustainable communities. Sport and active recreation can make an important contribution to this relationship through: identifying opportunities for delivering an enhanced quality of life for communities in the short, medium and longer term; recognising and taking full advantage of the unique ability of sport and active recreation to contribute to a wide array of policy and community aspirations; the development of partnership working stimulated by, and perhaps centred on, sport and active recreation as a common interest; and using sport and recreation as one of the building blocks of planning and delivery of sustainable communities. A fundamental prerequisite is a sound evidence base including patterns of use and value to the local community. A PPG 17- compliant assessment of open space, sport and recreation facilities, in particular for playing fields should address this issue. Reliance on NPFA standards is not an adequate means of establishing local needs, as was established in the Stafford and Lichfield Core Strategy Inquiries. The ruling that Lichfield's Core Strategy was unsound was partly based on the finding that there was a lack of credible evidence to support the policy relating to the provision of open space in new developments. In developing the evidence base for sport and active recreation, the following checklist should be of assistance: has the range of information gathered by Sport England and updated by local authorities, in relation to facility planning (Active Places and Active Places Power), been drawn upon? Has the information available through PPG17 audits and needs assessments of open space and sport and recreation facilities been used? Has use been made of parallel data gathering and analysis exercises undertaken as part of initiatives such as green infrastructure planning and playing pitch strategies which could provide opportunities for joint working? Has there been a consideration of the quality and accessibility of provision as part of the preparation of Local Area Agreements? Have significant cross-boundary issues, particularly relating to facility provision been attended to? Has information from other local authority strategies, including sport and recreation been attended to? Has information from other local authority strategies, including sport and recreation strategies, play strategies and community strategies been considered?</p>

476	No reason to dissent.
479	The document is not spatial enough and should focus more on how the places within Wirral will be affected by the proposals in the plan. Diagrams, including a Key Diagram, could assist with this process and help to demonstrate the links within and without the Borough.
572	It is too limited to package all of transport under three issues. Transport is a cross cutting theme which should be integrated within the other issues.

10.78 The Council has responded to these comments by:

- Providing additional information within the Spatial Portrait
- Including more detailed Settlement Area profiles within the Spatial Portrait
- Identifying the issues arising from the Spatial Portrait and the individual Settlement Area profiles within the Spatial Options Report
- Including a series of policy options and alternatives within the Spatial Options Report
- Including an assessment of the likely implications of each policy option for individual Settlement Areas throughout the Spatial Options Report
- Revising the Strategic Objectives for the Core Strategy to focus on a shorter list of strategic priorities
- Including a Strategic Objective for Public Safety
- Including additional information on the emerging evidence base throughout the Spatial Options Report
- Providing a greater emphasis on transport and accessibility throughout the Spatial Options Report
- Providing a greater emphasis on Climate Change throughout the Spatial Options Report
- Including policy options for green infrastructure
- Including policy options for sustainable design and construction
- Beginning to prepare a schedule of infrastructure requirements to be published alongside the Preferred Options Report

11 SPATIAL VISION

11.1 The following general comment was submitted on the section setting out the emerging Spatial Vision for Wirral:

ID	Summary of Responses Received
46	The rationale for the emerging Vision is not fully explained and there is no real debate about the future role of the Borough before the Vision is set out. Whilst there are problems, the Borough fares far better than other places within the region. The history of a reliance on shipping and heavy industry in the east, has altered in favour of a situation where many residents live in Wirral but commute

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	to either Liverpool and beyond or south Wirral and beyond. If the Sustainable Community Strategy and the Council's own strategies have determined that this is not desirable, why not say so and allow a debate both on this and the content of the Vision?
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11.2 The Council has responded to this comment by:

- Including additional information on the background to the Spatial Vision within the Spatial Options Report
- Including additional background information in the Spatial Portrait

Responses to Consultation Question 7

11.3 The responses to Consultation Question 7 - *Do you agree with the spatial vision set out above? If not, how could we improve it?* - were mainly directed towards:

- Comments on specific Items within the Vision
- Comments suggesting a revised form of words for specific Items
- Comments on additional Items that should be considered for inclusion in the Vision

11.4 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
14	Agree with the Vision. Item N - waste generated should be processed as close as possible to the Borough - preferably within the Borough. Sites to support this strategy should be allocated and protected.
67	Item J - it is too simplistic and generalised to include Hoylake & West Kirby as part of the same vision for tourism as New Brighton. Hoylake and West Kirby are quite different in character and need to be viewed - and planned for - as primarily residential/low key/day visitor amenities, which needs to be explicitly recognised.
87	Item I - The regeneration of Wirral Waters is supported but should be to the highest sustainable design principles (i.e carbon neutral), include top quality rail and public transport access. The height of buildings should not intrude on the skyline of Wirral and into views across Wirral and beyond. Item J - The development of tourism, based on the quality of its natural environment, built heritage and the coastal resorts of New Brighton, West Kirby and Hoylake, is strongly supported. However, the resources applied to this are insufficient to make a difference. The built heritage owned by Wirral Council and by the private sector is declining at an alarming rate, not

	<p>helped by the Strategic Asset Review, and this needs to be reversed. It should be noted that West Kirby and Hoylake are not resorts but local residential communities with a day tripping role. The latter needs to be encouraged but not to the extent of inappropriate developments such as the Sail hotel which will affect the functioning of the town in terms of car parking, over development etc and not at the expense of the Green Belt, which offers potential for sustainable agricultural and allotment development, nature conservation and the development of initiatives exploiting eco-tourism. Progress towards combating the impact of climate change and reversing the trends is massively too slow. There is no urgency in Wirral's progress. At a micro level progress on satisfying the demand for allotments is non-existent. There is no mention of local farm produce, development of local market gardening with solar power, farmers markets and allotments. Industrial and retail warehouse roofs have a massive potential to tap solar power but this is not addressed.</p> <p>Item M - Strongly supported but needs active measures and funding which is not present in Wirral at the moment. Parks are under funded and their infrastructure crumbling and there is no evidence of safeguarding and enhancing biodiversity and geodiversity resources. Built heritage owned by Wirral Council and private owners is declining at an alarming rate and needs to be specifically addressed in the plan. These trends need to be reversed with expenditure in parks and open spaces and in public buildings. There are major opportunities in developing the Dee Estuary and the Carr Fields / BirkettValley as a beacon development in eco-tourism and sustainable agricultural and community food production. Greening the towns of Wirral needs to be addressed to include streets, park open spaces and allotments.</p> <p>Item N - Waste recycling is too weak and needs to be replaced with more demanding words.</p> <p>Item O - Current plans and strategies are not achieving any progress on transport and land use. Strong strategies and funding streams for public transport need to be instituted to achieve this such as the electrification of the Wrexham-Bidston railway line with large park and rides at the strategic locations at Bidston and Woodchurch, new rolling stock and extra capacity on the rail network, radical measures to control the school run and a ban on all new link and inter-town connecting roads.</p>
96	<p>Item I - Support the intent and purpose which sets out the vision for Wirral Waters. A proposed alternative wording would, however, more accurately reflect the vision to 2025: "Wirral Waters will be halfway through a 30+ year transformational programme of development, achieving integrated sustainable, mixed-use regeneration through the re-use of vacant and under-used land</p>

