

# 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)

<b>Title</b>	
<b>First name</b>	
<b>Last name</b>	
<b>Organisation (where relevant)</b>	Stoford Properties Ltd
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone number</b>	
<b>Email address</b>	
<b>Objective ID number (if known)</b>	

### 2. Agent's details (if applicable)

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

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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](mailto: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](mailto: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 [ 70 ]

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

Sound – No

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 effect of the MM:

The effect of MM70 will be that the employment land supply for strategic B8 needs will not be available, needs will not be met and this will continue to be the case in the future review of the Plan too, because of the LCR SDS emerging draft. Whilst the indicators E1 and E2 within MM70 are helpful in terms of highlighting shortcoming in employment land delivery, they do not specifically then appear within the triggers for reviewing the Plan, and neither does the mention of a Green Belt review despite the widely acknowledged tightly constrained urban area and administrative boundaries.

Further explanation of our position:

Main Modification MM70

Within , the Examination, where we presented evidence of our concern regarding the supply of allocated employment sites, the Inspectors requested that future supply of employment land was monitored by use – especially given our concerns that number of sites that formed the council's supply were either proposed for /consented for or being used for port related uses. Port related uses were not part of the B2/B8 requirements that underpinned the overall requirement (we referred to this in our verbal evidence). We also expressed concern about the net developable areas of some sites, and the time for some sites to be delivered – suggesting that some may not be delivered at all to a history of not being available, on site constraints etc. We therefore welcome the indicators listed at E1 and E2 of this Main Modification. However we consider that given the limitations of the Plan in terms of providing for employment land needs, compounded by the geography of the Borough and its tightly constrained urban areas, it further supports our case that meeting employment land needs (strategic and non strategic) and the need to review the Green Belt, should be listed within the triggers for a review of the Plan in Policy WS12.

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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.

The Local Plan is at such an advanced stage that it is unlikely that additional sites will be allocated to address the failure to meet objectively assessed needs. There are only two available ways to rectify this:

1. Withdraw the Local Plan or
2. Add in additional text within the review and monitoring mechanisms to reflect the strategic employment need for B8 uses will be a matter for triggering an early review, and will be a matter for the subsequent Local Plan if that review is done at five years from adoption.

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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.

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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.**

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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.**

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Thank you for completing this form.

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