



# Wirral Local Plan – Main Modifications Response Form

## 3. Data Protection Notice

x	Please tick this box to confirm that you understand that your name and your response will be published, that your full name and details will be passed to the Planning Inspectors, and that you have read and understood the Council's privacy notice.
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Please note that all comments will be held by Wirral Council and made available in accordance with our privacy notice, which can be viewed at <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/forward-planning-privacy-notice> or obtained from one of the addresses below.

Please read all the information related to this consultation on the Council's webpage at <https://www.wirral.gov.uk/new-local-plan> or which has been placed in public libraries, and the Wirral Local Plan Modifications Response Form Background Note before you make your representations.

## 4. Completed Responses

Please submit your completed Response Form/s **to arrive at one of the addresses below no later than 5pm on Friday 8 November 2024.**

- by email to: [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk), clearly marked as 'Wirral Local Plan – Consultation on Main Modifications'  
or
- by post to: Wirral Local Plan - Main Modifications, Wirral Council, PO Box 290, Wallasey CH27 9FQ

Please note that comments received after this deadline will not be accepted.

Please use a separate Response Form for each modification that you wish comment on.

If you require any further information, please contact the Council's Forward Planning Team by e-mail at [localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk) or by telephone on 0151 691 8235.

# Wirral Local Plan – Main Modifications Response Form

## Part B

1. **To which Modification does your representation relate?** (please insert as appropriate)

Main Modification Reference number: MM [ 56 ]

Policies Map Reference number: PM [ ]

Additional Modification Reference number: AM [ ]

2. **If your comment is on a Main Modification, do you consider that the Main Modification is:**

Legally Compliant – Yes / (please delete as appropriate)

Sound – No (please delete as appropriate)

3. **Please explain why you consider a Main Modification does not assist in achieving legal compliance or soundness or provide any other comments on it in the box below. Please be as precise as possible.**

### **MM56 Design Details**

3.176 The Council is clear that retrofit of new buildings is an expensive route to zero carbon and prefers development to be built as zero carbon design now, hence minimising the cost of retrofit. Such measures might include ensuring there is space for air source heat pump, or configuration for connection to a future heat network. However, avoiding any need for retrofit is preferable.

We support this. Merseyside has too many buildings already which need serious upgrading to meet zero-carbon and reduce fuel poverty e.g. an estimated 100,000 homes in Merseyside, plus public and community buildings. However, in view of this, surely WD23 D is too weak, and for soundness in a climate emergency should:-

Remove ~~'where possible and viable'~~. Many smaller builders have demonstrated that viable lower-carbon construction and operation is perfectly possible e.g. the new modular houses in New Ferry and Bromborough. Large volume house builders must be made to move into the 21<sup>st</sup> century.

3 'Seeking to minimise any retrofit' is too weak to accord with 3.176 and should say 'remove or minimise any need to retrofit to achieve zero-carbon in use.'

We regret the loss of any reference to Passivhaus but realise that standards will change over the lifetime of the Plan, as the reality of climate change becomes all too apparent.

Note Sustainability Appraisal: Appraisal of Modifications, which says that 'making policies less prescriptive means they could lead to fewer benefits in relation to soils and land, energy/climate change mitigation, air quality and biodiversity'

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4. Please set out in the box below the changes you consider necessary to make the Main Modification legally compliant and sound.

Remove ~~'where possible and viable'~~.

Remove ~~'Seeking to minimise any retrofit'~~, replace with 'remove or minimise any need to retrofit to achieve zero-carbon in use.'

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- 5. Do you have any comments on the Sustainability Appraisal or to the Habitats Regulations Assessment in respect of this particular Main Modification? Please provide them in the box below.**

Note Sustainability Appraisal: Appraisal of Modifications, which says that 'making policies less prescriptive means they could lead to fewer benefits in relation to soils and land, energy/climate change mitigation, air quality and biodiversity'

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### 6. Do you have any comments on a Proposed Change to the Policies Map? Please provide them in the box below.

Please state the proposed change to which you refer (in the format 'PMxx'). Please state as concisely as possible how you think the Policies Map should be changed. Please include or attach a map showing your proposed change, if you are able to do so.

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## Part C

**Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below.**

Please state the additional modification to which you refer (in the format 'AMxx') and provide your comments as concisely as possible

## Wirral Local Plan – Main Modifications Response Form

Thank you for completing this form.

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