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	<p>in Birkenhead and Wallasey docks, creating sustainable communities in inner Wirral by securing thousands of new jobs and homes through the creation of new living and working markets"</p> <p>Item L - Should make specific reference to need to improve energy efficiency and secure renewable sources of energy of appropriate scale for Wirral including the potential delivery of the Mersey Tidal Power project.</p> <p>Item O - Should be amended to include specific reference to "water" as a sustainable transport mode.</p>
101	<p>The Vision is ambitious. Although these issues may all need to be taken forward and the scope of the vision may need to be broad, reference should be made to issues that will take more priority. Pleased to note that the vision includes the promotion of high quality, well designed, zero carbon homes to meet the needs of all sectors of the community.</p>
122	<p>Agree with the Vision but would like to see the inclusion of bringing contaminated land back into use.</p>
138	<p>Agree with general principles of the Vision.</p> <p>Item I - Concern that too much emphasis has been placed on the regenerative impact of the Wirral Waters Scheme especially given the downturn in the economy.</p> <p>Item J - Concern that the plans to develop Wirral's coastal resorts are too developer dependent and do not take into sufficient account the wishes of local communities or the needs of the Borough as a whole</p>
142	<p>Largely agree with the Vision.</p>
155	<p>Global climate change is the major threat to wildlife and people. The Vision should therefore include a Borough where everyone has access to local services, reducing the need to travel for work, school, shopping, recreation, food miles, waste miles, etc. all of which will get more expensive as we approach Peak Oil. If national carbon reduction targets are to be met, everyone will have to change the way we live.</p>
181	<p>Generally in agreement with the Vision.</p> <p>Item C - Add high technology and environmental technology. The lesson of the current financial situation is that a balanced economy is important.</p>
238	<p>Item G should be revised to read '..... vacant, derelict and contaminated land ...' Is this issue only confined to the "older urban areas"?</p>

	<p>Item M - needs to include the importance of farming particularly from the perspective of local food production and should also be revised to read '..... safeguarded, enhanced and well managed biodiversity.....'</p> <p>Item N - Wirral has recently consented a major new waste facility at Eastham and Bidston MRF is operational but the wording "as close as possible to the Borough" needs to be amended as it could be interpreted to mean adjacent to but not within Wirral. The location of any new waste management facilities will be led-by the Waste DPD and will need to take account of the proximity to waste arisings.</p> <p>A separate Item should be included to promote low carbon and renewable energy generation within Wirral or in Liverpool Bay.</p>
260	<p>Agree with the Vision but</p> <p>Item O - Will only be resolved if a successor to the MPTA have the powers to co-ordinate all modes of transport to control all bus company operations.</p>
280	<p>Generally support the Vision.</p> <p>Item J - particularly supported.</p> <p>Item L - particularly supported.</p> <p>Item M - the reference to 'built heritage' is not sufficiently inclusive as arguably it excludes Wirral's important historic parks and gardens and many of its archaeological resources - the words "heritage assets" should be used instead. A landscape character element also needs to be included to say "The landscape character assessment of the Borough will have been utilised to inform new development and secure appropriate landscape enhancements".</p> <p>A new Item is needed to safeguard designated Green Belt and to achieve the purposes and objectives of Green Belt policy.</p>
298	<p>The Vision should recognise that if previously developed sites cannot be delivered then suitable deliverable greenfield sites within the defined Regional Spatial Strategy LCR2 Policy area should be considered or released from the Green Belt through an appropriate phasing policy. Greenfield sites can come forward alongside previously developed sites and can unlock development potential and attract inward investment.</p>
316	<p>Supports this Vision on the basis that it offers a high quality of life for Wirral's residents and visitors; sustainable development; a successful tourism industry that benefits from a quality natural environment; adaptation and mitigation of the effects of climate change; high quality urban and rural environments;</p>

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	<p>biodiversity and geodiversity that is conserved and enhanced; and a sustainable transport network. However, would welcome an amendment to include conservation and enhancement of local landscape and townscape character and quality and the promotion of local distinctiveness.</p>
330	<p>Partly agree with the Vision.</p> <p>Item B - The Investment Strategy was commissioned in 2004, before recession, climate change and peak oil were serious considerations. If this Strategy does not examine the threats and opportunities presented by these issues, it will fail to offer a realistic vision for Wirral.</p> <p>Item C - Should mention the need to move to a low-carbon economy, to reduce the number of jobs that are currently at risk from increasing fossil fuel energy prices. Jobs should be located closer to housing so that they are more easily reached by bicycle or on foot.</p> <p>Item G - areas of vacant and derelict land in older urban areas are ideally situated for use as allotments.</p>
337	<p>Support the Vision subject to points set out elsewhere.</p>
346	<p>The Vision is supported. The role of Croft Retail and Leisure Park in achieving this Vision should be recognised, as a provider of retail and leisure/services facilities to local residents and to employees of the nearby Wirral International Business Park, making a vital contribution to the local economy through the employment of local people and an established infrastructure and transport system. The owners ongoing commitment to invest in and regenerate the Park provides the potential to build on this position over the next 15 years.</p>
364	<p>Welcomes the Vision.</p> <p>Item B - Should be amended to outline the desired outcomes of the Investment Strategy rather than simply saying that the Strategy will have been implemented.</p> <p>Item C - supports the economic objectives</p> <p>Item E - supports the economic objectives</p> <p>Item F - the housing objective is supported</p> <p>Item I - the major regeneration opportunity at Wirral Waters would be consistent with the objectives for the proposed new Strategic Regional Site at Birkenhead Docklands.</p> <p>Item J - supports the economic objectives</p>

