



The People's Project

Bramley-Moore Dock - Planning Addendum
Alternative Sites Assessment
September 2020





ALTERNATIVE SITES ASSESSMENT

Everton Stadium Development Limited

September 2020

CONTENTS

1.0 Introduction	2
2.0 Goodison Park: The Need to Relocate	6
3.0 ASA Methodology: Overview	26
4.0 Planning Policy & Precedent	27
5.0 Defining the Area of Search	32
6.0 Site Size & Identification	51
7.0 Site Assessment Criteria	54
8.0 Site Assessment	57
9.0 Conclusions	98
Appendix 1: Site Assessment Plan	99
Appendix 2: Site Assessment Proformas	100
Appendix 3: Summary of Relevant Planning Policy	101
Appendix 4: Strategic & Regeneration Policy	116
Appendix 5: Preferred Area of Search	122
Appendix 6: Extended North Liverpool	123
Appendix 7: Wider Area of Search	124
Appendix 8: Minimum Site Size	125
Appendix 9: LFC 2007 ASA	126

1.0 Introduction

ALTERNATIVE SITES ASSESSMENT

- 1.1 This Alternative Site Assessment ("ASA") has been prepared by CBRE Limited ("CBRE"), on behalf of Everton Stadium Development Limited (herein referred to as "Everton" or "the Club") to assess potential alternative sites for stadium development and to support a planning application at Bramley-Moore Dock ("BMD"), which is the Club's identified location for a new football stadium and ancillary facilities. This document forms a part of and should be read alongside the suite of documents that support the People's Project¹ planning application.
- 1.2 This document was first prepared and submitted in December 2019 as part of planning application ref. 20F/0001. The submitted ASA has subsequently been updated in August / September 2020 as part of the resubmission of a revised scheme at BMD to address changing circumstances and to reflect the feedback received from key stakeholders and Liverpool City Council ("LCC").
- 1.3 It is agreed between the Club, LCC and Historic England ("HE") that due to the scale of the development proposed, the heritage status of BMD and the tests of national policy, it is critical to undertake an assessment of the availability of alternative sites which might reasonably accommodate a stadium development that meets the needs of the Club, without prejudice to all other planning considerations.
- 1.4 Paragraphs 193 to 196 of the National Planning Policy Framework ("NPPF") consider the potential impacts to designated heritage assets, including World Heritage Sites ("WHS"). The submitted Heritage Statement² demonstrates that the development will cause "substantial harm" to the Stanley Dock Conservation Area, the Grade II listed BMD walls and the Outstanding Universal Value ("OUV") of the WHS. Paragraph 194(b) of the NPPF requires that any "substantial harm" to assets of the highest significance, including WHS, must be "wholly exceptional" and require clear and convincing justification. Therefore, the ability to demonstrate that there are no suitable or alternative sites is important in considering the justification for any harm to any heritage assets to be necessary and wholly exceptional.
- 1.5 The ASA provides a comprehensive assessment of alternative site options; assessing the suitability of each site for a new stadium development based on a comprehensive set of assessment criteria. In summary, the ASA includes:
 1. **Introduction and Background** - an introduction to the ASA purpose, content and a background to the Club's previous plans to relocate to a new football stadium;
 2. **The Need for Relocation** - an assessment of the drivers for change, including a review of the operational and footballing imperatives that underpin the need for Everton to relocate from Goodison Park to a site that can accommodate the needs of a modern football Club;
 3. **ASA Methodology** – a detailed explanation of the methodology and an overview of the ASA scope including:

¹ The People's Project includes proposals for a new stadium and associated development at Bramley-Moore Dock and the redevelopment of Goodison Park for a community-led mixed-use development

² Heritage Statement, KM Heritage (Updated August 2020) – submitted as part of the planning application resubmission

4. **Planning Policy & Precedent** - summary of the relevant planning policy (Statutory Development Plan) and case law/precedent has informed the ASA;
5. **Area of Search** - the approach to defining an 'area of search' for ASA;
6. **Site Size and Identification** - the methodology for a site search and identification exercise within the area of search; and
7. **Site Assessment Criteria** - the proposed robust set of site assessment criteria against which it is proposed to assess each identified site.
8. **Site Assessment** - a detailed qualitative review of the suitability of each identified site. A plan of the sites assessed is included as **Appendix 1** and a full copy of the detailed site assessment proformas are contained as **Appendix 2**; and
9. **Conclusions** – a succinct summary of the ASA conclusions.

BACKGROUND

- 1.6 Everton has been seeking an alternative site for a new football stadium for more than 20 years due to the challenges associated with the redevelopment of its existing historic home at Goodison Park. Whilst Everton has explored, in depth, the potential to redevelop or extend existing stands on the same Goodison footprint, the expansion of the site is not feasible, and the stadium is currently not considered appropriate to meet the needs of a top tier English Premier League ("EPL") or European Club due to:

1. Its poor physical condition, including accessibility, ageing stands and facilities;
2. Physical and size constraints which limit its potential to meet modern needs (including the dense residential character of the surrounding area and the significant acquisition that would be required over a long period of time to support any redevelopment);
3. Lack of amenity to meet the needs of a modern football stadium, including poor accessibility and supporter experience and operational inefficiency across significant elements of the stadium;
4. Limited capacity or modern facilities to match the ambition of the Club; and
5. Compliance issues with modern and future regulations due to significant physical constraints, including disability access, diversity and inclusion.

- 1.7 The issue of whether Goodison Park is fit for purpose was considered extensively during the Inquiry into the Club's proposed move to Kirkby in 2008/2009, with the Inspector stating that³ [CBRE **emphasis** added]:

*"Goodison Park is agreed by all to be in need of very significant work to improve to a suitable level, and that would require, as Mr Keirle⁴ shows in his evidence, a much larger site than EFC possess at Goodison Park. Mr Keirle's evidence deals with the question of potential changes to Goodison Park and the surrounding land. The matter has been exhaustively explored by the club over the past ten years, including a review by Mr Keirle's firm in July 2008 on the basis of the funding available for this project. **There is no credible evidence that a stadium of the kind that EFC needs can be provided at or near Goodison Park.** It is clear from Mr*

³ Report to the Secretary of State for Communities and Local Government, 2nd July 2009, APP/V4305/V/08/1203375, page 47, pp 5.6.37

⁴ David Keirle is the founder of KSS Architects, who worked on the Kirkby scheme

Elstone's evidence that had it been feasible to stay at or near the current site, EFC would have done so".

- 1.8 Further justification to underpin why Goodson Park cannot meet the needs of a modern Premier League club and cannot be feasibly or practically redeveloped, or extended to meet the present or future needs of the Club is set out in **Section 2**.

Previous Stadium Proposals

- 1.9 In its long-standing search for a new stadium site, Everton has continued to regularly review the availability and suitability of alternative sites. Historically, it has actively pursued three opportunities for stadium redevelopment. These include:

Kings Dock (1999-2003)

- 1.10 At the turn of the century, Everton pursued a scheme on the Kings Dock on Liverpool's Waterfront. The Kings Dock location would have provided an iconic waterfront location and received strong support from the Club's fans. However, the proposal was not progressed due to issues with funding at the time and the site is now home, in part, to Liverpool's successful M&S Arena, which is one of the City's premier entertainment venues.

Kirkby, Knowsley (2006-2009)

- 1.11 The Club (in partnership with Tesco Stores Ltd) submitted a hybrid planning application for a 50,000-capacity football stadium along with enabling retail development in early 2008. Despite a resolution to approve the application from Knowsley MBC, the scheme was subsequently called-in by the Secretary of State and ultimately dismissed in late 2009 on primarily retail planning grounds. The scheme received significant opposition from the Club's fan base and was subject to organised objections from fan groups, including Keep Everton in Our City ("KEIOC"), and also from LCC. The lessons learned, a change in leadership at the Club, the emergence of Everton in the Community ("EitC") close to Goodison Park and the opposition generated by the scheme has led Everton to now focus its search for a new stadium on sites which have a tangible and realistic connection to its spiritual home in North Liverpool and which have the backing of fans and the local community. Further detail on why the Club will not move to Knowsley / Kirkby is provided in Section 5.

Walton Hall Park (2014-2016)

- 1.12 A site at Walton Hall Park was explored as a possible location for the Club's stadium approximately 6 years ago. The project did not move beyond initial feasibility work, which was undertaken to assess the potential of the site for a new stadium development. However, owing to the site's status as an important City Park (designated as protected green space) and key area of high quality open space for the North Liverpool community, as well as the quantum of retail development required to cross-subsidise the development, the site was ultimately not progressed beyond the feasibility stage. Initial proposals generated significant opposition to any development at Walton Hall Park and an early public consultation event in September 2014 demonstrated the strength of local opposition against the scheme, attracting a number of organised and substantial demonstrations by the local community and local groups, including the Friends of Walton Hall Park.
- 1.13 Subsequently, Liverpool Mayor Joe Anderson pledged Walton Hall Park will "remain a park and will be designated as such" in the forthcoming Local Plan – ruling out future development. Furthermore, LCC has since been clear that it would not consider

important City Parks or protected open space, including Walton Hall Park, as suitable sites for sale or for stadium development due to the importance of these assets to the local community.

- 1.14 Previous stadium proposals have provided the Club with significant lessons in its search for a new stadium site and its supporter expectations in terms of the location and quality of a new stadium. It has given the Club a clear mandate to seek to identify a stadium that retains Everton within the City of Liverpool, and in a location that has strong physical and cultural connections to its existing spiritual home at Goodison Park, within North Liverpool. The Club's new leadership is now committed to delivering a stadium that is embedded within this traditional catchment area.
- 1.15 The following section explores the reasons why Everton must find an alternative site and seek to relocate from Goodison Park; setting out the practical, physical, social, sporting and financial imperatives that underpin the need for the Club to move to a stadium that is befitting of a top EPL tier team.

2.0 Goodison Park: The Need to Relocate

- 2.1 Goodison Park, known affectionately by supporters as “The Grand Old Lady”, has been home to Everton Football Club for more than 125 years and is recognised as the first major purpose-built football stadium in England. It is at the heart of the Club and has helped to foster significant ties with the surrounding community. However, Goodison Park is a stadium that has been extensively altered over time and has, since the start of the Premier League era, begun to significantly fall behind its rivals in terms of its capacity, quality, accessibility and supporter facilities and experience.
- 2.2 Whilst Everton has strong cultural, historic, emotional and social ties to Goodison Park and must retain close links to Goodison and its community, it is not feasible to expand or redevelop the existing site to accommodate the needs of the Club.
- 2.3 This section reviews the history of Goodison Park, its inability to meet the needs of the modern game and the reasons why the redevelopment or extension of Goodison Park is not a feasible, practical or reasonable alternative for the Club in its ambitions to develop a modern stadium with an increased capacity and modern ancillary facilities.

HISTORY OF GOODISON PARK



Image of Goodison Park in c.1938 (Source: Liverpool Echo)

- 2.4 In 1878, the congregation of St Domingo Methodist Chapel (now demolished) on Breckfield Road North in Everton formed a football team, simply known as “St Domingo”, to play in Stanley Park, one of Liverpool's municipal parks. The team's success and popularity rapidly outgrew the chapel community and, in 1879, the team adopted the name Everton Football Club.
- 2.5 Everton left Stanley Park in 1883 to find a private ground - leasing a field on Priory Road. The following year the Club leased a field on Anfield Road and the club moved, with stands erected, as Everton became a founding member of the Football League in 1888. Everton's first game at Anfield was played in September 1884 and soon after the Club became a professional team. By the 1890/91 season the club had won its first championship and often played in front of crowds of up to 20,000.

- 2.6 In 1892, Everton moved to fields known as Mere Green located to the north of Stanley Park and west of Anfield Cemetery on Goodison Road, only half a mile from Anfield Road which then became home of Liverpool FC.
- 2.7 At Mere Green, Everton spent £3,000 developing a new football ground, which included two uncovered stands, each of 4,000 capacity, and one covered stand seating 3,000. The ground was named Goodison Park, owing to its location on Goodison Road, and was formally opened on 24th August 1892, hosting a pre-season friendly with Bolton Wanderers. At this point in time, Everton was the richest club in the country.



Image of Goodison Park c.1905 (Source: Liverpool Echo)

- 2.8 Following its opening, Goodison Park has, over the years, been subject to several key developments and modifications which have sought to improve the stadium's capacity, facilities and supporter experience.
- 2.9 Major developments that have shaped Goodison Park into the stadium that exists today are summarised in Figure 1.

Figure 1: Chronology of Major Development at Goodison Park

Source: CBRE

- 2.10 Since the mid-1990s, Goodson Park has only been subject to more limited alterations, owing to the constrained nature of the site, the lack of viable options to increase capacity and the costs associated with further development. Recent alterations include the piecemeal provision of small numbers of corporate boxes, a revised crowd surveillance gantry, cosmetic improvements and a hospitality marquee that was erected in the Park End car park in 2003; and between 2017-2019, improvements to the Park End which have sought to make Goodison Park compliant with disability access guidelines (this is explored in more detail later in this section).

- 2.11 Goodison Park has required significant investment in general maintenance and capital expenditure (to make the stadium compliant with modern regulations, such as accessibility guidelines) over the past 5 years for it to remain fit-for-purpose. Evidence from Everton accounts demonstrate that the Club has spent more than £19m between 2015-2016 and 2019-2020 on major maintenance works and capital expenditure to ensure that the stadium continues to meet modern regulations and standards⁵.

THE NEED FOR A NEW STADIUM

- 2.12 As discussed, Goodison Park was once one of the finest football grounds in the country, with Everton one of the great innovators amongst its football club peers. In stadium construction terms, it achieved several new 'firsts' and set benchmarks for others to follow; offering excellent views of the pitch from the new grandstands and boasting hot water boilers, large double baths, a referees' changing room, and other facilities.
- 2.13 However, Goodison Park has fallen significantly behind its rivals during a period of unprecedented success and intensive infrastructure development in the English Premier League. It is now imperative that the Club seeks to increase the capacity of the stadium and improve the stadium facilities in order to improve accessibility and supporter experience and to compete commercially with top tier EPL and European Clubs. ***The key constraints that exist at Goodison Park are the restricted capacity of the stadium, the age and condition of the stands and stadium itself, the lack of modern amenities to meet supporter expectations and the constraints of the area around the stadium which limit the potential for expansion or redevelopment.***
- 2.14 Goodison Park has a number of deficiencies which exacerbate its operational weaknesses and make it extremely difficult, inefficient and costly to expand or redevelop the stadium to meet modern expectations within its existing footprint. These are set out below along with an assessment of why the redevelopment or expansion of Goodison Park is not a realistic, feasible or practical option for the Club.

Operational Weaknesses

a) Spectator Viewing Experience

- 2.15 The 2017/18 Premier League Matchday Fan Experience Survey asked fans from all EPL clubs to rate what criteria is the most important in determining their matchday experience. Based on a score of 1 (not important) to 10 (very important), stadium 'sightlines' has consistently ranked as the most important element of matchday experience (with an average of 8.6), alongside 'overall matchday experience'. Based on the 20 EPL Clubs surveyed, Everton was the lowest ranked Club for 'sightlines' in the Premier League and ranked 14th of 20 for overall matchday experience⁶. The Club has consistently ranked at the bottom of the EPL in terms of sightlines to the pitch over the past 15 years.
- 2.16 Goodison Park currently has more than 21,000 seats with an obstructed view of the playing area, which equates to approximately 53% of the stadium capacity - hindered by stanchion posts or other viewing obstructions. Furthermore, of these seats, more than 3,000 (8%) have an obstructed view of the goal area. With increasingly better access to matches on television, match tickets with poor sightlines are becoming difficult to sell and the

⁵ Everton Football Club Accounts 2015-2020 including costs for 'major maintenance' (£1.68m) and 'capital expenditure' works on Goodison Park (£17.5m) to ensure the stadium meets modern requirements

⁶ Populus Premier League Matchday Fan Experience Survey 2017/2018

experience does not match the expectations of a top EPL or European Club. Furthermore, seating terrace widths are narrow and there are issues with the widths/quality of seats, the quality of accommodation, views and comfort in the majority of the stands. This is a major issue at Goodison Park which could not be rectified without the comprehensive redevelopment of the stadium. Figure 2 provides examples of the obstructed viewing experience at different locations within the stadium.

Figure 2: Obstructed Supporter Viewing



b) Accessibility and Facilities

i) Disabled Facilities and Wider Access for All

- 2.17 Facilities for disabled supporters at Goodison Park have consistently fallen behind the required quantity, quality and accessibility standards during recent years, with designated spectator areas limited in size and access within the stadium being narrow and difficult for wheelchair users.
- 2.18 The EPL committed to implement the Accessible Stadia Guide (“ASG”)⁷ in 2015 to improve accessibility in Premier League stadiums. According to ASG guidance, Everton should provide 207 wheelchair positions, with 75% of these being located in elevated positions and within proximity to accessible toilet facilities.
- 2.19 In 2015, the Club had only 118 wheelchair positions, with only 67 in accordance with ASG guidance (only 25% of the total were pitch-side with a 40m travel distance to toilet). The Club has since sought to improve accessibility, providing 121 seats that meet ASG guidance in 2017, with further works over that past two years undertaken in order to meet the standards imposed by the ASG. However, the complex nature of the stadium has made it extremely difficult for the Club to fully meet ASG and Equalities and Human Rights Commission (“EHRC”) standards and to provide the quality of accessible provision required by wheelchair users – particularly in terms of elevated seats, access to facilities and overall access to the stadium.
- 2.20 Whilst the Club is currently legally compliant, the stadium still does not provide appropriate proximity to WC facilities for wheelchair positions, sufficient numbers of elevated positions or accessible positions in all stands around the ground (with no elevated positions in the Bullens Road or main section of the Gwladys Street Stand). Given the constraints of the stadium, infrastructure issues at Goodison Park will continue to restrict the ability of the Club to continue to meet future accessibility requirements and has come at a significant capital expenditure cost the Club.

⁷ Premier League Accessible Stadia Guidelines Report (2015)

Figure 3: Disabled Facilities – at the lowest level of the Bullens Road Stand



In addition to disability access issues, Goodison Park also has no dedicated changing place facilities, breastfeeding rooms, prayer rooms or quiet rooms in the stadium which creates significant issues in terms of access to facilities for minority groups or those with specific needs. At present, the Club has to use existing office space for these purposes, where required, which does not provide the quality or type of suitable space to meet these needs.

ii) Quality and Access to Facilities

- 2.21 The existing concourse area is small, offers a poor supporter experience and creates significant movement issues for large crowds – particularly in accessing amenities, toilets and retail facilities. This has a particular impact on the accessibility and movement of disabled supporters and those with access issues, as well as families with small children. Fans are also unable to walk around the ground which further restricts access to facilities and inhibits circulation. Poor concourse conditions increase queues and waiting times, which impacts upon the overall matchday experience of supporters and has a commercial impact by limiting the sale of goods.

Figure 4: Cramped Concourse and Bar Conditions



- 2.22 Toilet and other amenity facilities are consistently ranked amongst the lowest in the EPL in the Premier League Matchday Fan Experience Survey – in 2017/2018 Goodison Park was ranked 19 out of the 20 EPL clubs on the separate measures of 'toilet facilities', 'cleanliness' and access to 'food and drink'⁸ – which has been consistent in the Matchday Survey over the past 10 years. The toilet facilities are not considered to be of an adequate standard to meet the expectations of a modern football stadium. Furthermore, Goodison Park ranked 16 out of 20 stadiums in terms of facilities for children, with conditions exacerbated by the cramped conditions and accessibility issues for families with children.
- 2.23 Goodison Park is further restricted by the lack of space for kitchen equipment, coolers and cellar space, which means the Club is unable to offer spectators certain types of hot food and draught beer in areas of the stadium. This cannot be expanded or improved due to the current structure of the stadium and is a significant detractor from the quality of the overall spectator experience at Goodison Park, as well as having an adverse financial impact on the Club.

iii) Access to ICT

- 2.24 Goodison Park does not have the quality of Information, Communication and Technology (ICT) infrastructure that is expected of a modern EPL club. The Club is unable to install a low power network that provides mobile phone coverage throughout the stadium and the wireless network infrastructure is restrictive owing to the stadium structure and lack of open spaces. The EPL Premier League Matchday Fan Experience Survey 2017/2018 ranks Goodison Park 14th and 15th respectively of 20 EPL clubs with regards to 'WIFI connectivity' and 'mobile phone signal', exacerbating the negative fan experience at the ground.
- 2.25 Due to the structure of the stadium and the piecemeal redevelopment over the years, there is now a hybrid configuration of ICT systems throughout the stadium. This requires a significant amount of time and expense for the Club to ensure that all platforms and facilities are operating effectively.

iv) Outside the Stadium

- 2.26 The stadium footprint is extremely constrained and is situated in a tight urban setting which has significant residential amenity impacts. Furthermore, three sides of the stadium are on the public highway which generates access, egress and movement issues around the stadium. As there is no dedicated exterior concourse for marshalling and managing crowds, surrounding roads have to be used for this purpose which compounds accessibility issues and increases the complexity of policing and stewarding. The Club has responsibility for staffing Traffic Control in these areas along with increased Counter Terrorism measures which includes Hostile Vehicle Mitigation within what is a tight urban setting.

⁸ Populus Premier League Matchday Fan Experience Survey 2017/2018, EPL ranking for 'Toilet Facilities', 'Cleanliness' and 'Access to Food and Drink'

Figure 5: Use of Public Highway Surrounding the Stadium



2.27 In terms of vehicular parking, there is limited coach and car parking provision within the vicinity of the stadium, which is currently restricting revenue streams, impacting on the quality of the corporate hospitality offer and serving to exacerbate amenity, accessibility and safety issues in the surrounding area.

c) Team and Coaching Facilities

2.28 The current facilities at Goodison Park for the players and coaching staff are limited and outdated. The player dug out, tunnel and area surrounding the pitch are inadequate – the current dugout area is small, with a lack of space surrounding for overflow of staff, medical staff, press and players. There are also insufficient facilities for briefing/staff areas for match day stewards. The facilities are not at the level expected from a top tier EPL or European Club and generate negative perceptions of the Club.

Figure 6: Limited Seating for Players and Coaching Staff



d) Retail

- 2.29 The Club's retail store is situated outside of the ground, 100 metres away from the stadium across a busy main road. This is unlike almost all other Premier League clubs where the retail stores are more easily accessible and integrated with the stadium. The Megastore is also considerably smaller (c.3,500sq ft) than other EPL club outlets, reducing the product offer and the ability to accommodate customers on matchdays. In addition, tours are not able to start and finish at the Megastore, due to safety concerns associated with the public highway and distance from the stadium.

Figure 6: Illustrating the distance between the Retail Megastore and Goodison Park



e) Corporate facilities

- 2.30 Goodison Park has a shortage of corporate facilities in all stands and, in particular, a severe lack of executive boxes and accompanying facilities. The revenue from corporate hospitality is a major revenue source for rival EPL clubs, and Everton is disadvantaged by its inability to fully maximise this type of revenue. At present the Club provides significantly less executive and corporate seating than its peers and there is an inability to expand this offer at Goodison Park.
- 2.31 Each corporate entertainment area is served by separate back of house facilities, which are limited in their size and functionality, due to the piecemeal way in which the stadium has developed, which is inefficient and costly. This also impacts on the quality of the product and service offer associated with the hospitality packages offered by the Club – particularly when compared to competitor Clubs that have access to modern, high quality facilities.

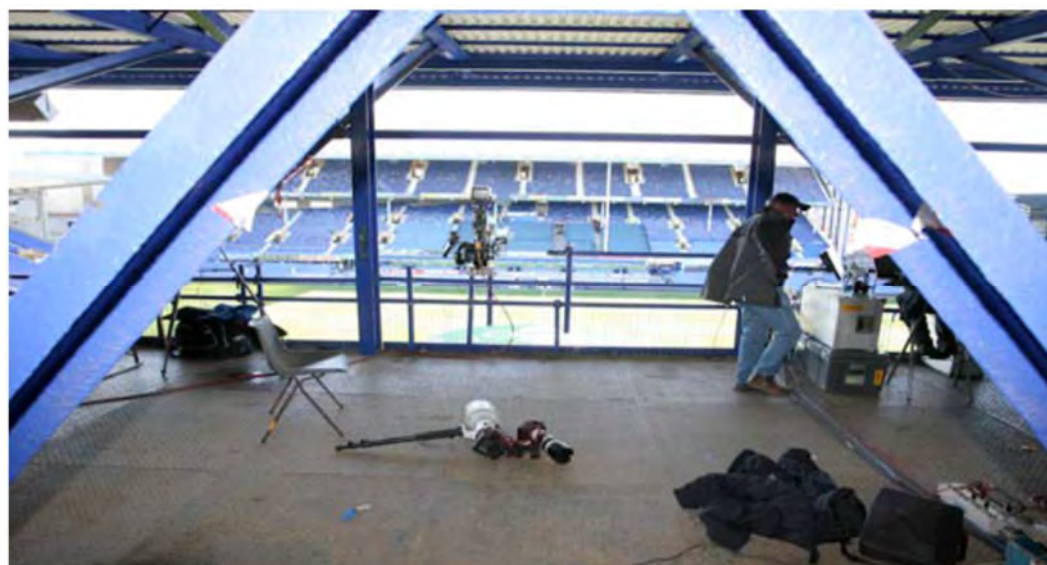
Figure 7: Limited Back of House Catering Space - Corporate Hospitality



f) TV and Press Facilities

- 2.32 Press facilities, including the gantry, TV commentary area, press box, Sky Studio, interview areas and camera positions are small, outdated and inconveniently positioned. This has an impact on the ability of the Club to accommodate national and international broadcasters and is not of the standard expected by the EPL and UEFA in hosting major domestic and European games. At present, Goodison Park meets the criteria which is contained within EPL Rules (Section K), however, this requires the creation of additional obstructed seats, with Press and Radio Facilities being separated from the Media Room and media representatives required to share space and facilities with General Admission spectators.

Figure 8: Photograph showing limited TV Gantry Facilities



g) Other Operational Issues

- 2.33 Other issues that impact on the operation of the Club at Goodison Park include:
- **Administrative space** – there is a lack of office space for administration staff, with the Club's staff detached from each other in different areas of the stadium and its surrounds, such as at the retail store.
 - **Ticket collection** - the existing ticket collection point is in close proximity to the Visiting Supporters collection point, which requires matches at night to have an added police presence and creates additional safety and security issues.
 - **External appearance** - the stadium has a poor visual and architectural quality that does not reflect the status of Everton as one of the top division's oldest and most respected Clubs. Due to the age, quality and adaptability of the construction, many parts of the ground are in poor condition and run down, dating from the 1930's onwards.
- 2.34 In summary, it is clear that Goodison Park is severely constrained and does not provide the level of integrated facilities or accessibility required by a top tier football club or to meet the expectations of spectators. This also has major financial implications for the Club - it is estimated that deficiencies at Goodison Park are imposing significant costs on the Club (as discussed earlier) and losing the Club significant revenues as a result of the practical and operational limitations of Goodison Park.

PREMIER LEAGUE ERA: GROWING COMPETITIVENESS

- 2.35 Everton was one of 12 founding members of the Football League in 1888 and is one of the 5 most successful English clubs, having won the League Championship 9 times, the FA Cup 5 times and UEFA Cup Winners Cup once. The Club has consistently been in the top division of English Football for over 100 years and has, during this time, been one of the country's premier teams.
- 2.36 However, since the inception of the EPL era in the 1992/1993 season, Everton has gradually fallen behind its 'top tier' rivals in terms of its stadium capacity, revenue generation potential (particularly through stadium related revenue), the scale of investment it has made in its facilities/amenities and, as a result, in its success on the pitch.
- 2.37 As illustrated in evidence provided at the Everton Kirkby Public Inquiry, over the period 1996/97 to 2007/08, more than 130,000 additional seats were added to EPL stadia, resulting in a 23% increase in aggregate attendance at Premier League games. In contrast, Everton's average attendance for Premier League games increased only marginally, from 36,186 to 36,955 (2%) for the same period⁹. Reinforcing this, average attendances in the Premier League as a whole in 1992/1993 were 21,132; whilst in the 2018/2019 season, average attendances stood at 38,168 – more than an 80% increase¹⁰.
- 2.38 This has been driven by intensive stadium and infrastructure development by a number of clubs in Everton's historic peer group, including investment in new or expanded stadium capacity and facilities by Manchester United, Manchester City, Arsenal, Tottenham Hotspur, Liverpool, Newcastle United and West Ham United. The development of expanded, new and modern facilities has significantly undermined Everton's ability to

⁹ Proof of Evidence of Robert Elstone, Everton Kirkby Inquiry, 2009, PINS reference APP\V4305\V\08\1203375

¹⁰ <https://www.worldfootball.net/attendance/eng-premier-league>

generate revenue, attract talent and to compete with rival top tier clubs. These clubs all benefit from improved and modern facilities, such as:

1. Increased capacities – all of which exceed 50,000 (with 4 of these clubs moving into new build stadiums since the turn of the century and the others subject to significant expansion in the EPL era);
 2. Significant capacity of hospitality executive seats and hospitality boxes;
 3. High quality facilities for players and team staff;
 4. Unimpeded views from all seating positions;
 5. Compliance with the latest ADM/DDA regulations;
 6. Compliance with Champions League requirements;
 7. Comprehensive match day travel plans; and
 8. Increased broadcasting potential and individual club iconography.
- 2.39 It should also be noted that the EPL is the most watched sports league in the world. Over 1.2bn unique viewers ‘tune-in’ every weekend across 230 territories. Such global coverage, in one sense, helps to explain such investment in infrastructure, but also importantly sets out the opportunity that exists to promote cities and their footballing cultural heritage across the globe.
- 2.40 It is clear that for Everton to remain competitive in a rapidly developing and commercially changing league, it must deliver the facilities, stadium and experience that matches the expectations of supporters, staff, investors and broadcasters. Everton must not miss the opportunity to evolve alongside its peer EPL and European counterparts, to ensure that it regains the success a Club of its stature demands and does not fall into further decline. A new stadium will provide the catalyst for Everton’s future growth, both on and off the pitch, and offer an opportunity to safeguard the future of the Club as one of the EPL’s elite teams for generations to come.

INSUFFICIENT CAPACITY: POTENTIAL FOR EXPANSION OR REDEVELOPMENT

- 2.41 Goodison Park accommodates 39,572 supporters and away team fans. Based on the Club’s analysis of demand, Everton requires more than 50,000 seats - there is currently a waiting list for season tickets of 8,677 individuals who have requested a total of more than 11,000 tickets¹¹. As discussed earlier, Everton’s peer clubs have substantially increased capacity over the last 10 years, which has enabled them to increase attendances, improve facilities, provide better accessibility, improve the matchday experience and enhance revenues to better compete at the top of the EPL.
- 2.42 The issue of whether Goodison Park is fit for purpose was explored extensively during the Inquiry into Everton proposed move to Kirkby, with the Inspector stating that¹² [CBRE **emphasis** added]:

“Goodison Park is agreed by all to be in need of very significant work to improve to a suitable level, and that would require, as Mr Keirle shows in his evidence, a much larger site than Everton possess at Goodison Park. Mr Keirle’s evidence deals with the question

¹¹ Everton season ticket waiting list, November 2019

¹² Report to the Secretary of State for Communities and Local Government, 2nd July 2009, APP/V4305/V/08/1203375, page 47, pp 5.6.37

of potential changes to Goodison Park and the surrounding land. The matter has been exhaustively explored by the club over the past ten years, including a review by Mr Keirle's firm in July 2008 on the basis of the funding available for this project. **There is no credible evidence that a stadium of the kind that Everton needs can be provided at or near Goodison Park.** It is clear from Mr Elstone's evidence that had it been feasible to stay at or near the current site, Everton would have done so".

Redevelopment

- 2.43 Goodison Park itself is situated on just a 24,000 sq m footprint – which provides a very high seating density of 0.60 seats/sq m. The stadium sits within a tight urban setting, utilising just 3.25 hectares of land for the stadium and its surroundings, which creates issues with residential amenity and issues between the operation of the stadium and the surrounding community. In addition, St Luke's Church, a building of architectural merit, is located in the northwest corner of the site.

Figure 9: Constrained Goodison Park Footprint



- 2.44 The ground can only operate on match days if the residential roads which surround it, with the exception of Walton Lane, are closed to vehicular traffic, impacting on surrounding residential properties. Furthermore, three sides of the stadium are on the public highway which, as discussed previously, creates access, safety and movement issues as a result of poor access and movement around the stadium. As there is no dedicated exterior concourse for marshalling and managing crowds, with surrounding roads being used for this purpose which increases the level and difficulty of policing and stewarding within the tight urban setting.
- 2.45 **A site of this size is considerably smaller than what would be required for the comprehensive redevelopment of a new stadium** (Section 6 and Appendix 8 set out why the Club requires a site that is a theoretical absolute minimum of 7.2 hectares to develop a modern stadium and ancillary facilities). Any major redevelopment of Goodison Park would require the acquisition (either privately or via Council-sponsored compulsory purchase) of residential properties, a school, shops and businesses; in addition to areas of

public highway. This would create significant site assembly issues and could be extremely damaging to the local community within which Everton is firmly embedded. This approach would require significant support from the Local Authority and generate strong opposition from local residents (notwithstanding the human rights implications of potential compulsory acquisition) and the wider community. In addition, the resulting site for an enlarged stadium scheme (expansion or total rebuild) would again become tightly constrained and surrounded by residential properties, with no resolution to the existing amenity and interaction issues.

Figure 10: Goodison Park within its tight urban setting



- 2.46 Notwithstanding the above, redeveloping the site would also have significant operational impacts. Comprehensive redevelopment would require the Club to relocate during construction which would generate logistical issues (in terms of relocation), and would have a severe impact on year-on-year revenues given the lack of alternative stadium options in the region.
- 2.47 A review of the potential for redevelopment (either partial stand-by-stand development or total redevelopment) of Goodison Park was considered by KSS Design Group as part of the 2008 Public Inquiry into the proposed Everton stadium scheme (50,000 capacity) on the edge of Kirkby town centre (Knowsley borough). This exercise has been updated by Pattern Architects (as the club's appointed technical delivery architect) by overlaying the footprint of current BMD stadium (52,888 capacity) onto Goodison Park and its surroundings. This review considers the potential Compulsory Purchase implications of these options.

KSS Evidence

- 2.48 KSS' Proof of Evidence¹³ was prepared by David Keirle for the Everton Kirkby Inquiry. The proof extensively considered in spatial, operational and financial terms, why neither the total redevelopment nor partial expansion (stand by stand) of Goodison Park was a feasible option for the Club. As set out earlier in this report, the Government-appointed Inspector at the

¹³ Reference: TEV/P/10, Planning Inspectorate Reference: APP\V4305\V\08\120337 – October 2008

Kirkby Inquiry fully endorsed this view and the need for Club to relocate, and the issues around compulsory purchase which existed in 2008, still exist today.

- 2.49 Figure 11 below demonstrates the significant land-take that a 50,000 seat stadium (based on the Kirkby scheme) would have on the Goodison Park community¹⁴. Based on a review of titles and properties within the site area¹⁵, the stadium demonstrated in Figure 11 would **require the acquisition of approximately 104 land ownerships, including a minimum of 89 residential properties and a school.**

Figure 11: BMD Goodison Park Overlay North-South



BMD Overlay

- 2.50 Pattern Architects has conducted an exercise to overlay the footprint of current BMD stadium (52,888 capacity) onto Goodison Park, in both a north-south and east-west direction – these options are illustrated in Figures 12 and 13. It should be noted that this represents the stadium footprint only and does not include any allowance for car parking, broadcasting requirements, circulation space, sub-stations or a fan space/plaza and therefore would in reality likely require a greater land take than what is demonstrated. Notwithstanding this, the exercise finds that **between 67 and 73 land ownerships (including a minimum of 57 to 61 residential properties) and a school would require acquisition or compulsory purchase** to accommodate a stadium of the size of BMD at Goodison Park in a north-south or east-west direction respectively (the stadium roof would require a redesign to fit on to the site).

