

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)	New Brighton Rugby Club
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)	Peacock + Smith
Who are you representing?	New Brighton Rugby Club
Address	█
Postcode	█
Telephone number	█
Email address	█
Objective ID number (if known)	

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.
---	--

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.

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 5

~~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.

Based on the Main Modification version of the Local Plan, we understand the Council are continuing with the approach of not releasing any Green Belt land and not proposing any new sites for development.

From the initial stages of the preparation of the Local Plan, there has been an unrealistic political aspiration and over-reliance placed on long-standing brownfield sites coming forward “around Birkenhead” and on the “‘LeftBank’ of the River Mersey”.

The Strategic Housing Land Availability Assessment (SHLAA) 2019 confirmed:

“currently there may not be enough specific ‘deliverable’, or ‘developable’ sites within the urban area and on existing brownfield sites that will be able to provide for the number of new homes required to be delivered within the Plan Period”.

The Wirral Local Plan CIL & Viability Assessment (2022), para ES13, also went on to state that:

“10% on-site provision of affordable housing is currently unviable on all sites in Zone 1- low value without grant funding”.

Despite the evidence above, the Council is relying on a significant amount of urban brownfield sites to come forward during the Plan period including in Zone 1, which has viability issues. Such sites have not been delivered during times of relative economic prosperity, when there was already a presumption in favour of developing urban brownfield sites. As we are now in a period of economic uncertainty, it seems even less likely that such sites will be delivered with an acceptable level of affordable housing.

Housing need, including affordable housing, is a District-wide matter and does not only arise within the urban area of Birkenhead. The strategy pursued by the Council should recognise this and plan to meet this need by distributing growth across the District. Whilst intensification with high-rise, high-density developments/apartments on urban sites has a proportionate role to play in meeting some of Wirral’s housing need, not everyone wishes to live in a high-rise/high-density development in the urban area in the east of the District.

Wirral Local Plan – Main Modifications Response Form

The government's recent consultation on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system' proposes raising the housing requirement for Wirral from 728 dwellings per annum to 1755 dwellings per annum. Wirral should be planning for this significant increase now, rather than pushing the issue further into the future. The plan as currently drafted does not contain sufficient flexibility if the delivery of complex, brownfield sites was to stall; this issue will only exacerbate when housing figures increase.

As we have set out in previous representations, our client's land at New Brighton Rugby Club (ref: 919) is brownfield, within the urban area, should be allocated for development to boost housing supply and provide for certainty in terms of delivery.

Senior Officers at the Council have recently accepted the principle of redeveloping New Brighton Rugby Club for housing, to allow the club to relocate to the former Claremount Specialist Sports College site. Discussions are advancing with Steve McMorrان, Manager of Assets and Surveying.

The Local Plan should acknowledge the acceptability of residential development on the Rugby Club site and the benefits of providing modern fit for purpose social, sport and physical activity at a redeveloped Claremount Sports College site that will be funded from development proceeds at the existing Rugby Club site.

At present the Rugby Club site is shown as a protected 'Urban Sport Facility' (ref: SR-SA5.2) on the Policy Map; its associated policy wording should allow for the agreed development to proceed without this designation acting as a hurdle.

An architect has been instructed to prepare a sketch/capacity study for the New Brighton Rugby Club site, which shows how up to 130 homes (104 semi-detached, 26 detached) could be delivered on the site. This is included at **Appendix 1**.

Wirral Local Plan – Main Modifications Response Form

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

The Council should allocate additional sites to ensure there is a variety of housing being delivered, and to give the strategy flexibility.

Our client's site remains available for allocation/development for residential purposes:

1. New Brighton Rugby Club (ref: 919).

Wirral Local Plan – Main Modifications Response Form

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.