381	Support the Vision but while welcoming the regeneration of Birkenhead, Liverpool should remain the main priority for regional retail development in accordance with RSS.
388	Generally support the Vision. Greater consideration and emphasis should be given to the importance of and need for retail development and its potential to assist in the achievement of the vision.
404	Can only support the Vision if a less restrictive approach to resolving issues and challenges is included.
425	Item M - The reference to built heritage does not reflect the strength of opinion described in the report of consultation or the particular challenges facing the historic environment in Wirral. The Vision should refer to the long-term aspirations for the historic environment and how its future management might contribute to social, environmental and economic objectives as well as safeguarding/reinforcement of the distinctive character of different places in Wirral.
432	Specific reference should be made to access to high quality sport and recreation opportunities throughout the Borough as part of developing sustainable communities and securing a wide range of objectives including health, fitness and a good quality of life.
463	Item M - Would hope that this will be a reality but would like action now to safeguard what we have left and to improve it. Unsuitable planning proposals should be weeded out at a very early stage in the process with more consultation with local groups first .
573	The Vision could do more to reflect the key role of transport.
583	The Vision could be more spatial.

11.5 The Council has responded to these comments by:

- Revising the Spatial Vision for the Core Strategy in the Spatial Options Report
- Revising the Strategic Objectives for the Core Strategy to focus on a shorter list of strategic priorities
- Including a series of policy options to address some of the issues that may need to be addressed in more detail

12 OBJECTIVES

12.1 The following general comments were submitted on the section setting out a series of twenty-nine suggested Strategic Policy Objectives:

ID	Summary of Responses Received
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46	The objectives are generic and could just as well apply anywhere. Many of them simply précis national planning guidance, such as Objective 8 and PPS 3. The document acknowledges at the very beginning that there is a disparity between the east and west of the borough and that overcoming this is a major objective but it is not clear how the Objectives, unless they are more focused, will achieve this.
331	The Objectives should be changed in line with responses to Questions 1 to 8. There should be more emphasis on locally grown food, low food miles, people growing their own food, walking, cycling, low-carbon jobs, and energy efficiency in homes and businesses.
586	Generally support the strategic objectives. Greater consideration and emphasis should be given to the importance of and need for retail development and its potential to assist in the achievement of many of the objectives.
588	The objectives should recognise that if previously developed sites cannot be delivered then suitable deliverable greenfield sites within the defined LCR2 Policy area should be considered or released from the Green Belt through an appropriate phasing policy. Greenfield sites can come forward alongside previously developed sites and can unlock development potential and attract inward investment.

12.2 The Council has responded to these comments by:

- Revising the Strategic Objectives for the Core Strategy to focus on a shorter list of strategic priorities with a clearer application to specific geographical areas
- Including a series of policy options to address some of the issues that may need to be addressed in more detail
- Including a short commentary on the likely implications of each of the policy options for the delivery of the Strategic Objectives throughout the Spatial Options Report

Responses to Consultation Question 8

12.3 The responses to Consultation Question 8 - *Do you agree with these Strategic Objectives? If not, please tell us why. Are there any others you would like to suggest?* - were mainly directed towards:

- Comments on specific objectives
- Comments on other objectives that ought to be considered

12.4 A summary of each of the comments received on the objectives suggested is set out in the table below:

ID	Summary of Responses Received
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139	Broadly supported.
261	Agree.
317	Agree with the list of draft Objectives
347	Support the Objectives
365	Support Objective 1
365	Support Objective 2
365	Support Objective 3
97	Objective 5 should refer to the "urban area" not "urban centres" as the use of the word "centres" implies town centres.
365	Objective 5 should be moved to 'Building Sustainable Communities' as it is of wider relevance than purely economic matters
365	Support Objective 6
365	Objective 7 should be moved to 'Building Sustainable Communities' as it is of wider relevance than purely economic matters
239	Objective 8 would benefit from the caveat that environmental impacts need to be avoided.
365	Support Objective 8
97	Objective 9 should be expanded to include Wirral Waters as a key area for new housing.
143	Support Objective 9 but high rise accommodation in Woodchurch and Moreton and sheltered accommodation in the West Kirby / Hoylake area may need to be re-provided.
365	Support Objective 9
16	Support Objective 11, which would be supported by the allocation of the company's sites for landfill/landraising
239	Objective 11 - remediation of contaminated land should be made more explicit in this objective.
281	Objective 12 should be sharpened to make specific reference to the Code for Sustainable Homes.
365	Support Objective 14 which should be moved to 'A Stronger Economy'
143	Support Objective 15 but enforcement is vitally important in addressing perceptions of personal safety and should be included.

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262	Support Objective 16, although it seems as far away as ever.
262	Support Objective 17, although it seems as far away as ever.
262	Support Objective 19, although it seems as far away as ever.
365	Support Objective 19
365	Support Objective 21 which should be moved to 'A Stronger Economy'
464	Support Objective 22
464	Support Objective 23
317	Objective 24 should be amended to include urban and rural environments.
427	Support Objective 24 which should include the rural as well as urban environment. This objective should not repeat national guidance but should be tailored to create a locally relevant and place-specific objective for the historic environment. A sound evidence base will enable the development of a local perspective on the national priority of protecting and enhancing the historic environment. Further consideration is needed to better tailor this objective to Wirral's particular circumstances.
464	Support Objective 24
427	Support Objective 25. This objective should not repeat national guidance but should be tailored to create a locally relevant and place-specific objective for the historic environment. A sound evidence base will enable the development of a local perspective on the national priority of protecting and enhancing the historic environment. Further consideration is needed to better tailor this objective to Wirral's particular circumstances.
464	Support Objective 25
97	Objective 26 should also promote energy efficiency and renewable energy.
281	Objective 26 is supported but should include a second element relating to the reduction of emissions and should appear as a cross-cutting Objective.
365	Objective 26 should be expanded to include mitigation as well as adaptation.
123	Objective 27 should be amended as 'minimise' may be misinterpreted as to allow some increased risk of flooding. An appropriate alternative would be 'To ensure there is no increase in the risk of flooding, and ensure opportunities to reduce the risk where possible are encouraged and taken.'
464	Support Objective 27
17	Support Objective 28, which would be supported by the allocation of the company's sites for landfill/landraising

239	Objective 28 should be revised to say - To work in partnership with other local authorities in providing a network of sustainable waste management facilities across the sub-region.
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12.5 A summary of the comments received on potential "missing" objectives is set out below:

ID	Summary of Responses Received
239	The following objectives could also be included under A Stronger Economy: To remove infrastructure barriers to sustainable economic regeneration. To promote and develop maritime and port related industry. To promote rural business diversification and the production of local food.
281	A Stronger Economy should include a commitment to sustainable construction which is not just a matter for residential development.
433	An objective should be included under 'Building Sustainable Communities' to complement the reference to sport and outdoor recreation under 'Environmental Quality and Protection' - "To protect, enhance and promote the provision of high quality, accessible sport and recreation facilities, both formal and informal."
239	The following objectives could also be included under Environmental Quality and Protection: To develop a network of green infrastructure across the Borough to help deliver the Core Strategy vision.
43	Good design should be included as well as protecting and enhancing character and local distinctiveness and the historic environment.
88	Two new objectives should be added for "Greening the Towns of Wirral" and "Maintaining the Public Assets of Wirral" .
123	An Objective should be added to bring contaminated sites back into use through successful and safe investigation and remediation, taking human health and controlled waters into consideration. The Core Strategy should address obligations required/advised in PPS23, RSS policies EM2 and DP7, Part 2A of Environmental Protection Act 1990, Catchment Abstraction Management Strategies (CAMS), Water Framework Directive and the Groundwater Daughter Directive and the Groundwater Regulations 1998 (to be updated as part of the Groundwater Daughter Directive due before end 2009).
156	An extra Objective should be added - to adapt to Peak Oil and the resultant sustained rise in energy prices.
281	A new objective should be added: "To ensure new development incorporates sustainable design and construction principles".

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281	An Objective for landscape character should be included: "The landscape character of the Borough will have been defined and used both to inform new development and secure the enhancement of its rural areas".
317	Protecting and enhancing the landscape character and quality of the rural environment has been omitted.

12.6 The Council has responded to these comments by:

- Revising the Strategic Objectives for the Core Strategy to focus on a shorter list of strategic priorities
- Including a series of policy options to address some of the issues that may need to be addressed in more detail

Responses to Consultation Question 9

12.7 The responses to Consultation Question 9 - *How can we measure success against each of these Strategic Objectives? What indicators should we use to measure progress in delivery?* - were mainly directed towards:

- The need for challenging indicators
- The range of specific indicators that could be included
- The need to publish regular progress reports

12.8 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
89	Success must be measured by using SMART criteria which are challenging. There is a lack of sense of ambition and challenge in facing the needs of sustainability, nature, climate change and protecting the traditional retail centres from out of town and edge of town development.
124	Total hectares of contaminated land successfully remediated and brought back into use; increase of new development achieving upper ratings against the Code for Sustainable Development; total area of sensitive habitats/greenspace lost as a result of development; total area of green infrastructure incorporated into developments; increase in Biodiversity Action Plan species / protected species recorded within the Borough and betterment of river water quality; number of developments incorporating high BREEAM ratings and number of developments achieving high Code for Sustainable Homes ratings; number of applications approved against Environment Agency advice/objections; number of new properties that lie within Flood Zone 2 & 3; number of Sustainable Urban Drainage schemes incorporated into new developments; increases in the provision of flood storage areas and number of properties that have been subject to flooding; reduction in waste produced;

	increase in recycling as a % of waste produced; increase in waste re-use; decrease in waste to landfill; decrease in wastes exported from Wirral; and increased capacity to store/process recyclable wastes.
157	Number of "services" such as work, school, food, shopping, leisure facilities are within 1 mile (walking distance) or 2 miles (cycling distance) of all sectors of the population.
240	Number of developments permitted with identified adverse affects on European nature sites; Number of SSSIs / Local Sites in favourable condition; and Ecological framework delivery.
263	A five point scale for each objective with 5 being the lowest.
317	The use of Landscape Character Assessment to provide baseline information, targets and indicators for 'landscape' and 'townscape'; links to Biodiversity Action Plan targets for habitat and species; and use of Natural England Accessible Natural Green Space Standards (ANGST) for green space.
332	Percentage of businesses locally owned; average commuting distance of people working in town; percentage of journeys carried out on foot or by bicycle including the percentage of children walking/cycling to school; average commuting distance for people working outside town; percentage of essential goods being manufactured within a given distance; percentage of raw materials sourced locally; energy input per unit of output of local businesses; percentage of energy produced locally; percentage of food grown locally; percentage of food supplied by small retail outlets rather than supermarkets; energy-in-use performance per m2 of new and existing housing; and the percentage of compostable 'waste' that is actually composted.
434	Surveys of local provision addressed through a PPG17 Assessment customer surveys of need and demand addressed through a PPG17 Assessment monitoring development control data relating to facilities lost or developed. indicators relating to participation in sport could be used, drawing on NI 8: Adult participation in sport; NI 57: Children and young people's participation in high-quality PE and sport; and NI 110: Young people's participation in positive activities.
465	Publish regular updates in a standard format in the local press.
589	Relevant measures would include: the proportion of schemes/new floorspace achieving different levels in the BREEAM standards; the Code for Sustainable Homes; and future work by Natural England on Tracking Change in Landscape Character.

12.9 The Council has responded to these comments by:

- Including an initial list of suggested indicators for monitoring progress under each of the Spatial Objectives in the Spatial Options Report

Core Strategy Report of Consultation on Issues, Vision and Objectives

- Beginning to prepare a schedule of monitoring indicators to be published alongside the Preferred Options Report
- Including the indicators eventually adopted for the Core Strategy in the Council's statutory Annual Monitoring Report

13 FRAMEWORK FOR DELIVERY

13.1 Comments on the section on A Framework for Delivery were mainly directed towards:

- The need to consider the infrastructure that will be necessary to support the delivery of the Core Strategy
- The inclusion of additional documents and initiatives within the final delivery framework
- The need for adequate resources to be identified
- Anticipated changes to regional level policy making

13.2 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
47	The document is silent on infrastructure provision, crucial to the delivery of proposals like Wirral Waters and housing growth. Recent PINS advisory visits to LPAs have emphasised infrastructure and delivery planning. Any major pieces of infrastructure that need to be provided in order to implement the Core Strategy should be identified, alongside who will provide them and when and how any constraints will be overcome. The aim is obtain infrastructure providers' agreement that their existing and longer programmes will line up with the Core Strategy. The Core Strategy must also demonstrate flexibility and set out what will happen if proposals are not implemented as expected, for example, to allow housing policies to respond to market change and what will happen if infrastructure is delayed etc
571	One of the weaknesses identified in Table 1 is limited funds for recreation and open space maintenance. The promotion of leisure, tourism, coastal recreation and watersports is also identified as an opportunity. The establishment of a strong policy stance within the Core Strategy is an important part of addressing these issues.
18	The Joint Waste DPD should be included within the delivery framework.
98	The Wirral Waters Strategic Regeneration Framework and the Mersey Heartlands Programme of Development should be added as long term strategies.
241	The Regional Biodiversity Delivery Plan, Merseyside GI Strategy and Merseyside Ecological Framework and the Building for Schools Programme should be included.