¹⁴ David Keirle Proof of Evidence, Page 19 (Reference: TEV/P/10)

¹⁵ Using Land Insight software

Figure 12: BMD Goodison Park Overly North-South

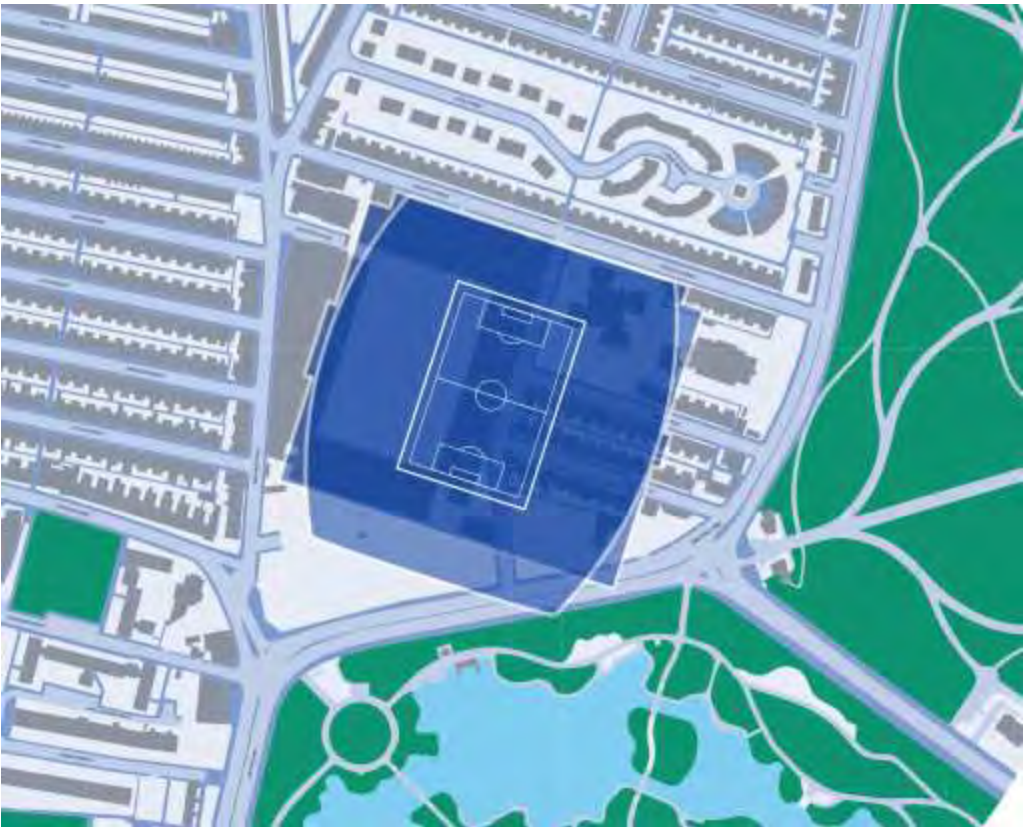
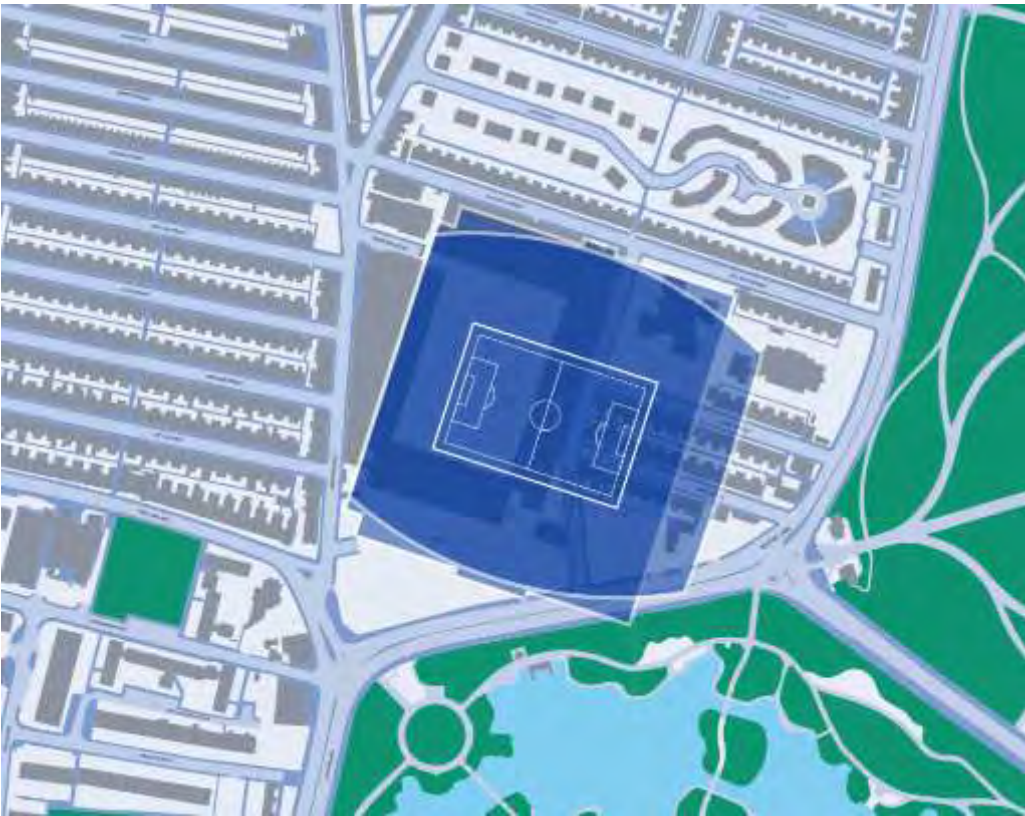


Figure 13: BMD Goodison Park Overly East-West



2.51 The options presented for the redevelopment of a new stadium at Goodison Park demonstrate that this would not be a realistic or reasonable option for the Club, for the following reasons:

- Significant land assembly of community and residential properties would be required to deliver a 50,000+ capacity stadium. The time required to acquire these properties and the significant impact it would have on established residential community is not considered reasonable, viable or realistic. A comparison with CPO processes at Tottenham Hotspur and LFC is provided later in this section demonstrates that these stadia developments are entirely different from the circumstances that would be faced by Everton.
- Undertaking the CPO of a significant number of established and privately owned residential properties (and a school) could have a devastating impact on the wider Goodison Park / County Ward community and Club's long-established relationship with its surrounding residents.
- It is the Club's understanding that LCC would not support an extensive programme of CPO in an established residential community (notwithstanding the human rights implications of such a programme).
- Any redevelopment would have major logistical implications and require the Club to relocate to an alternative stadium for a minimum of two seasons. There are significant financial implications of this which were considered and recognised in detail at the Kirkby call-in inquiry.
- The time required to acquire/CPO property and the costs of temporary relocation would have a significant year-on-year impact on the Club's revenues, in addition to continued investment which would be required in Goodison Park to ensure it remains fit-for-purpose and compliant with modern regulations.
- Options for redevelopment or expansion have been extensively considered in the Kirkby Inquiry, where the Inspector definitively concluded that *"There is no credible evidence that a stadium of the kind that Everton needs can be provided at or near Goodison Park. It is clear from Mr Elstone's evidence that had it been feasible to stay at or near the current site, Everton would have done so"*.

2.52 As such, a new stadium (comprehensive redevelopment) on Goodison Park is not feasible, practical or realistic.

Stadium Expansion or Partial Redevelopment

2.53 Options have previously been considered to extend Goodison Park by increasing the capacity of existing stands¹⁶. This has included considering additional tiers, at the Park Stand and the Bullens Road Stand, which would require an extended footprint and result in the encroachment onto Bullens Road and adjacent houses – requiring acquisition or compulsory purchase of residential and community property. A review of the potential to expand the Bullens Road Stand (considered by KSS as the *"the only realistic option for a qualitative expansion of the existing stadium"*) was undertaken as part of the KSS Proof of Evidence at the Kirkby Public Inquiry; however, this option would only expand Goodison Park's capacity to 44,000 – this overlay is shown in Figure 14.

2.54 Notwithstanding the logistical, financial and non-resolution of existing operational problems, an expanded Goodison Park, as demonstrated in Figure 14, would likely require the

¹⁶ This was explored in the KSS and Robert Elstone Proofs of Evidence to the Kirkby Inquiry (Reference: TEV/P/8 - Planning Inspectorate Reference: APP/V4305/V\08\1203375)

acquisition or compulsory purchase of 21 land ownerships, including a minimum of 19 residential properties and a school. Partial redevelopment would also likely result in a significant impact on seating capacity and revenues during the construction phase. In reality, further rows of properties to the east would likely require acquisition to ensure sufficient circulation space is provided and to ensure that residential amenity is, to some extent, mitigated. However, the tightly constrained residential nature of the ground would again be a key issue for the Club.

Figure 14: Bullens Road Expansion (KSS)



- 2.55 The expansion or partial redevelopment of Goodison Park is not realistic, practical or deliverable to meet the needs of Everton. Whilst some modest expansion of the stadium may be feasible, it would not deliver the capacity, benefits or amenities that the Club requires to remain competitive; including delivering a 50,000+ capacity stadium, significantly enhancing the amenity, facilities and accessibility at the stadium, including providing high quality modern facilities for players and staff, providing the amenities to meet supporter expectations and raising the profile of Everton in the EPL and internationally.
- 2.56 In addition, expanding Goodison Park would not address critical weaknesses of the stadium, such issues with sightlines, accessibility, narrow concourses, the ageing nature of the existing stands, the lack of external circulation and the inherent lack of modern facilities. Many of these issues would remain at an extended Goodison Park and it would not deliver a stadium of the quality and size to allow the Club to compete at the highest level. An extended Goodison Park would fundamentally not represent an improvement when compared to the Club's proposals for a new stadium at BMD.

Other Examples of CPO for Stadium Development

- 2.57 As set out above, both the redevelopment and expansion of Goodison Park would require significant acquisition, likely through a process of compulsory purchase which the club understands Liverpool City Council is highly unlikely to sponsor. Two examples of compulsory purchase being used to redevelop or expand football stadia include:
- Tottenham Hotspur FC; and
 - Liverpool Football Club.
- 2.58 In the case of **Tottenham Hotspur**, a planning application for a new stadium was first submitted in 2009, with the scheme being revised and delayed a number of times due to a protracted dispute over a CPO relating to an existing business at the proposed development site (with start on site occurring in 2016). In this case, the Club underwent a long and costly process of acquiring land in and around the existing White Hart Lane stadium, which predominantly comprised industrial units. Ultimately, one owner refused to sell (Archway Metal Works), which resulted in the CPO decision being brought before the High Court. The CPO process for the property took 3 years to resolve (2012-2015), ultimately achieving resolution in the High Court; and had significant implications on the programme for stadium. Whilst this example would be in no way comparable to acquiring multiple established residential properties, it demonstrates the difficulty that Tottenham Hotspur faced in acquiring a single commercial premises that refused to sell.
- 2.59 In the case of **Liverpool Football Club**, LFC began to acquire residential properties from 1996, without announcing an intention to expand Anfield, leaving many houses vacant and leading to decline in the area. In October 2013, LCC commenced CPO proceedings on 23 land holdings – most of which were vacant, derelict and had owners which couldn't be contacted. The new stand was developed in 2016, 20 years after LFC started to acquire property for its expansion. Residential properties surrounding Goodison Park are in good condition and have an established community, with limited property (apart from the operational EitC facilities – see Section 5 for details) within the Club's ownership. Embarking on a programme of acquisition / compulsory purchase would have a significant impact on both the Club's programme for a new stadium, and its established surrounding community.
- 2.60 In summary, both the Tottenham Hotspur and LFC examples are not in any way comparable to the scale and complexity of acquisition that would be required for a new stadium at Goodison Park (or other sites which would require a complex process of land assembly) – which would be significantly more complex and have a major impact on an established residential community. Even so, when making these comparisons, these examples do demonstrate the protracted timescales and difficulty in pursuing a programme of acquisition and CPO. It is simply not realistic or feasible to consider extensive CPO as an option.

SUMMARY

- 2.61 Whilst Goodison Park has a rich footballing heritage and was once one of the most prestigious grounds in the country, it has become unfit for purpose and has resulted in Everton falling significantly behind its rivals in the Premier League era. Goodison Park has become outdated amongst its competitors and it does not provide the facilities, amenities, experiences or revenue generating potential of rival clubs. Everton now requires a modern stadium with the capacity, facilities and potential to match the aspirations of the football club.
- 2.62 The scale of new stadium that Everton requires would not be appropriate at the existing Goodison Park due to the small stadium footprint, the lack of adequate onsite facilities and the dense residential nature of its surroundings – with no scope for redevelopment or expansion without significant compulsory purchase and land assembly. It is clear that a

current site assessment process would not identify Goodison Park (even as an enlarged footprint) due to its location and size, being surrounded by housing on three sides and by public roads.

- 2.63 As such, **Goodison Park does not provide a feasible, practical or realistic opportunity to provide a football stadium that will meet the modern needs of an elite football club.**

3.0 ASA Methodology: Overview

- 3.1 Everton Football Club, in consultation with Liverpool City Council, has undertaken a series of extensive site searches over the past 20 years in order to identify a suitable site for the Club to relocate its footballing operations to a new stadium that matches the requirements of a top EPL club.
- 3.2 Everton confirmed in November 2017 that it had reached an agreement (subject to obtaining planning permission) to acquire land at Bramley-Moore Dock as the potential location for its new football stadium. Everton considers BMD to provide a site that offers a suitable location and iconic setting (the iconic Liverpool waterfront for which the city is famed worldwide) for a new stadium; and one which retains Everton's cultural and historic ties to North Liverpool and to Goodison Park, whilst catalysing significant regeneration along Liverpool's derelict Northern Docks area.
- 3.3 The ability of Everton provide a new football stadium is contingent on a planning application demonstrating that there are exceptional cultural, economic and social benefits of relocating the stadium to BMD that outweigh any perceived harm to the UNESCO World Heritage Site ("WHS") designation (as transposed into local planning policy via the World Heritage Site Supplementary Planning Document adopted in 2009) and designated heritage assets. An assessment of potential alternative sites is also required to demonstrate that the Club's relocation to BMD is necessary to accommodate the relocation of the Club.
- 3.4 In order to underpin a planning application at BMD, and due to the heritage sensitivities of the site and the tests of national policy, it is agreed by all parties (including the Club, LCC and Historic England) that an up-to-date ASA is required to assess whether there are any alternative sites that are practical, realistic or feasible to accommodate a proposed stadium development within a suitable and reasonable catchment area.
- 3.5 The sections that follow set out the rationale and methodology for the ASA and include:
 1. **Section 4: Policy and Precedent** – a summary of the relevant planning policy context and precedent that has informed the ASA methodology;
 2. **Section 5: Area of Search** – setting out the approach to defining a reasonable 'area of search' for the Club;
 3. **Section 6: Site Identification** – providing the methodology for a site search exercise within the area of search; and
 4. **Section 7: Site Assessment Criteria** – the proposed site assessment criteria against which each identified site is assessed.

4.0 Planning Policy & Precedent

ASA METHODOLOGY: RELEVANT PLANNING POLICY CONTEXT

- 4.1 A full review of the key planning policies that are relevant to the planning application for a new stadium are contained in the accompanying 'Planning Statement' and are not repeated in detail in the ASA. A summary of the Strategic and Planning Policies that are relevant to the assessment of individual sites in the ASA are contained as **Appendix 3** and **Appendix 4** to this report. Below is a brief summary of extant planning policy and explanation of how it informs the *methodology* for the ASA.

The National Planning Policy Framework

- 4.2 The National Planning Policy Framework ("NPPF") provides policy guidance which places sustainable development at the heart of planning decisions, but does not provide guidance on undertaking an ASA for the purposes of a sports stadium relocation. Paragraph 86 of the NPPF (February 2019) states that Local Planning Authorities *"should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan"*. However, a sports stadium is not in the category of 'main town centre uses' as defined by the NPPF¹⁷ and therefore the sequential test in this context does not apply.
- 4.3 Paragraphs 184 to 202 set out the policies for heritage assets and the historic environment in the NPPF. In particular, Paragraphs 193 to 196 set out the considerations for assessing the impact of a proposed development on designated heritage assets. The submitted Heritage Statement¹⁸ demonstrates that the proposed stadium development will cause "substantial harm" to the WHS, Stanley Dock Conservation Area and Grade II listed BMD walls. Paragraph 194(a) of the NPPF requires that any "substantial harm" to a designated heritage asset must be "exceptional" or "wholly exceptional" and therefore the ability to demonstrate that there are no suitable or alternative sites is important in considering the justification for harm to any heritage assets.
- 4.4 This ASA is important to the justification, and ultimately the planning balance exercise, to demonstrate that the development is necessary and that there are wholly exceptional circumstances (i.e. the lack of an alternative site to accommodate the development) that outweigh any harm to BMD, which should be read alongside the evidenced public benefits that have been submitted to support the scheme.

Development Plan

- 4.5 **Policy E9** (Leisure Development) of the 2002 **Liverpool Unitary Development Plan** ("UDP") seeks to apply the sequential test to new leisure development (including sports stadia). It states that [CBRE emphasis added]:
- 4.6 *"Planning permission will be granted for leisure development (as defined below) in the City and District Centres, on those sites listed in Schedule 6.4 and in other locations including edge of centre sites provided:*

¹⁷ Annex 2 of the NPPF categorises Main Town Centre Uses as *"Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)"*.

¹⁸ Heritage Statement, KM Heritage (2019) – submitted as part of the BMD Planning Submission

- *There is a need for the development and a sequential approach to site selection has been adopted;*
 - *The scale and design is appropriate to a particular location;*
 - *Residential amenity is not adversely affected;*
 - *Highway, traffic and servicing matters are satisfactorily addressed;*
 - *The proposal will not by itself or in conjunction with other proposals undermine the vitality or viability of the evening economy of any nearby centre;*
 - *The site is, or will be made, highly accessible to modes of transport; and*
 - *The proposed development would not prejudice or undermine other plan policies.”*
- 4.7 Policy E9 however is based on the former PPG6 which is inconsistent with and has been replaced by the NPPF; therefore, the traditional sequential test is no longer appropriate for this ASA.

Emerging Local Plan

- 4.8 The emerging Liverpool Local Plan was submitted to the Secretary of State in January 2018 to undergo Examination in Public by an Independent Inspector – which is due to take place later in October 2020. The emerging Local Plan provides no requirement for a sequential test or ASA to support new leisure or stadia development. It also provides no material guidance on the methodology for undertaking an ASA.
- 4.9 Heritage policies in the emerging Local Plan are provided in draft policies HD1 (Heritage Assets: Listed Buildings; Conservation Areas Registered Parks and Gardens; Scheduled Ancient Monuments) and HD2 (Liverpool Maritime Mercantile City World Heritage Site). Policy HD1 states that *“Proposals affecting a designated heritage asset (or an archaeological site of national importance) should conserve those elements which contribute to its significance. Harm to such elements will be permitted only where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset (or an archaeological site of national importance) will be permitted only in exceptional circumstances”*.
- 4.10 As set out earlier, a full review of the relevant emerging planning policies is set out within the Planning Statement.

Assessment of Sites

- 4.11 Notwithstanding the absence of planning policy and guidance to inform the methodology for the ASA, the site assessment criteria, as set out in Section 7 (Figure 21), provide a full assessment of candidate sites against the relevant planning policies and guidance.

ASA METHODOLOGY: APPROACH

- 4.12 Based on the planning policy position detailed above, current planning policy provides no material guidance on the scope or approach to undertaking an ASA. However, whilst there is no policy basis to underpin the requirement or scope of an ASA for a new stadium development, as discussed earlier, an ASA is critical to understand whether there are any alternative sites for development given the heritage sensitivities of the Club’s proposed site at BMD and the need to justify why any perceived harm is acceptable in the WHS.
- 4.13 The remainder of this section sets out the precedent and approach which underpins the ASA.

Case Law Precedent

- 4.14 A review of relevant planning decisions (principally by the Secretary of State) has been undertaken to understand precedent and comparable cases for justifying stadium relocation, in order to inform the ASA approach.
- 4.15 An extensive Compass¹⁹ search has been undertaken to review relevant planning decisions. From this review, two decisions provide direct material assistance. These include:
1. Oldham Athletic Football Club stadium proposals (1999)²⁰ – which highlights the importance of the traditional catchment area of a football club; and
 2. Brighton and Hove Albion's new stadium (2007)²¹ – which is considered the most relevant to the proposals to relocate to BMD.

Oldham Athletic FC

- 4.16 An outline application for Oldham Athletic Football Club and Oldham Rugby League Football Club was submitted for a football/rugby stadium and associated suites and offices, motel, health/fitness club and restaurant. The proposals related to a 30.25 ha site, comprising Westwood Athletic Ground, Furtherwood Farm land, Clayton Playing Fields and Boundary Park. Part of the application site was located on 'Protected Open Land'.
- 4.17 When considering whether the proposal had special site needs, the Secretary of State identified that a stadium requires *"a large flat site with good access and preferably high visibility in a local and regional context if it is going to be successful"* and *"this could have a profound effect on the image of Oldham in terms of sport and investor confidence"*²².
- 4.18 In assessing whether an alternative site was available, the Secretary of State took into consideration sites which could accommodate the special site needs as a composite package, which provides a sporting and recreational facility to meet modern needs rather than merely providing a box for spectators which is essentially a 'part time' use of the site. The alternative sites considered include:
- **Westwood Park:** had planning permission for the development of a stadium but OAFC held that the development of that site was "financially irresponsible" as it is not large enough to accommodate a new stadium together with the associated development.
 - **Broadway:** was not considered suitable as the Secretary of State stated that the site *"would conflict with a Primary Employment Zone allocation in the UDP and would be distant from the football Club's traditional catchment area."*²³
 - **The Fernhurst Mill:** the site was rejected because the site is designated as a Primary Employment Zone.

¹⁹ Compass is Planning Resource containing more than 180,000 appeal decisions in a planning appeals database

²⁰ Oldham Athletic Football Club, PNW/5038/219/51, 10th February 1999

²¹ Applications for Brighton and Hove Albion Football Club Ltd, Land North of Village Way, Falmer, Application No's BH2001/02418/FP, LW/02/1595, BH2003/02449/FP, LW/03/1618 - Secretary of State Final Decision 23rd July 2007

²² Oldham Athletic Football Club, PNW/5038/219/51, 10th February 1999, para. 9.3

²³ Oldham Athletic Football Club, PNW/5038/219/51, 10th February 1999, para. 9.9

- 4.19 The Secretary of State found that a critical element of the proposal was whether the proposed development is sufficiently special to justify developing an area of Protected Open Space and that the *“proposed stadium would be built close to the existing OAF ground and would therefore remain within the **traditional catchment area of the Club.**”*²⁴
- 4.20 The inspector therefore, found that *“It is possible that the stadium could be located elsewhere on a business park or industrial land and I accept that some very successful football clubs operate in old stadia on constrained sites in densely built up areas. However, I agree with the Council and the applicant that no other site is available which has the locational advantages of the application site and which has the added benefit of being adjacent to the existing ground. The proposed stadium would serve the existing fans well and would be located in an area used to dealing with the crowd and traffic problems associated with match days.”*²⁵
- 4.21 This decision is relevant in its assessment which considers a football club as a special case, in which the Inspector clearly considers the requirements of the Club and its traditional catchment area as having material weight in decision making.

Brighton & Hove Albion

- 4.22 The Brighton and Hove Albion (“BHA”) stadium case relates to the requirement for BHA to relocate to an alternative site, and proposed the development of a new football stadium in an Area of Outstanding Natural Beauty (“AONB”). The new stadium was approved by the Secretary of State in 2007 and considered the test of alternative sites to consider if they *“were sufficiently advantageous that they represented feasible, practical and realistic alternatives to the application site for the proposed community stadium”*²⁶. These principles were adopted in the Secretary of State’s consideration of alternative sites and it was recorded that [CBRE **emphasis added**]:

*“The Secretary of State considers that it is both relevant and reasonable for her to consider whether there is a reasonable prospect of planning permission being granted for a community stadium at the alternative sites put forward for assessment. The Secretary of State considers that she is in a position properly to approach this part of her decision on that basis”*²⁷.

- 4.23 Whilst there are no directly comparable UK cases to Everton’s proposals to develop a stadium in the WHS, the BHA case is considered the most relevant precedent by way of guidance that has been considered.
- 4.24 In summary, this decision is considered the most directly relevant to Everton’s proposals for a stadium at BMD in terms of:
1. Relating to a major football stadium;
 2. Being in a location affected by a significant policy constraint, namely AONB;
 3. Having a second inquiry and decision which was solely in relation to the approach to alternative sites; and

²⁴ Oldham Athletic Football Club, PNW/5038/219/51, 10th February 1999, para. 9.1

²⁵ Oldham Athletic Football Club, PNW/5038/219/51 and PNW/5083/21/175, Inspector Report, pg. 49, para. 9.3

²⁶ Secretary of State Final Decision 23rd July 2007, p2, pp3

²⁷ Secretary of State Final Decision 23rd July 2007, p2, pp30

4. The Secretary of State setting out specific criteria for the assessment of the availability and suitability of alternative sites.
- 4.25 This decision is therefore considered of direct relevance to Everton's proposals to relocate to BMD and in the consideration of alternative sites. The Brighton decision notes that feasible alternatives are those which are ***"sufficiently advantageous to represent a feasible, practical and realistic alternative"*** as set out above.
- 4.26 A review of the Brighton case suggests the application of a balanced planning judgment for each potential alternative, based on the following relevant questions:
 1. Is the site large enough for the proposed stadium and parking?
 2. Are there any overriding site-specific planning issues?
 3. Is site acquisition a realistic proposition?
 4. Can a stadium be built without incurring unaffordable development costs on the site?
 5. Is the site accessible by sustainable modes of transport?
 6. Will there be any unacceptable environmental or visual impacts?
- 4.27 It is therefore proposed that these tests form the basis of the site assessments in the Everton ASA, whilst also considering whether each site has a "reasonable prospect" of being granted planning permission. The detailed approach to site assessment is contained in Section 7.

Operating in the "Real World"

- 4.28 Whilst the sequential test is applicable to the location of a 'main town centre use' which does not apply to this proposal, the case in *Tesco Stores Limited v. Dundee City Council* (2012)²⁸ provides material legal precedent and guidance in understanding how the requirements and preferences of the 'developer' should be considered. The decision clearly concluded that the criteria for sequential assessments ***"...are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so"*** (Lord Hope, Paragraph 38).
- 4.29 This is an important case law consideration of the approach to defining a reasonable catchment within which Everton would consider its relocation in the "real world" – in defining a realistic catchment area within which the Club would be willing to relocate, and in considering locations where the Club would fundamentally not consider moving to in the "real world".
- 4.30 The following section sets out the approach to the ASA based on selection of an appropriate catchment area which reflect the requirements of the Club, whilst ensuring the assessment is robust and comprehensive.

²⁸ [2012] UKSC 13 (see (2012) 151 SPEL 68).

5.0 Defining the Area of Search

- 5.1 This section sets out the rationale for considering what is an appropriate, realistic and robust area of search for the ASA, underpinned by the planning policy and legal precedent review set out in Section 4.
- 5.2 As discussed, planning policy provides no material guidance to inform the approach to undertaking an ASA, or in the definition of a reasonable area of search. Therefore, it is important to consider relevant planning decisions and precedent to underpin the definition of an area of search, by recognising that developers work in the “real world” and not an artificial world in which they have no interest in doing so, as set out in the Tesco vs Dundee decision, and that football clubs are a “special case” when considering stadium locations.
- 5.3 In light of the above, it is important to understand the unique drivers of Everton’s search for a new stadium and the factors which must be considered in setting an appropriate area of search that considers Everton’s requirements in the “real world” and the Club as a “special case”. As such, this section presents the factors which have framed the selection of an appropriate area of search for the ASA. Of critical relevance to the definition of the catchment area is the Club’s deep-rooted physical, social, cultural and emotional links to its Goodison Park home and the strong bond that the Club has developed within its L4 postcode area and North Liverpool community.
- 5.4 The case for the Club retaining close connections to North Liverpool is set out in Part B) of this section. Part A) below expands upon the definition and selection of a reasonable and realistic catchment area. Part C) addresses the reasons why, in light of the Clubs previous proposals to move to Kirkby, that Knowsley is not included within the proposed catchment area and why the Club would not consider a move to this location in the “real world”.

A) DEFINING THE AREA OF SEARCH

- 5.5 In defining a proposed catchment, this report has assessed the following three areas of search:
 1. **Area 1a: “North Liverpool”** – Everton’s preferred area of search that meets requirements of the Club and its local community in North Liverpool and retains a close connection to Goodison Park;
 2. **Area 1b: “Extended North Liverpool”** – an extended area of search that includes the northern part of LCC, the City Centre and parts of South Sefton. Whilst outside of the Club’s preferred catchment, this defines an area where the Club would be willing to consider relocation if absolutely necessary, if a site met the requirements of the Club and retained a connection to the Club’s traditional heartland; and
 3. **Area 2: “Wider Area of Search”** – including all sites within LCC (including South Liverpool) and South Sefton. This includes locations which are fundamentally outside of the catchment of the Club and where the Club would not consider relocation. However, this area of search has been considered, without prejudice, following discussions with Historic England.
- 5.6 The reasons why the Club must retain its connections to North Liverpool are considered in part B) of this section and clearly set out why **the Club would not consider relocating beyond Extended North Liverpool (Areas 1a and 1b)**. A detailed definition of each area of search is provided as follows.

Area 1a: Everton's Preferred Area of Search: North Liverpool

5.7 Everton is a longstanding pillar of its community in both:

1. **L4** – L4 is the postcode area within which Goodison Park sits and which is at the heart of the Club's community and outreach programmes, such as its charity Everton in the Community ("EitC"); and
2. **North Liverpool** – 'North Liverpool' (as referred to in this report) is broadly defined as an area that stretches from the City Centre to the south to the boundary with Sefton in the north. The North Liverpool and South Sefton Strategic Regeneration Framework ("SRF")²⁹ defines North Liverpool within LCC's boundaries as the wards of **Anfield, Everton, Kirkdale** (within which BMD sits) and **County** (within which Goodison Park sits). A ward map and aerial plan which illustrate this defined area of North Liverpool, which is the preferred area of search for the Club, is illustrated below in Figure 15 and contained as **Appendix 5**.

Figure 15: North Liverpool (Wards of Anfield, Everton, Kirkdale and County)



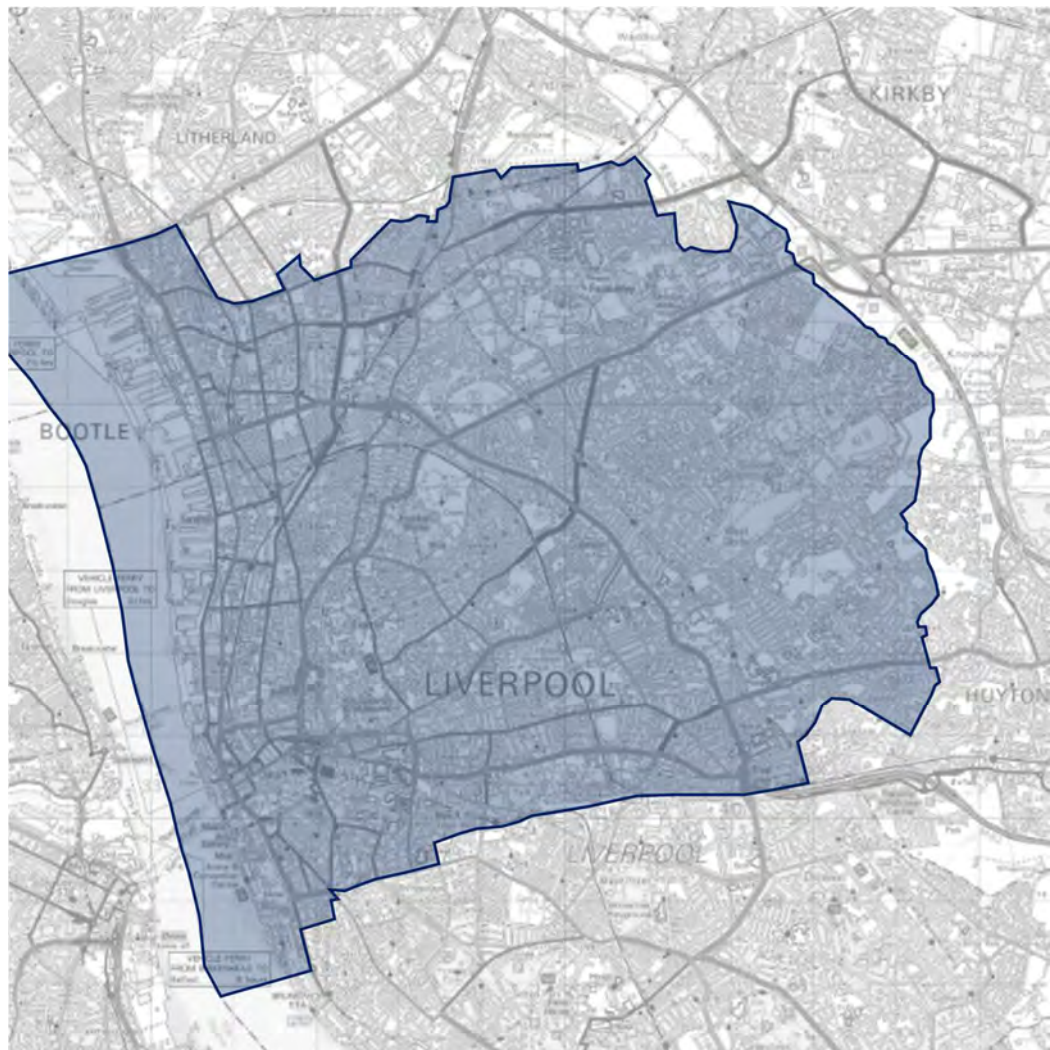
- 5.8 The area of North Liverpool as defined above is the heartland of Everton's community and it is a clear preference of both the community and the Club to remain within this area, and as close to its spiritual Goodison Park home as possible.
- 5.9 An assessment of the reasons why the community, the supporters and the Club has a clear preference to remain in the north of the City, and particularly North Liverpool, is set out in Part B) of this section.

²⁹ The North Liverpool and South Sefton Strategic Regeneration Framework (2010) is a strategic document that covers an area from the city centre to South Sefton - the fundamental purpose of which is to create sustainable communities and to maximise North Liverpool's contribution to the City's competitiveness over the next 20 years and beyond

Area 1b: Expanded Area of Search: Extended North Liverpool

- 5.10 Whilst there is a preference of the existing community, the fans and the Club to remain within the defined area of North Liverpool (with the most immediate cultural and physical ties to L4 and Goodison Park) illustrated in Figure 15, if it was absolutely necessary, the Club would be willing to consider an extended geographical area that encompasses the northern extent of LCC and part of South Sefton. This area of search is herein referred to **'Extended North Liverpool'** and includes:
1. Land within the administrative boundary of LCC to the north of the M62 / Edge Lane;
 2. Land within Sefton that sits within the North Liverpool & South Sefton Regeneration Area (including the Sefton wards of Derby and Linacre); and
 3. Liverpool City Centre.
- 5.11 For clarity, the boundary of this extended North Liverpool catchment is illustrated below in Figure 16 and in **Appendix 6**.