Wirral Local Plan – Main Modifications Response Form

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

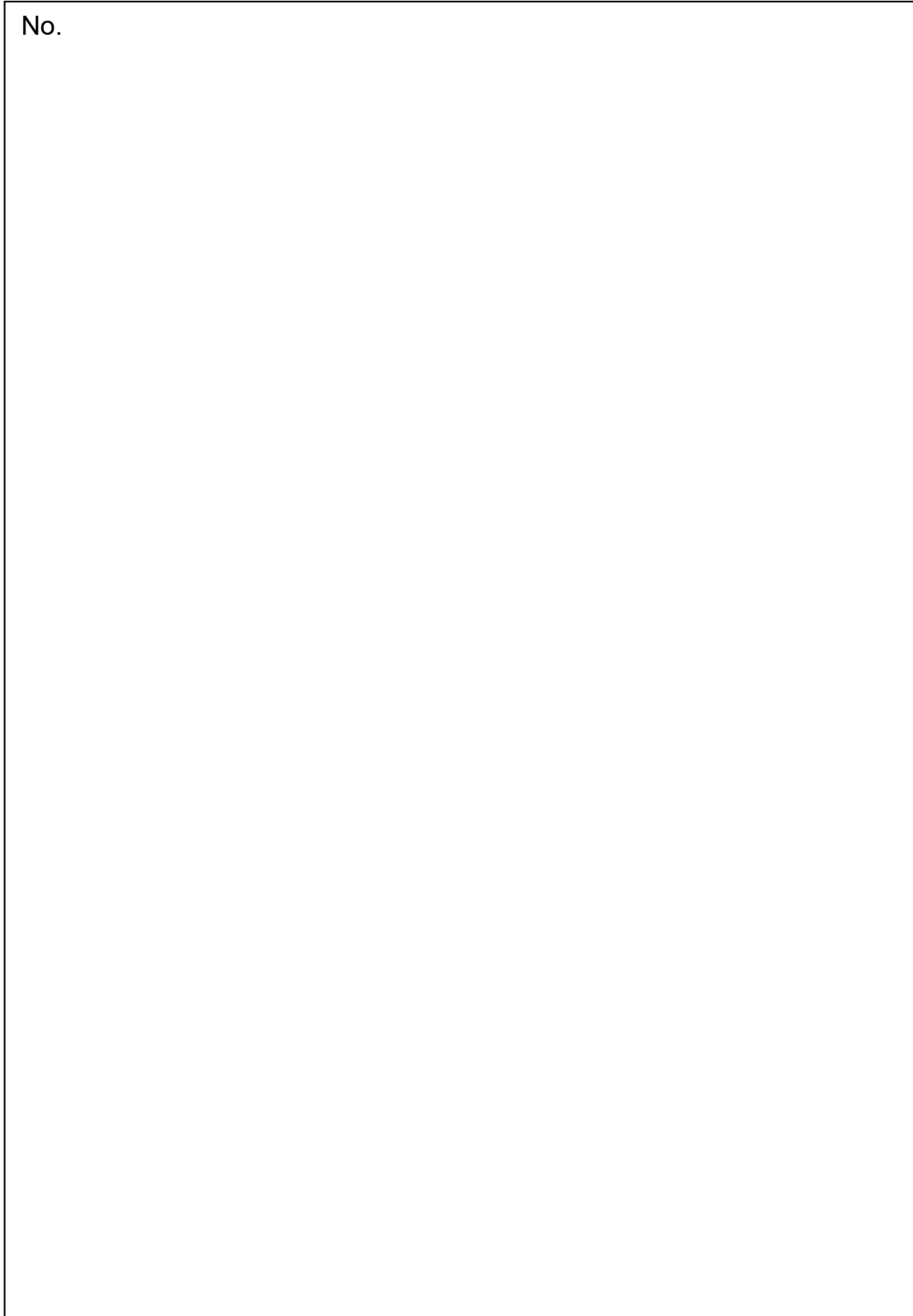
No.

Wirral Local Plan – Main Modifications Response Form

Part C

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

No.



Wirral Local Plan – Main Modifications Response Form

Thank you for completing this form.

