

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	Mr
First name	Keith
Last name	Keeley
Organisation (where relevant)	
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

<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.**

- 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 [14 & 22]

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.**

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.

The proposed modifications MM14 and MM22 will make the Plan unsound in that the Plan will not be justified or in this context does not adopt an appropriate strategy, taking into account the reasonable alternatives.

Please see Appendix 1 to this form for full representation details.

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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.

The original policy wording and boundary for Wallasey Town Hall Quarter and Toronto/Desmesne Street and Borough Road East Waterside Neighbourhood Masterplan Area (MPA-RA1.1) should be retained.

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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.

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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.

The boundary of the original masterplan area for Wallasey Town Hall Quarter and Toronto/Demesne Street and Borough Road East Waterside Neighbourhood Masterplan Area (MPA-RA1.1) should be retained.

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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

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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

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Appendix 1: Representation in respect to Question 3:

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.

The proposed modifications **MM14 and MM22** will make the Plan unsound in that the Plan will not be justified or in this context it will not adopt an appropriate strategy, taking into account the reasonable alternatives.

The proposed modification to delete the wider Toronto/Desmesne Street and Borough Road East Waterside area from the **Wallasey Town Hall Quarter and Toronto/Demesne Street and Borough Road East Waterside Neighbourhood Masterplan Area (MPA-RA1.1)** and instead reduce the masterplan area to cover the Wallasey Town Hall environs is a fundamental error in the regeneration strategy which underpins the Local Plan and the Birkenhead 2040 Strategy. It ignores the recent evidence which the Council prepared through the work undertaken on the Seacombe River Corridor Masterplan in 2022/ 23 in partnership with the other main land owner in the area Magenta Living.

The Draft masterplan identified that the whole original masterplan area had significant social, health, environmental, and housing issues and that a comprehensive approach to its regeneration was essential. The area was identified as being one of the most deprived locations in the country. Despite the very serious issues in the area the masterplan identified very important potential positive and underutilised drivers for regeneration including:

- A world class waterfront location facing the Liverpool Waters Regeneration Area and the new iconic Everton FC Football Ground. The views and potential value of this waterfront area in regeneration terms will only increase with the proposed Liverpool Waters regeneration development which will emerge in the next few years following funding announced by the Government recently;
- The amazing asset of the broad Seacombe Promenade which forms the eastern boundary of the site which provides a world class recreational resource linking Seacombe Ferry to New Brighton and beyond as part of the Wirral Way; and
- The area is 'book ended' by the heritage assets of the Grade II Listed Seacombe Ferry Terminal (including the Eureka Children's Science +Discovery Centre) and the iconic Grade II* Listed Wallasey Town Hall.

It was also noted that the comprehensive regeneration of this area represented the only opportunity to deliver change at scale in the deprived south Wallasey area and that its successful regeneration could have significant 'ripple effects' into the wider area.

Through the masterplan work the project team became aware of the following key factors that led to the original Policy RA1:

- the significant regeneration opportunities in the area with potential for transformative residential led mixed-use renewal delivering a significant number of new dwellings as well as improved housing which could only be delivered through a comprehensive approach to the whole area developed with the local community.
- the Wallasey Town Hall Area ('Quarter') including the redevelopment of the Town Hall annex sites, a new primary school, a repurposed mixed-use Wallasey Town Hall, a replacement leisure centre overlooking the River Mersey with direct links to the

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promenade should be treated as a catalyst for but part of the regeneration of the wider original masterplan area. A key part of this approach is to provide modern quality community infrastructure to serve existing as well as attract new residents;

- that piecemeal redevelopment focussed on Wallasey Town Hall environs only would likely be ineffective in regeneration terms as it would not have the critical mass of development required to overcome the immediate context of urban decline and deprivation or be seen as a wider branded major regeneration project.
- It was also considered that the viability of appropriate scaled and typologies of housing projects within the Wallasey Town Hall environs would likely only be achieved and redevelopment be successful if it were seen as part of the first phase of the wider Masterplan project developed with the existing community. In this context, the successful bid which the Council made in 2023 for Brownfield Funding for the redevelopment of the Town Hall Annexes was premised on this wider masterplan area approach and the land value uplift that such an approach would help bring about. The Wallasey Town Hall 'Quarter' concept was therefore developed as part of this approach and the Brownfield Land Bid in particular and was intended to be a part of a wider regeneration approach for the wider Seacombe River Corridor area.

Of all the masterplan areas identified to help deliver the Birkenhead 2040 strategy this masterplan area is especially important because it was the one area which would impact on an existing deprived community directly, and which if delivered correctly could help them share in the area's potential as well as having potential regeneration impacts on the wider South Wallasey area and the LeftBank concept northwards to New Brighton. It would also support the recently opened Eureka project at the Seacombe Ferry Terminal which is a modern, innovative pioneer visitor attraction set in an otherwise deprived area.

The main purposes of the masterplan approach set out in the Local Plan are to:

- identify areas which should be regenerated in a comprehensive manner to maximise their potential to deliver meaningful change at scale;
- set out a clear spatial planning policy context to provide certainty for developers and investors;
- to provide a focus for branding, place making, infrastructure investment, funding bids, and delivery coordination; and
- to prevent piecemeal development from undermining the comprehensive regeneration of the area

The original masterplan area for the Seacombe River Corridor area as set out in the draft Local Plan was based on evidence prepared by the Council and was intended to meet the above purposes.

In conclusion, the proposed modification is unsound because it is not justified and is not the appropriate strategy for the area based on the needs of the area and the masterplan evidence prepared by the Council. The modification is also contrary to paragraph 98 of the NPPF which promotes estate regeneration.

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I am concerned that if the masterplan boundary and Policy for this area is amended as proposed in the main modifications 14 and 22 then future piecemeal development within the wider Toronto Street, Demesne Street and Borough Road East area could prevent the successful comprehensive regeneration of this strategically important area to the detriment of local communities. It will also limit the potential for significant housing improvement and future brownfield housing delivery in the area to safeguard the Borough's Green Belt.

The retention of the existing masterplan boundary set out in the existing Policy RA1 and the Policies Map, would encourage the required comprehensive approach for the wider area and enable the Council and partners to build on the existing draft masterplanning evidence and use the existing available funding for the redevelopment of the Town Hall Annex sites and new school as a catalyst for the regeneration of this wider, strategically important, area as originally envisaged in the Birkenhead 2040 Strategy and the Draft Local Plan. It would also provide the context for the purposeful reuse of the Wallasey Town Hall. The proposed modification will prevent this from happening.

K Keeley

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