366	The Local Democracy, Economic Development and Construction Bill makes provision for the replacement of the Regional Spatial Strategy, Regional Housing Strategy, Regional Transport Strategy and Regional Economic Strategy with a Single Regional Strategy. RSS will continue to form part of the statutory Development Plan until the Bill comes into force and the Secretary of State approves a new Regional Strategy or determines that specified parts of the existing RSS are deemed to constitute the new Strategy.
99	This section only refers to social and community infrastructure and needs to be expanded to include other aspects of engagement and delivery stakeholders. Reference should be made to partnership working being essential to the delivery of Wirral Waters.

13.3 The Council has responded to these comments by:

- Including a section on the additional mechanisms likely to be needed to support the delivery of each of the Strategic Objectives for the Core Strategy and a section on the likely implications for delivery under each of the policy options in the Spatial Options Report
- Beginning to prepare a schedule of infrastructure requirements to be published alongside the Preferred Options Report
- Referring to the preparation of the Single Regional Strategy for the North West (RS2010)

14 NEXT STEPS

14.1 Comments on the section on Next Steps were mainly directed towards:

- Considering alternative options for regeneration activity,
- Ensuring the soundness of the Core Strategy
- The identification of strategic site allocations

14.2 A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
25	In terms of developing future options, it is important that the options do not conflict with national and regional policy or guidance. Where the options which are being consulted on clearly conflict with national and regional policy, it is likely that GONW would object at later stages if such options were to be included. As preparation progresses, you will need to have regard to the Planning Inspectorate guidance on soundness. We would also recommend that you use the Planning Advisory Service Soundness Self-Assessment toolkit, which PINS strongly urge. We have included an outline setting out what the DPD needs to consider in terms of the format of its development in future stages. Overall, it is clear that the Council has a lot of good information and evidence to draw upon, but work now needs to be done to develop this

into a clear and concise core strategy. We commented upon an 'Issues and Options' draft paper in July of 2008. It is not clear why the discussion of potential options has been dropped from this document and the focus shifted to consulting upon the issues and 'strategic objectives'. The result is a need for an additional stage of consultation which could have been avoided. The new Regulation 25 has removed the bespoke consultation stages that existed to put in place a more flexible system able to adapt to both the nature of the plan document and the needs of the local community. Nonetheless, early indications are that most, if not all authorities will be following a similar process to that set out below. However, whatever approach an authority chooses to take, the plan will still have to satisfy the requirements of soundness which, in part, require reassuring an Inspector that all those likely to have an interest in the outcome of the Plan have been consulted and at the appropriate time. From experience the process adopted by nearly all authorities would seem to be along the following lines: Preparatory work - initial gathering of information, review of available evidence, internal consultation of likely scope of the document etc. Sustainability Appraisal Scoping - input from SA consultees 'Issues and Options' Consultation, in most cases the first of two bespoke six week periods of consultation. The document itself at this stage usually comprises - an explanation of the LDF and the plan making process explaining the role of the Core Strategy, SA etc., the existing evidence base and an outline of what additional studies are being conducted and the other plans/strategies which impact upon it such as national guidance, RSS, Local Plan, UDP, Corporate Plan etc. - a spatial portrait of the borough, an appraisal of the issues facing the borough with the opportunity for stakeholders to agree or otherwise, which may remain at the borough-wide level or choose as well to look at key settlements/areas within the borough. This section/chapter would draw heavily upon the evidence base compiled to date - a contextual section/chapter which looks at the borough in the context of the region/sub-region and the plans and strategies impacting upon it e.g. LTP, RES, RHS, major developments, strategic sites (in terms of both PPS 12 and NWDA), Growth Point etc., - a spatial vision for the area which draws upon the vision within the Sustainable Community Strategy, again with the opportunity for comment, together with a set of spatial objectives designed to achieve the vision. The better documents will tailor these to addressing specific areas within the borough, again with the opportunity to comment - potential options for addressing the issues facing the borough and the settlements and areas within it with the opportunity for consultees to comment upon the merits of the options or put forward alternatives. This would include implications flowing from the choice of options in terms of for example, infrastructure needs etc. 'Preferred Alternative' or 'Preferred Options' Consultation - the second of the two major bespoke consultation events leading to publication of the final Plan document and preceding submission to the Planning Inspectorate, usually comprises - a contextual section précis again the nature of the area, issues etc., and the nature of the consultation to date - the spatial vision for the area together with the objectives

	<p>- the preferred overall spatial option for the area detailing the outcome of the options in terms of SA, evidence base, etc., showing how development will be distributed across the borough over the lifetime of the Plan, together with a key diagram to illustrate this. This section, or an appendix to the document, will also deal with the reasons behind the rejection of alternative options again drawing upon the evidence/SA. - flowing from the above, a series of sections detailing the interpretation/impact of the chosen option for settlements/areas within the borough. This again would highlight the reasons why alternatives have been rejected. As an alternative to the above, some have chosen a thematic approach with again an explanation of the reasons behind rejection of alternative approaches. - a monitoring/implementation strategy which should identify infrastructure requirements flowing from the preferred option with an indication of when provision will be needed, at what cost and by whom - the 'when, where and how' of the Plan delivery. Around the two major bespoke consultation events outlined above, there will be any number of more focused ad-hoc events with stakeholders who may be specialists in a particular field such as the Highways Agency, Environment Agency, or where the Plan refers to certain settlements/areas, neighbourhood forums and the like. The important thing is that all such consultation exercises are documented and go towards supplementing the evidence base. The advice in conducting any form of consultation is that it is relevant and appropriate and above all, timely. We would be of the opinion that this can be comfortably accommodated within eighteen months of the evidence gathering process.</p>
429	<p>The development of spatial options should include alternative approaches for achieving the regeneration activities outlined earlier in the report, marrying the needs of the Borough with delivery of development. The spatial options will provide the opportunity to question and test the best locations for development and could for example propose the further development of the Laird Grid with connections to Hamilton Square and Birkenhead Park.</p>
48	<p>The publication stage should not be viewed as simply another opportunity for consultation, reverting back to the old system of two deposits. The publication document should be the document that the Council intend to submit. Nothing should come as a surprise in the publication document. The publication process is a final opportunity to capture representations as to soundness that will then be considered at Examination. If it is thought that representations received will lead to any need to affect major changes to the document, this would indicate that a further consultation stage may be required before publication. The section as written gives the impression that it will be open to consultees to propose further changes to the publication draft.</p>

