

aspirations of national policy to significantly boost housing, meet as a minimum the objectively assessed needs for housing or identify a positively prepared strategy.

It should also be noted that within the sources of housing supply outlined, an allowance for 1,514 dwellings from conversions and changes of use, alongside an additional allowance for windfall development of 420 dwellings, are included.

It is not considered to be appropriate to separately categorise these sources of supply and this also results in the over-inflation of the overall windfall allowance. Indeed, it has been considered throughout Richborough's representations during the plan preparation process that the evidence justifying the windfall allowance is not robust or compelling and therefore, should delivery of these supply sources be lower, the shortfall in the overall housing supply would be further exacerbated. Furthermore, conversions and changes of use are unlikely to deliver the right types or sizes of homes required in the borough, including the critical need for affordable housing, as outlined in the SHMA.

In addition to the over-reliance on allowances for windfall and conversions/changes of use, the spatial strategy identified within the Local Plan places focus on regeneration, particularly in Birkenhead. Whilst urban renewal is important, the strategy disproportionately relies on development of brownfield land for housing without full consideration of distributing development across sustainable settlements in all areas of the borough, in an effort simply to avoid the release of Green Belt land. The schedule of main modifications sets out that identified sites (excluding committed sites or that with planning permission) within regeneration areas are proposed to deliver 6,816 dwellings across the plan-period, which is over 57% of the proposed Local Plan housing supply.

This source of development is unlikely to deliver a significant proportion of affordable units or larger, family sized housing and therefore ignores the results of the SHMA which recommends 60% of all new dwellings to be 3-bedrooms or more. Richborough have outlined the significant viability constraints of brownfield sites, including remediation and build costs, through previous consultation stages and during the Examination in Public alongside the viability concerns regarding the delivery of associated infrastructure with the current strategy.

Any slippage or non-delivery of brownfield sites, associated with the viability constraints identified, will have critical implications to meeting the identified housing needs of the borough over the plan period. [REDACTED] modifications do not satisfy the tests of soundness set out in the [REDACTED] progress to adoption.

Monitoring and Review

It is welcomed that Main Modification 21 provides further monitoring and review tests in relation to the scope of undertaking an early review of the Local Plan within Policy WS 21 and outlines that a review of the Local Plan will commence immediately following adoption. However, this approach is merely 'kicking the can' down the road in terms of ensuring identified housing needs are delivered and also does not commit the Council to a full and comprehensive review of the Local Plan. It is considered that further modifications to Policy WS 21 to ensure that Council begin a comprehensive and full review of the Local Plan following adoption due to the critical housing supply and delivery issues highlighted within this representation.

The proposed Local Plan does not propose to meet its own housing needs across the plan period, and this shortcoming is only amplified by the proposed national planning policy changes which were consulted on between July and September 2024.

This consultation outlined significant reforms to the standard method calculation for local housing needs which would see an annual increase in housing need of 1,027 dpa for Wirral alongside significant changes in relation to Green Belt policy.

A further transitional arrangement for the purposes of plan-making is identified for Local Plans submitted for examination on or before the publication date (+ one month) of the new Framework, outlining that Local Plans that reach adoption with an annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure will be expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need.

Implementation of plan-making reform would further demand an immediate *full* review of the Local Plan is undertaken with consideration of reviewing and amending Green Belt boundaries.

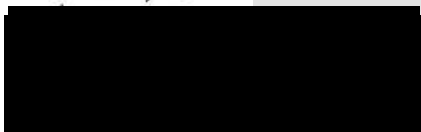
Conclusion

This letter has been prepared by Hive Land & Planning on behalf of Richborough Estates in response to the Wirral Local Plan Main Modifications consultation being undertaken by Wirral Borough Council between the 25th September and 8th November 2024.

The main modifications do not address concerns regarding the soundness of the Local Plan in regard to the spatial strategy, over-reliance on brownfield sites and windfall allowance for the delivery of housing and the shortfall in housing supply to delivery the identified housing need over the plan period.

Furthermore, it is critical that the monitoring and review policy requires an immediate, full and comprehensive review of the Local Plan to address the critical shortfall in housing supply over the plan period and to align with the emerging national planning policy changes.

Yours sincerely



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