Figure 16: Area 2: Extended North Liverpool Area of Search



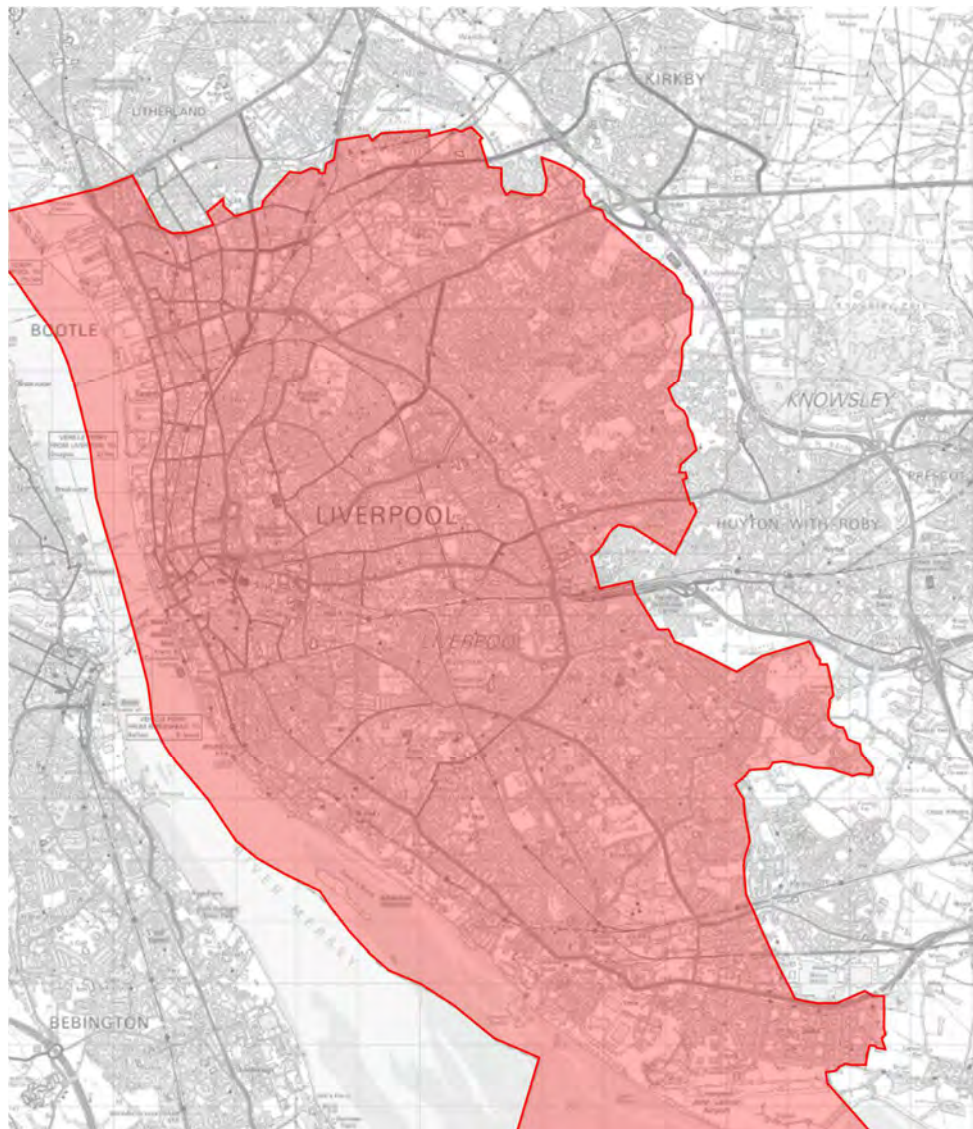
- 5.12 It is important to note that based on precedent and guidance, the Extended North Liverpool area is considered robust and justified based on the evidence presented at Part B) of this section. It is considered that **this area of search is reasonable and appropriate for the ASA,**

is robust and is based on a comprehensive case that sets out the reasons why it is critical for the Club to remain close to North Liverpool and its existing home.

Area 2: Wider Area of Search: LCC

- 5.13 In defining a scope and reasonable catchment area for the ASA, the Club and CBRE has engaged with Historic England ("HE") and LCC to discuss the methodology for the assessment. Whilst the Club is clear that it would not be reasonable for it to consider a site outside of the Extended North Liverpool area (i.e. Area 1a and 1b) it has, at the request of HE and without prejudice, undertaken a wider assessment of sites within the entirety of LCC (i.e. including all sites in South Liverpool). This wider area of search includes:
- All sites within the administrative boundary of Liverpool City Council (therefore including sites in the south of the city); and
 - Sites in South Sefton within the boundaries of the North Liverpool and South Sefton SRF (within the Wards of Derby and Linacre).
- 5.14 A plan of the proposed wider catchment area is provided at **Appendix 7** and illustrated below in Figure 17:

Figure 17: Wider Area of Search: LCC



- 5.15 It is important to note that the Club would not consider moving to south of the city, away from its historic home, however this assessment has been undertaken as part of a collaborative approach with key stakeholders, and to assess in detail whether there are any sites of a suitable size and scale across the entirety of the Liverpool City Council administrative area. This assessment has been undertaken without prejudice and demonstrates that the Club has also undertaken a full review of sites across LCC – outside of its preferred catchment and where it would not consider relocation – to ensure that the ASA is comprehensive, robust and is undertaken based on engagement with key stakeholders (including HE and LCC).

B) THE CASE FOR EVERTON RETAINING ITS CONNECTION TO NORTH LIVERPOOL

- 5.16 This section sets out the reasons why Everton is committed to finding a site that retains its links to Goodison Park and North Liverpool (within Area 1a or 1b) – setting out the physical, cultural, social reasons why is it imperative that the Club must remain connected to its existing community. This section clearly sets out the reasons why:
1. The Club's preferred area of search is North Liverpool (Area 1a) but it would consider relocation within Extended North Liverpool (Area 1b), with close links to its existing home, if necessary; and
 2. The Club would not consider relocation to a site outside of Extended North Liverpool, which would fundamentally disconnect the Club from its existing community.

1. The People's Club: A Pillar of the Community

- 5.17 Since 1878, Everton has been an integral part of North Liverpool and has remained within a mile or so of its original home – St Domingos Church, in Everton Valley. From its humble beginnings to becoming one of the best teams in European football, altruism and community spirit has remained within Everton's DNA.
- 5.18 More recently Everton has become known as 'The People's Club'. An ethos that the Club proudly maintains by listening to, investing in, working with and inspiring not only its fans but communities across the City and beyond. The People's Club mantra is borne from the close ties the football club has with people in the city and more specifically with people living around the stadium in North Liverpool.
- 5.19 Evertonians are known to be a passionate and loyal fanbase supporting the Club through both good and tough times. For over 30 years, Everton's sporting charity, Everton in the Community ("EitC"), has been at the forefront of social intervention across Merseyside and in particular Liverpool 4 (L4). Working alongside the Club, EitC has been tackling issues which others have neglected including health inequalities, both mental and physical, crime, youth engagement, elderly social care and disability sport. For a lot of fans and the local community, Everton is a constant in their lives with supporters not afraid to turn to their Club in their time of need for help and support.
- 5.20 The Club and charity's award winning, life changing and lifesaving work is recognised not just on a local and national level but also internationally. The Club's relationship with its community is seen as an exemplar and led to Everton practitioners sharing knowledge and information with other global sporting institutions on how they could and should interact with their own communities.
- 5.21 Everton and EitC has been responsible for over £10m of community assets invested in the streets around Goodison Park. The Club's home is located within a ward facing some of the most challenging socio-economic conditions in the country. The roots the football club

has put down as well as the opportunities it has created for local people have ensured the community have a point of reference and facilities to help tackle some of the issues in the area.

- 5.22 As a consequence, the Club's fan base and community radiates away from its focal point at Goodison Park and makes Everton a firm and important part of the North Liverpool fabric. Everton has been an anchor of the community in the north of the City since 1878, when the Club was formed, embedding football at the heart of the community and making the Club an integral part of the local area.
- 5.23 As the 'Peoples Club', Everton is a pioneer in engagement and investment in its local community, which is borne from the close physical ties that Goodison Park shares with its L4 neighbours and the unique socio-demographic profile of North Liverpool. The following further sets out the reasons why the Club's spiritual home is in the North Liverpool area and why Everton is a crucial pillar of L4 and the wider North Liverpool community.

i) Commitment to L4

Everton in the Community

- 5.24 As touched upon, EitC is Everton's official charity and is intrinsically linked to its footballing and community engagement operations. EitC provides more than 60 programmes covering issues such as physical and mental health, employability, crime, education, youth engagement, disability, dementia and anti-social behaviour and supports around 2,000 other local charities a year.
- 5.25 EitC is recognised as one of the nation's leading sporting charities and has pioneered initiatives over the last 30 years to tackle the problems that are prevalent in the community and stimulate real and tangible social change. The success of the charity depends on the dedication, commitment and support of all stakeholders associated with Everton, EitC and the local L4 community.
- 5.26 EitC started in 1988, with 2 employees, and an annual budget of £6,000 per year. The charity has grown significantly since then, and now has 120 dedicated full-time staff, 72 casual staff and 144 volunteers. Both EitC and Everton share staff, resources and services as part of the wider Everton family – meaning the physical connection between the Club and EitC is critical to improving efficiency, reducing travel and in providing the resources needed to support the operation of EitC's programmes and initiatives.
- 5.27 In terms of outcomes, EitC has contributed to a 65% reduction in anti-social behaviour and a 79% reduction in crime in challenging areas in Merseyside. EitC has a 100% success rate on all education programmes and has assisted almost 50% of participants on the employment programme to return to work.
- 5.28 In 2018 alone, EitC won a series of awards, including the Football Business Awards 'Best Football Community Scheme – Premier League' and 'Best Corporate Social Responsibility Scheme', as well as the Northwest Football Awards 'Best Community Initiative'.
- 5.29 EitC has invested £8 million in several community-focussed developments close to Goodison Park in recent years. Key EitC facilities include:
1. **The Everton Free School** - which offers alternative educational experiences to almost 200 students aged 14-16 years old. Established in 2012, the School's alternative provision curriculum helps young people reach their potential where traditional educational routes might have failed.

2. **The People's Hub** – which opened in 2017 and is the home of EitC. The Hub acts as a meeting place where local people can access information and support, get training or take advantage of sports facilities, including one of only seven Cruyff Courts³⁰ in the UK.
 3. **The Blue Base** - which is the latest addition to the campus has seen the renovation of an abandoned social club on Salop Street which is now used as a matchday meeting point for disabled supporters.
 4. **Properties along Goodison Road** – EitC operates several programmes from No. 41 Goodison Road and No. 25 Goodison Road, in the heart of the L4 community.
- 5.30 A plan showing EitC's existing facilities and ownerships within L4 is illustrated in Figure 18. It demonstrates the Club's clear ongoing physical commitment to L4 and reinforces the need for the Club to retain a strong physical connection to both the expanding portfolio of EitC facilities and the potential to develop a truly unique community legacy asset that seamlessly links into these facilities, at a community focussed redevelopment of the Goodison Park site. EitC and Everton have no plans to relocate any facilities from L4 and, conversely, is planning to commit further investment to the local area (as set out below).

Figure 18: Plan showing current EitC Assets



Source: Everton Football Club

- 5.31 In addition to existing facilities, EitC has announced a fundraising campaign to develop a new permanent mental health centre as part of the campus, costing more than £1 million and known as 'The People's Place'. The People's Place will operate from a new purpose-built facility positioned adjacent to The People's Hub on Spellow Lane, just 500 metres from Goodison Park. The new centre will help people who are struggling with mental health issues regardless of their age or situation and help deliver the charity's award-winning mental health programmes. The People's Place reinforces EitC and Everton's ongoing commitment to expanding its footprint in the L4 community and supporting the social and physical regeneration of the Goodison area. The People's Place was granted planning consent in May 2020, reinforcing the commitment to this project.

³⁰ <https://www.cruyff-foundation.org/en/activities/cruyff-courts>

Figure 19: 'The Peoples Place' Concept

Source: Everton Football Club

- 5.32 This significant investment in L4 provides an important anchor for the Club through EitC in the L4 community. It reinforces the need for the Club to retain a strong physical, as well as social connection to L4 in order to realise its vision for a lasting legacy at its historic home. Everton is committed to retaining its presence in L4 and delivering a stadium that has close links to the area, which alongside the Goodison Park Legacy project, is critical in fostering the development and regeneration of the local area.

The Goodison Park Legacy Project

- 5.33 Everton and EitC are committed to delivering a truly lasting legacy at Goodison Park when it relocates to a new stadium. Goodison Park and the land available for redevelopment is to be transferred to a Trust Board to ensure that a new community-focused development at Goodison Park will support local businesses and residents for generations to come, by creating facilities that are matched to local needs and linked to the ongoing work of EitC.
- 5.34 The Goodison Park Legacy project will include a range of community facilities including health facilities, education amenities, community meeting rooms, leisure provision and homes. Plans for Goodison Park will be overseen by the Trust Board and incorporate detailed consultation with the local community.
- 5.35 EitC is working closely with the Club on planning and community engagement for the Goodison Park Legacy, with detailed plans for development to commence as soon as the Club moves to a new stadium.
- 5.36 The new Goodison Park Legacy 'campus' and the existing community buildings surrounding it will ensure the heartbeat of the Club remains in the local community it has called home for more than 125 years. Building on the growing ties between Everton, EitC and L4; the Goodison Park Legacy project will strengthen commitment to L4 and create a critical mass of facilities that are intrinsically linked – physically, culturally and socially - to Everton Football Club.

- 5.37 The Goodison Legacy project will provide a firm commitment to extend and grow ever closer the relationship between club and its local community around L4 for generations to come. On this basis, it is important that the Club moves to a stadium location that can continue to foster connections with L4 and the legacy at Goodison Park, and that retains the existing connections the Club has with its community.

ii) Commitment to Regeneration in North Liverpool

- 5.38 Everton is a huge 'family' with a complex set of relationships that affects many thousands of lives, including service and product suppliers, local hospitality providers, retail shops, a training academy, tourism / visitors and most significantly perhaps the Everton 'community' through its prestigious and renowned EitC programme. Everton plays a very significant and much wider and deeper role in the lives of people in and around Goodison Park and the surrounding area. The Club is committed to ensuring that the investment and benefits that it brings to North Liverpool, and that will be accelerated by the development of a new stadium alongside the Goodison Park Legacy Project, are retained in the north of the City - and continue to benefit the communities within the Everton 'family' for future generations.
- 5.39 The Club recognises the duty to support its community, which is recognised as one of the most deprived parts of the country and deliver on its promises to deliver real public benefit to the local area. Delivering a new stadium in North Liverpool, alongside the realisation of the Goodison Park Legacy vision, provides a generational opportunity to affect transformational physical and social change in the area which might not be achieved if the Club were to move to a location outside of its preferred area of search or the Extended North Liverpool area.

North Liverpool: A Regeneration Priority

- 5.40 North Liverpool is a clear regeneration priority for the city and the key regeneration priorities of the defined North Liverpool area are articulated through a number of strategic and policy documents and projects including:
- **The North Liverpool and South Sefton Strategic Regeneration Framework** – the fundamental purpose of the SRF is to create sustainable communities and to maximise North Liverpool's contribution to the City's competitiveness over the next 20 years and beyond. The SRF acts as an 'umbrella document' to provide the strategic context for more detailed delivery plans. The strategic objectives of the SRF are to enable further investment and employment growth to accommodate economic growth sectors of the future, increase the ability of local residents to access better quality employment opportunities, establish an ambitious and strategic vision for sustainable neighbourhoods and to link business districts and housing neighbourhoods through a multi modal transport system and coherent green infrastructure network.
 - **The Atlantic Corridor Development Framework** - running north from the City Centre along the north Liverpool bank of the River Mersey, the Corridor framework establishes a set of regeneration and development principles for a significant area of the northern part of the City. The Atlantic Corridor Development Framework provides the overarching context for regeneration and aims to better connect these emerging destinations to each other and the city centre, identify further opportunities for coordinated for investment, create improved investment conditions, and improve access to new jobs and opportunities for local residents and workers.
 - **The North Liverpool Mayoral Development Zone (MDZ)** – the North Liverpool Mayoral Development Zone (MDZ) is the largest of the MDZs and support business development and regeneration in the inner north. The MDZ covers the area stretching from the expanse of Liverpool's docks in the north to the edge of the City Centre's commercial

business core. Not only does it include a swathe of traditional industrial and warehousing sites alongside the river, it also reaches eastwards into Everton Valley to encompass rapidly regenerating residential suburbs and district shopping centres. Being home to both of the city's football clubs, the MDZ recognises Everton's redevelopment plans within North Liverpool.

- **The Ten Streets Spatial Regeneration Framework** – the Ten Streets SRF encompasses an area of Kirkdale to the north of the City Centre. The Ten Streets District will function as a new economic driver and connector between the Stanley Dock complex to the north and the City Centre to the south. The SRF fully recognises the potential of BMD to support a new football stadium and consequently the long-term potential of the Ten Streets area to support this aspiration, noting that the stadium has the potential have a transformational effect on the North Docks and the Ten Streets framework area. The SRF seeks to facilitate rapid change and create a catalyst that will accelerate the redevelopment of the wider framework area.
- **Liverpool Waters (and Liverpool Waters Enterprise Zone)** – Liverpool Waters is a £5 billion project that will comprehensively transform the city's northern docks, regenerating a 60 hectare stretch to create a world-class, mixed-use waterfront quarter in Central Liverpool. It offers a generational opportunity to transform Liverpool's north docks and could truly transform communities to the north of the City Centre.

- 5.41 The commitment of the Club to remain connected to its existing community is reflective of the commitment it has made to the regeneration of North Liverpool, but importantly a recognition of the contribution that the Club can make to truly catalysing the regeneration of the area. This commitment will generate significant public benefit for the wider North Liverpool area and, importantly the local community within which Everton is fully embedded.

The Potential for Social and Economic Change

- 5.42 Within the LCC administrative boundary, North Liverpool constitutes the four wards of Anfield, Everton, Kirkdale and County. It has been 'awarded' regeneration area status since the mid-1970's, and large parts of the area are designated within the North Liverpool Mayoral Development Zone, the North Liverpool and South Sefton Strategic Regeneration Framework (SRF) area and the Atlantic Corridor regeneration priority area. The North Liverpool and South Sefton Strategic Regeneration Framework area encompasses some 2,500 hectares of land and population of around 85,000³¹ to the north of the city centre. The SRF in 2011 noted that³²:

"Whilst North Liverpool suffers many of the same structural problems that can be observed at a city wide level, it ranks worse than the city average on many of the core indicators of deprivation and pulls down the city's overall performance. Despite its proximity to the city centre and areas of comparative growth and affluence, North Liverpool remains fundamentally disconnected from the growing city centre economy. As a series of fragmented neighbourhoods, it no longer plays a key role in attracting and retaining, young and economically active people and families for the city; its residents are more likely to live in poor quality housing; to be unemployed or on other working age benefits and suffer from poor health. These factors make North Liverpool the most disadvantaged area of England"

- 5.43 Whilst there has been some improvement in the area since these assertions were made, these social and structural issues are largely characteristic of the area today. A summary

³¹ 70,000 for the narrower definition of the area.

³² North Liverpool and South Sefton SRF 2011

of the Index of Multiple Deprivation (IMD) (compared with the city) is set out in Table 1 below:

Table 1: Indices of Multiple Deprivation North Liverpool

Average Indices of Multiple Deprivation (2019 Data)		
	North Liverpool	Liverpool
IMD	64.7	43.1
Income	0.4	0.2
Employment	0.3	0.2
Education	53.4	33.9
Health	2.1	1.3
Crime	1.2	0.6
Barriers to Housing & Services	13.8	14.2
Living	52.6	41.9
Source : IMD DATA (2019) Note - Higher scores = worse, Lower scores = Better		

Goodison Park (County Ward)

- 5.44 Goodison Park sits within the County Ward within North Liverpool. The ward has a total population of around 14,000 people but this has been in decline over the last 10 years, which is a major indicator of economic distress. Key indicators suggest that County Ward is one of the most deprived wards in the City, and in the UK, which scores poorly against the city average across almost all the main relevant socio-economic indicators³³. A summary of the key socio-economic indicators for the UK, LCC and County Ward is provided in Table 2:

Table 2: Key Socio-Economic Indicators – County Ward, LCC, UK

Socio-economic Indicators ³⁴	County Ward	Liverpool	UK
Average Household Income (index base = 100) (2017)	78	100	137
Unemployment rate ³⁵	5.8%	4.5%	4.1%
Claimant Count	6.1%	3.5%	2.0%
Worklessness % (working age) (2016)	33.5%	21%	14.5%
Incapacity Benefit Claimants (2016)	17.20%	10.90%	6.30%
Workforce 16+ (no qualifications) (2011)	37.30%	28.70%	22.70%
Workforce 16+ (NVQ4 +) (2011)	11.50%	22.40%	27.20%
Percentage 5+ GCSEs A*-C (2017)	43.8%	54.8%	60.6%
Life expectancy (index) (2015-17)	98	100	104
Child Poverty (2018)	39%	27.7%	16.8%
Crime per 1000 (2018)	150.7	113.6	na
IMD - % of area in most deprived 10% nationally	100%	49.6%	na
IMD score (highest = worse)	64.5	43.1	na
Business per capita ratio (bu:pop) (2016)	1:94	1:25	na

³³ The city itself scores poorly in relation to many of the same indicators against the UK average.

³⁴ Data is 2019 unless otherwise noted

³⁵ Calculated by the difference between Liverpool Unemployment in 2016 and 2019 and applying this to County

GVA per head (Index UK = 100) ³⁶	57	88	100
---	----	----	-----

Source: LCC / ONS / CBRE

- 5.45 The ward has 3 Lower Super Output Areas (“LSOAs”) which are in the top 1% most deprived in the country and is clearly one which requires continued investment and regeneration to elicit social and physical change. Everton and EitC’s role in this community cannot be overstated – it is critically important at many levels, from providing a positive psychological influence, to the significant scale of investment in the community.
- 5.46 If Everton were to leave this area completely, or lose its physical and cultural connection with the community, it could have significant consequences for North Liverpool. However, Everton’s departure from Goodison Park provides a generational opportunity to reinvigorate the area in a way that seldom presents itself. In regeneration terms, the Legacy project for Goodison Park becomes as important as the decision to relocate the (footballing) operations of the Club, and retaining the connections to Goodison Park by relocating the Club to a location with strong links to North Liverpool presents a unique opportunity to evolve and build upon existing social, physical and cultural ties.
- 5.47 Other wards within North Liverpool (including Kirkdale, Anfield and Everton) share a similar socio-economic profile to the County Ward and are reflective of social and economic issues that are prevalent in the area. Wards within North Liverpool would benefit from significant investment and regeneration, sharing clear social and cultural ties, and physical proximity to Goodison Park.
- 5.48 In addition to the above, the situation with regards to the impact of Covid-19 has created significant uncertainty for North Liverpool and the City Region. While the context is rapidly changing, it is clear that there will be significant social and economic distress and rising unemployment as the fallout from Covid-19 continues. As is demonstrated in the accompanying Economic Impact Assessment, the delivery of major development schemes of national significance will be critical in providing the jobs and investment to support the City Region’s economic recovery. Therefore, the Covid-19 crisis places increased focus and importance on the jobs created the BMD and GPLP projects and could provide a significant boost to the communities of North Liverpool during a period of social and economic recovery.

2. Supporters and the Community

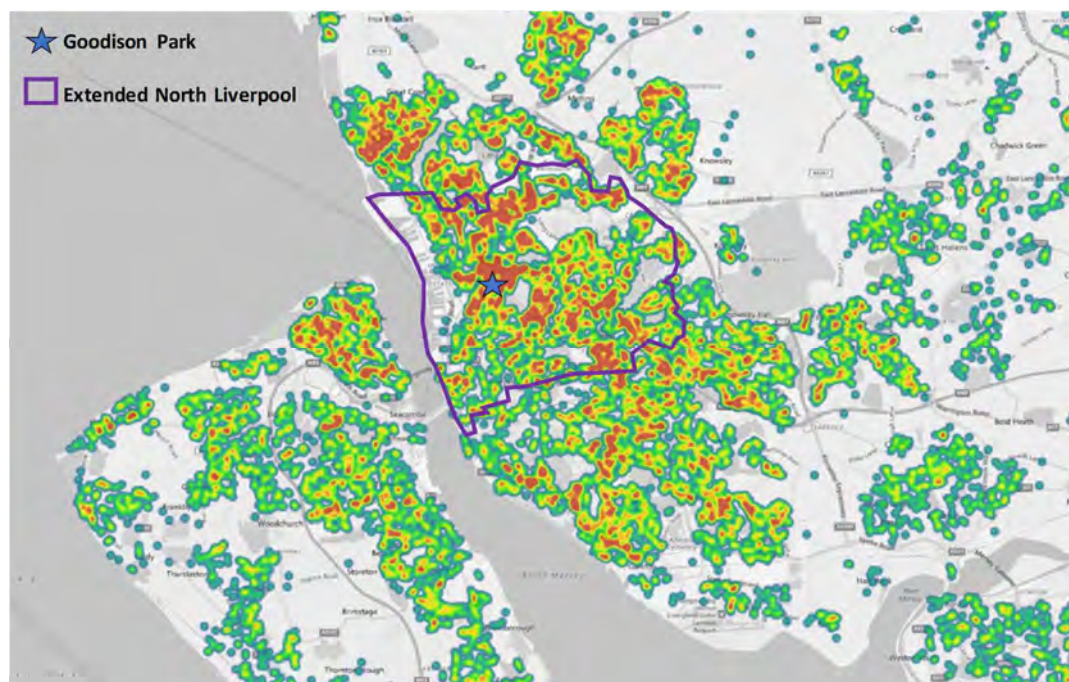
- 5.49 Everton’s supporter catchment demonstrates a heavy concentration of supporters in Liverpool and the City Region. Unlike more national and internationally recognised clubs such as Manchester United, Liverpool, Manchester City, Chelsea and Arsenal, Everton’s fanbase is primarily more ‘localised’ and is traditionally strongest in its heartland in the north of the City, with a longstanding and loyal supporter base that has been built by the Club over generations.
- 5.50 Season ticket sales, supporter sentiment (as set out later) and the wider views of the community and the City; evidenced by recent public consultation and Everton’s previous proposals to move out of the City, demonstrate a strong and clear preference from the people of Liverpool and the local community for Everton to remain in the north of the City, where it can retain its established connections to its traditional fanbase.

a) Supporter Catchment

³⁶ Calculated by the difference between Liverpool GVA in 2016 and 2019 and applying this to County

- 5.51 Everton has a concentration of support in the north of the City, focussed particularly around L4, North Liverpool and the southern part of Sefton. The heat map in Figure 20 illustrates the concentration of season ticket holders across the City in 2018/2019 and highlights the concentration of season ticket holders around its existing home, when compared to the south of the City or other Local Authorities.

Figure 20: Season Ticket Holder Heat Map: 2018/2019



Source: Everton Football Club

- 5.52 Season ticket data demonstrates that the north of the City and its immediate surrounds acts as a nucleus for the Club's core support. The deep-rooted ties that the Club has fostered in the community over the past 150 years has developed a loyal core fanbase that has been passed from generation to generation in the local community. It is imperative that Everton retains a connection to its fans and its traditional heartland. The fans have strong emotional connections to the Club in the area and, as explained below, a move from the wider North Liverpool area has the potential to undermine the loyal support that has been built by the Club over the generations and garner significant opposition from the full spectrum of Everton fans.

b) Supporter and Community Sentiment

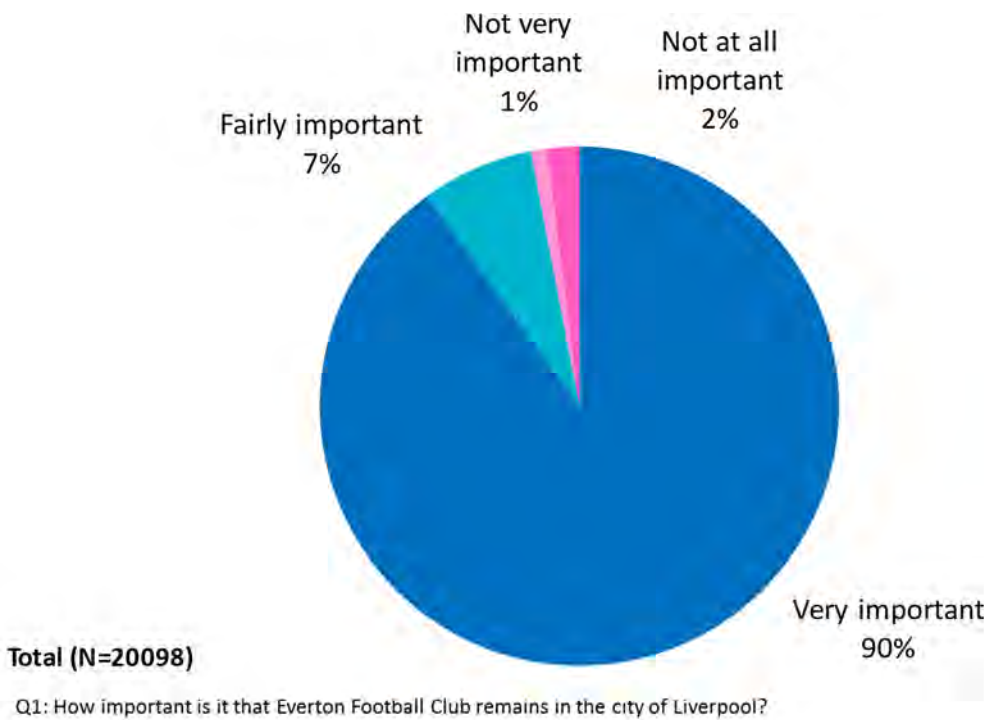
- 5.53 In addition to the core fanbase being more concentrated in the north of the City, **there is a clear and overwhelming desire from the Club's supporters and the people of Liverpool for the Club to remain within the City of Liverpool, and more specifically to remain in the north of the City.**
- 5.54 A public consultation event was held by the Club between 15th November 2018 and 3rd December 2018, including a daily roadshow event across the region, an online website/survey and postal survey. The consultation garnered 20,168 responses³⁷, including a substantive sample of 1,919 non-Everton fans.

³⁷ 15,660 (78%) online responses, 2,945 (15%) roadshow responses and 1,563 (8%) postal returns

5.55 The consultation clearly demonstrated majority support for the retention of Everton in Liverpool and specifically in North Liverpool. Key highlights are set out below which demonstrate the clear supporter (and non-supporter) sentiment to retain the Club in North Liverpool [CBRE **emphasis** added]:

- **97% respondents think it's important that Everton stays in the City of Liverpool**
- **86% respondents think it's important that Everton stays in North Liverpool**
- 94% agree Bramley-Moore Dock is an appropriate site for Everton's new stadium
- 95% agree on the new stadium being used on non-match days to host other events
- 95% agree with the Goodison Park legacy

Consultation Question 1: How important is it that Everton remains in the City of Liverpool?



Source: Influential

Consultation Question 2: How important is it that Everton remains in North Liverpool?



Source: Influential

- 5.56 Further disaggregation of the data demonstrates that the preference to remain in North Liverpool is stronger within the communities of North Liverpool, as demonstrated in Table 3 below, with 90% of people in L4 and 87% of people in North Liverpool considering that it is important for Everton to remain in North Liverpool respectively.

Table 3: Preference to remain in North Liverpool by geography of respondent

Q: HOW IMPORTANT IS IT THAT EVERTON REMAINS IN NORTH LIVERPOOL?	L4	NORTH LIVERPOOL ³⁸	EXTENDED NORTH LIVERPOOL ³⁹	LIVERPOOL CITY REGION
Very Important	77%	70%	69%	63%
Fairly Important	13%	17%	19%	24%
Not Very Important	5%	6%	6%	9%
Not Important at All	5%	6%	5%	4%
Don't Know	0%	0%	0%	0%
<i>Sub-Total: Important for Club to remain in North Liverpool</i>	90%	87%	88%	87%

Source: Influential and Everton, 2018

- 5.57 It is clear that there is a strong preference, not only from supporters of Everton but also the wider Liverpool community, for the Club to remain not only within LCC administrative area, but specifically in North Liverpool. Significant weight should be attached to the preferences of the local community in the search for and selection of the location for Everton's new stadium and, as such, the catchment area of this ASA and the assessment of candidate sites should reflect this.

³⁸ Area comprising the postcodes of L3, L4, L5 & L6 – which is the area which mostly closely aligns with Everton preferred catchment (which is the wards of Anfield, Goodison, County and Kirkdale)

³⁹ Area comprising the postcodes of L1 to L13 (inclusive) and L20 – the area which most closely aligns with the Extended North Liverpool catchment

- 5.58 A second stage of public consultation was undertaken in Autumn 2019, focussing on the proposed design of the new stadium. It found that 96% of more than 40,000 responses preferred the Club to continue with the People's Project, including 84% of non-Everton fans. The scale of the consultation demonstrates the weight of public support both for retaining Everton in LCC and pursuing a stadium that is close to the Club's existing home.

3. Everton's Commitment to North Liverpool

- 5.59 There are clear physical, cultural, social and emotional reasons why Everton must retain its connections to North Liverpool, building on the entrenched community ties and connection to its spiritual home. Whilst Everton must relocate from Goodison Park, it is committed to identifying a stadium in the north of the City which has a clear connection to its existing community. In summary, Everton is committed to remaining connected to North Liverpool based on:

- The strong preference of the local community, Everton supporters and people of the City of Liverpool to retain the Club in the north of the City;
- The history of the Club and its deep-rooted connections to its community in L4 – Everton has been an anchor of the community in both its local L4 community and in North Liverpool since 1878;
- As the People's Club, the investment and physical development that Everton has committed, and continues to commit to L4, through EitC, community initiatives and by developing community focused proposals for the Goodison Park legacy - and the need for the community/the Club to develop and foster this investment and continue to draw on shared resources;
- The duty that Everton has to the regeneration of its surrounding community and the North Liverpool area, which contains some of the most deprived communities in the UK;
- The commitment of Everton to supporting LCC's longstanding regeneration objectives in the north of the city and to support its communities in the area;
- The need for Everton to remain in its traditional supporter heartland which is concentrated in the north of the City, building upon the connections which have been developed over the past 150 years; and
- Lessons learned from the past, particularly in the Club's proposals to move to Kirkby and the significant opposition from LCC, the Club's fans and the community.

C) REASONS FOR NOT EXTENDING THE AREA OF SEARCH

- 5.60 The ASA methodology and the justification for its area of search provides a robust catchment area that has been discussed and agreed between all relevant parties.⁴⁰ This approach has demonstrated flexibility in the adoption of an area of search, being initially expanded from the Club's preferred catchment in North Liverpool (Area 1a) to include an area of Extended North Liverpool and South Sefton (Area 1b); and then subsequently extended further to include the entirety of LCC's administrative boundary (Area 2)⁴¹ (i.e. including South Liverpool), following discussion and agreement with HE and LCC.

⁴⁰ Including Historic England and LCC

⁴¹ It should be noted that this correlates with the boundary of LFC ASA in 2007, which included the LCC administrative boundary.