19	The need to include strategic sites is agreed. Land at Carr Lane, Moreton (former Barker and Briscoe Brickworks and clay pit) and at Prenton (former Prenton Brick and Tiles Works) should be included as strategic sites for waste disposal.
100	The catalyst neighbourhoods of Wirral Waters should be included as strategic site allocations, rather than just being "area" or "location" specific policies and diagrams/plans. The policy for Wirral Waters should include key aspects of the Stage 3 Vision and Development Framework of the Wirral Waters SRF and will need to establish land use, transport, sustainability and other key principles, including the principle of a tall buildings cluster.
242	It would be helpful if there was an agreed timescale for the Core Strategy to build into our work programme.

14.3 The Council has responded to these comments by:

- Consulting with Government Office and the Planning Advisory Service on the format and presentation of the Spatial Options Report
- Including a series of options and alternatives within the Spatial Options Report
- Including references to the potential for the identification of strategic site allocations in the Core Strategy throughout the Spatial Options Report
- Publishing the Spatial Options Report and the available evidence base for public consultation

15 Appendix 1 - List of Contacts

Age Concern Wirral	Mr C Airey
Ainsley Gommon Architects	Mr C M Brand
Alinbrook Ltd	Mr C P Hales
Allerton Trust	Mr C R Hutchinson
Alyn Nicholls & Associates	Mr C S Thompson
Ancient Monuments Society	Mr C T Moore
Arriva North West Limited	Mr C W Dent BA Dip TP RIBA MRTPI
Athertons	Mr Casement
Atisreal Limited	Mr D Birkett
Axis Planning Environment & Design	Mr D Clamp
Barnston Conservation Society	Mr D Cross
Barnston Womens Institute	Mr D McKaigue
Barratt Chester	Mr D Nooman
BE Group	Mr D Taylor
Bebington Centre for Voluntary Service	Mr Davies
Beechwood & Ballantyne EMB Ltd	Mr E J Norton
Beechwood Community Association	Mr F Burgana BA MCD MRTPI
Bell Developments Ltd	Mr F Howell
Bellway Homes	Mr F Hyde
Bett Limited	Mr G Bryan
Bidston Preservation Trust	Mr G D Evans
Bidston Residents Association	Mr G Noble
Bidston Village CAAC	Mr Grey
Biffa Waste Services	Mr H Turnbull
Birkenhead Market Tenants Association	Mr Hogg
Birkenhead Town Centre Forum	Mr Hussenbux

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Birkenhead YMCA	Mr I Coulthard
Black Macadam	Mr J A Wright BA (Hons) MRTPI
Bloomfields Limited	Mr J M Corfe
Blue Sky Planning Limited	Mr J Noble
Bluemantle Ltd	Mr J O'Neil
Bovis Homes Limited	Mr J Thompson
Braithwaite Associates	Mr K Collins
Bridgewater Meeting Room Trust	Mr L Burman
Bristol-Myers Squibb Pharmaceutical Research	Mr L Parker-Davies
British Aerospace	Mr M Curtis
Broadway Malyan Planning	Mr M F Lewis
Brock Plc	Mr M G Laurenson
Brockway Dunn Limited	Mr M Harrision
Brodies Solicitors	Mr M Muller
Building Design Partnership	Mr M Rattenshaw
Bullivant Jones & Company	Mr Mahoney
C D Hughes	Mr Martin
Caldy CAAC	Mr Mighall
Campaign for Real Ale	Mr P Barton MCD BA (hons)
Carey Jones Architects	Mr P Haywood
Cass Associates	Mr P Jackson
CB Richard Ellis	Mr P McCann
CDP Limited	Mr P Pendleton
Central Liscard Area Residents Association	Mr Prandle
CgMs Consulting	Mr R J Wood
Chelford Properties	Mr R L Shelbourne

Cheshire & Wirral Partnership NHS Trust	Mr Reade
Cheshire Gardens Trust	Mr Rowland
Cheshire RIGS Group	Mr T Clark
Cheshire Wildlife Trust	Mr T Tarr
Chris Thomas Limited	Mr W Mitchel
Church Commissioners	Mr W O'Dowd
Claire House Children's Hospice	Mr Wilkinson
Clatterbridge Centre for Oncology NHS Foundation Trust	Mrs B Murthwaite
Cloughton Community Group	Mrs Clarke
Cliff Walsingham & Company	Mrs Duncan
Clive Watkin Partnership	Mrs E M Hale
CLM Services	Mrs G Nicholas
Colin Buchanan & Partners	Mrs G Wollers
Colliers CRE	Mrs J Andrews
Corporate Property Solutions	Mrs J M Smith
Council for British Archaeology	Mrs K M Ives
Country Land & Business Association	Mrs Lewis
Countryside Properties	Mrs M Dockrell
Crosby Homes NW Ltd	Mrs N L Ratcliff
Crown Estate	Mrs R M Fraser
Cuff Roberts Solicitors	Mrs S Charlesworth
Cunnane Town Planning	Mrs S Shaw
Cycling Project	Mrs V Doodson
D Morgan Plc	Mrs Weston
D2 Planning	Ms C Radford
Dalton Warner Davies	Ms D Toony
Daly International	Ms Foster

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David McLean Homes Limited	Ms J M McIlhatton
David Wilson Homes	Ms K Robinson
De Pol Associates	Ms L Woodhead
Dee Estuary Conservation Group	Ms M Johnson
Denis Wilson Partnership	Ms S Colquhoun
Denton Clark & Co.	Ms S J Wall
Design Planning Development	Ms S Magee
Development Planning & Design Services	Ms S Sweeney
Devonshire Park Residents Association	Ms Seager
Dickinson Dees	Muir Associates
Diocese of Chester	Multiple Sclerosis Society
Disabled Motorists Federation	N Power Renewables
Dixon Webb	Nathaniel Litchfield & Partners
Doyle Developments	National Farmers Union - NW Region
DPP	National Trust
Dr K Singh	National Wind Power Limited
Dr M A Turpin	Network Rail (Mining)
Dr M Baker-Schommer	Network Rail (Planning)
Dr M Day	New Brighton BRAVO
Dr Macbeath	New Brighton Community Association
Drivers Jonas LLP	New Brighton Community Partnership
DTZ Piedad Consulting	New Brighton Environmentalists
E M Enterprises	New Brighton Football Club
Eastham Village Preservation Association	New Ferry & Rock Ferry Conservation Society
EDAW Plc	New Ferry Regeneration Action Group
Edmund Kirby	NJL Consulting
Eleanor Road Residents Association	Norland

