

Wirral Local Plan – Main Modifications Response Form from ITPAS

Part A

1. Personal details

(if an agent is appointed, please complete only the title, name and organisation in the boxes below but complete the full contact details of the agent in section 2 below)

Title	[REDACTED]
First name	[REDACTED]
Last name	[REDACTED]
Organisation (where relevant)	Irby Thurstaston & Pensby Amenity Society (ITPAS)
Address	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]
Email address	[REDACTED]
Objective ID number (if known)	1311854

2. Agent's details (if applicable) NOT APPLICABLE

3. Data Protection Notice

<input checked="" type="checkbox"/>	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.**

Wirral Local Plan – Main Modifications Response Form from ITPAS

Part B for MM 1.

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

Main Modification Reference number: **MM [1]**

Additional Modification Reference number: AM [] – see Part C.

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

Legally Compliant – **YES**

Sound – **YES**

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.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 1 (Delivering Growth through sustainable low carbon regeneration):

We strongly support the confirmation that “exceptional circumstances to justify alterations to the Green Belt boundaries set out in national planning policy do **NOT** exist in Wirral”.

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

No changes are required to make the MM legally compliant and sound.

Our comment is that “, subject to delivery,” is superfluous and should be omitted.

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.**

We have NIL comments on either Document.

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

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

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Part B for MM 2.

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

Main Modification Reference number: **MM [2]**

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

Legally Compliant – **YES**

Sound – **YES**

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.**

We support the legal compliance and soundness of all the Main Modifications and call for the Local Plan to proceed to Adoption asap so that the benefits for Wirral can be realised.

We highlight below our principal comments and/or suggestions:

Regarding MM 2 (Vision – Items H & K):

LP Page 47 Vision Item H: the district centre of **Irby** having a retail centre remaining vibrant should be included in the list of district centres.

LP Page 47 Vision Item K: suggest adding at end, “, indeed a New Town within an historic Old Town.

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

No changes are required to make the MM legally compliant and sound, but we suggest amendments outlined in Box 3 above.

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.**

We have NIL comments on either Document.

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

We have NIL comments on the Policies Map other than the font size needs adjusting in places for clearer reading.

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Part C for AM 106 - Comments in the box below.

We highlight below our principal comments and/or suggestions:

Regarding AM 106 (Paragraph 5.1)

“13,360 new dwellings” still in text – figure is surely out-of-date?

Needs correcting for consistency despite the figure being highly-inflated and not based on best Data or Methodology.

Part C for AM 130 - Comments in the box below.

We highlight below our principal comments and/or suggestions:

Regarding AM 130 (Para 5.60 – The priorities for Irby, Thingwall, Pensby, Heswall and Gayton are to:) Suggested new items 7, 8 and 9 (with context)

7. In addition to the heritage matters in item 4 above for the Scheduled Monument Irby Hall, preserve or enhance the vista from Irby Village across the protected ‘surrounds’ (historically-linked fields) of Irby Hall (between the Anchor PH and Irby Hall moated site), across farmed fields to the Dee Estuary and distant Welsh Hills.

Some years ago, this vista was included in the Council’s booklet on the Character of Wirral, appeared in a photograph, and was held to be an outstanding feature of Wirral to be preserved. In addition, the Council accepted ITPAS’s opinion that this view and the red sandstone buildings around the T-junction (Irby Road / Thingwall Road), which included a Scheduled Monument, Listed and other historic Buildings, together formed the highly valued and significant setting and gateway to the ancient (and modern) settlement of Irby.

8. Preserve or enhance the vital wildlife corridor from Limbo Lane (Irby) and adjacent fields, across Thingwall Road to Harrock Wood (Ancient Woodland owned by the National Trust) and on to fields beside and beyond, through which runs Arrowe Brook.

This featured significantly (inter alia) in the Leverhulme Estates Inquiry 2023 and was supported unanimously in the Public Meeting Session of the Inquiry by the over 500 Wirral Residents present.

9. Preserve or enhance the unique and highly valued open vista from Thingwall Road (between the distinct communities of Irby and Thingwall), extending seven kilometres across open farmland to the shore at Meols and the Irish Sea beyond.

This featured significantly (inter alia) in the Leverhulme Estates Inquiry 2023 including in respect of the need to keep the distinct communities of Irby and Thingwall separate (in line with the Purposes of Green Belt, NPPF Para 143 (b) – to prevent merging) and was supported unanimously in the Public Meeting Session of the Inquiry by the over 500 Wirral Residents present.

Part C for AM 172 - Comments in the box below.

We highlight below our principal comments and/or suggestions:

Regarding AM 172 (Appendix 13 - Page 354, LGS-SA7.16)

LGS-SA7.16 is known as ‘Irby Park’ and not ‘Irby Recreation Ground’; but thank you for correcting the OS Typology to the categories given in Reg 19 Representation and earlier.

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Part C for Various – Comments and Questions in the box below.

We highlight below our principal comments, questions and/or suggestions:

Appendix 12: SA7 – Irby Park (not Recreation Ground) seems to be omitted – Park & Garden with Play Area and Urban Sports Facilities. Also, Gayton Park?

Appendix 13: SA7 – Greenfield Estate (WK Sheep Field) is shown as being omitted but the approved development includes a large area of publicly-accessible greenspace – LGS. Put back in?

Appendix 16 Heritage Designations: Despite past Representations by ITPAS and WGSA, ‘Londymere’, the sandstone Roman Well remains with access steps ‘for the sick’ at the junction of SA7 and SA8 beside Footpath FP44 (subject of an archaeological dig, recording and protective covering up) is not mentioned here or anywhere in the LP. Could it be, not least because it is on a potential entry onto the Green Belt from Dawlish Road, Irby?

Appendix 17 (and elsewhere), why is Heswall Golf Course not mentioned, anywhere?

Various positions to mention ‘Basements’: Despite WGSA, ITPAS and other’s past Representations, there is no mention of ‘**Basements**’ anywhere in the Local Plan, especially for larger developments, where there would be obvious benefits to efficient use of land, servicing, extent and value of ground floor lettable space, appearance from the public zone, car parking, etc. – why not?

Several Maps/Plans are not clearly associated with their appropriate text:
e.g. WP4.2 Page 205 to 211 – Title to RES SA4.1 is on Pg 205 but Map of RES SA4.1 is on Pg 206 immediately above title for RES SA4.2 and RES SA4.3 on Pg 207.
Another example is Pg 224/225, EMP-SA5.4 – title is against the wrong site shown on the next page.