- 5.61 Notwithstanding the above, this section addresses why the former proposed stadium site on the edge of Kirkby town centre, associated with the Kirkby Call-In Inquiry in 2009, and any other sites within the administrative area of Knowsley (or other locations such as the Wirral) are not realistic. These reasons can be summarised as follows:

1. Links to Goodison Park and North Liverpool

- 5.62 It has been demonstrated extensively in this section that the Club has, over the past 125 years, fostered unbreakable connections with both its immediate (Goodison and L4) and wider (North Liverpool) community. These connections are deep-rooted and are continually being strengthened as the Club rapidly develops its community and social programmes, which are transcending Everton's role beyond a traditional football Club. To illustrate and reiterate this, it should be noted that:

- Everton has forged unbreakable links to its local community since 1878 when the Club was formed, with Goodison Park now regarded as its spiritual home. As the 'Peoples Club', Everton is a pioneer in engagement and investment in its local community, which is borne from the close physical ties that Goodison Park shares with its L4 neighbours and the unique socio-demographic profile of North Liverpool. Put simply, the Club is the heart of its local community and it is essential that these ties are not irreparably damaged. The Club is a "special case".
- In recent years (since proposals to move to Kirkby were abandoned), the Club has forged stronger than ever connections to L4 and North Liverpool. As set out in earlier in this section, through the physical and community programmes delivered by EitC throughout the 2010s, the Club has reinforced its commitment to the local community in North Liverpool and now more than ever relies on the physical and social ties with these initiatives – closely sharing resources and planning further physical investment in the area.
- The Goodison Park Legacy Project will further embed and grow ever closer the relationship between Club and its local community around L4 for generations to come. It is critical that the Club relocates to a location that can retain and build upon this legacy.
- Kirkby/Knowsley is not considered to be a part of Liverpool administratively, culturally or geographically – and it should be wholly unrealistic to divorce the exercise of looking for a new home for a professional football club from the geographic, social and cultural identity of the club⁴². Everton is the "People's Club" and its fans consider it to be a Club within deep rooted support in the City of Liverpool, and in particular North Liverpool. The opposition to the previous Kirkby proposals confirms the resolve (of fans, the community and the City) to keep the Club in the Liverpool. Geographically, the former Kirkby site is approximately 6.7km from the Club's existing Goodison Park home, with the proposed BMD stadium only 2.7km away, and within North Liverpool.

2. Extensive Consultation and Community Sentiment

- 5.63 The Club has undertaken one of the largest ever public consultation exercises - both in Liverpool and the Liverpool City Region – engaging with its fans, the local community and with people across Liverpool and the Region. This exercise has overwhelmingly

⁴² . It should be noted that in the case of the UK, the move of MK Dons was significantly opposed by the wider football community as a first step towards 'franchising'. A recent example is at Tottenham Hotspur, where its proposed move to the Olympic Stadium was met with significant fan opposition.

demonstrated the importance of retaining Everton in the City of Liverpool, and particularly in North Liverpool, finding that:

- An overwhelming 97% respondents think it's important that Everton stays in the City of Liverpool; and
- That 86% respondents think it's important that Everton stays in North Liverpool, reinforcing community sentiment and underlining the perceptions of the Club being an integral part of the north of the City.

3. Objections to Leaving Liverpool

- 5.64 The Kirkby relocation proposals generated impassioned opposition from the Club's fan base and the community, which vehemently and vocally opposed the relocation of the Club to a site that was not considered to be administratively, culturally or geographically part of Liverpool. Keep Everton in Our City ("KEIOC") was a fan organised group that had significant support, mobilising a highly organised and resourced campaign against the relocation of the Club to Kirkby. KEIOC had significant support and investment, appearing and giving evidence at Public Inquiry and launching a widespread media campaign. Conversely, whilst the Kirkby scheme was met with significant opposition, as set out above, there has been overwhelming from both Everton fans and non-Everton fans for the BMD project and, in particular, to retain the Club in Liverpool. It should also be noted that Everton's move from the City of Liverpool was strongly opposed by LCC at the time.

4. Everton's Commitment to Liverpool and North Liverpool

- 5.65 Whilst it is accepted that the Club considered a move to Kirkby more than 13 years ago, it should be noted that this represented an entirely different time for the Club and in the significant time that has elapsed since, the Club is in a completely different position. During the time that has elapsed, the relevance of this proposed move has diminished and the Club's commitment to retaining links to its current home have been reinforced.
- 5.66 The Club is now under different ownership and leadership, with raised ambitions both on and off the pitch, resulting in a desire to take the Club in a different direction with regards to its stadium relocation and community engagement – requiring an iconic stadium that is befitting of Club and supporter ambition, and a stadium that unequivocally retains its community ties in North Liverpool. Additionally, the proposed Kirkby move was predicated by financial drivers and the need for retail enabling development to cross subsidise the scheme. This is no longer the case - the club has its own funding sources and does not need to form part of a wider development proposal driven by a major retailer.
- 5.67 The Club is now absolutely committed to retaining its ties to Goodison Park and North Liverpool. It categorically would not consider moving to a site outside of Liverpool or to Knowsley. The Club is committed to remaining in Liverpool – and specifically in North Liverpool – to deliver a stadium in a location and of a quality that its fans demand, and one which allows the Club to develop its relationships in L4.

5. Previous Kirkby Proposals

- 5.68 As set out above, the Club finds itself in entirely different circumstances to 2007 and has learned difficult lessons from its proposed move to Kirkby. Whilst, for the reasons set out above, the Club would never reconsider a such a proposal, it is important to note that the scheme at the time was also met with significant local opposition and had issues that extended beyond retail planning grounds.

- 5.69 Whilst the scheme was refused primarily on retail planning grounds, other issues were identified such as residential amenity and the impact on living conditions in the surrounding suburban community, with the Secretary of State stating that *“The [Secretary of State] agrees that the new stadium would have a harmful impact on the living conditions of residents of a group of houses on Whinberry Drive through the loss of daylight and harmful visual impact, and that residents in the Grange Estate would also be most affected by noise during football matches. He also agrees that the disruption at the end of the match is likely to be spread throughout the community and would have a significant effect on the way in which the town’s residents conduct their lives during that time (IR19.49)”*⁴³.
- 5.70 Whilst it is accepted that these issues do not preclude development, or that another site may have a less harmful impact, it demonstrates that the scheme had the potential to have a significant impact on an established community. This was demonstrated by significant local opposition to the proposals (on amenity grounds), supported by the Kirkby Residents Action Group which strongly opposed the development at Public Inquiry.

SUMMARY

- 5.71 Overall, the case for Everton to remain closely connected to North Liverpool is clear and compelling. The Club has fostered unbreakable connections with the area over the past 150 years and a move away from its spiritual home would create long term damage both to the Club and the communities of North Liverpool within which Everton forms an integral part.
- 5.72 For the reasons set out in this section, **it is not considered to be a realistic or feasible proposition for the Club to consider a move outside of the Extended North Liverpool area (Area 1a and 1b) to a site that would not retain any tangible links between the Club and the North Liverpool community.** Moreover, it is seen as imperative by the local community, supporters and people of the City to retain the Club close to its historic home. Based on past experiences and the aspirations of the Club leadership, **the Club (and its supporters) would categorically not consider such a move outside of the Extended North Liverpool area in a “real world” scenario and is fully committed to developing a feasible, practical, realistic and deliverable stadium which enables the Club to remain embedded in the north of the city.**
- 5.73 Whilst the Club consider that the ‘Extended North Liverpool’ area of search (as illustrated in Appendix 6) is the most robust and reasonable area of search based on all guidance, precedent and evidence; it has been agreed following discussions with Historic England that, without prejudice, the area of search is extended to include South Liverpool and the entire LCC administrative area (Area 2) to ensure that all sites across LCC have been considered as part of a wider search.
- 5.74 **Therefore, the catchment area provided at Appendix 7 forms the basis of the comprehensive Alternative Sites Assessment.**

⁴³ SoS Decision, Kirkby Inquiry, APP/V4305/V/08/1203375, pp21

6.0 Site Size & Identification

- 6.1 A comprehensive site search has been undertaken to generate a long list of sites for assessment based on a “policy off”⁴⁴ approach. This search has been undertaken within the area of search defined in Appendix 7, which includes:
- **Extended North Liverpool (Areas 1a and 1b)** – including the preferred catchment area of the Club and a reasonable and realistic area within which the Club would consider relocation; and
 - **A Wider Area of Search (Area 2)** – including areas on the south of the City where the Club would categorically not consider relocation, but which are included in the assessment, without prejudice, following discussion with key stakeholders including HE.

MINIMUM SITE SIZE

- 6.2 The Club, CBRE, Pattern (the Club’s Project Architect) and Buro Happold (the Club’s engineers) have considered, in detail, the minimum site area and critical dimensions required for a site to accommodate a 52,888 capacity stadium and ancillary facilities, to reflect the stadia which is proposed at BMD. The findings of this assessment are contained at **Appendix 8**, which includes a theoretical sizing assessment and a benchmarking exercise of comparable football stadia.
- 6.3 This study also considers the design drivers that influence the selection of a stadium site. Regulations such as the Green Guide set out minimum space provisions for seating, escape routes, concourses, and toilet accommodations – all of which are major drivers for the overall size of a stadium and its surrounding external site. Consideration of these regulations demonstrates that the proposed stadium at BMD is an efficient design and its size is a close approximation to the minimum size that a 52,888-seat EPL stadium could be.
- 6.4 Guidance published by football regulating bodies including the EPL and UEFA agree that certain facilities are required within a stadium site for the function of hosting football matches, namely car parking and a sizeable Outdoor Broadcast (OB) compound. The amount of public space required for safe spectator circulation around the stadium (clear of other parking or OB Compound requirements), is a function of the constraints to that site.
- 6.5 A summary of the conclusions of the theoretical and benchmarking reviews is set out as follows:

Theoretical Size

- 6.6 Appendix 8 considers three hypothetical sites using the same abstracted size and shape based on the BMD stadium, which is representative of the minimum viable size for a 52,888-seat stadium. Each of the hypothetical sites features a different level of constraint in terms of its access, as this drives the overall circulation space required to allow spectators to leave the stadium safely.
- 6.7 It acknowledges that no one site operates on a symmetrical basis and that there are always points of interest and travel that dictate movement and spaces. In the example of BMD, the proposed Eastern Fan Zone plaza is required for circulation and without it, the circulatory space needed around the stadium footprint would need to increase. This space is therefore essential when viewed in the context of stadium constraints, minimising the circulation space required and effectively working as a holding location so that visitors can leave the site safely.

⁴⁴ Assuming no policy constraints (i.e. open space, heritage, landscape, land use etc)

- 6.8 Appendix 8 also clearly sets out how the EPL and UEFA have set requirements outside of the stadium itself, including:
- Media seats, studios, and interview positions;
 - Broadcast facilities;
 - Match officials' areas;
 - Parking spaces; and
 - Outdoor Broadcast Compounds, for the use of satellite trucks to broadcast the live signal during the match.
- 6.9 In summary, the theoretical exercise considers sites in three different scenarios at 6ha, 6.9ha and 7.2ha. However, as set out in detail in Appendix 8, given the likelihood of any given site to present a reasonable number of constraints that would drive additional site area beyond a theoretical minimum, it is not reasonable to consider that sites at 6.0 or 6.9 hectares are realistic. The hypothetical exercise is useful in understanding how site constraints drive the required area for a project. It demonstrates the mechanics of how a relatively unconstrained 7.2 hectare site might be suitable for the same stadium as a more constrained 10-hectare site. However, the study considers just the constraint of spectator access. Whilst this constraint might be considered one of the biggest drivers for overall site size (as it determines the amount of clear circulation area required around a stadium's footprint), it is just one of many constraints that might characterise a site.
- 6.10 Therefore, it is concluded that **7.2 hectares is a minimum threshold that begins to approach the level of constraint that is present in most theoretical potential sites.**

Benchmarking

- 6.11 Whilst the theoretical exercise is useful to determine, in detail, the stadium requirements, benchmarking is a more reliable indicator of the amount of land required for a stadium, as actual projects better reflect how site constraints affect the plot size required for a project. On this basis, Appendix 8 provides a detailed review of relevant comparable stadia in England. This review suggests that when reviewing the land requirements and average site area (including circulation and car parking) of stadiums that have been built in the past 25 years and have a capacity of more than 45,000 seats (i.e. most directly relevant to BMD), it suggests **an average site area of 8ha.**

Summary and Adopted Minimum Size

- 6.12 The above analysis therefore confirms that an absolute minimum area for the stadium the size of which is proposed by Everton is between 7.2 ha and 8ha.
- 6.13 Therefore, in order **to ensure that the assessment is robust, the lower of these thresholds (7.2 hectares) has been adopted as the basis for the site search exercise.**

SITE SEARCH & IDENTIFICATION

- 6.14 A comprehensive site search has been undertaken of sites which meet the minimum threshold size (7.2ha), and also where sites have been considered by Everton and Liverpool Football Clubs in previous site searches. This has included:

1. **Previous LFC and Everton site searches** - a review of all sites assessed as part of LFC's 2007 ASA (and Supplementary Submission)⁴⁵ and as part of Everton's known previous searches for an alternative site that are within the catchment area of this ASA defined in Section 5 of this report.

A plan showing the sites assessed in LFC 2007 assessment is provided at **Appendix 9**. It should be noted that some of these sites fall below the minimum threshold identified above, but have been included for completeness.

2. **Primary search** - a primary search for sites of a suitable size based on:
 - a) A review of existing and emerging policy allocations and sites promoted through the development plan (i.e. including its evidence base and the SHLAA);
 - b) 'Land Insight'⁴⁶ software that are of sufficient size and do not require unacceptable or unreasonable land assembly;
 - c) Sites reviewed and identified in a workshop with key LCC officers – undertaken on 18th December 2018 and 22nd October 2019 with Policy, Planning and Regeneration Officers; and
 - d) Sites of a sufficient size identified in consultation with Senior Planning Officers at Sefton Borough Council (October 2019).

- 6.15 51 sites (excluding BMD) have been identified as part of the extensive site search – these are included in **Appendix 1** and **Appendix 2** and have been assessed against the criteria set out in the following section.

⁴⁵ Liverpool Football Club Alternative Sites Assessment and Supplementary Submission (2007), App ref: 07F/2191

⁴⁶ Land Insight is a powerful land search tool which allows site searches based on set parameters, including details of ownerships, planning applications, planning policy and market valuations

7.0 Site Assessment Criteria

7.1 The criteria against which each site has been assessed are set out in Figure 21 below. The ASA provides a qualitative assessment of whether each site offers a “reasonable prospect of planning permission being granted and which represents an improvement over what is being proposed” as set out in the Brighton and Hove Albion call-in decision. The site conclusions form a summary assessment based on assessment criteria drawn from the Brighton and Hove Albion call-in decision which considers the following as key questions when assessing potential alternative sites:

3. Is the site large enough for the proposed stadium and parking?
4. Are there any overriding site specific planning issues?
5. Is site acquisition a realistic proposition (is the site available)?
6. Can a stadium be built without incurring unaffordable development costs on the site?
7. Is the site accessible by sustainable modes of transport?
8. Will there be any unacceptable environmental or visual impacts?

Figure 21: Site Assessment Criteria

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
Site Details	
<i>Site Area</i>	Site area in hectares.
<i>Existing Site Uses</i>	Description of current site uses.
<i>Surrounding Uses</i>	Summary of immediate surroundings and uses.
<i>Site Ownership</i>	Summary of key land ownerships (and leaseholds where appropriate).
Planning Policy	
<i>Adopted Policy</i>	Liverpool Unitary Development Plan Position (screenshot of adopted Local Plan).
<i>Emerging Policy</i>	Draft Local Plan Position (screenshot of emerging Local Plan).
<i>National Policy and Other Material Considerations</i>	Assessment of NPPF policies Any relevant supplementary planning policies (SPDs, Local Plan evidence base documents, planning guidance etc).
Statutory Designations	
<i>Heritage</i>	Details of whether the site is within the WHS/WHB Buffer Zone, any listed buildings within or adjacent to the site (and their grading), any Scheduled Ancient Monuments, proximity to a Conservation Area or to any Locally Listed Buildings.
<i>Flood Risk</i>	Assessment of Environment Agency Flood Zone classification.
<i>Ecology</i>	Details of any relevant ecological designations or protection areas within or close to the site — or if the site is within the impact zone of any significant designations.

<i>Landscape</i>	Details of any relevant landscape designations or protection areas within or close to the site — or if the site is within the impact zone of any significant designations.
Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	Existing / emerging regeneration strategy / strategic policy within or close to the site — i.e. SRFs, Development Frameworks, Economic Development Strategies, Mayoral Development Zones, Enterprise Zones etc.
<i>Socio-Economic Profile</i>	Socio-Economic Profile of the Local Area (IMD, 2019).
Planning History and Development Context	
<i>Planning History</i>	Updated assessment of the (relevant) Planning History for the site (including pending applications and early pre-application discussions, where available).
<i>Development Status</i>	Summary of surrounding development context.
<i>Landowner / Developer Aspirations</i>	Summary of landowner or development aspirations / commitments (where known).
Accessibility	
<i>Access to National Network</i>	Access to strategic highway network.
<i>Access to Public Transport Nodes</i>	Distance to key public transport nodes, including Mersey Rail and Bus Services.
<i>Pedestrian and Cycle Access</i>	Proximity and ease of access via walking and cycling.
<i>Highways Capacity and Access</i>	Suitability of and access to the site and capability of the local highways network. ⁴⁷
Other Development Issues	
<i>Other Potential Constraints</i>	Other issues to deliverability such as contamination, topography, impact on the amenity of surrounding uses, possible engineering/construction issues.
Fit with Everton Requirements	
<i>Connection to North Liverpool</i>	Physical, cultural and social connections to North Liverpool and Goodison Park.
<i>Iconic Location</i>	Could the site deliver an iconic stadium development, befitting of a world class football club?
Site Assessment	
<i>Is the site large enough for the proposed stadium and parking?</i>	Is the site at least 7.2 hectares? Is the site of a size, shape and configuration that could accommodate a football stadium and ancillary facilities?

⁴⁷ input from Mott MacDonald (Everton transport consultants) supports this assessment where required.

<i>Are there any overriding site-specific planning issues?</i>	<p>Are there any planning or policy constraints that are considered to preclude the development of the site for a stadium use?</p> <p>Is there potential to mitigate or outweigh the adverse impacts of any identified issues?</p>
<i>Is site acquisition a realistic proposition?</i>	<p>Is the site available, from a legal and land ownership perspective?</p> <p>Is the acquisition (including CPO) and assembly of the land considered to be a reasonable and realistic proposition?</p>
<i>Can the stadium be built without incurring unaffordable development costs on the site (viability and deliverability)?</i>	<p>Would a stadium development be viable and deliverable on the site?</p>
<i>Is the site accessible by sustainable modes of transport?</i>	<p>Is the site accessible by sustainable modes of transport – high capacity public transport (train), walking (close to City Centre and key population hubs) and cycling?</p> <p>Would the site promote car borne modes as the primary mode of transport?</p>
<i>Would there be any unacceptable environmental or visual impacts?</i>	<p>Are there any environmental or visual impacts that are considered to preclude the development of the site for a stadium use?</p> <p>Is there potential to mitigate or outweigh the adverse impacts of any identified issues?</p>
<i>Conclusions / Summary Assessment</i>	<ul style="list-style-type: none"> ▪ Summary of the key site characteristics and assessment ▪ Comparison with BMD and conclusions on whether the site is feasible, practical and realistic alternative.

8.0 Site Assessment

- 8.1 This section sets out the findings of the comprehensive assessment of alternative sites, based on the methodology outlined in sections 3 to 7. A review of sites within the proposed catchment based on a 'policy off' site search has identified a total of **52 sites including BMD** within the wider area of search (Area 2) which includes:
- 32 sites within the Extended North Liverpool area (Area 1a and 1b), including BMD; and
 - A further 20 sites in the wider administrative boundary of Liverpool City Council (i.e. in South Liverpool).
- 8.2 A plan and detailed proformas for each site is provided as **Appendix 1** and **Appendix 2**. These assess each identified site against the criteria set out in Section 7 and provide a qualitative assessment of each site against the key tests, as well as a comparative assessment of the site against BMD to understand whether, if available, it provides a more favourable alternative than the Club's current proposals.
- 8.3 A summary of the qualitative site assessment against the identified site assessment criteria is provided in **Table 4 (Extended North Liverpool)** and **Table 5 (South Liverpool)**. These are summary tables only and should be read alongside the detailed proformas and individual site assessments contained in **Appendix 2**.

Table 4: Site Assessment: Summary Conclusions - Extended North Liverpool Catchment**KEY:**

1. Suitable Size? 2. Site Specific Planning Issues? 3. Available? 4. Viable? 5. Accessible? 6. Visual / Environmental Impact?

✓ (Criteria could be met) ✗ (Criteria not met) ? (Further assessment/investigation required)

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
1	BMD	✓	?	✓	✓	✓	✓	<p>Summary Assessment</p> <p>The site is readily available and under the control of Everton, subject to planning consent. A key consideration for the site is its location within the WHS and the Stanley Dock Conservation Area (containing a number of listed buildings and structures). The development of the site would require the infill of the existing dock and would cause harm to the WHS, Stanley Dock Conservation Area and other designated heritage assets (including listed buildings). Planning policy, including the NPPF and WHS guidance, does not preclude development in the WHS – stating that any substantial harm to these heritage assets must be necessary and exceptional, demonstrating that there are no other alternative sites and demonstrating that there are substantial public benefits that outweigh any heritage harm (paras 195 and 196 of the NPPF). The club has sought to address these tests as set out in this ASA and the accompanying Planning Statement (which sets out the public benefits case).</p> <p>Conclusion</p> <p>Based on the comprehensive planning submission by Everton, the site considered to be a feasible, practical and realistic proposition for a new stadium development.</p>
2	Central Docks	✓	✓	✗	✓	✓	✓	<p>Assessment Summary</p> <p>The site is within North Liverpool (within the Kirkdale Ward) and is well connected to the Goodison Park and Everton's existing community. It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home; and to develop a site in an iconic location. It is a site that is appropriate for a range of uses in planning and policy terms, in principle.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<p>However, the key consideration is that the site fundamentally not available due to its ownership by Peel Land & Property who will not consider the sale of the site. Peel Land & Property has extant planning permission and “live” development plans for the Central Docks Neighbourhood, which are critical to the value and viability of the wider Liverpool Waters scheme. The discharge of Condition 11 (19DIS/1315) attached to the Liverpool Waters Outline Planning Consent (100/2424) has approved the “Central Docks Neighbourhood Masterplan” which sets an important milestone for the redevelopment of the area. The Central Docks Neighbourhood Masterplan provides detail and certainty on how the neighbourhood will be brought forward for development through future Reserved Matters applications, in terms of the delivery strategy and the phasing of development plots. The Neighbourhood Masterplan is a statement of intent for Central Docks and provides clarity on how Peel Land & Property will deliver the Central Docks Neighbourhood which includes significant new development, as well as Central Park, which will be one of the largest areas of new open space in the City.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that, in comparison to BMD, Central Docks is a site that is less constrained in terms of planning policy and constraints and could, in principle, provide a suitable location for a stadium development. However, the key consideration is that the site is not available.</p>
3	Ten Streets	✓	?	✗	✗	✓	✓	<p>Assessment Summary</p> <p>The site is within North Liverpool (within the Kirkdale Ward) and is well connected to the Goodison Park and Everton’s existing community. It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its existing home.</p> <p>However, the site is not available nor deliverable due to its complex land ownership situation. The site is in active use for a range of industrial uses and is in multiple landownerships (with more 52 individual freehold and leasehold titles), which would require significant land assembly and CPO to be considered available. There is therefore no reasonable prospect of acquisition within a reasonable or realistic time period to meet the immediate needs of the Club. Notwithstanding this, when property cost estimates on parts of the site were undertaken in 2017 are compared with the landowners perceived value of the same sites in 2020 (following the emergence of Everton’s stadium proposals), there is evidence of significant “hope value” being built into the valuation of these sites. One example is the value of a single site, estimated at £1.25m in 2017 being valued at £7m today by the landowner – almost 6 times the valuation of the site in 2017.</p> <p>In summary, it would not be reasonable to expect the Club to consider a protracted land assembly process and there would be significant development costs associated with CPO, nor is it considered that LCC would support the CPO of a well-established employment area – as well</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<p>as a critical impact on programme and therefore year-on-year revenue for Everton. The implications of a embarking on a major CPO process for the Club are explored further in Section 2 (Goodison Park).</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that, in comparison to BMD, both sites have planning and policy constraints, in principle. However, for the reasons stated in this proforma, the key consideration is that the site is not available (owing to the complex land ownership situation) and would incur unacceptable costs on the Club in terms of land acquisition, the cost of a lengthily CPO process and the year-on-year and ongoing cost of a delayed stadium move that would be borne by the Club.</p>
4	Stonebridge Cross	✓	?	✗	✓	✗	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Availability — the site is in the ownership of LCC. LCC will not consider its sale and therefore the site is not available to Everton. • Planning policy — the site is allocated for employment uses in the adopted UDP and emerging Local Plan. If assessed against adopted and emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policies EC1 and EC2) as well as the NPPF with regard employment (pp's 80-82) and residential amenity. • Employment need — the site is a key part of LCC's employment land supply and there is an identified need for B8 uses in the north of the City with links to the SuperPort and the strategic highways network. There is no other site in a strategic location of this scale that could meet this identified need and the site is currently actively marketed for employment uses. • Access by sustainable modes of travel — the site is in an unsustainable location for a stadium development, in terms of highways, sustainability and accessibility by sustainable modes of transport. The site is disconnected from the rail network and from realistic sustainable modes of transport (the closest rail station is Fazakerley some 2km to the north, or approximately 40 minute walk by the shortest route). It is likely to support high levels of car borne journeys. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. Notwithstanding this, Stonebridge Cross is also in an unsustainable location for stadium development, in terms of highways, sustainability and accessibility by sustainable modes of transport; and does not represent a better alternative to what is proposed at BMD.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
5	Stanley Park	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — Stanley Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as a Grade II* listed Historic Park in the adopted and emerging Local Plan, containing more than 16 Grade II listed buildings. Whilst planning policy, including the NPPF not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and any loss or adverse impact on this use would need to be tested against the relevant adopted / emerging policies and the NPPF given that is considered to be a "Green Flag" status park of "particularly excellent quality" in the Liverpool City Council Open Space Assessment Report (2017) - any development would require convincing justification and mitigation and would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Adjacency to Anfield — whilst the site has previous has consent for a stadium, this did not consider the development of two stadia, side by side. This could generate transport (loss of c.1,000 LFC parking spaces), amenity and operational issues (which would require Premier League Board approval under rule K.6.5 of the Premier League Handbook to consider any potential adverse impacts on either club). <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
6.	Walton Hall Park	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — Walton Hall Park is in the ownership of LCC and is a key open space and community asset, serving a large catchment in the north of the City, that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<ul style="list-style-type: none"> Planning policy constraints – the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality – there is evidence to suggest that Walton Hall Park is a high quality recreational space that well used and is afforded high value by its community, including: <ul style="list-style-type: none"> The Liverpool City Council Open Space Assessment Report and Standards (2017) recognises Walton Hall Park as a very high-quality park which is <i>“aesthetically pleasing and well maintained with plenty of appeal to a variety of users for different reasons; play, exercise, wildlife and relaxation.”</i> Recent investments being made in its sports provision (including £350,000 invested in new 3G pitches which are the home of Liverpool’s County FA; and investment by the FA and Everton ladies to bring new facilities which will see a new 500-seater stand, standing areas upgraded and VIP and press sections). As such the site is an important location in the City Region for FA grass roots and women’s football. The Strategic Green and Open Spaces Review Board (2016) identified that where development threatened the integrity of Walton Hall Park, campaigns were witnessed with a groundswell of public engagement which saw a broad range of local people of all ages come together to protect locally important spaces from housing or larger developments. The Chair of the Strategic Green and Open Spaces Review Board supported the decision to ensure that Walton Hall Park will be retained for future generations. Highways and transport – the site is constrained from a highways access perspective. To the north is dense residential, principally made up of cul-de-sac developments; to the west is residential fronting the A5058 Queens Drive; to the east is Blackthorne Road which is effectively a cul-de-sac access to a residential area; and to the south is the A580 Walton Hall Avenue / East Lancashire Road. Development of the site would require a comprehensive transport strategy to understand how these issues could be resolved. <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
7.	Prescot Road	✓	?	✗	✗	✓	✓	<p><u>Summary Assessment</u></p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – the site is not available nor deliverable due to its complex land ownership situation. The site is in active use for a range of industrial uses and is in multiple landownerships (with more than 30 individual freehold and leasehold titles), which would require significant land assembly and CPO to be considered available. There is therefore no reasonable prospect of acquisition within a reasonable or realistic time period to meet the needs of the Club. Planning policy constraints – the site is allocated and is operational for employment uses in the adopted and emerging Local Plan. Whilst planning policy and guidance does not preclude development on employment sites, any development would require justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. It is noted that Liverpool's Employment Land Study (2017) identifies that the site is located within the north of the Edge Lane Corridor an existing employment area considered to be functioning well. The Study recommends that <i>"the existing industrial areas within the Edge Lane Corridor North should be protected and the loss of existing Class B employment space should be resisted."</i> Highways and transport - the site is constrained from a highways access and pedestrian access perspective. Development of the site would require a comprehensive transport strategy to understand how these issues could be resolved. Residential amenity – the site has the potential to generate significant impacts on surrounding residential areas. A comprehensive mitigation strategy would be required to understand if these issue could be addressed. <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use. However, for the reasons stated, the key consideration is that the site is not available (owing to the complex land ownership situation) and would incur unacceptable costs on the Club in terms of land acquisition, the cost of a lengthy CPO process and the year-on-year and ongoing cost of a delayed stadium move that would be borne by the Club.</p>
8.	Everton Park	✓	?	✗	✓	✓	✓	<p><u>Summary Assessment</u></p> <p>In summary, the key considerations when assessing the site include:</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<ul style="list-style-type: none"> Availability — Everton Park is in the ownership of LCC and is a key open space and community asset, serving a large catchment in the north of the City, that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as an open space and Local Wildlife Site in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing recreational facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — there is evidence to suggest that Everton Park is a high quality recreational space that well used. Liverpool City Council's Open Space Assessment Report and Standards (2017) identifies Everton Park as a 'high-quality' park and garden with a 'high value' attached to it from the community. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
9.	The 'Loop'	✗	?	✓	✓	✓	✓	<p>Summary Assessment</p> <p>The site is only included as it was reviewed (and discounted) as part of a previous site search by the Club prior to its proposed move to Kirkby, and by LFC in its 2007 ASA. Fundamentally, the site is constrained by surrounding highways infrastructure and is not of a sufficient size to accommodate a stadium development (c.4ha).</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not of a sufficient size to accommodate a stadium development (c.4ha).</p>
10.	Stanley Dock	✗	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>The site is only included as it was reviewed (and discounted) as part of a previous site search by the Club prior to its proposed move to Kirkby, and by LFC in its 2007 ASA. Fundamentally, the site is unavailable (under development and restoration), and is not of a sufficient</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<p>size to accommodate a stadium development (c.5ha). The site is not therefore considered to be a feasible, practical or realistic option for a new stadium development.</p> <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, the site could have a greater heritage harm than BMD. However, the key consideration is that the site is not of a sufficient size to accommodate a stadium development (c.4ha) and is not available.</p>
11.	Sandhills Lane	✓	?	✗	✓	✓	✓	<p><u>Summary Assessment</u></p> <p>The key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is not considered to be available. The site is in the ownership of the Mersey Docks and Harbour Company and is a key part of the Mersey Ports Masterplan. Planning policy — the site is allocated for employment uses in the adopted UDP and emerging local Plan. If assessed against adopted and emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policies EC1 and EC2) as well as the NPPF with regard to with regard to heritage (WHS buffer zone and heritage assets (pp.192 onwards) and employment (pp's 80-82). Need — The site is a key part of the Mersey Ports Masterplan. The site is an integral part of supporting the additional demand of the Super Port, as the Employment Land Study (2017) and the Employment Land Evidence Base (2017) both recognise that the development of the SuperPort (within which the site sits) will have a major impact on the sub regional distribution and warehouse market as it is anticipated it will generate an additional sub-regional demand of 634 ha of additional B2 and B8 uses within Liverpool City Region. The site is located within the north of the Great Howard Street A565 Corridor, within which the character of the area is purpose-built employment uses. Hazardous substances and contamination - the site is likely subject to contamination and is the location of a notifiable hazardous installation. The emerging Local Plan (Policy R2) notes that “proposed development within the defined consultation zones surrounding existing locations or pipelines with Hazardous Substances Consent will not be permitted if it would result in a significant increase in the number of people living in, working in or visiting the area, or would otherwise cause unacceptable risk”. A stadium would include the use of the site by significant numbers of people and further investigation would be required to understand the hazardous risk presented by the site.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<u>Conclusion & Comparison with BMD</u> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. Notwithstanding this, the site has a notifiable hazardous installation which could (subject to further investigation) preclude the development of a use which supports the congregation of large numbers of people.</p>
12.	Anfield Community Centre & Edinburgh Park	✓	?	✗	✓	✗	✓	<u>Summary Assessment</u> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — part of the site is being developed by Persimmon for 232 new homes (c.5ha). The remainder of the site (c.9ha) is in the ownership of LCC, which has recently invested £2.2 million into the park for a new 3G pitch and ancillary features. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Size, amenity and access — a stadium development could generate a significant impact on the amenity of the surrounding community — the site is bounded on all sides by residential development. Whilst the site is theoretically large enough, the siting, shape and orientation of the site, as well as the requirement for suitable access in the context of its residential setting — the site is considered to be site unsuitable for a stadium development. The site is also in an unsustainable location, more than 2.8km from a rail station. Usage and quality — there is evidence to suggest that Edinburgh Park is a high quality recreational space that well used and is afforded high value by its community. It is considered as High-Quality Open Space as the Liverpool City Council Open Space Assessment Report and Standards April 2017 which identifies the site as an Amenity Greenspace with provision for children and young people within the Inner North, known as Lower Breck Recreation Ground (the western part of the site). Lower Breck Recreation Ground is considered to be of a High Quality and is regarded as one of the highest scoring sites for value within the Open Space Assessment Report. The high value is recognised for the accessible recreational opportunity they offer at an excellent standard of quality for a wide range of users.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<u>Conclusion & Comparison with BMD</u> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available and is not of a sufficient size to accommodate a stadium when considering its surrounding uses and demonstrable constraints.</p>
13.	Newsham Park	✓	?	✗	✓	✓	✓	<u>Summary Assessment</u> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — Newsham Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as a Grade II listed Historic Park and within a Conservation Area in the adopted and emerging Local Plan. Whilst planning policy, including the NPPF not preclude development within a Historic Park or CA, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and any loss or adverse impact on this use would need to be tested against the relevant adopted / emerging policies and the NPPF given that is considered to be a park of "high value" in the Liverpool City Council Open Space Assessment Report (2017). <u>Conclusion & Comparison with BMD</u> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
14.	Walton Clubmoor Recreation Ground	✓	?	✗	✓	✓	✓	<u>Summary Assessment</u> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. In addition, redevelopment of the site would require the acquisition and demolition of community assets along Townsend Lane, including Clubmoor Community Centre (LMH Clubmoor), the Poppy Centre Social Club (Age Concern Liverpool) and Beacon Counselling Trust Liverpool to allow suitable access to the site.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<ul style="list-style-type: none"> Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Sustainable access — the site is in an unsustainable location, situated more than 2.5km from a rail station. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. It is considered as a High Value Green Space, with the Liverpool City Council Open Space Assessment Report and Standards April 2017 identifying the site as high quality and high value green space that helps to serve the gap in provision of natural/semi-natural space. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
15.	Rice Lane Recreation Ground	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. In addition, the site is inaccessible and it would be likely properties would need to be acquired to allow suitable access to the site — requiring land assembly and potentially CPO. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<ul style="list-style-type: none"> Usage and quality — there is evidence to suggest that Rice Lane is a high quality recreational space that well used and is afforded high value by its community. It is identified as high value open space in the Liverpool City Council Open Space Assessment Report (2017), due to the site offering a number of features such as sports provision (playing pitches) and play facilities (e.g. pitches, a Skate Park). <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
16.	Former Fruit and Veg Market	✗	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>The southern part of the site (4.3ha) has planning consent (2017) and is currently being developed to deliver a new Metropolitan Police Hub. The northern part of the site (c.3ha) is now proposed for housing development and will be allocated for this use in the emerging Local Plan. Notwithstanding other site specific issues (such as size, circulation and access), the site is fundamentally not available.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available, nor is it of sufficient size or in a suitable location to accommodate a stadium.</p>
17.	John Moores and NTL Site	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>The site was previously considered by the Club as an alternative site (prior to its redevelopment for employment and retail uses), and by LFC in its 2007 ASA. However, it has since been developed for a range of employment and retail uses and which forms a key employment location in the City — as part of Wavertree Technology Park. There are a number of recent planning applications and “live” developments on the site which demonstrate its ongoing development as a key employment and retail destination along the Edge Lane Corridor. Notwithstanding this active use, the has a series of complex and fragmented freeholds and leaseholds which would require acquisition and land assembly.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been developed for commercial and retail uses since it was considered in previous site search assessments and is not available.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
18.	Wavertree Botanic Gardens	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – Wavertree Botanic Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints – the site is allocated as a Grade II* Historic Park. Whilst planning policy, including the NPPF not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and any loss or adverse impact on this use would need to be tested against the relevant adopted / emerging policies and the NPPF given that is considered to be a park of "high value" in the Liverpool City Council Open Space Assessment Report (2017). <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
19.	Kings Dock	✓	✓	✗	✓	✓	✓	<p>Summary Assessment</p> <p>Whilst the site is in an iconic waterfront location and it was considered by the Club in the early 2000's (before its regeneration and development for its existing uses), it is fundamentally not available and no longer contains the available land to develop a new stadium – the site contains a number of existing developments, such as the M&S Arena and Conference Centre, and the site has already experienced successful regeneration over the past 20 years as part of its evolution as a City Centre leisure and visitor destination.</p> <p>Part of the site (7.6 acres) was being (December 2019) marketed for a mix of uses, but these remaining development plots are not of sufficient size to accommodate a new stadium development.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, the site is less constrained in policy terms and could to be suitable for a stadium use, however the key consideration is that the site has been redeveloped since it was considered in previous site search assessments and is not available.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
20.	Edge Lane	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>Whilst the site was considered by the Club (and LFC in its 2007 ASA) some years ago (before its regeneration and redevelopment for retail uses), the site is fundamentally no longer available. It has recently been recently developed for out-of-town retail uses, as Edge Lane Retail Park.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been redeveloped as an out-of-town retail park since it was considered in previous site search assessments and is not available.</p>
21.	Croxteth Country Park	✓	?	✗	✓	✗	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — Croxteth Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site has significant policy constraints. The site is allocated as a Grade II Historic Park in the adopted and emerging Local Plan and contains a number of designated heritage assets. Whilst planning policy, including the NPPF not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and as Green Belt. The development of Green Belt would require very special circumstances to be demonstrated (NPPF para 143) and any loss or adverse impact on open space use would need to be tested against the relevant adopted / emerging policies and the NPPF given that is considered to be a park of "high value" in the Liverpool City Council Open Space Assessment Report (2017). Quality and use — Croxteth Park is the single largest park in Liverpool which has both a high-quality and a high-value within the Liverpool City Council Open Space Assessment Report and Standards (2017). The report also scores Croxteth Hall & Country Park as one of the highest scoring parks and gardens in terms of quality in Liverpool due to the aesthetically pleasing and well-maintained environment with plenty of appeal to a variety of users for different reasons; play, exercise, wildlife and relaxation. It is identified as "one of Liverpool's most important heritage sites" as identified in Liverpool's Strategic Green and Open Spaces Review Board Final Report 2016.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<ul style="list-style-type: none"> Unsustainable location - Fazakerley train station is located 3.7 km to the north of the site and the park is in peripheral suburban location that would likely create conflict on the local highway network and create significant issues for local residents. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
22.	West Derby Golf Club	✓	?	✗	✓	✗	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – the site is owned by West Derby Golf Club and is in active use. There is no indication that the site is available for redevelopment. Planning policy constraints – The site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy GI1 and GI3), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England. Location and sustainability - The site is in an unsustainable location for a stadium use. It is poorly connected by public transport including rail, being both disconnected from the City Centre and more than 2.5km away from Broad Green train station. It is in a peripheral suburban location that would generate significant traffic and amenity impacts on the local community. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key considerations are that the site is in a wholly unsustainable location for a major movement and activity generating use, and is in active use and not considered to be available.</p>
23.	Gilmoss A	✓	?	✗	✓	✗	✓	<p>Summary Assessment</p> <p>This site is included as it has been previously assessed by Everton and LFC (in its 2007 ASA) as part of a review of alternative sites. Whilst the site is of sufficient size, it is now occupied for employment uses and, as demonstrated by the recent planning and development history of the site, it has been recently developed for a range of new operational employment uses and is fundamentally no longer available for development. In addition, this site is in an unsustainable location for a stadium development – in terms of highways, sustainability and</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<p>accessibility by sustainable modes of transport. It is fundamentally disconnected from the rail network and situated more than 2.2km from Fazakerley Rail Station. The ease of highway access would likely mean that travel to and from the site would be car dominated which is likely to result in significant traffic impact and congestion on event days.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been redeveloped for employment uses since it was considered in previous site search assessments and is not available.</p>
24.	Gilmoss B	✓	?	✗	✓	✗	✓	<p>Summary Assessment</p> <p>This site is included as it has been previously assessed by Everton and LFC (in its 2007 ASA) as part of a review of alternative sites. Whilst the site is of sufficient size, it is now occupied for employment uses and, as demonstrated by the recent planning and development history of the site, it has been recently developed for a range of new operational employment uses and is fundamentally no longer available for development. In addition, this site is in an unsustainable location for a stadium development — in terms of highways, sustainability and accessibility by sustainable modes of transport. It is fundamentally disconnected from the rail network and situated more than 2.2km from Fazakerley Rail Station. The ease of highway access would likely mean that travel to and from the site would be car dominated which is likely to result in significant traffic impact and congestion on event days.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been redeveloped for employment uses since it was considered in previous site search assessments and is not available.</p>
25.	Joe Stone Playing Fields	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<ul style="list-style-type: none"> Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within on open space or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. The Liverpool's Open Space Assessment (2017) considers Joe Stone Playing Fields, part of Fazakerley Ecology Park, to be a natural and semi-natural greenspace which is considered to have both a high quality and a high value. The natural and semi-natural greenspace serves walk time gaps of amenity green space and parks and gardens. Location and sustainability — the site is in a predominately residential area would likely result in traffic issues on the local highway network and would require a comprehensive transport assessment to test its feasibility. In addition, this site is disconnected from the A580 frontage and is accessed via local roads only. In a location that could generate amenity issues with surrounding residential areas. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
26.	Long Lane 1	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>This site is included as it has been previously assessed by Everton and LFC (in its 2007 ASA) as part of a review of alternative sites. Whilst the site is of sufficient size in its entirety, it is not considered to be a feasible, practical or realistic option for a new stadium development. The site is not available — it is occupied for employment uses and, as demonstrated by the recent planning and development history of the site, it has been now been developed for a range of new operational employment uses and is no longer available. Liverpool's Employment Land Study (2017) identifies that the site is located within the A580 Stonebridge Cross Corridor West — which is a key employment and industrial corridor in the north east of the City where non B-Class uses should be resisted. A c.5 ha employment site is identified as being available within the site for industrial uses, which sits in the heart of the industrial estate and would not be appropriate for a stadium, or for non-industrial uses.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<u>Conclusion & Comparison with BMD</u> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been redeveloped for employment uses since it was considered in previous site search assessments and is not available.</p>
27.	Long Lane 2	✓	?	✗	✓	✓	✓	<u>Summary Assessment</u> <p>This site is included as it has been previously assessed by Everton and LFC (in its 2007 ASA) as part of a review of alternative sites. As demonstrated by the recent planning and development history of the site, it is now developed and occupied for a number of new operational educational and employment uses and is no longer available for development. The Archbishop Beck Catholic Sports College development was completed in October 2014 at a cost of £18m on 4 hectares to the west of the site with industrial uses developed on land to the west of the site. The site is now fully developed and is fundamentally not available.</p> <u>Conclusion & Comparison with BMD</u> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been redeveloped for recent educational and employment uses since it was considered in previous site search assessments and is not available.</p>
28.	Jeffrey's Humble Playing Fields	✓	?	✗	✓	✓	✓	<u>Summary Assessment</u> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. • Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within on open space or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<ul style="list-style-type: none"> Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. The Liverpool's Open Space Assessment (2017) considers the site to be of high quality. A new state of the sports facility has opened in October 2018 as part of a £20m development to improve grassroots football in Liverpool (the Parklife Project). The Jeffrey Humble Playing Fields features three floodlit third generation (3G) artificial grass pitches (AGP), changing facilities, car parking and an 80-station gym with group exercise classes available. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
29.	Neighbourhood Services Ltd Site	✓	?	?	✓	✗	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — site is in private ownership and its availability is unknown. Planning policy constraints — the site is allocated as Green Belt in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF does not strictly preclude development in the Green Belt, any development would require the demonstration of very special circumstances. The site also has constraints in terms of nature conservation and flood risk which would require assessment and mitigation. Location and sustainability — this site is in a wholly unsustainable location for a stadium development. It is not within close proximity to existing public transport and is 2.2km to the nearest local train station (with no clear walking route) which, coupled with the ease of highway access off M57 (if accessible) would mean that travel to and from the site would be car dominated and that suitable volumes of car parking would need to be provided to reduce impacts to surrounding residential communities. This would likely to result in significant traffic impact and congestion on event days. The site is also in a residential location with no existing access to the site. Access to the site from the strategic highway network would be challenging to implement and new access would be required from A580/M57.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<u>Conclusion & Comparison with BMD</u> <p>he applicant contends that in comparison to BMD, both sites have planning and policy constraints (including Green Belt) which would need to be addressed to be suitable for a stadium use. However, the key consideration is that the is in a wholly unsustainable location, with no immediate access and within close proximity to peripheral suburban residential uses. The availability of the site is unknown. The site does not represent a better or more realistic alternative to what is proposed at BMD even if it were to be made available.</p>
30.	Mab Lane Youth Centre	✓	?	✗	✓	✗	✓	<u>Summary Assessment</u> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. • Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. • Sustainability and location — the site is in an unsustainable location (in a predominately residential area) in terms of public transport, including rail. The site is disconnected from the City Centre and more than 2.5km from Roby train station. This site is also in a location that would likely result in traffic issues on the local highway network and create significant amenity issues in a predominantly residential / suburban area (being surrounded by residential uses on all sides). <u>Conclusion & Comparison with BMD</u> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. This site is also in a wholly unsustainable location for a stadium development.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
31.	Derby Park	✗	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Size & location — whilst the site is 8.9ha in size, it is only 180m in width. It is not considered that it is of sufficient size or orientation in the context of surrounding constraints, to accommodate a stadium. The site is tightly bounded by residential uses on all sides and could not provide the access and egress to support a high capacity use. Availability — the site is a Grade II Listed Historic Park within a Conservation. It is not considered to be available. Planning policy constraints — the site is allocated as a Grade II Historic Park and within a Conservation Area. Whilst planning policy, including the NPPF not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and any loss or adverse impact on this use would need to be tested against the relevant adopted / emerging policies and the NPPF. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not of a sufficient size, in terms of its orientation and setting, being just 180m wide and tightly constrained by established residential uses on all sides.</p>
32.	South Park / Bootle Recreation Ground	✗	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Size & location — whilst the site is 8.5ha in size, it is not considered that it is of sufficient size or orientation in the context of surrounding constraints, to accommodate a stadium. The site constrained by the L20 Hugh Baird University Centre (part of Hugh Baird College) to the north west and Hawthorne Road Sheltered Housing to the south east. Bootle South Recreation Ground contains Kings Gardens, Open Space, Woodlands, Bootle War Memorial, Play Facilities, Basketball Court, Football Cage Facility and Firwood Bootle Cricket Club and Function Rooms — all of which are important community and recreational assets. Availability — the site is an important open space and recreation asset. The Sefton Green Space Strategy SMBC (2009) identifies that the site is located within the Bootle, Litherland and Netherton — key green space opportunity area, South Park is identified as a Highest Priority Parks Improvement Site. It is not considered to be available.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary & Conclusions
								<ul style="list-style-type: none">Planning policy constraints — the site is allocated as open space and contains sport and recreation facilities. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not of a sufficient size, in terms of its orientation and setting, and is a key recreation asset that is not available.</p>