Elite Homes (North) Limited	Norman Street & Area Residents and Tenants Association
Emerson Group	North Birkenhead Neighbourhood Forum
Emerson Group	North Country Homes Group Limited
Emery Planning Partnership	North West Association of Sea Angling Clubs
Energy Projects Plus	North West Strategic Health Authority
Entec UK Ltd	North Western Baptist Association
Environmental Resources Management	North Western Confederation of Passenger Transport
Fisher German	Northern Trust
Forestry Commission NW	NW & North Wales Sea Fisheries Committee
Forster and Company	Overchurch Residents Association
Fort Perch Rock	Oxton Society
Forthview Limited	P H Property Holdings Limited
Forum Housing Association	P Wilson & Company
Frankby CAAC	Paddock Johnson Associates
Friends of Arno & Oxton Fields	Partnership for Racial Equality
Friends of Arrowe Country Park	Patrick Farfan Associates Ltd
Friends of Ashton Park	Paul Butler Associates
Friends of Bidston Hill	Paul Dickinson Associates
Friends of Birkenhead Park	Peacock & Smith
Friends of Central Park	Peel Holdings Limited
Friends of Coronation Gardens	Persimmon Homes (North West)
Friends of Dibbinsdale	Phil Major Waste Disposal Limited
Friends of Eastham Country Park	Phoenix House Residential Rehabilitation

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Friends of Flaybrick	Planning and Environmental Services Ltd
Friends of Gilroy Nature Conservation Society	Planning Bureau Limited
Friends of Grange Community Park	Port Sunlight Village Society
Friends of Harrison Park	Poulton & District Residents Association
Friends of Heswall Shore	Premier Brands UK Limited
Friends of Hilbre Nature Reserve	PTS Property
Friends of Hoylake & Meols Gardens	Pulford Road Residents Association
Friends of Leasowe Lighthouse	R G Drake
Friends of Ness Gardens	Ramblers Association (Wirral Group)
Friends of North Wirral Coastal Park	Reclaim Our Quarry
Friends of Rock Park	Reddington Developments Limited
Friends of Storeton Woods	Redrow Homes North Limited
Friends of Tam O'Shanter Urban Farm Trust	Rev Father Ostaszewski
Friends of the Earth	Robinson & Neal
Friends of Tower Grounds	Robinson Architects
Friends of Vale Park	Rock Ferry Community Partnership
Friends of Wirral Country Park	Rock Park Estate Management Committee
Fuller Peiser	Rodney Housing Association
FWT	Roger Tym & Partners
Garden History Society	Roman Catholic Church
Garry Usherwood Associates	Royal Estates
General Aviation Awareness Council	Royal Liverpool Golf Club
George Wimpey North West Limited	Royal National Lifeboat Institute
Georgian Group	RPS Planning Transport & Environment
Gerald Eve	RSPB Northern England

Gilling Dod Architects	Rural Development Service
Gilmore Developments Limited	S & W Cates
GL Hearn	Safety Layne (Investments) Limited
Goodwin Planning Services	Salisbury Developments
Gough Planning Services	Salvation Army
Greasby Outdoor Activity & Leisure	Saughall Massie CAAC
Gregor Shore	Savills (L & P) Limited
Grosscurth & Co	Seacombe Local Area Partnership
GroundSure Limited	Seddon Homes Limited
Groundwork Merseyside	Seven Waves Community Radio
GVA Grimley	Showmens Guild of Great Britain
Halcyon Properties	Signet Planning
Hallam Land Management Ltd	SLR Consulting Limited
Halliwells LLP, Planning Section	Smith & Sons Property Consultants
Harlor Homes	Smiths Gore
Haston Reynolds Partnership	Society for the Protection of Ancient Buildings
Hawarden Airport (Airbus)	Sommerville Primary School
Henry Boot Developments Limited	Spawforths
Hepher Dixon	St. Mary's Catholic College
Heswall & District Business Association	Stanton Estate Residents Association
Heswall Congregation of Jehovah's Witnesses	Steer Davies Gleave
Heswall Society	Steven Abbott Associates
Hickling Gray Associates	Stewart Ross Associates
Higham & Co.	Storey Sons & Parker
HM Coastguard	Stranraer
Hooton Park Trust	Street Design Partnership

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HOW Planning LLP	Strutt & Parker
Hoylake Civic Society	Sure Start (Birkenhead Central)
Hoylake CVS	Survey & Design Associates
Hylgar Properties	Sustrans
Indigo Planning Limited	Taylor Wimpey UK Limited
Inglewood Properties	Taylor Woodrow Developments
Irby, Thurstaston & Pensby Amenity Society	Taylor Young
J10 Planning	Terrence O Rourke
JMP Consulting	Tetlow King Planning
Job Centre Plus	Theatres Trust
Jones Lang LaSalle	Thomas Estates Limited
Kemp & Kemp	Thornton Hough Community Trust
Kersh Commercial	Tower Action Group
King Sturge	Townswomen Wirral 101-25
Kings Gap CAAC	Tranmere Alliance
Kings Lane Supporters Association	Tranmere Parks
Knight Frank LLP	Tranmere Together
Lairdside Communities Trust	Tribal MJP
Lambert Smith Hampton	Tulip Limited
Land Planning Group	Turley Associates
Land Projects UK Associates	Tweedale
Landmark Information Group Ltd	Twentieth Century Society
Leasowe Community Centre	Unichema Chemicals
Leasowe Community Homes	Unilever Research Port Sunlight
Leith Planning Limited	Unilever UK Home and Personal Care
Leverhulme Estates	Unilever UK Property
MacIntosh Communications Limited	Union Street Day Resource Centre

