

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)	Derwent Development Management Ltd
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)	ATP
Who are you representing?	Derwent Development Management Ltd
Address	
Postcode	
Telephone number	
Email address	
Objective ID number (if known)	Person ID 1240223

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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? (as appropriate)

Main Modification Reference number: **MM 53**

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.

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Please provide all the information and evidence necessary to support or justify your comment. If you wish to support the legal compliance or soundness of a Main Modification, please clearly state that you support it and set out your comments in this box.

MM53 is focused upon the topic of Social Value through accompanying text and moving the policy reference from Policy WS2 to WD20.

We submitted previous representations to the Regulation 19 plan which sought to impose policy requirements to all major development. We argued that this would capture several developments that would constitute major development but would not result in any significant construction activity or material changes to the character of use. This would mean that those applications would need to commit resource to provide technical assessments and consider measures, where those developments would have no substantive opportunity to contribute to the objectives of those policies.

We advised that Regulation 19 policy WS2 should be amended accordingly. Through the Main Modifications, WS2 has been morphed into a new Policy WD20. Regrettably, the revised policy WD20 still fails to recognise that it will provide a blunt instrument that would apply to all development typologies even where they would not result in any activity where the Social Value approach could have genuine utility. That fundamentally misses the point and the policy remains unsound.

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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.

Please say why each change you consider necessary will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy WD20 should be amended to ensure that it only relates to development typologies which are genuinely relevant to its objectives. We propose the following (changes in red text):

Policy WD 20 Social Value

A. Proposals for major development *that involves significant construction activity* should demonstrate how they are designed and are to be delivered in a way that seeks to increase social value, as defined in supporting text to this policy and in a manner proportionate to the nature of the development proposed.

B. Major development proposals *that involve significant construction activity* are required to provide a social value statement that explains how the development will secure and deliver social value that would arise from the proposals including:

1. Local labour policy for construction and occupation of the development covering skills and training provision including apprenticeships; and
2. Local sourcing of products and materials for construction.

These revisions would help to ensure that these policy requirements would align with the tests of soundness.

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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.**

Please state the document to which you refer, with the relevant paragraph, page and table number. Please be as concise as possible.

We make no comment on this matter.

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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.

We make no comment on this matter.

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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

We make no comment on this matter.

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Thank you for completing this form.

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