Table 5: Site Assessment: Summary Conclusions (Wider Area of Search - South Liverpool Sites)

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
33.	Childwall Golf Course	✓	?	✗	✓	✗	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – the site is owned by Childwall Golf Club and is in active use. There is no indication that the site is available for redevelopment. Planning policy constraints – the site is allocated as Green Belt in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF does not strictly preclude development in the Green Belt, any development would require the demonstration of very special circumstances. Location and sustainability – the site is in an unsustainable location and poorly connected to sustainable modes of transport, including rail, being both disconnected from the City Centre and more than 2km away from Huyton train station and in a predominantly residential area (where significant amenity issues would be generated). Preference of the Club and its supporters – the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key considerations are that the site is in a wholly unsustainable location for a major movement and activity generating use, and is in active use and not considered to be available. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.</p>
34.	Former Dunlop Site	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – the site is allocated for employment uses and is an important parking resource for the Airport.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Planning policy constraints — the site is allocated as employment uses in adopted and emerging policy. Whilst planning policy and guidance, including the NPPF does not strictly preclude development on employment uses, it would need to provide justification for the loss of existing uses and potentially the impact on the operation of the airport. The Liverpool Airport Master Plan (allocated the site for employment and airport uses. This site comprises employment land located to the south of the A561 (Speke Road and Speke Boulevard). This area is characterised by a series of business parks and large-scale manufacturing units many of which relate to Jaguar Land Rover. The Employment Land Study (2017) recommends that <i>“the existing B Class employment space within Speke and Garston South should be protected and the loss of employment land to alternative uses should be resisted.”</i> Location — the site is immediately adjacent to Liverpool Airport and its runway and could have a significant impact on the operation Airport in terms of the scale of development, lighting impact and impact on traffic /operations on matchdays. This would require significant testing and investigation and could preclude such a use in this location. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location which could have an unacceptable impact on the operation of the Airport and is wholly divorced from the Club’s traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a “real world” scenario.</p>
35.	Former Festival Gardens Site	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council and being brought forward in part for residential development (the site will be remediated and currently suffers from significant contamination as the brownfield site of a former landfill A £10m government funding grant from Homes England was approved Feb 2019 to support the site and the site is being remediated and brought forward for development. Site preparation and enabling is now being brought forward through “live” planning applications, which demonstrate the commitment to the development of the site. The site is fundamentally not available.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Planning policy constraints — the site is designated for a range of open space, Green Wedge and nature conservation policies in both the adopted and emerging development plan. However, this does not preclude development subject to meeting the relevant local and national policy tests — as evidence by current residential development proposals on the site. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.</p>
36.	Garston Dock	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Associated British Ports (ABP) who has a statutory undertaking to continue the port operations, therefore the site is not available. There may be scope for some residential-led redevelopment in the medium to long term to the north of the site, following consolidation of the port operations, which are proposed to remain operational for port-related use. Planning policy constraints — the site is allocated as a Port Zone (E3) and SSSI Protection Area (OE5 and OE6) and Developed Coastal Zone (OE4) in the adopted UDP. It is allocated for housing and as a port zone in the emerging Local Plan. Convincing justification would be required to support the loss or relocation of existing (and future) uses on the site. Notwithstanding this, the site is likely subject to contamination and is the location of two notifiable hazardous installation. The emerging Local Plan (Policy R2) notes that <i>“proposed development within the defined consultation zones surrounding existing locations or pipelines with Hazardous Substances Consent will not be permitted if it would result in a significant increase in the number of people living in, working in or visiting the area, or would otherwise cause unacceptable risk”</i>. A stadium would include the use of the site by significant numbers of people and further investigation would be required to understand the hazardous risk presented by the site. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<u>Conclusion & Comparison with BMD</u> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. Notwithstanding this, the site has two notifiable hazardous installations which could (subject to further investigation) preclude the development of a use which supports the congregation of large numbers of people; and the site is in a location which is wholly divorced from the Club's traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a "real world" scenario.</p>
37.	Land at Speke Boulevard	✓	?	✗	✓	✓	✓	<u>Summary Assessment</u> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Availability — the site in multiple ownerships and is in active employment and retail uses — including a retail park and vehicle storage use (by the Ford Motor Company). Restrictive covenants exist on the Title of the vehicle storage land relating to the use of the land and the height of future built development. • Planning policy constraints — the site is allocated as employment uses in adopted and emerging policy. Whilst planning policy and guidance, including the NPPF does not strictly preclude development on employment uses, it would need to provide justification for the loss of existing uses. This site comprises employment land located to the south of the A561 (Speke Road and Speke Boulevard). This area is characterised by a series of business parks and large-scale manufacturing units many of which relate to Jaguar Land Rover. The Employment Land Study (2017) recommends that <i>"the existing B Class employment space within Speke and Garston South should be protected and the loss of employment land to alternative uses should be resisted."</i> • Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <u>Conclusion & Comparison with BMD</u> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								which is wholly divorced from the Club's traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a "real world" scenario.
38.	Lee Park Golf Course	✓	?	✗	✓	✗	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Availability — the site is owned by Lee Park Golf Club and is in active use. There is no indication that the site is available for redevelopment. • Planning policy constraints — the site is allocated as Green Belt in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF does not strictly preclude development in the Green Belt, any development would require the demonstration of very special circumstances. The site also has constraints in terms of nature conservation and flood risk which would require assessment and mitigation. • Location and sustainability — the site is in an unsustainable location and poorly connected to sustainable modes of transport. It has limited accessibility to the bus network and there is no accessible train station, with Halewood train station more than 2km away. Also, access to the site can only be achieved via local roads including the B5178 (Childwall Valley Road). The site is in a predominantly residential area and any major events in this location would have a significant adverse impact on the local highways network and residential amenity. • Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key considerations are that the site is in a wholly unsustainable location for a major movement and activity generating use than what is proposed, and is in active use and not considered to be available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
39.	Speke Northern Airfield	✓	?	✗	✓	✓	✓	<p><u>Summary Assessment</u></p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – the site is owned and occupied by a number of retailers, logistics companies and other business users (and includes over 500 leaseholds). As demonstrated by the recent “live” planning and development history of the site, it has been recently developed for a range of new operational employment uses and is fundamentally no longer available for development. LCC has confirmed that the site is now considered fully developed. Planning policy constraints – the site is allocated for employment uses in the existing and emerging development plan. The Liverpool Employment Land Study (2017) identifies that the site is located within the Speke and Garston South Employment Area. The majority of the site is identified as the Former Northern Airfield, the study identifies that the site has successfully been developed in stages for employment uses and recommend <i>“The site is a key employment site and any remaining capacity of approximately 12 ha should be reserved for employment (B1, B2, and B8) uses. Changes of use to non-B Class should be resisted.”</i> Preference of the Club and its supporters – the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location which is wholly divorced from the Club’s traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a “real world” scenario.</p>
40.	Wavertree Playground	✓	?	✗	✓	✓	✓	<p><u>Summary Assessment</u></p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – the site is owned by Liverpool City Council who is committed to retaining the site as an important community recreation asset, including the provision of active playing fields. LCC will not consider the sale of the site to Everton and therefore the site is not available.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. Liverpool's Open Space Assessment (2017) recognises that Wavertree Playground as a Park and Garden which has both a high-quality score and a high value score with a secondary function as a green corridor. Wavertree Playground also helps to serve the gap in the provision of amenity greenspace and natural/semi-natural space. In addition, the site contains a range of community uses including Liverpool Harriers and Athletic Club alongside associated running track, Wavertree Bowling Green, Kiddy Academy Wavertree, the Harthill Youth Centre, Liverpool Tennis Club, Grange Court Sheltered Housing Scheme and Liverpool Aquatics Centre. LCC has stated that it would not favourably consider a planning application for a stadium development on a high value community open space and recreational asset. Location and access — the site is surrounded on all sides by residential and community uses with no suitable access — development of the site would require the acquisition of residential and community properties in order to deliver access/egress that would meet the needs of a stadium use. The site is also in a location that could generate significant amenity issues with surrounding residential areas. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>
41.	Long Lane Recreation Ground	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as an important community recreation asset, including the provision of active playing fields. LCC will not consider the sale of the site to Everton and therefore the site is not available. In addition, the site is inaccessible and it would be likely properties would need to be acquired to allow suitable access to the site — requiring land assembly and potentially CPO. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. Liverpool's Open Space Assessment (2017) recognises Long Lane Recreation Ground a large Amenity Green Space in the city which is considered to have both a high quality and a high value score. Location and access — the site is surrounded on all sides by residential and community uses with no suitable access. The development of the site would require the acquisition of residential or community properties in order to deliver access/egress that would meet the needs of a stadium use. The site is also in a location that could generate significant amenity issues with surrounding residential areas. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>
42.	Allerton Park	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Availability — the high-quality areas of the site are publicly accessible, and are owned by the Council, and are not available for sale. Part of the site to the north and west is owned by Redrow Homes NW and Allerton Priory LLP (Land off Woolton Road, Allerton, Liverpool) and has recently been granted planning permission at appeal for the development of up to 160 residential units. The Inspector found that although the site is located in the Green Wedge, and the proposal would reduce the physical separation between existing built up areas, there would be little or no harm in respect of many of the requirements of the policy. It notes that the site is not used for recreational purpose, is privately owned and views into the site area limited (which is in contrast to other more valuable areas of the park). The Council's intentions for this site were clear in its refusal of the initial planning application, which generated significant local opposition. LCC will not consider the sale of the site (in its ownership) to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as Green Wedge, open space (including playing pitches), as a Local nature /wildlife site and partially within a conservation area (containing a number of listed buildings) — in both then adopted and emerging development plans. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>
43.	Allerton Golf Course	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council, with the Golf Club being a long leaseholder. The golf club is currently investing in Allerton Golf Club — which is demonstrated by the proposed investment into A 31 bed hotel incorporating spa and conference facilities. LCC will not consider the sale of the site (in its ownership) to Everton and therefore the site is not available.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Planning policy constraints — the site is allocated as Open Space and Green Wedge, open space in both then adopted and emerging development plans. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. The site is also centred around a Grade II listed building where any impacts would require clear and convincing justification. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>
44.	Heron Eccles Playing Fields	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as an important community recreation asset, including the provision of active playing fields. LCC will not consider the sale of the site to Everton and therefore the site is not available. In addition, the site is inaccessible and it would be likely properties would need to be acquired to allow suitable access to the site — requiring land assembly and potentially CPO. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. There has been significant investment in this site in recent years through the upgrading of the facilities provided — including the development of new 3G pitches. Heron Eccles Playing Fields are identified within the Open Space Strategy 2016 as one of four key hubs around Liverpool which will receive investment from the Council and be transferred to a local delivery vehicle (Football Trust) responsible for maintenance and management of such facilities. The upgrades include installation of both artificial and natural grass pitches, changing provision and car parking. Recent planning applications demonstrate the commitment to this investment and the future recreational use of the site. Location and access — the site is surrounded three sides by residential uses and to the west by a rail line - with no suitable access. The development of the site would require the acquisition of residential or community properties in order to deliver access/egress that would meet the needs of a stadium use. The site is also in a location that could generate significant amenity issues with surrounding residential areas. It is also in a location where the development of a stadium would be inappropriate - the development of the site would generate significant issues in what is a suburban residential area of the City. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>
45.	Sefton Park	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — Sefton Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site has significant policy constraints. The site is allocated as a Grade I Historic Park in the adopted and emerging Local Plan and contains 17 designated heritage assets, is within a Conservation Area and contains Local Wildlife Sites. Whilst planning policy, including the NPPF does not preclude development within a Historic Park, any substantial

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<p>harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits.</p> <ul style="list-style-type: none"> Quality and use – Sefton Park is a highly significant Grade I historic park of national significance, and a Green Flag and Green Heritage awarded site with beautiful features and monuments. LCC has stated that it would not favourably consider a planning application for a stadium development on a high value community open space and recreational asset Preference of the Club and its supporters – the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including significant heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
46.	Princes Park	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – Princes Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints – the site has significant policy constraints. The site is allocated as a Grade II* Historic Park in the adopted and emerging Local Plan and contains 5 designated heritage assets. Whilst planning policy, including the NPPF does not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. Preference of the Club and its supporters – the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including significant heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
47.	Otterspool Park	✓	?	✗	✓	✓	✓	<p><u>Summary Assessment</u></p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – the site is predominantly owned by Liverpool City Council who is committed to retaining the site as an important community recreation asset, including the provision of active playing fields. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints – the site is allocated as Green Wedge, a Local Nature/Wildlife site an open space and recreation asset (including playing pitches) in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality – the Liverpool Open Space Study (2017) identifies that the site as a Park and Garden with green corridor functions - Otterspool Park has the fifth highest quality in Liverpool and has a high value, additionally, the site contains provision for children and young people which has the fourth highest quality in Liverpool and a high value. Preference of the Club and its supporters – the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>
48.	Calderstones Park	✓	?	✗	✓	✓	✓	<p><u>Summary Assessment</u></p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – Calderstones Park is predominantly in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Planning policy constraints — the site is allocated Green Wedge, Green Space and Open Space in the adopted and emerging Local Plan and contains a Scheduled Monument and 9 Grade II listed assets. Whilst planning policy and guidance, including the NPPF, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. In addition, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits; in line with NPPF and Local Policy. Quality and usage - Liverpool's Open Space Assessment (2017) identifies that the site as the highest-ranking Park and Garden in terms of quality in Liverpool due to the wide range of provision and excellent standard of appearance within them which also has high value. The park also has provision for children and young which is regarded as the second highest in terms of quality in Liverpool, with high value and acts as a green corridor. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>
49.	Woolton Golf Club	✓	?	✗	✓	✓	✓	<p><u>Summary Assessment</u></p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Woolton Golf Club and is in active use. There is no indication that the site is available for redevelopment. Planning policy constraints — the site is allocated as Green Wedge and Open Space in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF, does not strictly preclude development in the Green Wedge, any development would require justification.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Location — the suite can only be accessed by local roads. Any major events in this location would have a significant adverse impact on the local highways network. It is possible the acquisition of residential properties could be required to achieve suitable access to the site. The site is surrounded by residential uses and could generate significant amenity issues with surrounding residential areas. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key considerations are that the site is in an unsuitable location for a major movement and activity generating use compared to what is proposed, and is in active use and not considered to be available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>
50.	Liverpool University Sports Pitches	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is an important public open space and used as playing pitch provision for the University of Liverpool. The site has been in the ownership of the University for many years, with the facilities being opened in 1922, as a memorial for Geoffrey Hughes who died during the Great War, for the provision of student sports facilities to the University of Liverpool. The listed Sports Pavilion, completed in 1963, is a purpose-built building accommodating the clubhouse, changing rooms and other ancillary facilities associated with the sports use. The Pavilion was designed by a former architecture lecturer at the University. The site is therefore an important resource for the University and fundamentally not available. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. The site also contains a Grade II listed clubhouse.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Location and access — the site is surrounded on three sides by residential uses and would generate significant amenity issues with surrounding residential areas. It is also in a location where the development of a stadium would be inappropriate - the development of the site would generate significant issues in what is a suburban residential area of the City. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.</p>
51.	Speke Industrial Estate	✓	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — The site is primarily owned by Liverpool City Council and is subject to more than 400 individual leaseholds. LCC is committed to retaining the site as an important element of the City's employment land supply which has been subject to significant recent investment and development. Notwithstanding this, the number of leaseholds that are active across the site would make land assembly unreasonable, extremely costly and time consuming. The site is subject to a number of recent planning applications and development activity, which demonstrate the "live" operational status of the site. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated for employment uses in the existing and emerging development plan. The loss or relocation of these uses would need to be considered in line with local and national planning policy. There are four notifiable hazardous installation sites within the site. The emerging Local Plan (Policy R2) notes that "proposed development within the defined consultation zones surrounding existing locations or pipelines with Hazardous Substances Consent will not be permitted if it would result in a significant increase in the number of people living in, working in or visiting the area, or would otherwise cause unacceptable risk". A stadium would include the use of the site by significant numbers of people and further investigation would be required to understand the hazardous risk presented by the site.

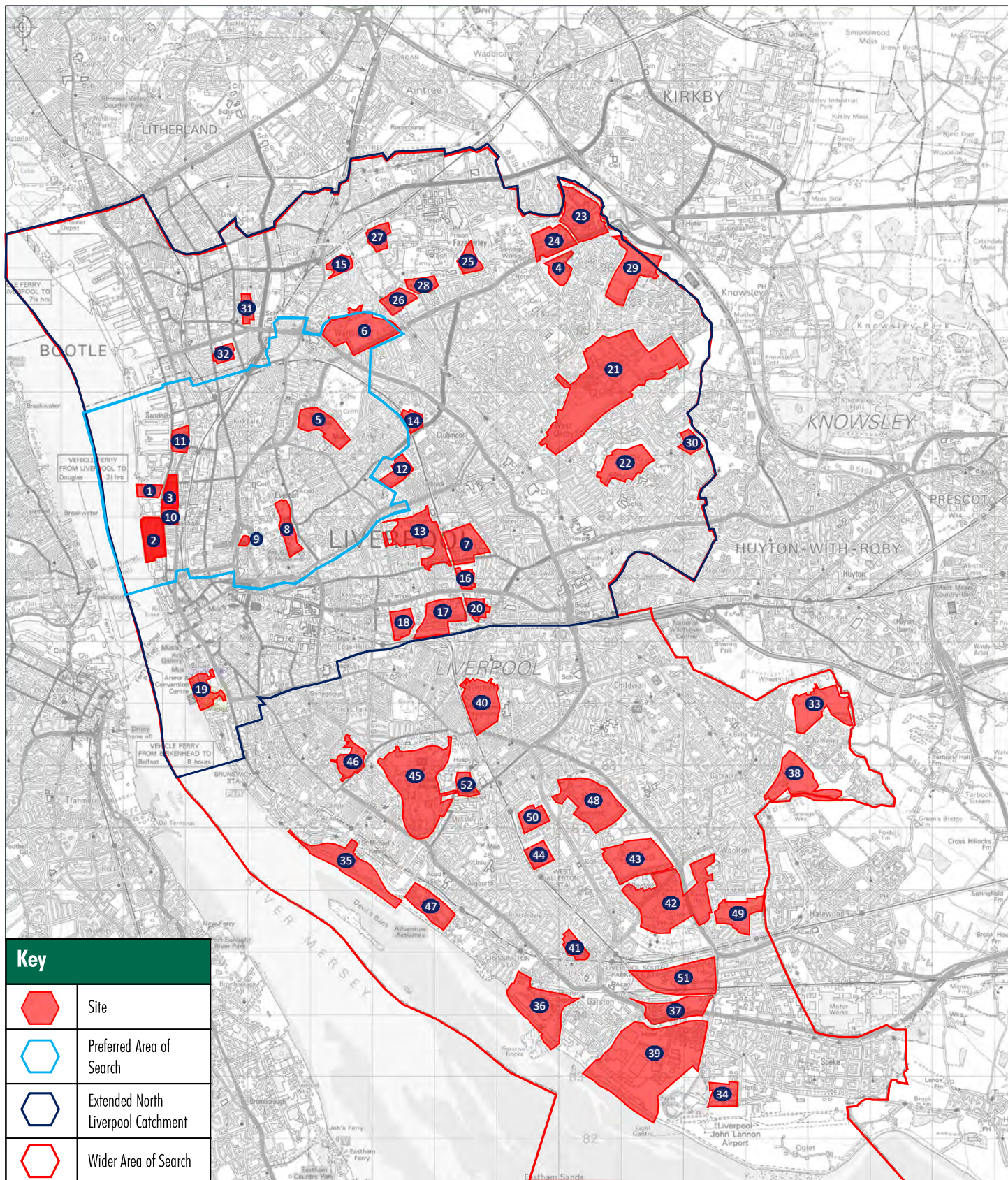
Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none"> Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. Notwithstanding this, the site has four notifiable hazardous installations which could (subject to further investigation) preclude the development of a use which supports the congregation of large numbers of people; and the site is in a location which is wholly divorced from the Club’s traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a “real world” scenario.</p>
52.	Greenbank Park	✗	?	✗	✓	✓	✓	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Size - the site is 7.2 hectares and is tightly constrained by surrounding residential uses. It is not considered to be of a sufficient size to accommodate a stadium in the context of its surrounding constraints. Availability — the site is owned by Liverpool City Council who is committed to retaining the site as an important community recreation asset, including the provision of active playing fields. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as an open space and recreation asset (including playing pitches) in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — the Liverpool Open Space Study (2017) identifies Greenbank Park as a Park and Garden with provision for children and young people which helps serve a gap in provision of for children and young people. Greenbank Park is identified as a high quality and a high value Park and Garden and high quality and high value amenity greenspaces. Greenbank Park also includes John Mitchels Playing Pitch (one of the oldest Gaelic Athletic Associations (GAA) club in the UK dating back to 1904), Greenbank Lane Park, woodland, children’s playing area and a large fishing pond.