Malcolm E Lloyd	United Co-operatives Ltd
Malcolm Judd and Partners	VCAW Bebington
Manor Egremont Mast Action Group	VCAW Heswall
Maritime Housing Association	VCAW Wallasey
Mason Owen Property Consultants	Venture Housing Association
Matthews & Goodman	Villa Medical Centre
McCormick Architecture	Wainhomes (Developments) Limited
McDyre & Co.	Wallasey Civic Society
McInerney Homes	Wallasey Village Community Partnership
Meols Drive Area Residents Association	Welcome Home Developments
Mersey Basin Campaign	Wellington Road CAAC
Mersey Docks and Harbour Company	West Kirby Village CAAC
Mersey Estuary Conservation Group	Westwood Road Residents Association
Mersey Estuary Development Co-ordinator	White Young Green
Mersey Waste Holdings Limited	WIRED
Merseyside & West Cheshire Ramblers	Wirral & Cheshire Badger Group
Merseyside & West Lancs Bat Group	Wirral Association for Disability
Merseyside Civic Society	Wirral Autistic Society
Merseyside Cycling Campaign (Wirral Branch)	Wirral Barn Owl Trust
Merseyside Environmental Trust	Wirral Black & Racial Minority Partnership
Merseyside Fire Service Headquarters	Wirral Chamber of Commerce
Merseyside Police	Wirral CVS
Merseyside Renewable Energy Initiative	Wirral Disabled Peoples Partnership
Merseytravel	Wirral Federation of Tenants & Residents Associations
Methodist Church Property Division	Wirral Fire Safety Command

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Miller Town Planning	Wirral Footpaths and Open Spaces Society
Miss J Marguerie	Wirral Green Belt Council
Mitsubishi Electrical Europe B.V.	Wirral Green Party
Mono Consultants Ltd	Wirral Hospitals Trust
Morris Homes (North) Limited	Wirral Investment Network
Mouchel Parkman	Wirral Jehovah's Witnesses
Mr R Neale	Wirral LA21 Forum
Mr & Mrs A Pasterfield	Wirral Methodist Housing Association
Mr & Mrs D Gleave	Wirral Metropolitan College
Mr & Mrs Dunne	Wirral Multicultural Organisation
Mr & Mrs Jacques	Wirral Partnership Homes
Mr & Mrs L & B Bell	Wirral Society
Mr & Mrs Neeson	Wirral Transport Users Association
Mr & Mrs PM & UR Weston	Wirral Urban Farm Association
Mr A Kennaugh	Wirral Victim Support
Mr A Nuttall	Wirral Wildlife
Mr A P McArdle	Woodchurch Neighbourhood Management Co-Ordinator
Mr B Legan Dip TP DMS	Woodford Group
Mr Badenoch	Woodland Trust
Mr Brown	

16 Appendix 2 - List of Specific Consultation Bodies

4 NW	Bell Ingram Pipelines Ltd
Airwave MMO2	British Telecommunications
Cheshire County Council	Cheshire Association of Local Councils
Countryside Council for Wales	Wirral Council, Children & Young Persons Department
Dwr Cymru Welsh Water	Denbighshire County Council
Ellesmere Port and Neston Borough Council	Fusion Online Limited
English Heritage	Halton UA
Flintshire County Council	Health & Safety Executive
Government Office for the North West	Helsby Parish Council
English Partnerships	Home Builders Federation
Hutchinson 3G UK Limited	Ince Parish Council
Liverpool City Council	Knowsley MBC
Merseyside Police Authority	Lands Office - Shell UK Pipelines
Orange Pcs Limited	Merseyside Archeological Service
Mobile Operators Association	Merseyside Environmental Advisory Service
National Grid	Merseyside Fire & Rescue Service
Natural England	Merseyside Policy Unit
North West Development Agency	Merseyside Waste Disposal Authority
NTL	Scottish Power
O2 UK Limited	Sport England
Puddington & District Council	St Helen's MBC
Secretary of State for Transport	Wirral Community Safety
Sefton MBC	Wirral Council, Community Services
SP Manweb	Wirral Local Strategic Partnership
T Mobile (UK) Ltd	Wirral Magistrates

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The Coal Authority

The Environment Agency

The Mersey Partnership

United Utilities

Vodafone

Wirral Sustainable Transport Co-ordinator

Wirral Voluntary & Community Services Network

Wirral Primary Care Trust

Willaston Parish Council

17 Appendix 3 - List of Area Forums

17.1 The Issues, Vision and Objectives report was presented at the following Area Forum meetings:

Area Forum	Date of Meeting
Bebington and Clatterbridge	Tuesday 3 February 2009
Oxton and Prenton	Tuesday 3 February 2009
Greasby, Frankby, Irby, Upton and Woodchurch	Wednesday 11 February 2009
Heswall, Pensby and Thingwall	Thursday 12 February 2009
Bidston and Claughton	Thursday 12 February 2009
New Brighton and Wallasey	Monday 16 February 2009
West Wirral	Monday 16 February 2009
Bromborough and Eastham	Tuesday 17 February 2009
Birkenhead, Tranmere and Rock Ferry	Thursday 25 February 2009
Leasowe, Moreton and Saughall Massie	Thursday 25 February 2009

Table 17.1

18 Appendix 4 - List of Respondents

Bellway Homes Limited	Mono Consultants Limited (for Mobile Operators Association)
Bollinwater Estates LLP	National Trust
Brock Plc	Natural England
Bromborough Society	4NW
Clive Watkin Partnership	Northwest Regional Development Agency
Coal Authority	Scottish Power Energy Networks
Colliers CRE (for Wilkie Leisure Group)	Spawforths
Countryside Council For Wales	Sport England
Devonshire Park Residents Association	Strutt and Parker LLP (for Leverhulme Estates)
DPP (for Tesco Stores Limited)	Theatres Trust
Drivers Jonas LLP (for Grosvenor)	Transition Town West Kirby
Eastham Village Preservation Association	Turley Associates (for Peel Holdings)
Ellesmere Port and Neston Borough Council	United Utilities
Emery Planning Partnership	Universities Superannuation Scheme (USS) Limited
English Heritage	Williams Estate Management
Environment Agency	Wirral Country Park Friends Group
Government Office for the Northwest	Wirral Partnership Homes
Greasby Community Association	Wirral Wildlife
Health and Safety Executive	Mr T Harney
Heswall Congregation of Jehovah's Witnesses	Mr M Harrison
Heswall Society	Mr R Neale
Hoylake and District Civic Society	Mr M Neish
Jones Lang LaSalle (for Warner Estates)	Mr J Noble

Liverpool City Council

Miss G Spencer

Merseyside Environmental Advisory Service Mr R Tann