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

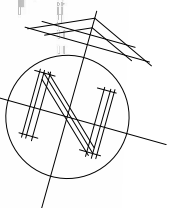
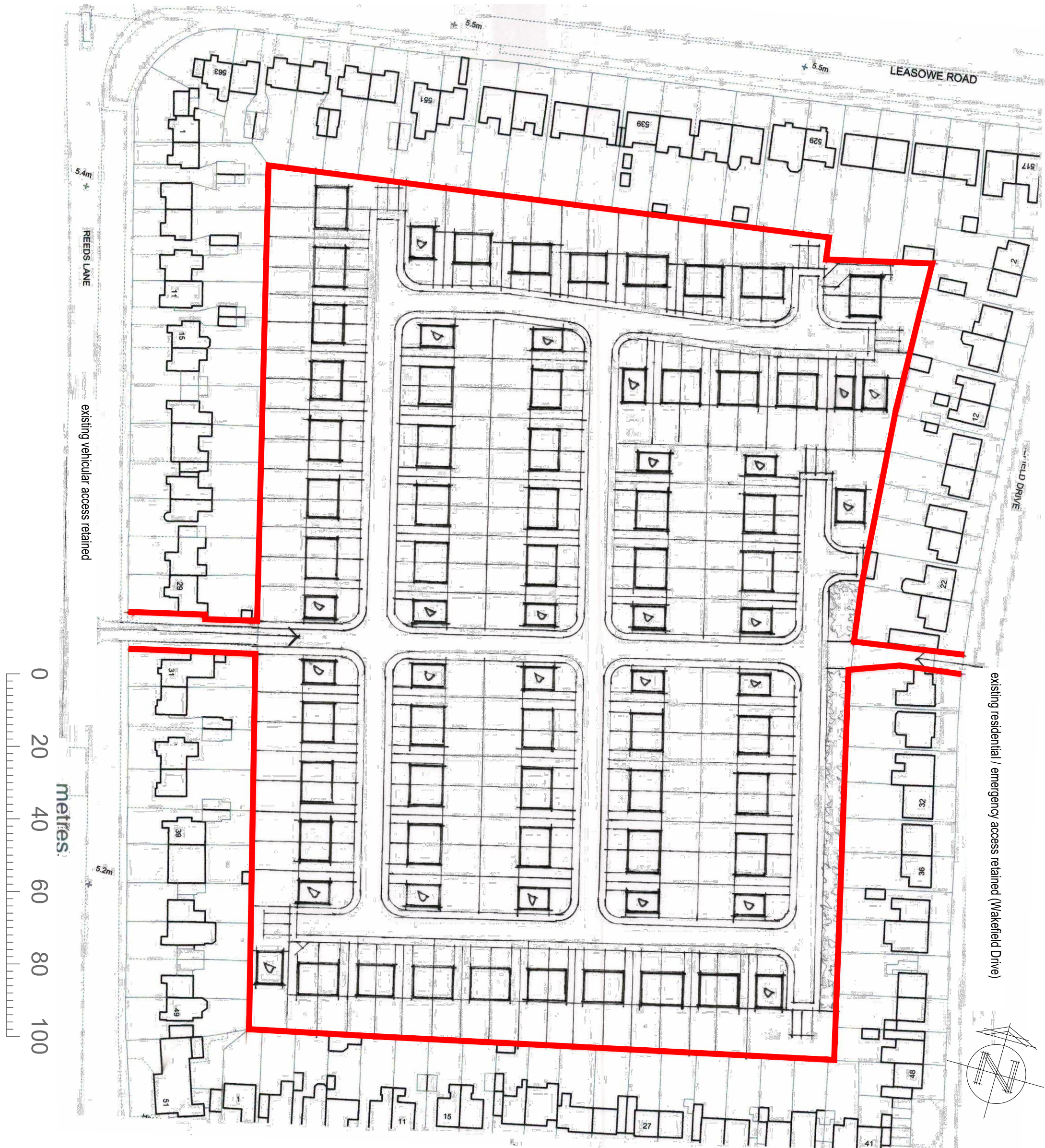
- by email to: localplan@wirral.gov.uk, clearly marked as ‘Wirral Local Plan – Consultation on Main Modifications’

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.

APPENDIX 1



- notes:
- The copyright of this drawing belongs to MAP Architects
 - The drawing may not be used without their consent
 - Written dimensions take preference over scaled dimensions
 - Scanned images may not be true to scale - do not scale
- revisions: date: description:

indicative site layout showing 130No. residential units. Comprising 104 No. Semis and 26No. detached (D)



MAP.architects

Greyfriars, Neston Road, Ness, Cheshire, CH64 4AR
Tel: 07850 530832 email: MAP.architects@outlook.com

CLIENT
New Brighton Rugby Club

PROJECT
Proposed residential development

DRAWING
Preliminary Site layout

SCALE
1:1000

DATE
10.11.22

DRAWING NUMBER
110.D.01

REVISION