Ref	Site	1.	2.	3.	4.	5.	6.	Assessment Summary
								<ul style="list-style-type: none">Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available, nor of a size that could accommodate a stadium development in the context of its surrounding constraints. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.</p>

9.0 Conclusions

- 9.1 This ASA has assessed, in detail, potential alternative sites for a new stadium development. The ASA provides a comprehensive assessment of alternative site options; assessing the suitability of each site for a new stadium development based on a comprehensive set of assessment criteria.
- 9.2 It has been demonstrated that whilst Goodison Park has a rich footballing heritage, it has become unfit for purpose and has resulted in Everton falling significantly behind its rivals in the Premier League era. Goodison Park has become outdated amongst its competitors and it does not provide the facilities, amenities, experiences or revenue generating potential of rival clubs. It is clear that Everton now requires a modern stadium with the capacity, facilities and potential to match the aspirations of the football club and that **Goodison Park does not provide a feasible, practical or realistic opportunity to provide a football stadium that will meet the modern needs of a top tier football club.**
- 9.3 The ASA considers three areas of search: Everton's preferred area of search in "North Liverpool" (which comprises the Wards of County, Anfield, Everton and Kirkdale), an area of "Extended North Liverpool" (within the administrative boundary of Liverpool City Council to the north of the M62 / Edge Lane and part of South Sefton) and a "Wider Area of Search" which included sites within the wider LCC administrative boundary, including South Liverpool.
- 9.4 The ASA sets out a clear and compelling case for Everton remaining closely connected to North Liverpool and its existing home based on the unbreakable connections it has developed over the past 150 years. For these reasons, **it is not considered to be a realistic proposition for the Club to consider a move outside of the Extended North Liverpool area (Area 1a and 1b).** The Extended North Liverpool area of search is considered to be the most robust and reasonable area of search based on all guidance, precedent and evidence. However, it was agreed following discussions with Historic England that, without prejudice, sites within the wider area of search (Area 2, Appendix 7) would be assessed - notwithstanding the fact that the Club would not consider relocation to South Liverpool.
- 9.5 Based on the methodology adopted, **the ASA demonstrates that there are no alternative sites that could accommodate the requirements of Everton's new stadium - either within Extended North Liverpool (Area 1a or 1b) or within a wider LCC catchment (Area 2).**

Appendix 1: Site Assessment Plan



Key	
	Site
	Preferred Area of Search
	Extended North Liverpool Catchment
	Wider Area of Search

Everton Football Club Alternative Sites Assessment December 2019

Appendix 1: Plan of Sites Assessed

Alternative Sites Assessment									
Number	Name	Number	Name	Number	Name	Number	Name	Number	Name
1	Bramley Moore Dock	12	Anfield Community Centre & Edinburgh Park	23	Gillmoss A	34	Former Dunlop Site	45	Sefton Park
2	Central Docks	13	Newsham Park	24	Gillmoss B	35	Former Garden Festival Site	46	Princes Park
3	Land North of Ten Streets	14	Walton Clubmoor Recreation Ground	25	Joe Stone Playing Fields	36	Garston Dock	47	Otterspool Park
4	Stonebridge Cross	15	Rice Lane Recreation Ground	26	Long Lane 1	37	Land at Speke Boulevard	48	Calderstones Park
5	Stanley Park	16	Former Fruit & Veg Market	27	Long Lane 2	38	Lee Park Golf Course	49	Woolton Golf Club
6	Walton Hall Park	17	John Moores & NTL	28	Jeffrey Humble Playing Fields	39	Speke Northern Airfield	50	University of Liverpool Sports Pitches
7	Prescot Road	18	Wavertree Botanic Gardens	29	Neighbourhood Services Limited Site	40	Wavertree Playground	51	Speke Industrial Estate
8	Everton Park	19	Kings Dock	30	Mab Lane Community Centre	41	Long Lane Recreation Ground	52	Greenbank Park
9	The Loop	20	Edge Lane Retail Park	31	Derby Park	42	Allerton Park		
10	Stanley Dock	21	Croxtheth Country Park	32	South Park / Bootle South Recreation Ground	43	Allerton Golf Course		
11	Sandhills Lane	22	West Derby Golf Club	33	Childwall Golf Course	44	Heron Eccles Playing Fields		

Appendix 2: Site Assessment Proformas

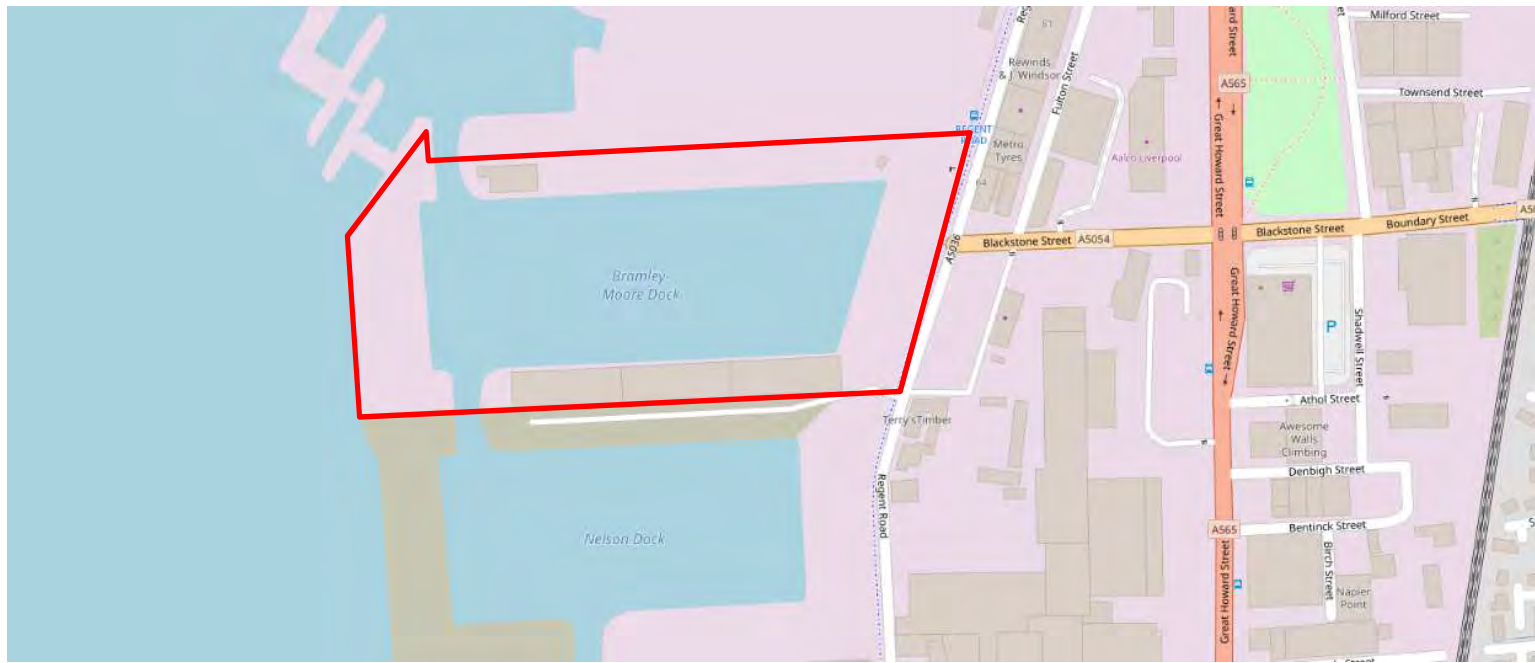
Appendix 2:


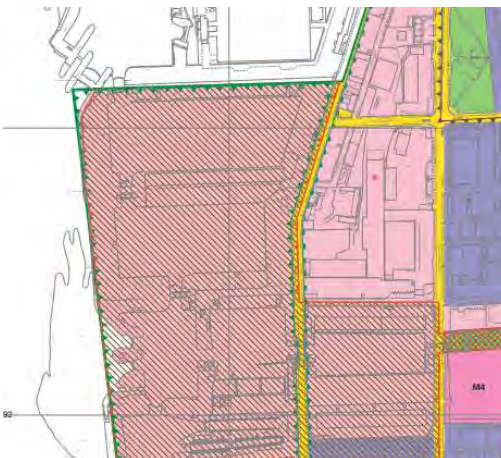
Alternative Sites Assessment: Proformas

Part 1: Sites Assessment Proformas

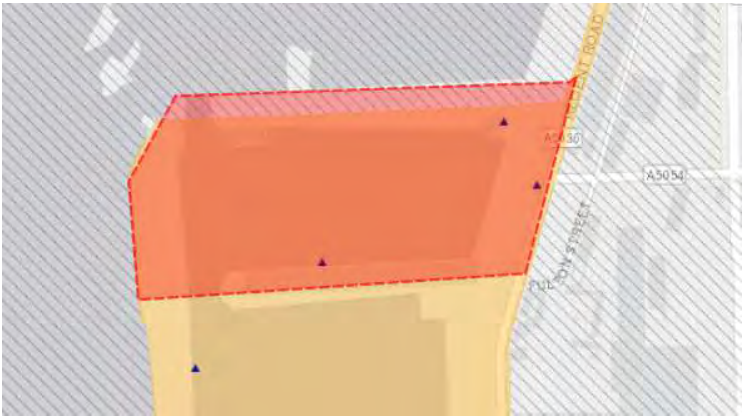
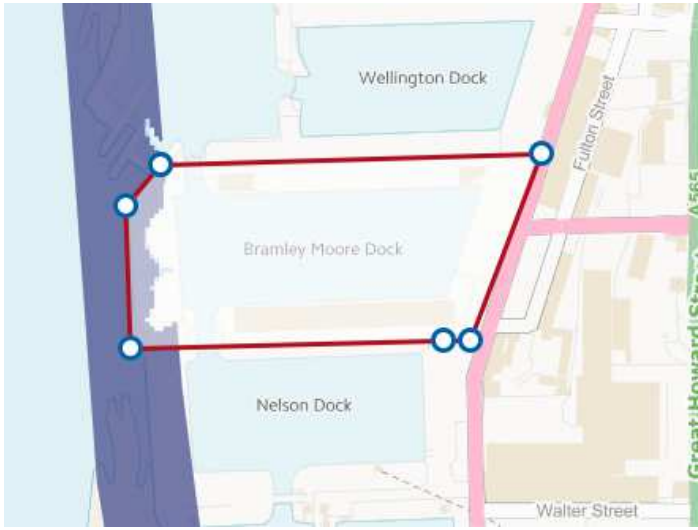
'Extended North Liverpool' Area of Search

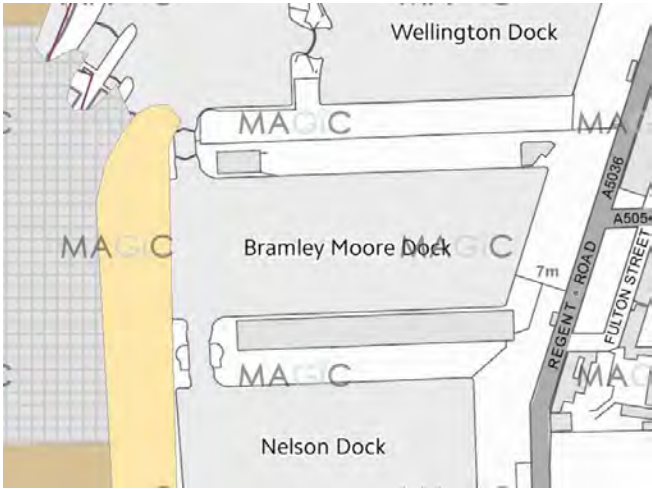
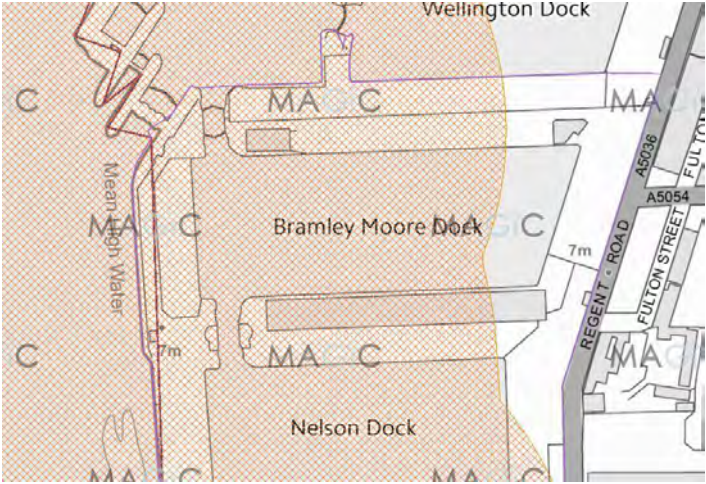
Site 1: Bramley-Moore Dock

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 8.67 hectares.
<i>Existing Site Uses</i>	The site is currently inaccessible to the public and is used for short term warehousing uses and limited evening events.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies Wellington Dock, where United Utilities use the site as a wastewater treatment plant, and Sandon Half Tide Dock. To the east Regent Road with a range of piecemeal industrial units forming the northern part of the Ten Streets area beyond. To the east and south lies Stanley Dock, including the Tobacco Warehouse and Titanic Hotel.


	<ul style="list-style-type: none">• To the south sits Nelson Dock, which forms part of Peel Holdings Liverpool Waters Scheme.• To the west sits the River Mersey.	
Site Ownership	The sites freehold titles include Peel Land & Property (Ports) Limited and The Mersey Docks and Harbour Company Limited. In November 2017, Everton entered into an Agreement for Lease for the site, subject to the receipt of planning permission, to lease the site for a 200 year period.	
Planning Policy		
Adopted Policy	Within Liverpool's Unitary Development Plan (UDP) (2006) the site is located in: <ul style="list-style-type: none">• Policy OE4 - A Developed Coastal Zone;• Policy E3 - Port; and• Policy HD7 - Stanley Dock Conservation Area (extension).	
Emerging Policy	Within the May 2018 submission draft Local Plan policies map, the site is allocated as a site for/within: <ul style="list-style-type: none">• Policies EC1 & EC6 - Mixed Use Various Type of Development;• Policy HD1 - The Stanley Dock Conservation Area;• Policy HD2 - World Heritage Site; and• Policy CC12 - Liverpool Waters.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p>The NPPF states that any harm to, or loss of, the significance of a designated heritage asset should require ‘clear and convincing’ justification (para. 194). In relation to Grade II listed buildings, substantial harm to, or loss of, such assets should be exceptional (para. 194(a)). Paragraph 195 of the NPPF states that:</p> <p><i>Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</i></p> <ul style="list-style-type: none"> <i>a) the nature of the heritage asset prevents all reasonable uses of the site; and</i> <i>b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</i> <i>c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and</i> <i>d) the harm or loss is outweighed by the benefit of bringing the site back into use.</i> <p>It is necessary in weighing the assessed harm against the benefits to address the following key points arising from the relevant ‘engaged’ NPPF paragraphs:</p> <ul style="list-style-type: none"> • That the substantial harm is necessary (NPPF para. 195); • That the substantial harm to designated heritage assets is exceptional (NPPF para. 194(a)); and • That the substantial public benefits outweigh the harm (NPPF para. 195 & 196).
	<p>World Heritage SPD (2009) – The World Heritage Site SPD provides guidance for protecting and enhancing the outstanding universal value (OUV) of Liverpool Maritime Mercantile City World Heritage Site, whilst encouraging investment and development which will secure regeneration for the area. The SPD aims to provide guidance which will harmonise the differing priorities for regeneration and conservation.</p> <p>The WHS site is divided into six-character area, the site sits within area three ‘Stanley Dock Conservation Area’, an area which is mostly derelict and disused. The area has massive potential to fulfil the city’s housing requirements and other aspirations through extensive heritage-based regeneration. Development should deliver active docksid es and water spaces, better internal and external connections and integration with the immediate hinterland, the city centre and its communities. The SPD recognises that the regeneration of this part of the WHS will require very significant levels of private investment, without which the tangible cultural heritage will continue to deteriorate.</p> <p>The SPD reiterates that the intention of the WHS inscription is not to prevent development of the city, but instead ensure that the conservation and enhancement of the historic environment, and the OUV of the WHS, is fully considered in all decision making. The World Heritage Site SPD, this is noted as being interim guidance which also predates the NPPF and does not include the ‘weighing’ exercise between heritage harm and public benefits.</p> <p>A full assessment of the BMD site against adopted policy and material considerations is contained in the accompanying Planning Statement.</p>

Statutory Designations		
Heritage	<p>The site is with the UNESCO World Heritage Site.</p> <p>The site contains three Grade II listed buildings or monuments including:</p> <ul style="list-style-type: none"> • The Hydraulic Engine House (“Hydraulic Tower”); • The Regent Road Dock Wall from opposite Sandhills Lane to Collingwood Dock with entrances; and • Bramley Moore Dock wet walls. <p>With several other listed buildings within the surrounding area.</p> <p>The site also sits within the Stanley Dock Conservation Area.</p>	
Flood Risk	<p>The site predominantly sits within Flood Zone 1. However, the western section of the site sits within Flood Zone 3 where it borders the River Mersey.</p>	


<p><i>Ecology</i></p>	<p>The ecological factors the site is affected by include:</p> <ul style="list-style-type: none"> • Intertidal Substrate Foreshore (England and Scotland) – Sand, • Priority Species for CS Targeting – Lapwing, • Grassland Assemblage Farmland Birds (England) – Lapwing, • Extremely High - Seabird Oil Sensitivity index 2016, and • Vulnerable Concentrations of Seabirds to Oil Spills 1995 – Modern Vulnerability. 	 <p>A map of the Wellington Dock area. It shows Wellington Dock at the top, followed by Bramley Moore Dock, and Nelson Dock at the bottom. A yellow highlighted area is on the left side of the docks. Roads shown include Regent Road, A5036, A5054, and Fulton Street. The word 'MAG' is repeated several times across the map.</p>
<p><i>Landscape</i></p>	<p>The site is located within the Wild Bird General Licence Exclusion Zone.</p>	 <p>A map of the Wellington Dock area, similar to the one above, but with a large orange shaded area covering most of the docks and surrounding land. This shaded area represents the Wild Bird General Licence Exclusion Zone. A purple line indicates the Mean High Water. Roads shown include Regent Road, A5036, A5054, and Fulton Street. The word 'MAG' is repeated several times across the map.</p>

Strategic and Regeneration Context	
Strategic and Regeneration Policy	<p>The North Liverpool and South Sefton SRF (2010)</p> <p>The site sits within Area 2 of the North Liverpool and South Sefton SRF (Liverpool Waters and Hinterland). The SRF identifies Liverpool Waters as a New Growth Point site and one of the City Region’s most important regeneration and investment opportunities. The project proposes one of the world’s biggest and most ambitious water developments accommodating 3 million sq ft of new business space, nearly 10,000 new homes, together with leisure, retail and cultural attractions. The scheme aims to reconnect the area with Liverpool through transforming and reanimating the waterfront to create a world-class urban quarter, providing a massive stimulus to the regeneration of the wider area and the potential to create tens of thousands of construction and long-term jobs for local people.</p> <p>The SRF recognises that Everton Football Club has large-scale investment plans for their facilities during the SRF timeline. The SRF describes this investment as catalytic for local economic growth and physical regeneration which will also radically improve the area’s image and visibility to prospective investors.</p> <p>The SRF demonstrates a clear strategic rationale for the regeneration of the North Docks and the development of the site.</p>
	<p>Atlantic Corridor Development Framework (2016)</p> <p>There are five-character zones identified within the framework. Bramley-Moore Dock sits within the Liverpool Waters character Zone which runs along the entire west of the Atlantic Corridor area and is the location of Peel’s proposal to regenerate 60-hectares of historic dockland to create a world-class, high quality, mixed use waterfront destination.</p> <p>The ACDF identifies a number of key principles to explore which include encouraging a more diverse mix of uses, improving connectivity, retaining historic structures and providing a building scale, form and massing to respond to the scale and drama of the warehouses, streets and framed views of the River Mersey and proposed Liverpool Waters cityscape.</p> <p>The ACDF further supports the provides the overarching context for regeneration and establishes principles for development in the north of the City and in particular along the northern docks. It notes that the area is predominately industrial and is often perceived as a series of dislocated locations with poor connections between the waterfront to the west and the residential areas to the east. The framework clearly aims to better connect these emerging destinations to each other and the city centre, identify further opportunities for coordinated for investment, create improved investment conditions, and improve access to new jobs and opportunities for local residents and workers.</p>

	<p>Mersey Waters Enterprise Zone — Mersey Waters EZ straddles the River Mersey and covers the Liverpool Waters and Wirral Waters areas. Extending across a combined area of 125 hectares. Within Mersey Waters Enterprise Zone there is Liverpool Waters and Wirral Waters, Bramley Moore Dock is located within the Liverpool Waters area.</p> <p>Liverpool Waters aims to regenerate 60-hectares of historic dockland to create a world-class, high-quality, mixed-use waterfront quarter in central Liverpool. Enabling the area to attract and accommodate national and international businesses and encourage a significant increase in the number of visitors to the city. The Enterprise Zone will enable this through providing:</p> <ul style="list-style-type: none">• access to Superfast broadband infrastructure;• occupiers with access to the EZZ funding team to grant support from a range of sources relating to plant and machinery and advice on tax relief; and• Associating developments with a nationally recognised development priority and enhanced access to public sector support organisations and government departments.	
<i>Socio-Economic Profile</i>	<p>The site is within and LSOA with an IMD ranking of 2,930 out of 32,844 LSOAs (amongst the 10% most deprived neighbourhoods in the country) and an Employment Deprivation Domain of as 1,872 out of 32,844 LSOAs (among the 10% most deprived neighbourhoods). The site lies within the 10% most deprived areas of the country therefore the development of a new stadium has the potential to have a significant catalytic impact on the regeneration of the area.</p>	

Planning and Development Context				
<i>Planning History</i>	Application Number	Date	Decision	Details
	20NM/1801		Pending	Application for non-material amendment to 100/2424 so as to Update Liverpool Waters Parameter Plan Report from "April 2019" to "July 2020" revision. The amended parameter plans include: PP004 - Development Parcels PP005 - Development Plots PP006 - Building Heights Amend wording of Condition 3 of the Decision Notice, updating "Liverpool Waters Parameter Plan Report (April 2019)" to "Liverpool Waters Parameter Plan Report (July 2020)".
	19RM/1817	30-08-2019	Approve without Conditions	Application to submit reserved matters for plot A-03 of Neighbourhood A (Princes Dock) as part of the Liverpool Waters Outline Consent (100/2424) following on from the approval of the initial reserved matters application for Plot A-03 (18RM/1554). Conditions which have been submitted as part of this application providing details include conditions 30,31,33,34,35,38,39,40,41,42,47,54. The reserved matters application seeks to gain consent for a 6 storey office development (B1 Use Class) with associated cycle parking, servicing and public open space.
	13L/1366	24-07-2013	Approve with Conditions	To demolish 2 no. outbuildings attached to Victoria Clock Tower.
	12C/0173	28-06-2013	Approve with Conditions	To demolish transit storage shed on south wayside and brick shed on north wayside so as to enable the comprehensive mixed-use redevelopment of land at Liverpool Central and Northern Docks (Liverpool Waters)
	100/2424	19-06-2013	Approve with Conditions	Liverpool Waters - The comprehensive redevelopment of up to 60 hectares of former dock land to provide a mixed use development of up to 1,691,100 sq m, comprising: up to 733,200 sq m residential (Class C3) (9,000 units), up to 314,500 sq m business (Class B1), up to 53,000 sq m of hotel and conference facilities (Class C1) (654 rooms), up to 19,100 sq m of comparison retailing (Class A1), up to 7,800 sq m of convenience retailing (Class A1), up to 8,600 sq m of financial and professional services (Class A2), up to 27,100 sq m of restaurants and cafes (Class A3), up to 19,200 sq m of drinking establishments (Class A4), up to 8,900 sq m of community uses (Class D1), up to 33,300 sq m of assembly and leisure (Class D2) up to 17,600 sq m for a cruise liner facility and energy centre (Sui Generis), up to 36,000 sq m for servicing (Sui Generis), and up to 412,800 sq m for parking (Sui Generis) together with structural landscaping, means of access, formation of public spaces and associated infrastructure and public realm works. (Outline Application)
	12L/0847	17-05-2012	Approve with Conditions	To carry out works in connection with re-opening of existing entrance to Bramley Moore Dock, demolish brickwork and replace with palisade fencing/gate.

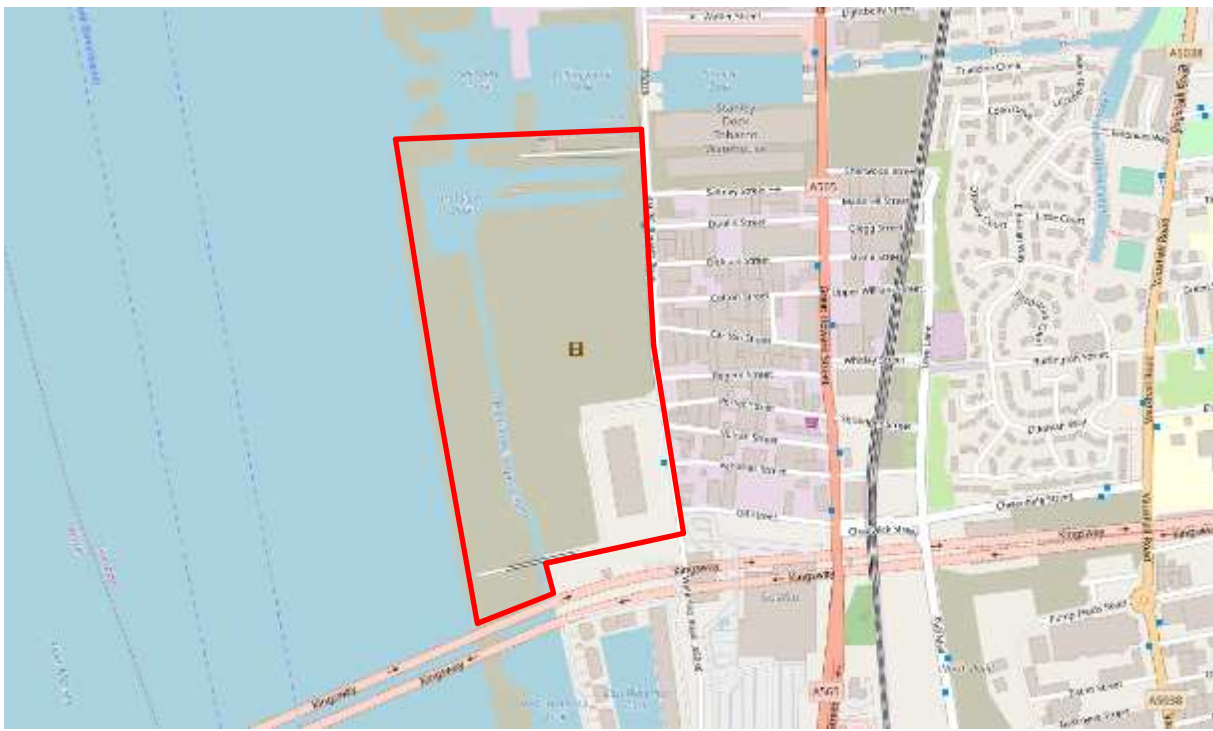
	12F/0845	17-05-2012	Approve with Conditions	To re-open existing entrance to Bramley Moore Dock, demolish brickwork and replace with palisade fencing/gate.
	12L/0428	10-05-2012	Withdrawn	To carry out alteration to dock boundary wall in connection with the proposed Liverpool Waters redevelopment scheme, including enlarging an existing opening on Bath Street and the creation of a new opening at the junction of Dublin Street/Regent Road and installation of new gate piers.
	10C/2425	18-11-2010 (registered)	-	To demolish transit shed and 2 no. brick sheds at Bramley Moore Dock, so as to enable the comprehensive mixed-use redevelopment of land at Liverpool Central and Northern Docks
	04L/0825		Approve with Conditions - 06-06-2006	To construct fixed isolation structure blocking passage between Bramley Moore Dock and Nelson dock in connection with the Liverpool Leeds Canal Link to Canning Dock (Planning application 04F/0823 refers)
<i>Development Status</i>	The area surrounding the site has been subject to a number of major proposals, particularly the conversion of Stanley Dock into hotel and residential uses, reflecting the changing character of the area and the development pressures moving northward from the City Centre. It is clear that the area is changing, and Liverpool Waters will undergo transformational change in the next 20 years.			
<i>Landowner / Developer Aspirations</i>	Both EFC and Peel Land & Property are committed to delivering Everton’s new stadium at Bramley-Moore Dock as part of the wider Liverpool Waters scheme. EFC has secured the site on a 200-year lease and is fully committed to bringing forward the project.			
Accessibility				
<i>Access to National Network</i>	Being close to the city centre, the site benefits from good access to the Strategic Road Network via the A565 Great Howard Street. This road connects to the north to Dunning’s Bridge Road and on to the M58 and M57, and to the south to Leeds Street and onwards to Edge Lane and the M62. Highway access is also convenient to the Wallasey and Birkenhead Mersey tunnels which access the Wirral and the M53 motorway.			

<p><i>Cycle and Pedestrian Accessibility</i></p>	<p>Pedestrian and cycle access to the site is via Regent Road and Great Howard Street. However, committed improvements to Regent Road/Waterloo Road (A5036), Derby Road/Great Howard Street (A565) are underway as part of the North Liverpool Key Corridor (NLKC) scheme. The NLKC is a major scheme which will create a modern fully 'dualled' road link on the A565 Great Howard Street and Derby Road between Sefton and Liverpool. New and improved cycling routes on Regent Road, reduced congestion, improved local access and east-west movement will also strengthen the connections between Liverpool and Sefton. The scheme will support the development projects being undertaken by Liverpool Waters, North Liverpool Regeneration and the SuperPort.</p> <p>The Grade II Listed dock wall which runs along the eastern site boundary, separating the site from Regent Road, forms a physical barrier between the site and the industrial area to the east. The site is accessed on foot, bicycle and vehicle through two sets of openings through the dock wall. These are located at the north eastern and south eastern corners of the site. More or wider openings will be required to enhance pedestrian / cycle accessibility and allow sufficient access/egress to the stadium in accordance with the findings of pedestrian modelling.</p>	 <p>Mersey Travel, Liverpool Cycle Map, 2013</p>
<p><i>Access to Public Transport Nodes</i></p>	<p>Sandhills, the nearest railway station, is located 750m to the north east of the site which provides access to the Merseyrail network, which provides access to wider National Rail networks and the City Centre.</p> <p>Bus services operate along Regent Road and Great Howard Street however services here are infrequent. Further afield, frequent bus services run along the A5038 (Vauxhall Road) 750m east of the site which provides services to Liverpool, Netherton and Thornton. Even more frequent services are available on A567 (Stanley Road) 1km east of the site.</p>	
<p><i>Highways Capacity and Access</i></p>	<p>A transport assessment and event day transport strategy is required to support the scheme to review and potentially mitigate the following issues:</p> <ul style="list-style-type: none"> • Great Howard Street is an important north / south highway corridor and experiences high traffic flows on a day to day basis. It also lies between the residential areas to the east and the nearest rail stations. Consequently, there will be significant pedestrian movement across this road on event days. A comprehensive traffic management strategy will therefore be required to control both the movement of vehicles and pedestrians; • Regent Road will be the focus of significant transport movement on event days as it will be the only access route to the new stadium. As such, an effective transport management strategy will be required complementary to Great Howard Street. The strategy is likely to require a range of event specific road closures; • This site currently lies outside of the existing Controlled Parking Zone surrounding the Goodison Park and Anfield Stadiums. It is also outside of the city centre Controlled Parking Zone. Extensions to these zones will be required to help protect the amenity of residents on event days. However, large areas of land are also non-residential industrial / commercial uses which may not need to be protected by a parking zone; • Sandhills is the closest rail station but does not have the capacity to accommodate event day passenger demand. There will therefore need to be a management strategy in place to handle the likely high demand for rail on event days. 	


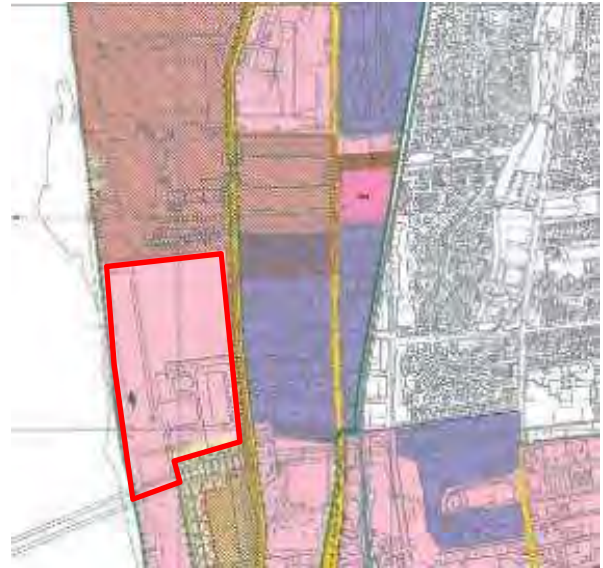
Other Development Issues		
<i>Other Potential Constraints</i>		<ul style="list-style-type: none"> • Potential land contamination and remediation from previous use. • Potential impact on waterways. • Requirement to infill the dock. • Microclimate.
Fit with EFC Requirements		
<i>Connection to North Liverpool</i>		<p>The site is well connected to North Liverpool and sits within the North Liverpool and South Sefton regeneration area (in the Kirkdale ward). It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for EFC in terms of its requirements to stay physically, socially and culturally connected to its home. It supports historic connections between the Club and the Docks and provides an opportunity to revitalise a Dock that was once vibrant and heavily used. The site provides an opportunity to significantly regenerate the communities of North Liverpool which form part of the Club's existing community.</p> <p>The site is located approximately 3km to the south-west of Goodison Park.</p>
<i>Iconic Location</i>		The site has the potential to provide an iconic location for EFC to develop a new stadium — being located immediately on the City's iconic Waterfront and within one of the City's flagship regeneration areas.
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> ▪ The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> ▪ The site is located within the WHS and the Stanley Dock Conservation Area (containing a number of listed buildings and structures) and would require the infill of the existing dock, generating harm to the WHS, Stanley Dock Conservation Area and other designated heritage assets (including listed buildings). However, planning policy, the NPPF and WHS guidance does not preclude development in the WHS. Any substantial harm to heritage assets in the WHS must be necessary and exceptional, demonstrating that there are no other alternative sites and demonstrating that there are substantial public benefits that outweigh any heritage harm (paras 195 and 196 of the NPPF). ▪ The site is currently within a Port area in the adopted UDP and is proposed to be located in a mixed-use policy area in the emerging Local Plan, which would not preclude a stadium development, in principle.

		<ul style="list-style-type: none"> ▪ The site is subject to an extant planning consent for large scale residential uses as part of the Liverpool Waters scheme, which establishes the principle of development on the site. ▪ The site is in a priority regeneration area, where there is a clear strategic rationale for regeneration and renewal. The development of the site would deliver significant benefits in terms meeting the City's regeneration priorities for North Liverpool, catalysing surrounding regeneration such as Ten Streets and having a social impact in one of the City and the UK's most deprived wards.
<i>Is site acquisition a realistic proposition?</i>	Yes	<ul style="list-style-type: none"> ▪ EFC has secured an option to acquire the site and therefore the site is readily available subject to planning consent.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> ▪ Key costs relating to the site include land remediation, the costs of sensitively infilling the dock (whilst retaining heritage assets such as the Dock wall) and the enhancement of onsite heritage features. ▪ The Club has undertaken significant due diligence and stadium design work, including costs and viability – with funding in place for delivery. The site is considered viable and deliverable.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> ▪ The site is accessible physically from Regent Road and by public transport (Sandhills Station) and is in close proximity to the City Centre. Subject to appropriate transport improvements and a transport strategy, it is considered that the site is in an accessible and sustainable location.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> ▪ Subject to sensitive design within the WHS (and in the context of the Liverpool Waters development) and environmental mitigation, there are not considered to be any environmental or visual impacts that would prevent the site from being development.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p>Summary Assessment</p> <p>The site is readily available and under the control of Everton, subject to planning consent. A key consideration for the site is its location within the WHS and the Stanley Dock Conservation Area (containing a number of listed buildings and structures). The development of the site would require the infill of the existing dock and would cause harm to the WHS, Stanley Dock Conservation Area and other designated heritage assets (including listed buildings). Planning policy, including the NPPF and WHS guidance, does not preclude development in the WHS – stating that any substantial harm to these heritage assets must be necessary and exceptional, demonstrating that there are no other alternative sites and demonstrating that there are substantial public benefits that outweigh any heritage harm (paras 195 and 196 of the NPPF). The club has sought to address these tests as set out in this ASA and the accompanying Planning Statement (which sets out the public benefits case).</p> <p>Conclusion</p> <p>Based on the comprehensive planning submission, the site considered to be a feasible, practical and realistic proposition for a new stadium development.</p>	


Site 2: Central Docks


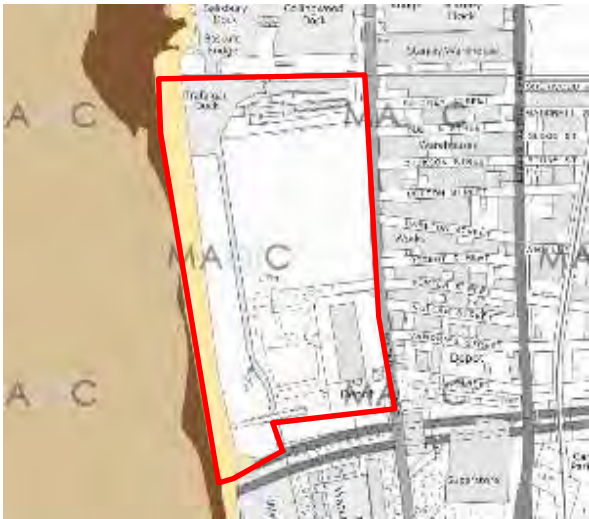
ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 19.7 hectares.
<i>Existing Site Uses</i>	Industrial units, recently development / under construction residential development sites (including Romal Capital) and vacant land (site of former Power Station).
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies Collingwood Dock and Nelson Dock. Stanley Dock sits to the north east and includes the Titanic Hotel and Tobacco Warehouse (which is undergoing redevelopment to deliver over 500 apartments).

