

Wirral Local Plan – Main Modifications Response Form

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	
First name	
Last name	
Organisation (where relevant)	United Utilities Water Limited
Address	
Postcode	
Telephone number	
Email address	
Objective ID number (if known)	

2. Agent's details (if applicable)

Title	
First name	
Last name	
Job title (where relevant)	
Organisation (where relevant)	
Who are you representing?	
Address	
Postcode	
Telephone number	
Email address	
Objective ID number (if known)	

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3. Data Protection Notice

✓	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, 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 or by telephone on 0151 691 8235.

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Part B

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

Main Modification Reference number: MM [44]

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~~/ No (please delete as appropriate)

Sound – ~~Yes~~ / 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.**

Within Policy WD4, United Utilities welcomes the amendments to paragraphs 6.42 which insert the word 'sewer' in the context of flood risk. Whilst we welcome this change, we wish to continue to highlight that the local plan does not explicitly refer to the sewer flood risk which we have identified at various allocations / regeneration areas within the plan which could be material to the design and developable area for these locations. This matter was addressed in detail in our response to the Examination (United Utilities response to Matter 9). This statement identifies the affected locations and recommends wording to reflect the on-site sewer flood risk. To avoid repetition, the sewer flood risk locations and the associated recommended policy wording is not repeated here. However, a copy of our statement is enclosed for ease of reference.

If sewer flood risk is not reflected in changes to text within the local plan, we would strongly advise that the risk of sewer flooding should at least be included in an update to the Strategic Flood Risk Assessment (SFRA). This reflects the planning practice guidance (PPG) at Paragraph: 001 Reference ID: 7-001-20220825 of the PPG which states:

'Strategic flood risk assessments show all sources of flood risk, now and in the future.'

Normal processes for preparing planning applications would ordinarily include reference to a SFRA. This reflects Paragraph: 004 Reference ID: 7-004-20220825 of the PPG states:

'Planning authorities and developers can investigate measures to control the risk of flooding affecting the site. Early discussions with relevant flood risk management authorities, reference to Strategic Flood Risk Assessments and any programme of flood and coastal erosion risk management schemes will help to identify such opportunities.'

It is therefore critical that SFRAs identify known flood risk from all sources.

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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.**

On the basis of the above, we request that the flood risk locations and the associated policy wording is reflected in an update to the local plan as set out in our response to the Examination Matter 9. We also request that the SFRA is updated to identify the risk of sewer flooding at the locations which we have identified in our statement to Matter 9 of the Examination.

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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.

No comment.

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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.

No comment.

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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.

No comment.

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