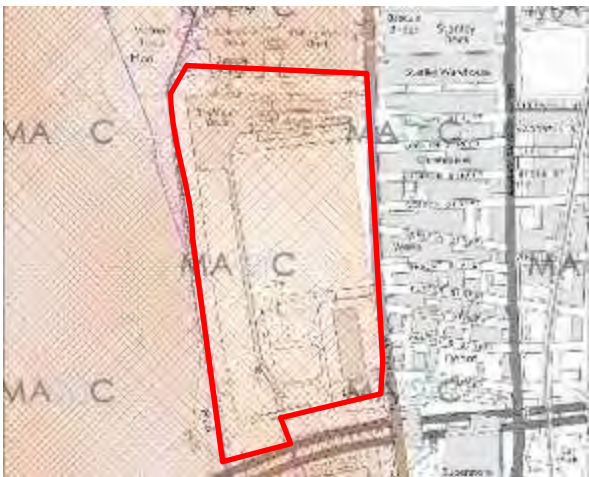
	<ul style="list-style-type: none"> • To the west lies the River Mersey. • To the south lies Waterloo Docks, including Waterside Apartments, Waterloo Warehouse (converted residential apartments) and Waterloo Dock apartments. • To the east lies various industrial units of various sizes within the Ten Streets SRF area and Costco Liverpool.
<i>Site Ownership</i>	<p>The site's freeholders include:</p> <ul style="list-style-type: none"> • The Mersey Docks and Harbour Company Limited; and • Peel Land & Development (Ports) Limited. <p>Several leaseholds exist over the land which including:</p> <ul style="list-style-type: none"> • Canal & River Trust; • Fulcrum Pipelines Limited; • Leep Electricity Networks Limited; • Peel Land & Development (Ports) Limited; • Romal Capital (C04-C06) Limited; and • United Utilities Water Limited.

Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002) proposals map, the site is allocated as:</p> <ul style="list-style-type: none"> ● Policy E6 - 'A Site for Various Types of Development'; ● Policy HD7 - a proposed extension or proposed new conservation area for the Stanley Dock Conservation area (north of site); ● Policy OE4 - a developed coastal zone; and ● Policy OE17 - a key recreational route. 	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site primarily as a 'Mixed-Use Area' (policy EC6). Key designations include:</p> <ul style="list-style-type: none"> ● Policy EC6 - 'Mixed-Use Area' ● Policy HD2 - World Heritage Site (partial) and buffer zone ● Policy GI 1 & GI 3 - Key Recreational Route (Policy GI 1 & GI 3); ● Policy H7 - Primarily residential area (to the south); ● Policy CC12 — Liverpool Waters; and ● Policy CC10 — Waterfront 	

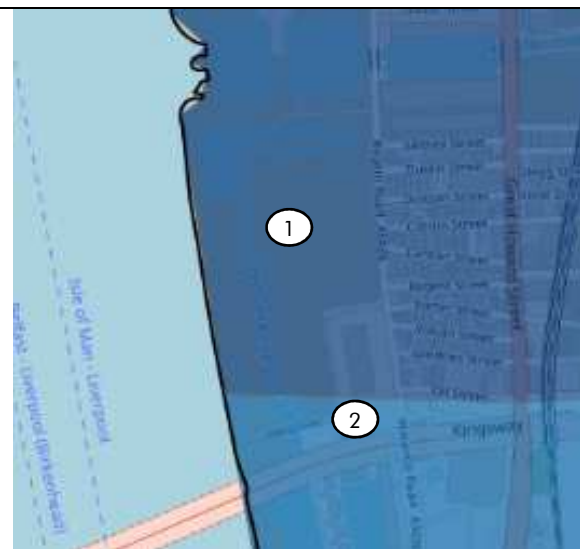
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset’s conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> A. grade II listed buildings, or grade II registered parks or gardens, should be exceptional; B. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p><u>Flood Risk</u></p> <p>Paragraph 155 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>Paragraph 163 - When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.</p> <p>World Heritage Site SPD (2009)</p> <p>The WHS site is divided into six-character areas, the site sits partially within but largely adjacent to the ‘Stanley Dock Conservation Area’. The area has massive potential to fulfil the city’s housing requirements and other aspirations through extensive heritage-based regeneration. Development should deliver active docksides and water spaces, better internal and external connections and integration with the immediate hinterland, the city centre and its communities. The SPD recognises that the regeneration of this part of the WHS will require very significant levels of private investment, without which the tangible cultural heritage will continue to deteriorate.</p>
---	---

	Liverpool's Employment Requirements The site is located within the Great Howard St/ A565 Corridor West as site M54 (Employment Land Study, 2017). The area is recognised as containing a <i>'high concentration of employment uses'</i> ; notwithstanding this, it notes that <i>"the Liverpool Waters mixed use scheme. . . will have a considerable impact on the character of the area and will, together with other mixed use sites in the area, be capable of making a contribution to the future land supply for employment use."</i> The Study also confirms that the small-scale industrial units are mostly let and as such is <i>"an established employment area which is functioning well"</i> . It is considered therefore that existing employment uses should be retained and protected.	
Statutory Designations		
<i>Heritage</i>	<p>The northern part of the site lies within the Liverpool Maritime Mercantile City Designated World Heritage Site and the remainder of the site is within the WHS buffer zone and contains seven Grade II listed buildings and monuments within the site boundary. The listed buildings within the site boundary include:</p> <ul style="list-style-type: none">• The gate to Clarence and Clarence Graving Docks;• North gate to Docks 28 to 31, Victoria, Princes and Waterloo Docks;• Sea wall to south of Salisbury Dock entrance;• Gate to Victoria and Trafalgar Docks;• Graving Docks;• Dock Master's Office; and• Gate to Clarence Dock. <p>Various other listed buildings lie within close proximity to the site.</p>	 <i>Historic England Map Search, 2019</i>

<p><i>Flood Risk</i></p>	<p>Areas of the site sit within Flood Zone 2 and Flood Zone 3 surrounding the Trafalgar Dock, canal and southern areas of the site. The remainder of the site sits within Flood Zone 1.</p>	 <p><i>Flood Map for Planning, 2019</i></p>
<p><i>Ecology</i></p>	<p>A desktop ecology search identifies that the site is adjacent to a number of habitat and species areas, including Intertidal Substrate Foreshore (Mud & Sand), Lapwing habitat and Seabird Oil Sensitivity areas. However, it is not considered that there are any ecology issues that would ultimately prevent the development of the site.</p>	 <p><i>Magic Maps, 2019</i></p>

<p><i>Landscape</i></p>	<p>The only statutory land-based designation on the site is a Wild Bird General Licence Exclusion Zone. However, it is not considered that there are any landscape issues that would ultimately prevent the development of the site.</p>	 <p>Magic Maps, 2019</p>
<p>Strategic and Regeneration Context</p>		
<p><i>Strategic and Regeneration Policy</i></p>	<p>The North Liverpool and South Sefton Strategic Regeneration Framework (SRF) 2010</p> <p>The site sits within Area 2 of the North Liverpool and South Sefton SRF (Liverpool Waters and Hinterland). As part of Area 2, the SRF identifies Liverpool Waters as a New Growth Point site and one of the City Region's most important regeneration and investment opportunities. The project proposes one of the world's biggest and most ambitious water developments accommodating 3 million sq. ft of new business space, nearly 10,000 new homes, together with leisure, retail and cultural attractions. The scheme aims to reconnect the area with Liverpool through transforming and reanimating the waterfront to create a world-class urban quarter, providing a massive stimulus to the regeneration of the wider area and the potential to create tens of thousands of construction and long-term jobs for local people.</p> <p>The SRF presents a clear strategic rationale for the development of the Liverpool Waters project and for the regeneration of North Liverpool / the North Docks.</p> <p>Atlantic Corridor Development Framework (ACDF) 2016</p> <p>The site sits within the Liverpool Waters character Zone which runs along the entire west of the Atlantic Corridor area. The Liverpool Waters proposal by the Peel Land and Property seeks to regenerate a 60-hectare historic dockland site to create a world-class, high quality, mixed use waterfront destination. The ACDF identifies a number of key principles to explore which include encouraging a more diverse mix of uses, improving connectivity, retaining historic structures and providing a building scale, form and massing to respond to the scale and drama of the warehouses, streets and framed views of the River Mersey and proposed Liverpool Waters cityscape.</p>	

	<p>The ACDF further supports the provides the overarching context for regeneration and establishes principles for development in the north of the City and in particular along the northern docks. It notes that the area is predominately industrial and is often perceived as a series of dislocated locations with poor connections between the waterfront to the west and the residential areas to the east. The framework clearly aims to better connect these emerging destinations to each other and the city centre, identify further opportunities for coordinated for investment, create improved investment conditions, and improve access to new jobs and opportunities for local residents and workers.</p> <p>The ACDF clearly identifies the site as part of a priority regeneration area and supports its redevelopment for a mix of uses.</p> <p>Mersey Waters Enterprise Zone</p> <p>The Mersey Waters EZ straddles the River Mersey and covers the Liverpool Waters and Wirral Waters areas. Extending across a combined area of 125 hectares. Within the Mersey Waters Enterprise Zone there is Liverpool Waters and Wirral Waters, including Central Docks. The EZ seeks to encourage the area to attract and accommodate national and international businesses and encourage a significant increase in the number of visitors to the city. The Enterprise Zone will enable this through providing:</p> <ul style="list-style-type: none"> • access to Superfast broadband infrastructure; • occupiers with access to the EZ funding team to grant support from a range of sources relating to plant and machinery and advice on tax relief; and • Associating developments with a nationally recognised development priority and enhanced access to public sector support organisations and government departments.
<p><i>Socio-Economic Profile</i></p>	<p>The site sits across two LSOAs (pictured), in 2019 the northern LSOA has an IMD ranking of 2,641 out of 32,844 LSOAs in England (amongst the 10% most deprived neighbourhoods in the country) and Employment Deprivation Domain (EDD) ranks the northern area as 2,085 out of 32,844 LSOAs in England (among the 10% most deprived neighbourhoods).</p> <p>The southern LSOA in 2019 has an IMD ranking of 3,937 out of 32,844 LSOAs in England (within the 20% most deprived neighbourhoods in the country) and an EDD ranking of 11,554 out of 32,844 LSOAs in England (among 40% most deprived neighbourhoods).</p> <p>Areas of the site lie within some of the 10% most deprived areas in the country therefore, the redevelopment and regeneration of the site has the potential to have a significant catalytic impact on the regeneration of the area.</p>



Planning and Development Context

Planning History

The site contains major live planning applications relating to the redevelopment of the site and the 60 hectares of former dock land which is part of the Liverpool Waters scheme. Outline permission with all matters reserved for Liverpool Waters was originally granted in June 2013 and has subsequently been varied to amend the parameters (19NM/1121) and (18NM/2766) — and more recently conditions have been discharged to put in place a Neighbourhood Masterplan to facilitate the delivery of development. More details on the recent and historic consents are outlined below.

Application Number	Date	Decision	Details
20NM/1801		Pending	Application for non-material amendment to 100/2424 so as to Update Liverpool Waters Parameter Plan Report from "April 2019" to "July 2020" revision. The amended parameter plans include: PP004 - Development Parcels PP005 - Development Plots PP006 - Building Heights Amend wording of Condition 3 of the Decision Notice, updating "Liverpool Waters Parameter Plan Report (April 2019)" to "Liverpool Waters Parameter Plan Report (July 2020)".
19DIS/1315	12-11-2019	Conditions Discharged	To discharge Condition 11 (Central Docks Neighbourhood Masterplan) attached to 100/2424. The approval of Central Docks Neighbourhood Masterplan is a critical milestone for the redevelopment area — providing details and certainty on how the neighbourhood will be brought forward for development, in terms of the delivery strategy and phasing of development plots. The Neighbourhood Masterplan is a statement of intent for Central Docks and provides clarity on how Peel L&P will deliver Central Docks as part of its "live" application.
19DIS/1314 and 19DIS/1337	12-11-2019	Conditions Discharged	To discharge a range of conditions relating to the delivery and development of the Central Docks Neighbourhood Masterplan. These conditions provide further strategies on how Reserved Matters applications will be brought forward on the site and demonstrate the commitment to the delivery of the Central Docks neighbourhood.
19NM/1121	23-08-2019	Non-Material Amendment Approved	Application for non-material amendment to 100/2424 to amend the 3 parameters plans (related to development plots, building heights and access & movement) and the illustrative masterplan, and the wording of condition 3.
19F/1745	08-08-2019	Approve with Conditions	To install District Heating Network (Use Class: Sui Generis) consisting of a below-ground pipe network servicing Central Docks South

	19F/0079	09-07-2019	Approve with Conditions	To construct a District Heating Network (Use Class: Sui Generis), consisting of a Central Docks Neighbourhood Energy Centre and a below-ground pipe network servicing Central Docks South (Liverpool Waters Neighbourhood C), in addition to two above-ground bridge pipe links (Leeds to Liverpool Canal Bridge adjacent plot C04 and the Princes Half Tide Crossing).
	19DIS/1314 and 19DIS/1337	12-11-2019	Conditions Discharged	To discharge a range of conditions relating to the delivery and development of the Central Docks Neighbourhood Masterplan. These conditions provide further strategies on how Reserved Matters applications will be brought forward on the site and demonstrate the commitment to the delivery of the Central Docks neighbourhood.
	19F/0068	20-02-2019	Approve with Conditions	Application for temporary (2 year) on-side education facility (use class D1) consisting of 3 blocks of pre-finished cabins, covered external practical space, covered walkways, temporary servicing, the removal of the existing Clarence Dock gate attached to the listed Clarence Dock Gate Piers and replace with metal gate.
	19L/0072 (Listed building consent)	20-02-2019	Approve with Conditions	Application for temporary (2 year) on-side education facility (use class D1) consisting of 3 blocks of pre-finished cabins, covered external practical space, covered walkways, temporary servicing, the removal of the existing Clarence Dock gate attached to the listed Clarence Dock Gate Piers and replace with metal gate.
	18NM/2766	15-11-2018	Non- Material Amendment Approved	Application for non-material amendment to 100/2424 to amend the proposed Phasing Plan (Central Dock to come forward as Phase 2), Development Parcels plan to change parcel boundaries to align with proposed development plots, Development Plots plan to change some of the plots to respond to public open space and street hierarchy, Building Heights Plan — to amend some of the heights to support townscape, heritage and public realm.
	17F/2628	11-04-2018	Approve with Conditions	To construct new link road, leading from Waterloo Road into West Waterloo Dock to provide access to the proposed relocation of the Isle of Mann Ferry Terminal. Works to include widening of West Waterloo Dock Canal Bridge to accommodate new link.
	17F/1628	18-12-2017	Approve with Conditions	Romal Capital Application - To erect a part 14 and part 8 storey residential block (Use Class C3) comprising 237 apartments for market sale with commercial space at ground level to incorporate B1a (Office); A3 (Restaurant/cafe); and D2 (Leisure/gym) use; 51 parking spaces; 120 cycle parking spaces, together with plant; reception; hard and soft landscaping; access and associated works.

	100/2424	14-06-2013	Approve with Conditions	Liverpool Waters. The comprehensive redevelopment of up to 60 hectares of former dock land to provide a mixed use development of up to 1,691,100 sq. m, comprising: up to 733,200 sq. m residential (Class C3) (9,000 units), up to 314,500 sq. m business (Class B1), up to 53,000 sq. m of hotel and conference facilities (Class C1) (654 rooms), up to 19,100 sq. m of comparison retailing (Class A1), up to 7,800 sq. m of convenience retailing (Class A1), up to 8,600 sq. m of financial and professional services (Class A2), up to 27,100 sq. m of restaurants and cafes (Class A3), up to 19,200 sq. m of drinking establishments (Class A4), up to 8,900 sq. m of community uses (Class D1), up to 33,300 sq. m of assembly and leisure (Class D2) up to 17,600 sq. m for a cruise liner facility and energy centre (Sui Generis), up to 36,000 sq. m for servicing (Sui Generis), and up to 412,800 sq. m for parking (Sui Generis) together with structural landscaping, means of access, formation of public spaces and associated infrastructure and public realm works. (Outline Application)
	000/1082	29-07-2004	Approve with Conditions	To develop land for a mix of residential development, light industrial/business units, leisure and tourist accommodation (including hotel and conference facilities), ancillary retail use, and marina/water sports centre, all within classes A1, A2, A3, B1, B2, C1, C3, D2 of the Town and Country Planning (use classes) Order 1987 (Outline Application).
Liverpool Waters Summary (19NM/1121, 18NM/2766 & 100/2424)	<p><i>Non-Material Amendment 18NM/2766– Approved Parameters</i></p> <p>Outline application ‘100/2424’ was approved in June 2013 and sought to comprehensively redevelop 60 ha of Liverpool’s Waterfront.</p> <p>In October 2018, a Section 96A application was submitted ‘18NM/2766’ seeking to amend the original Liverpool Waters Parameters Plan Report, by making non-material amendments to 4 Parameter Plans and the illustrative masterplan. The application was approved on November 2018.</p> <p>In April 2019 a second Section 96A application was submitted ‘19NM/1121’, seeking to make non-material amendments to the Development Plots Parameter Plan, Building Height Parameter Plan and the Access and Movement Plan. The Neighbourhood Parameter Plan divides Liverpool Waters site into five neighbourhoods:</p> <ul style="list-style-type: none"> A. Princes Dock, B. King Edward Triangle, C. Central Docks, D. Clarence Docks, and 			

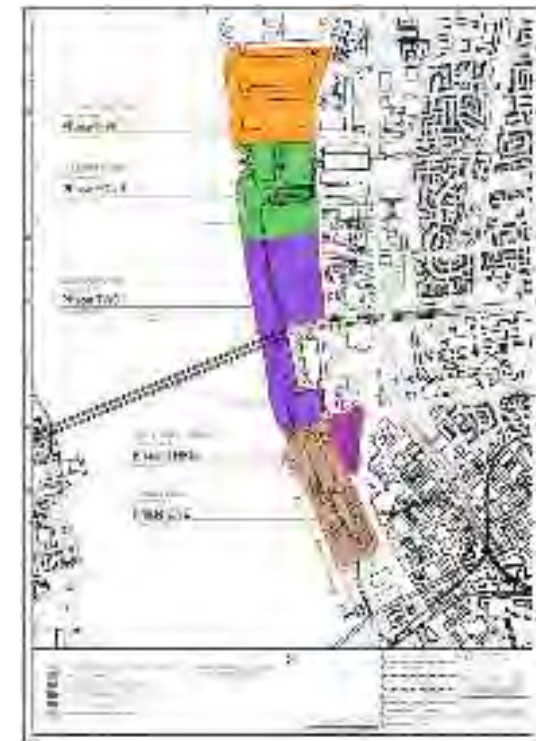
E. Northern Docks.

In November 2019 Condition 11 of Outline Consent '100/2424' was discharged as a detailed Neighbourhood Masterplan was developed which outlines the form and delivery strategy of the development plots and necessary infrastructure to meet the aspirations of the neighbourhood. The approval of Central Docks Neighbourhood Masterplan is a critical milestone for the redevelopment area and provides clarity on how Peel L&P will deliver Central Docks as part of its "live" application.

The assessment site sits partly across Central Docks and partly across Clarence Docks Neighbourhoods which are the second and fourth phases of the consent as pictured across. The planned quantum of floorspace per neighbourhood by land use (sqm) for Central Docks and Clarence Docks neighbourhoods are outlined below:

	Central Docks	Clarence Docks	Total
A1 Shops (Comparison)	8,700	5,700	14,400
A1 Shops (Convenience)	4,200	1,500	5,700
A2 Financial & Professional	2,600	1,100	3,700
A3 Restaurants & Cafes	11,900	5,200	17,100
A4 Drinking Establishments	12,600	2,900	15,500
B1 Business	165,900	4,600	170,500
C1 Hotels	35,400	2,800	38,200
C3 Dwelling Houses	235,300	89,400	324,700
D1 Non-Residential Institutions	600	1,800	2,400
D2 Assembly & Leisure	30,700	1,000	31,700
Servicing	17,500	4,500	22,000

Phasing Plan:



Sui Generis (other)	16,600	0	16,600
Sui Generis (Parking)	180,400	41,900	222,300
Totals	722,400	162,400	884,800

Although the Central Docks and Clarence Docks neighbourhoods extend beyond the assessment sites red line boundary, the assessment site does amount to most of both neighbourhood's areas meaning the total quantum does amount to close of the 884,800 sqm figure.

Central Park sits within Central Docks and forms a fundamental part of the Liverpool Waters proposals as this designates a large area of open space in the assessment area and will form one of the largest green spaces in the city.

The building heights parameter plan (PP006) sets out that the assessment site contains 20 plots varying in height from 11m to 141m.


Illustrative Masterplan of the site:



Building Heights Parameter Plan:



<p><i>Surrounding Development Context</i></p>	<p>The area surrounding the site has been subject to a number of major proposals as part of the regeneration of the North Docks area, including (this is not an exhaustive list):</p> <ul style="list-style-type: none"> • The conversion of Stanley Dock into the Titanic hotel; • The conversion of Tobacco Warehouse to create 538 new residential apartments and 45,000 sq. ft. offices; • A new Cruise Liner Terminal approved with Reserved Matters submitted (19RM/1037), along with a new cruise liner hotel; • The Isle of Man Ferry Terminal — which is now consented (18F/3231); • The Plaza 1821 PRS scheme; • The approval of No.5 Princes Dock (Plot A03) '15F/0560' the first Reserved Matters of the '100/2424' outline consent, reflecting the changing character of the area and the development pressures moving northward from the City Centre. <p>The surrounding development context for the North Docks is one of ongoing regeneration, investment and renewal; demonstrating that the area is on undergoing transformational change in line with key strategic and regeneration priorities. There is a clear rationale for major development in this location.</p>
<p><i>Landowner / Developer Aspirations</i></p>	<p>Peel Land & Property has clear aspirations to redevelop the site as part of the Liverpool Waters development. This is clear from its extant consents related to the wider regeneration of the Liverpool Waters scheme to deliver a major mixed-use Waterfront development. In addition, Central Docks is subject of temporary uses — and has full planning consent (19F/0068) and associated LBC application (19L/0072) by Liverpool City College (submitted on 10th January 2019) for the construction of temporary education facilities on Clarence Dock (for a period of at least 2 years) and is fully occupied. Notwithstanding this, Peel has a clear strategy for the future development of Clarence Dock and Central Docks.</p> <p>Romal Capital has planning consent for 646 units and 232 sqm. in six blocks of between 10 to 14 storeys' in height as part of the Liverpool Waters site and aim to be on site in 2020, demonstrating Peel's commitment to the delivery of Liverpool Waters.</p> <p>Further progress with Liverpool Waters is demonstrated by the Non-Material Amendment (19NM/1121) approved August 2019 and the discharge of Condition 11 which puts in place the Central Docks Neighbourhood Masterplan. The approval of Central Docks Neighbourhood Masterplan is a critical milestone for the redevelopment area — providing details and certainty on how the neighbourhood will be brought forward for development, in terms of the delivery strategy and phasing of development plots. The Neighbourhood Masterplan is a statement of intent for Central Docks and is a material consideration that provides clarity on how Peel L&P will deliver Central Docks as part of its "live" application and adding certainty to the future development of Liverpool Waters.</p> <p>The site is currently well advanced in the development of the Central Docks Neighbourhood, where development is "live", ongoing and Central to Peel Land & Property's Liverpool Waters scheme. The site is fundamentally not available for the development of a new stadium.</p>


Accessibility		
<i>Access to National Network</i>	Being close to the city centre, the site benefits from good access to the Strategic Road Network via the A565 Great Howard Street. This road connects to the north to Dunning's Bridge Road and on the M58 and M57, and to the south to Leeds Street and onwards to the City Centre, Edge Lane and the M62. Highway access is also convenient to the Wallasey and Birkenhead Mersey tunnels which access the Wirral and the M53 motorway.	
<i>Access to Public Transport Nodes</i>	<p>Bus services operate along Regent Road and Great Howard Street. Further afield, frequent bus services run along the A5038 (Vauxhall Road) 750m east of the site which provides services to Liverpool, Netherton and Thornton. Even more frequent services are available on A567 (Stanley Road) 1km east of the site.</p> <p>The site is located 1.5km from Sandhills train station and 1.3km away from Moorfields train station at their nearest points. Both stations provide access to the Merseyrail network, which connect the site to the City Centre and the National Rail Network.</p>	
<i>Pedestrian and Cycle Accessibility</i>	<p>Pedestrian and cycle access to the site is via Regent Road and Great Howard Street. Committed improvements are underway to Regent Road/Waterloo Road (A5036), Derby Road/Great Howard Street (A565) as part of the North Liverpool Key Corridor (NLKC) scheme. The NLKC is a major scheme which will create a modern fully 'duelled' road link on the A565 Great Howard Street and Derby Road between Sefton and Liverpool. New and improved cycling routes on Regent Road, reduced congestion, improved local access and east-west movement will also strengthen the connections between Liverpool and Sefton. The scheme will support the development projects being undertaken by Liverpool Waters, North Liverpool Regeneration and the SuperPort.</p> <p>Furthermore, the Grade II Listed dock wall which runs along the eastern site boundary, separating the site from Regent Road, forms a physical barrier between the site and the industrial area to the east. There are a few vehicular openings in the wall adjacent to Central Docks, one of which is currently being improved and upgraded to signal control as part of the Isle of Man Ferry terminal proposals. Notwithstanding this it is likely that more would be required to enhance pedestrian / cycle accessibility and allow sufficient access/egress to the stadium in accordance with the findings of pedestrian modelling.</p>	 <p>Mersey Travel, Liverpool Cycle Map, 2013</p>

<i>Highways Capacity and Access</i>	<p>A transport assessment and event day transport strategy would be required to support the scheme to review and potentially mitigate the following issues:</p> <ul style="list-style-type: none"> • Great Howard Street is an important north / south highway corridor and experiences high traffic flows on a day to day basis. It also lies between the residential areas to the east and the nearest rail stations. Consequently, there will be significant pedestrian movement across this road on event days. A comprehensive traffic management strategy would therefore be required to control both the movement of vehicles and pedestrians; • Regent Road will be the focus of significant transport movement on event days as it will be the only access route to the new stadium. As such, an effective transport management strategy will be required complementary to Great Howard Street. The strategy is likely to require a range of event specific road closures; • This site currently lies outside of the existing Controlled Parking Zone surrounding the Goodison Park and Anfield Stadiums. It is also outside of the city centre Controlled Parking Zone. Extensions to these zones are likely to be required to help protect the amenity of residents on event days. However, large areas of land are also non-residential industrial / commercial uses which may not need to be protected by a parking zone; <p>Moorfields and Sandhills stations are the closest rail stations, passenger demand will be significant on event days. There will therefore need to be a management strategy in place to handle the likely high demand for rail on event days.</p>
Other Development Issues	
<i>Other Potential Constraints</i>	<ul style="list-style-type: none"> • Potential land contamination and remediation from previous use. • Potential impact on waterways between West Waterloo Dock and Trafalgar Dock. • Microclimate (including wind)
Fit with Everton Requirements	
<i>Connection to North Liverpool</i>	<p>The site is well connected to North Liverpool and sits within the North Liverpool and South Sefton regeneration area (in the Kirkdale ward). It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.</p> <p>The site is located approximately 3km to the south-west of Goodison Park.</p>
<i>Iconic Location</i>	<p>The site has the potential to provide an iconic location for Everton to develop a new stadium – being located on the City’s iconic Waterfront and within one of the City’s flagship regeneration areas.</p>



Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is considered to be of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking, taking into account the proposed Liverpool Waters scheme.
<i>Are there any overriding site-specific planning issues?</i>	No	<ul style="list-style-type: none"> The site is in a location where a number of uses are acceptable and would, in principle, represent an appropriate location for stadium development (subject to other planning constraints and considerations). The site is subject to an extant planning consent for a mix of uses as part of the Liverpool Waters scheme, which has established the principle of development on the site. The site is in a priority regeneration area, where there is a clear strategic rationale for regeneration and renewal. The development of the site would deliver significant benefits in terms of meeting the City's regeneration priorities for North Liverpool, catalysing surrounding regeneration such as Ten Streets and having a social impact in one of the City's and the UK's most deprived wards. The site is located primarily within the WHS buffer zone. Subject to suitable planning, design and mitigation, it is considered that the site could accommodate a stadium development. The site contains listed buildings and is adjacent to the Stanley Dock Conservation Area. The redevelopment of the site could offer the opportunity to enhance key heritage features of the site. There are not considered to be any overriding planning, environmental or other constraints would prevent the redevelopment of the site.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> Peel Land & Property has clear aspirations to redevelop the site as part of the wider Liverpool Waters scheme, which is demonstrated by recent planning consents and development – including the recent condition discharge of the Central Docks Neighbourhood Masterplan attached to the Liverpool Waters Outline Planning Consent (100/2424). The approval of Central Docks Neighbourhood Masterplan is a critical milestone for the redevelopment area – providing details and certainty on how the neighbourhood will be brought forward for development, in terms of the delivery strategy and phasing of development plots. The site is fundamentally not available.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> Whilst remediation would be required, it is not considered that unaffordable development costs would prevent the development of a stadium on the site.

<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is accessible physically from Regent Road and by public transport and is in close proximity to the City Centre. Subject to appropriate transport improvements and a transport strategy, it is considered that the site could be appropriate for a new stadium development.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> Subject to sensitive design within the WHS buffer zone (and in the context of the Liverpool Waters development) and environmental mitigation.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p>Assessment Summary</p> <p>The site is within North Liverpool (within the Kirkdale Ward) and is well connected to the Goodison Park and Everton's existing community. It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home; and to develop a site in an iconic location. It is a site that is appropriate for a range of uses in planning and policy terms including a stadium, in principle.</p> <p>However, the key consideration is that the site fundamentally not available due to its ownership by Peel Land & Property who will not consider the sale of the site. Peel Land & Property has extant planning permission and "live" development plans for the Central Docks Neighbourhood, which are critical to the value and viability of the wider Liverpool Waters scheme. The discharge of Condition 11 (19DIS/1315) attached to the Liverpool Waters Outline Planning Consent (100/2424) has approved the "Central Docks Neighbourhood Masterplan" which sets an important milestone for the redevelopment of the area. The Central Docks Neighbourhood Masterplan provides detail and certainty on how the neighbourhood will be brought forward for development through future Reserved Matters applications, in terms of the delivery strategy and the phasing of development plots. The Neighbourhood Masterplan is a statement of intent for Central Docks and provides clarity on how Peel Land & Property will deliver the Central Docks Neighbourhood which includes significant new development, as well as Central Park, which will be one of the largest areas of new open space in the City.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that, in comparison to BMD, Central Docks is a site that is less constrained in terms of planning policy and constraints and could, in principle, provide a suitable location for a stadium development. However, for the reasons set out in the site proforma, the key consideration is that the site is not available.</p>	



Site 3: Land North of Ten Streets

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 9.7 hectares.
<i>Existing Site Uses</i>	The site contains a mix of fragmented industrial uses, including logistics, storage, light industrial and timber supply businesses.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> ▪ To the north of the site lies a range of industrial units/uses that are characteristic of the wider area and the United Utilities treatment plant sits to the north west of the site. ▪ To the east of the site lies Great Howard Street and a mix of industrial and retail units with large floorplates (including the WH Lung Supermarket) which reflect the character of the wider Ten Streets area.

	<ul style="list-style-type: none"> ▪ To the south of the site lies Stanley Dock (with the listed Titanic Hotel immediately adjacent). ▪ To the west of the site lies Regent Road, with Sandon Half Tide Dock, Bramley-Moore Dock and Nelson Dock located further west.
<i>Site Ownership</i>	<p>The site is subject to a complex and fragmented landownership ownership scenario, with 45 freehold titles, notable landowners include:</p> <ul style="list-style-type: none"> • AJ Bell Trustees Limited; • Barnett Waddingham Trustees Limited; • Boyce and Daughters Limited; • Circle Liverpool Limited; • FWB Properties Limited; • Harsant Pensioner Trustees Limited; • JCDECAUX Limited; • Kitchens INC; • Liverpool City Council; • Metro Tyres Limited; • Negotiate and Find Limited; • P & A Holdings (NW) Limited; • Rewinds and J. Windsor & Sons (Engineers) Limited; • SLL Properties Limited; • Stanley Dock Properties Limited; • Terry's Timber Limited; and • ZWY Property LTD; and • A number of unknown freeholds. <p>Additionally, the site contains seven leasehold titles.</p>

Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E1 - 'Primarily Industrial Area' and 'Industrial / Business Development' with allocation E38. 	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy EC6 - a 'Mixed-Use Area', and • Policy CC13 — 'Ten Streets', and sits within the Northern Gateway area. 	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 - In determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 - Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> • grade II listed buildings, or grade II registered parks or gardens, should be exceptional; • assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p>Liverpool's Employment Land Study (2017)</p> <p>Within Liverpool's Employment Land Study (2017) 'Ten Streets' is recognised as <i>"a new economic driver and connector between the Stanley Dock complex to the north and the City Centre to the south."</i> The site is located within the north of the Great Howard Street A565 Corridor and provides developable land for the proposed development at the Port of Liverpool.</p>
---	---

Statutory Designations		
<i>Heritage</i>	<p>The site lies in the World Heritage Site Buffer Zone and borders the World Heritage site.</p> <p>The surrounding area contains 28 Grade II listed buildings. Those which directly border the site include the north-end entrance to the Stanley Dock, the Hydraulic Tower to the west within the BMD site, the dock wall and the Grade II* listed Former Warehouse on north side of Stanley Dock, which is home to the Titanic Hotel.</p> <p>The Ten Streets SRF identifies that the site has some structures of architectural merit that should be retained.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The site lies in Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>

<i>Ecology</i>	<p>A desktop ecology search identifies that the site is adjacent to a number of habitat and species areas, including Intertidal Substrate Foreshore (Mud & Sand), Lapwing habitat and Seabird Oil Sensitivity areas.</p> <p>However, it is not considered that there are any ecology issues that would ultimately prevent the development of the site.</p>
<i>Landscape</i>	There are no statutory landscape designations within or immediately adjacent to the site which would act as a constraint to development.
Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	<p>The North Liverpool and South Sefton SRF (2010)</p> <p>The SRF identifies the land north of Ten Streets as an area proposed for “employment uses” within the “hinterland of the Liverpool Waters scheme” and to the north of proposed development at Stanley Dock — as such, whilst the SRF supports regeneration, it envisages this area to remain as an established employment location.</p> <p>Atlantic Corridor Development Framework (ACDF) (2016)</p> <p>The site sits across the City Fringe and the Liverpool 2 and Port character zones. The City Fringe Zone is an area proposed to offer a transition into the city centre, with a wider range of uses encouraged, including creative/artist space, hybrid units and ancillary mixed uses (leisure and residential) focused along key frontages and streets, together with light employment uses.</p> <p>The ACDF identifies Ten Streets as a significant investment cluster opportunity as the area will function as a new economic driver and connector between the Stanley Dock complex to the north and City Centre to the south, forming the first phase of development activity and investment.</p> <p>The Liverpool 2 and the Port Character Neighbourhood is the focus for port related uses and activities including logistics, storage and distribution, recycling and processing and supporting engineering and mechanical workshops and hybrid units.</p> <p>The ACDF clearly identifies the site as part of a priority regeneration area but supports its development primarily for employment and Port related uses.</p>

Ten Streets SRF (2018)

The site sits within the **Northern Gateway** character area, which is characterised by industrial and storage uses of a larger scale, and a small retail park with food and drink and retail uses. The quality of the built environment is considered to be generally poor but there are some buildings and infrastructure of architectural significance which could be reused or restored as part of any regeneration of the area.

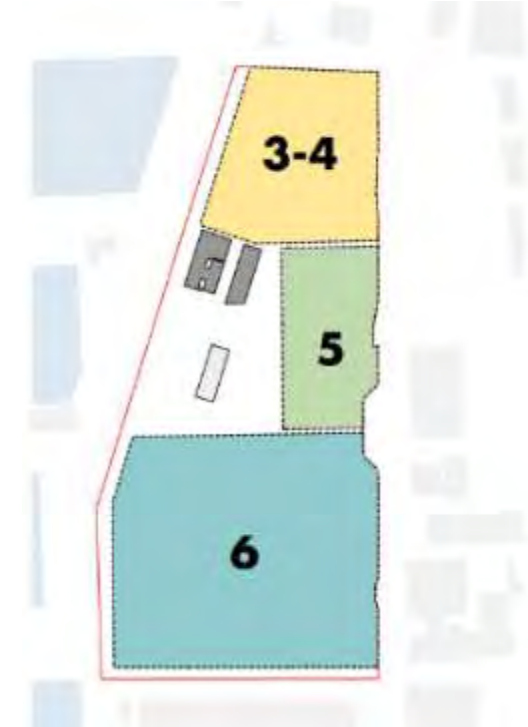
As the area lies adjacent to Bramley-Moore Dock (BMD), the Northern Gateway is identified as a critical area to provide connectivity, public space and ancillary uses to support a potential stadium on BMD.

The Northern Gateway is envisaged as an area that supports a “new retail and leisure destination” and is **identified as a “key location for access and spill out from Bramley-Moore Dock, which is the proposed location for a new football stadium”**. The SRF provides a number of character area development principles which include:

- 1) Uses that support a new employment and leisure destination;
- 2) A scale and density to respect the World Heritage Site;
- 3) Improved connectivity and public realm;
- 4) Development that is sensitive to heritage; and
- 5) Design that reflects the aspirations of the Northern Gateway.

The proposed indicative maximum scale of development in the Northern Gateway is illustrated within the building height parameters figure illustrated adjacent. The key principles of the Scale and Density section are to “*respect the scale of the World Heritage Site and the Stanley Dock Conservation Area*” and “*not be greater in scale than the Tobacco Warehouse, which forms the visual marker for the Stanley Dock Complex and is iconic in the context of the wider area*”.


The SRF fully recognises the potential of BMD to support a new football stadium and consequently the long-term potential of the area to support this aspiration, stating that: “*Everton have announced plans to redevelop Bramley-Moore Dock, the stadium has the potential have a transformational effect on the North Docks and the framework area. The SRF for Ten Streets has the potential to support this significant project and assist in providing the connectivity and types of facilities required within the framework area*”.



Ten Streets SRF, 2018

	Liverpool City Enterprise Zone The south of the site sits within the Liverpool City Enterprise Zone which consists of the city’s Commercial Office District, the waterfront area with the Three Graces, the Historic Downtown Area, and part of the north city docklands reaching as far as Stanley Dock. The zone contains the greatest concentration of employment in the city region, and is home to several local, national and international firms with expertise in banking, professional services and the creative and media sectors. To the north of the zone, Pumpfields and Northshore are well-established industrial areas strategically sandwiched between the growing City Centre and the proposed £5.5billion Liverpool Waters development. These two areas share a wealth of sites with redevelopment potential for mixed uses which can help the two Enterprise Zones knit together with North Liverpool where there is a pool of skilled and semi-skilled labour available. This area offers incentives for companies to set up business in Liverpool and encourages existing city-based business to grow. This area is clearly seen as a location to promote new business / employment opportunities as part of the Liverpool City Enterprise Zone.			
	North Liverpool Mayoral Development Zone The northern part of the site sits within the North Liverpool MDZ which covers the area stretching from the expanse of Liverpool’s docks in the north to the edge of the City Centre’s commercial business core. Not only does it include a swathe of traditional industrial and warehousing sites alongside the river, it also reaches eastwards into Everton Valley to encompass rapidly regenerating residential suburbs and district shopping centres. North Liverpool has a growing reputation for renewable energy technologies including Eco Environments who provide renewable energy solutions, and Agri UK who have established the country’s largest cooking oil biodiesel plant. More traditionally minded businesses choosing North Liverpool include motor repairs (the area is the city’s car showroom hub), maintenance and distribution facilities, IT firms such as MCS Professional IT Support, Sigma Technology Solutions Ltd (Internet marketing for businesses), Computer Plus Ltd (PC manufacturers), and Cooler Master (supplier of CPU coolers).			
	<i>Socio-Economic Profile</i> The site is within one of the most deprived wards in the country. In 2019 the area has an IMD ranking of 266 out of 32,844 LSOAs (1% most deprived in the country) and an Employment Deprivation Domain of 219 out of 32,844 (1% most deprived in the country). The redevelopment of this area therefore has the potential to have a significant catalytic impact on the regeneration of the area.			
Planning and Development Context				
<i>Planning History</i>	Both recent and historic planning consents within the area are minor and relate to individual landownerships. Historic/relevant planning applications within the site are set out below.			
	Application Number	Date	Decision	Details
	18F/2011	01-11-2018	Approve with Conditions	To erect first floor extension to the side and convert roof space to living accommodation in connection with re-instatement to hotel (Bar Coast – corner of Boundary Street and Regent Road).

	18F/2049	03-08-2018	Refused	To convert property to form 5 self-contained flats (retrospective application).
	17L/0460	20-04-2017	Approve with Conditions	To make minor alterations to parapet wall.
	16F/1207	19-07-2016	Refuse	To alter and convert existing warehouse to form residential unit including alterations to external appearance.
	10F/0751	29-07-2010	Approve with Conditions	To use vacant unit as trade warehouse (within Use Class B8).
	08F/1920	21-10-2008	Approve with Conditions	To erect 10,000 sq. ft. extension to existing warehouse building.
	07F/1580	09-07-2007	Approve with Conditions	To demolish existing kiosk and erect a single-storey structure comprising 4 no. units for the sale of hot take-away food, with associated car parking.
	06O/2703	12-12-2006	Approve with Conditions	To erect a building to be used as a hot food take-away (within Use Class A5) (outline application).
	05F/3782	27-02-2006	Approve with Conditions	To erect a single-storey 'Trade Counter' warehouse unit, with associated parking and ancillary works.
<i>Surrounding Development Context</i>	The area surrounding the site has been subject to a number of major development proposals, particularly the conversion of Stanley Dock into hotel and residential uses. This conversion reflects the changing character of the area and the development pressures facing the City Centre, extending the City northwards. It is clear that the area is changing and will form part of the area that could undergo transformational change in the next 20 years, as set out in the Ten Streets SRF. Major developments in the surrounding area include the 150 bed Titanic Hotel & Conference Centre, Southern Warehouse Conversion to 256 bedroom apart-hotel, Tobacco Warehouse conversion to 538 apartments and '19F/2024' planning permission submitted for the 190-bed hotel on the land bounded by Waterloo Road, Porter Street and Regent Street.			
<i>Landowner / Developer Aspirations</i>	The site is in multiple ownerships and the aspirations of all landowners is unclear, however, there is clear evidence of development activity in the area, evidenced by a current planning application for hotel development on Regent Road. Further commentary on the landownership position is contained in the summary assessment.			
Accessibility				
<i>Access to National Network</i>	The site has good access to the strategic highways network. Boundary Street (A5054) runs through the site which connects the site to J4 of the M57 (5 miles) and to J4 of the M62 (6 miles). The site also borders Great Howard Street (A565) which connects the site to Liverpool (1.5 miles) and the M58 (7 miles).			


<p><i>Access to Public Transport Nodes</i></p>	<p>Three bus stops are located along the site boundary, providing services to Seaforth, Bootle and Liverpool. However, regular services can be found 550m east of the site along Vauxhall Road, providing services to Netherton (two per hour), Thornton (two per hour) and Liverpool (five per hour).</p> <p>Sandhills train station is located 500m north-east of the site, providing access to Merseyrail services, which connect to the City Centre and the National Rail network.</p>	
<p><i>Pedestrian and Cycle Accessibility</i></p>	<p>Pedestrian and cycle access is provided via Derby Road, Regent Road, Boundary Street, Walter Street and Blackstone Street.</p> <p>Committed improvements to Regent Road/Waterloo Road (A5036) and Derby Road/Great Howard Street (A565) as part of the North Liverpool Key Corridor (NLKC) scheme is currently underway. The NLKC is a major scheme which will create a modern fully 'duelled' road link on the A565 Great Howard Street and Derby Road between Sefton and Liverpool. The improvements will provide new and improved cycling routes on Regent Road, will reduce congestion, improve local access and improve east-west movement and connections between Liverpool and Sefton will be strengthened. The scheme will support the development projects being undertaken by Liverpool Waters, North Liverpool Regeneration and the SuperPort.</p> <p>There is also a new north-south pedestrian and cycle route proposed through the Ten Streets character zone, the location of this is subject to the availability of sites and future planning applications. Further investment could improve connections between Sandhills Station and Bramley-Moore Dock / the Stanley Dock Complex, with increased pedestrian connections between Regent Road and Great Howard Street.</p>	 <p><i>Mersey Travel, Liverpool Cycle Map, 2013</i></p>
<p><i>Highways Capacity and Access</i></p>	<p>A transport assessment and event day transport strategy would be required to support the scheme to review and potentially mitigate the following issues:</p> <ul style="list-style-type: none"> • Great Howard Street is an important north / south highway corridor and experiences high traffic flows on a day to day basis. There will be significant pedestrian movement across this road on event days. It's possible that the road will need to be temporarily closed on event days for a significant period. The duration of the closure would be subject to further detailed analysis, but presents a significant planning risk to this site. • Boundary Street lies to the east of the site and as part of the event day strategy may also need to be closed locally. • Regent Road will be the focus of significant transport movement on event days. As such, an effective transport management strategy will be required complementary to Great Howard Street; • This site currently lies outside of the existing Controlled Parking Zone surrounding the Goodison Park and Anfield Stadiums. It is also outside of the city centre Controlled Parking Zone. Extensions to these zones are likely to be required to help protect the amenity of residents on event days. However, large areas of land are also non-residential industrial / commercial uses which may not need to be protected by a parking zone; 	



	Sandhills is the closest rail station, passenger demand will be significant on event days. There will therefore need to be a management strategy in place to handle the likely high demand for rail on event days.
Other Development Issues	
<i>Other Potential Constraints</i>	<ul style="list-style-type: none"> • Potential land contamination due to long history of industrial / hazardous uses. • Impact on surrounding uses and amenity. • Loss of employment land. • Land assembly, CPO and land acquisition.
Fit with Everton Requirements	
<i>Connection to Goodison Park and L4</i>	The site is well connected to North Liverpool and sits within the North Liverpool and South Sefton regeneration area (in the Kirkdale ward). It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home. The site is located approximately 2.36km to the south west of Goodison Park.
<i>Iconic Location</i>	The site currently sits within a largely industrial context and, whilst the area is planned for major regeneration in the next 20 years, it would not provide an iconic location for stadium development — when compared to a Waterfront location.

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is considered to be of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site is allocated for employment uses in the adopted UDP. If assessed against adopted policy, a stadium development would need to address key employment policies (E1) as well as the NPPF with regard to with regard to heritage (WHS buffer zone and heritage assets - pp.192 onwards) and employment (pp's 80-82). The site is located within a mixed-use policy area in the emerging Local Plan and is identified for a mix of uses in the adopted Ten Streets character area. If assessed against emerging policy, a stadium development would need to address key emerging policies (CC13 – Ten Streets) as well as the NPPF with regard to with regard to heritage. The Ten Streets SRF identifies the site for a mix of retail and leisure uses, which may acceptable in principle for stadium uses. However, the SRF identifies an indicative maximum height of 6 storeys (circa 22m-25m) in the “Northern Gateway” area. A stadium development would extend in height up to 42m-45m, far exceeding the adopted height parameters and potentially generating an impact on the Listed Titanic Hotel and Tobacco Warehouse, within the Stanley Dock Conservation Area. The site is adjacent to the Stanley Dock Conservation Area and WHS (within the buffer zone). The key planning constraints relate to the heritage impact on the adjacent Stanley Dock Conservation Area and the conflict with the adopted and emerging development plan policies (in terms of scale and uses). The site is in a priority regeneration area, where there is a clear strategic rationale for regeneration and renewal. The development of the site would deliver significant benefits in terms of meeting the City’s regeneration priorities for North Liverpool, catalysing surrounding regeneration and having a positive impact in one of the City and the UK’s most deprived wards.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is in active use for a range of industrial uses and is in multiple landownerships, which would require significant land assembly, including CPO, to be considered available. As such, it is not considered that the site could be made available to meet the immediate needs of the Club to relocate to a new stadium. It would also not be reasonable or realistic to expect the Club to consider a lengthy land assembly process. There would be significant development costs associated with CPO and land assembly (with more 52 individual freedhold and leasehold titles) – as well as a critical impact on programme and therefore year-on-year revenue for Everton. There is therefore no reasonable prospect of acquisition within a reasonable or realistic time period to meet the immediate needs of the Club.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	No	<ul style="list-style-type: none"> The costs of acquisition, CPO and relocation could generate significant expense to the Club. The likely long-term timeframe for any CPO / land assembly would also have a significant year on year revenue impact for the Club if it were to remain at Goodison Park in the medium to long term. Notwithstanding this, when property cost estimates on parts of the site were undertaken in 2017 are compared with the landowners perceived value of the same sites in 2020 (following the emergence of Everton’s stadium proposals) , there is evidence of significant “hope value” being built into the valuation of these sites. One


		example is the value of a single site, estimated at £1.25m in 2017 being valued at £7m today by the landowner - almost 6 times the valuation of the site in 2017.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is accessible physically from Regent Road and Great Howard Street, by public transport and is in close proximity to the City Centre. Subject to appropriate transport improvements and a transport strategy, it is considered that the site could be appropriate for a new stadium development.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> Subject to sensitive design within the WHS (and in the context of the Liverpool Waters development) and environmental mitigation.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Assessment Summary</p> <p>The site is within North Liverpool (within the Kirkdale Ward) and is well connected to the Goodison Park and Everton's existing community. It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its existing home.</p> <p>However, the site is not available nor deliverable due to its complex land ownership situation. The site is in active use for a range of industrial uses and is in multiple landownerships (with more 52 individual freehold and leasehold titles), which would require significant land assembly and CPO to be considered available. There is therefore no reasonable prospect of acquisition within a reasonable or realistic time period to meet the immediate needs of the Club. Notwithstanding this, when property cost estimates on parts of the site were undertaken in 2017 are compared with the landowners perceived value of the same sites in 2020 (following the emergence of Everton's stadium proposals), there is evidence of significant "hope value" being built into the valuation of these sites. One example is the value of a single site, estimated at £1.25m in 2017 being valued at £7m today by the landowner - almost 6 times the valuation of the site in 2017.</p> <p>In summary, it would not be reasonable to expect the Club to consider a protracted land assembly process and there would be significant development costs associated with CPO, nor is it considered that LCC would support the CPO of a well-established employment area - as well as a critical impact on programme and therefore year-on-year revenue for Everton. The implications of a embarking on a major CPO process for the Club are explored further in Section 2 (Goodison Park).</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that, in comparison to BMD, both sites have planning and policy constraints, in principle. However, for the reasons stated in this proforma, the key consideration is that the site is not available (owing to the complex land ownership situation) and would incur unacceptable costs on the Club in terms of land acquisition, the cost of a lengthy CPO process and the year-on-year and ongoing cost of a delayed stadium move that would be borne by the Club.</p>	


Site 4: Stonebridge Cross


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	Circa. 16.5 ha allocated (22.25 ha identified by Stoford but includes River and land designated as Open Space and a Local Wildlife Site to the west and south).
<i>Existing Site Uses</i>	The site is currently a vacant cleared site, the River Alt traverses the site centrally from north to south.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies several industrial units, vacant plots allocated for industrial development, Liverpool Food Hub (Fruit and Vegetable market) and United Utilities' treatment plant. To the east lies several terraced and semi-detached houses and bungalows, BUPA UKs Stonedale Lodge Residential and Nursing Home, West Derby Cemetery and Stonedale Retail Park with retailers such as Showcase Cinema, McDonald's, Domino's Pizza, KFC, Frankie & Benny's, Iceland Foods and B&M Store operating.

	<ul style="list-style-type: none">To the south lies semi-detached and terraced residential units which make up the suburb of Croxteth.To the west lies managed open space, beyond which is the Alt Valley Skills Centre, Our Lady's & St Swithin RC Primary School, Alt Park Nursing Home, retail units along Moss Way and Croxteth Community Primary School.	
Site Ownership	The site is owned by Liverpool City Council.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">Policy OE11 and Policy OE12 - Green Space; andPolicy H4 - Primarily Residential Area.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">Policy EC2 - Primarily Industrial Area.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ol style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Highways</u></p> <p>Paragraph 108 states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p> <ol style="list-style-type: none"> appropriate opportunities to promote sustainable transport modes can be — or have been — taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. <p>Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p><u>Residential Amenity (surrounded by residential)</u></p> <p>Paragraph 180 states that decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.</p> <p><u>Employment (Emerging B8 allocation)</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>
---	--

	<p>Liverpool's Employment Land Study (2017) and Employment Land Evidence Base (2017)</p> <p>Liverpool's Employment Land Study (2017) identifies an employment requirement of approximately 60-80 ha of warehouse and distribution (B8) land. The Employment Land Evidence Base (2017) recognises that 35.2 ha - 45.4 ha of large scale B8 Warehouse /Distribution Land is required between 2013-33 (higher end of the range is recommended).</p> <p>The Employment Land Study (2017) recognises that there is a limited number of sites to deliver warehouse/distribution (B2/B8) units with very large floor plates, with Stonebridge Cross being the only site within the pipeline over 10 ha.</p> <p>The Employment Land Study (2017) and the Employment Land Evidence Base (2017) both recognise that the development of the SuperPort will have a major impact on the sub regional distribution and warehouse market as it is anticipated it will generate an additional sub-regional demand of 634 ha of additional B2 and B8 uses within Liverpool City Region. However, such large-scale Warehouses/Distribution uses generated from the SuperPort will require large plots, excellent access to the motorway network, HGV suitable access, and often all-night operation.</p> <p>Stonebridge Cross is located along East Lancashire Road (A580) a key strategic A road, 1km east of J4 of the M57, within an area characterised by a high quality industrial area and is the only strategic site within Liverpool's employment pipeline over 10ha. For Liverpool to successfully meet the employment demands which the SuperPort is anticipated to bring the Employment Land Study (2017) states that <i>"the sites in the identified supply should be protected from change of use to alternative (non-B Class) uses"</i> otherwise the loss of suitable employment sites such as Stonebridge Cross to alternative non-B class uses <i>"would have a detrimental impact on the City's future economic growth and should be resisted."</i></p> <p>It is clear that Stonebridge Cross is a critical element of LCC's B8 employment supply in the emerging Local Plan and during the forthcoming Plan Period. There are no other sites of the scale and location of Stonebridge Cross to meet this need or to support the growth of Liverpool's SuperPort.</p>	
Statutory Designations		
<i>Heritage</i>	<p>The site borders Gillmoss Lodge, a Grade II listed building, and 400m east of the site lies the Grade II listed Croxteth Hall Park and Garden.</p>	 <p>Historic England Map Search, 2019</p>

<i>Flood Risk</i>	<p>A small section of the site lies in Flood Zone 3 surrounding the River Alt, the remainder of the land surrounding the River Alt lies in Flood Zone 2 and the balance of the site lies in Flood Zone 1. The realignment of the River Alt has reduced the risk of flooding on the site.</p>	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	<p>It is not considered that there are any ecology issues that would ultimately prevent the development of the site, subject to suitable mitigation.</p>	
<i>Landscape</i>	<p>There are no statutory landscape designations within or immediately adjacent to the site which would act as a constraint to development.</p>	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	<p>Stonebridge Cross Mayoral Development Zone (MDZ)</p> <p>The site sits within Stonebridge Cross Mayoral Development Zone which is located on either side of the East Lancashire Road that connects Liverpool to Greater Manchester. Stonebridge Cross is in the city’s longest-established manufacturing zone. Considerable site assembly, infrastructure and environmental enhancement works has been undertaken which now offers high quality services plots and new business units available for commercial and industrial use, making Stonebridge appealing to businesses.</p> <p>The Stonebridge Cross Mayoral Development Zone holds the city’s largest single site in public ownership at Stonebridge Cross which is available for a significant international employer, with capacity to bring between 500 to 1,000 new jobs. The site is clearly identified as a major employment site within the City.</p>	

<i>Socio-Economic Profile</i>	<p>The site is split across two LSOAs, the first LSOA in 2019 has an IMD ranking of 2,353 out of 32,844 LSOAs (10% most deprived) in England and an Employment Deprivation Domain of 2,858 out of 32,844 LSOAs in England (10% most deprived).</p> <p>The second LSOA in 2019 has an IMD ranking of 556 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 563 out of 32,844 LSOAs in England (10% most deprived).</p> <p>Part of the site falls within the 10% most deprived LSOAs in the country therefore, a stadium development has the potential to have a catalytic impact on the regeneration of the area.</p>	 <p>Indices of Multiples Deprivation 2015 Explorer</p>		
Planning and Development Context				
<i>Planning History</i>	<p>Significant planning applications fall within the site boundary including an application for improved access works to the area and an application to accommodate two industrial units which will provide 1 million sq. ft. of industrial space. There is currently a live application to develop a 60-bed health care facility.</p>			
	Application Number	Date	Decision	Details
	18F/2394	30-08-2018	Awaiting decision (as of December 2019)	To erect a 3-storey building for a 60-bed health care facility with associated car parking and landscaping on a 0.75ha plot to the east of the site.
	16NM/2818	25-11-2016	Non-Material Amendment Approved	Application for non-material amendment to 13F/1838 To demolish existing buildings and erect 2 no. buildings (max height not exceeding 20m) to comprise storage and distribution centre with ancillary office (within Use Classes B8 and B1) with associated landscaping, parking, servicing areas and ancillary works.
	13F/1838	22-11-2013	Approve with Conditions	To demolish existing buildings and erect 2 no. buildings (max height not exceeding 20m) to comprise storage and distribution centre with ancillary office (within Use Classes B8 and B1) with associated landscaping, parking, servicing areas and ancillary works. Expired 2016.

	12F/3199	21-02-2013	Approve with Conditions	To carry out engineering and landscaping works in connection with realignment of River Alt. The scheme was considered to reduce the risk of flooding, with the submitted flood risk assessment concluding that it would reduce flood risk upstream with no negative impact on flood levels downstream.
	06RM/0746	19-06-2006	Approve with Conditions	To lay out access roads and carry out landscaping works in connection with development of the site as a business park, including provision of open space, and realignment of River Alt (details of reserved matters pursuant to outline permission 030/4000)
	030/4000	26-01-2006	Approve with Conditions	To develop land for use as a Business Park comprising offices/light industrial use (use class B1), general industrial use (class B2), storage and distribution use (class B8), and other ancillary uses; To lay out public open space, new vehicular access and circulation roads, car parking and servicing, landscaping works; To carry out partial widening of the River Alt, realignment and naturalisation of Sugar Brook, and other associated engineering operations
	03F/4001	25-05-2004	Approve with Conditions	To create a new road junction to service the proposed Stonebridge Cross Business Park, together with associated internal access/circulation roads, footpaths, and other associated engineering operations
<i>Surrounding Development Context</i>	<p>The area surrounding the site has been subject to a number of major development proposals associated with industrial development as part of the Stonebridge Cross Mayoral Development Zone. Major developments include Home Bargains Warehouse, four industrial developments off Sugarbrook Drive, Home Bargains Training Centre, Fruit & Vegetable Wholesale Market and the 50,000 sq ft industrial unit at Stonebridge 52.</p> <p>The surrounding development context demonstrates the clear industrial character of the area and the importance of Stonebridge Cross as an employment site that will support the growth of the corridor as a major B8 employment destination that supports Liverpool’s SuperPort.</p>			
<i>Landowner / Development Aspirations</i>	<p>Liverpool City Council is actively promoting the site for industrial development in partnership with Stoford. The site is identified as a key employment site in the City and LCC is committed to bringing the site forward for employment uses to support the future development of the SuperPort.</p>			
Accessibility				
<i>Access to National Network</i>	<p>The site borders East Lancashire Road which provides access to J4 of the M57. Although this makes the site highly accessible by car, the convenience of access to major roads is likely to encourage people to travel to events by car rather than public transport.</p>			

<p><i>Access by Public Transport</i></p>	<p>Key concerns relate to the accessibility of the site by public transport, and in particular access to a convenient heavy rail station. This in combination with the ease of access by car, is likely to result in significant traffic impacts on surrounding roads. The closest rail station is Fazakerley some 2km to the north, or about a 40 minute walk by the shortest route. The rail station operates a good frequency of services to Liverpool City Centre and Kirby (approximately 15 mins in either direction), but the distance of the walk route is likely to deter its use by many people (especially for evening or winter events).</p> <p>There is access to the City Centre by bus along Storrington Avenue to the south, however the bus journey by scheduled services is approaching one hour, which again is unlikely to be a popular means of access for supporters.</p> <p>Historically in Liverpool, access by taxi to event stadiums is very popular with around 20 – 30% of total trips being made by this mode. With journey times from the City Centre by taxi to Stonebridge Cross approaching 30 minutes, fares would likely be around £30 – £35 which would act as a deterrent.</p>
<p><i>Pedestrian and Cycle Accessibility</i></p>	<p>Everton has a strong supporter catchment close to the existing Goodison Park stadium – many of which would walk to and from the ground on matchdays. The density of supporters around the Stonebridge Cross site is much less, and as a consequence the propensity to walk to the stadium will reduce.</p> <p>The site benefits from an on-road signed cycle route sitting to the south of the site connecting the site to Stanley Park and Central Liverpool and an off-road cycle track to the north of the site which connect the site to Kirkby.</p> <p>The off-road cycle track is however, narrow, over grown with vegetation and unlit in parts.</p> <div data-bbox="1464 555 2045 994" data-label="Image"> </div> <p><i>Mersey Travel Cycle Maps, 2017</i></p>
<p><i>Highways Capacity and Access</i></p>	<p>Key considerations for highway access for this site would include the following:</p> <ul style="list-style-type: none"> • The A580 East Lancashire Road is part of the Department for Transport's proposed Major Road Network which is classified as being one of the busiest and most economically important local authority 'A' roads. This road forms the northern boundary of the site, and would need to remain open and functional during the period of events; • The A580 road would be a major barrier to pedestrian movement to / from the north – which is the direction to the closest rail station and also land which could be used for event day car parking. Pedestrian encroachment into the A580 carriageway (especially at the end of an event) would be a significant issue which would need to be resolved;

	<ul style="list-style-type: none"> • The combination of a lack of convenient pedestrian access to a major transport hub (or the City Centre of Liverpool), plus the close proximity of the Strategic Road Network of the M57 / M58 / M62 would likely encourage a high proportion of people to drive to an event. This would mean that suitable volumes of car parking would need to be provided to reduce impacts to surrounding residential communities. Highways England would be a key stakeholder as a result of potential impacts to the Strategic Road Network; • Related to this, a new Controlled Parking Zone would likely need to be established for residential areas surrounding the site. This would be outside of Parking Zones already in operation in Liverpool. The Zone itself may need to extend into the borough of Knowsley which would require cross authority coordination; • Even so, traffic associated with the stadium would likely result in significant congestion and delay along the A580 and other local roads before and after an event; • Stonebridge Lane to the south of the site would most likely need to form the main pedestrian access to the site due to issues associated with the A580 and the constrained nature of land to the east. However, the site itself is cut-off from Stonebridge Lane by the River Alt Nature Reserve. East / west pedestrian permeability of the reserve would need to be achieved to help facilitate a stadium in this location; • As Stonebridge Lane is likely to need to be the front door of the stadium, significant event day traffic management measure would need to be in operation along its length to control: pedestrian movement; pick-up / drop-off; taxis; and coaches. The amenity of local residents would need to be protected. <p>Overall, the Stonebridge Cross site has many transport and access issues which could reduce the accessibility of the stadium to non-car modes. Whilst the relative ease of access by car to the site is likely to result in off-site traffic impacts and congestion. The importance of the A580 road may mean that it would not be practical to close during events which would result in road safety concerns for supporters before and after events. In summary, the site is not sustainably located to accommodate a major stadium and events venue and does not represent a more favourable alternative than what is proposed.</p>
Other Development Issues	
<i>Other Potential Constraints</i>	<ul style="list-style-type: none"> - Potential impacts relevant to residential amenity, including the following: - Noise arising from the stadium during matches/events; - Traffic noise; - Crowd noise from those entering and exiting the site, and along key access routes; - Light pollution from the stadiums flood lights and other relevant stadium lighting; - Anti-social behaviour; - Visual impact of stadium development; and - Congestion on local road network and public transport.

Fit with Everton's Requirements		
Connection to North Liverpool	The site is outside of North Liverpool (as defined by the North Liverpool and South Sefton SRF) and as such does not retain the same connection to Goodison Park and L4 as other sites in North Liverpool which connect better with the existing community at Goodison Park. The site is located close to the boundary with Knowsley and shares more of a relationship with residential areas around the M57 corridor and into Kirkby. The site is also disconnected from the City Centre and the Docks.	
Iconic Location	The site currently sits within a largely industrial and residential context and would not provide an iconic location for stadium development.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The site is allocated as greenspace and as a primarily residential area in adopted policy. If assessed against adopted policy, a stadium development would need to address key polices (OE11, OE12 and H4) as well as the NPPF with regard to the loss of open space (pp's 96-101).The site is allocated in emerging policy for B8 employment uses is identified as an important element of LCC's B8 employment supply in the emerging Local Plan. There are no other sites of the scale and location of Stonebridge Cross that have the ability to meet identified needs and the emerging needs of Liverpool's SuperPort. If assessed against the emerging plan, a stadium development would need to address key polices (EC2) as well as the NPPF with regard to employment uses (pp's 80-82).In terms of need, Stonebridge Cross is identified within a high quality industrial area and is the only site within Liverpool's employment pipeline over 10ha. For Liverpool to successfully meet the employment demands which the SuperPort is anticipated to bring, Liverpool's Employment Land Study (2017) states that "the sites in the identified supply should be protected from change of use to alternative (non-B Class) uses" otherwise the loss of suitable employment sites such as Stonebridge Cross to alternative non-B class uses "would have a detrimental impact on the City's future economic growth and should be resisted."Residential dwellings bound the site on three sides which could lead to amenity issues on match/event days.
Is site acquisition a realistic proposition?	No	<ul style="list-style-type: none">The site is in the ownership of LCC. LCC will not consider it sale and therefore the site is not available to Everton.

<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> ▪ The site is clear and development ready — therefore, it is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> ▪ The site has a range of significant transport and access issues which would need to be adequately mitigated to make it suitable for a new stadium for Everton. The transport and access issues include: <ul style="list-style-type: none"> ○ the proximity of the A580 sterilising one side of the site; ○ the need to achieve access from Stonebridge Lane which will require making the Alt Valley Nature Reserve permeable to pedestrians; ○ the long walk distance to the nearest rail station; ○ the lengthy journey times for buses and taxis from the City Centre; and ○ the ease of highway access. ▪ Combined with the ease of highway access, this would mean that travel to and from the site would be car dominated which is likely to result in significant traffic impact and congestion on event days. ▪ In summary, the site is not sustainably located to accommodate a major stadium and events venue and does not represent a more favourable or better alternative than what is proposed.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> ▪ There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site. ▪ The development of a stadium is unlikely to cause any unacceptable environmental or visual impacts.

Summary and Conclusions

Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?

Summary Assessment

In summary, the key considerations when assessing the site include:



- Availability — the site is in the ownership of LCC. LCC will not consider its sale and therefore the site is not available to Everton.
- Planning policy — the site is allocated for employment uses in the adopted UDP and emerging Local Plan. If assessed against adopted and emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policies EC1 and EC2) as well as the NPPF with regard employment (pp's 80-82) and residential amenity.
- Employment need — the site is a key part of LCC's employment land supply and there is an identified need for B8 uses in the north of the City with links to the SuperPort and the strategic highways network. There is no other site in a strategic location of this scale that could meet this identified need and the site is currently actively marketed for employment uses.
- Access by sustainable modes of travel — the site is in an unsustainable location for a stadium development, in terms of highways, sustainability and accessibility by sustainable modes of transport. The site is disconnected from the rail network and from realistic sustainable modes of transport (the closest rail station is Fazakerley some 2km to the north, or approximately 40 minute walk by the shortest route). It is likely to support high levels of car borne journeys.


Conclusion & Comparison with BMD

The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available**. Notwithstanding this, Stonebridge Cross is also in an unsustainable location for stadium development, in terms of highways, sustainability and accessibility by sustainable modes of transport; and does not represent a better alternative to what is proposed at BMD.


Site 5: Stanley Park



ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	30 hectares (circa.)
<i>Existing Site Uses</i>	The site contains open space, football playing fields, a pond and car parking for Anfield football stadium.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies Goodison Park football stadium and terraced residential units. To the east lies Anfield Cemetery. To the south lies terraced residential units, Anfield football stadium and Four Oaks Community Primary School.

	<ul style="list-style-type: none">To the west lies terraced and newly built semi-detached residential units, ALDI, McDonalds, The Isla Gladstone Conservatory and Lester Gardens.	
Site Ownership	The site is owned by Liverpool City Council.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">Policy HD7 - Proposed Extension or Proposed New Conservation Area;Policy HD15 - 'Historic Park'; andPolicy OE11 & OE12- Green Space.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">Policy HD1 — 'Historic Park'; andPolicies GI 1 and GI 3 — Open Space.	

<p><i>Anfield Neighbourhood Plan</i></p>	<p>The Anfield Neighbourhood Forum applied for the Anfield area to be designated as a Neighbourhood Plan Area on 18th October 2013 and the forum was designated on 7th July 2014.</p>	 <p>Anfield Neighbourhood Area, LCC, 2013</p>
<p><i>Other</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. 	

	<p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:</p> <ul style="list-style-type: none"> A. Grade II listed buildings, or grade II registered parks or gardens, should be exceptional; B. Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p><u>Natural Environment</u></p> <p>Paragraph 174 seeks to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</p> <p>Paragraph 175 (a) states that When determining planning applications, local planning authorities should apply the principle that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p> <p>Liverpool City Council Open Space Assessment Report and Standards (2017)</p> <p>The LCC Open Space Assessment Report and Standards (2017) identifies Stanley Park as “<i>being of particularly excellent quality</i>” this is recognised by the park having a Green Flag Award status; a national mark for open spaces and is only awarded if they are managed and maintained to a high standard. Furthermore, Stanley Park is identified as having a high value due to the opportunities it provides for local communities and people to socialise.</p> <p>The report identifies locations outside of a 5-minute walk from an amenity green space over 0.2 ha, the inner north of Liverpool is recognised as having a dense population and containing several catchment gaps which are served by Stanley Park due to its size and quality.</p> <p>Furthermore, Natural England's Accessible Natural Greenspace Standard (ANGSt) provides a set of benchmarks for ensuring access to places near to where people live. These standards recommend that people living in towns and cities should have:</p> <ul style="list-style-type: none"> • An accessible natural greenspace of at least two hectares in size, no more than 300 metres (5 minutes' walk) from home; • At least one accessible 20-hectare site within two kilometres of home; • One accessible 100-hectare site within five kilometres of home;
--	---

	<ul style="list-style-type: none"> • One accessible 500-hectare site within ten kilometres of home, and • One hectare of statutory Local Nature Reserves per thousand population. <p>Liverpool City Council's Strategic Green and Open Spaces Review Board (2016)</p> <p>The Review identifies a number of recommendations for green and open spaces within Liverpool including:</p> <ul style="list-style-type: none"> • No person should live more than 300m from their nearest area of accessible natural green space of at least 2 hectares in size (and with a children's play area); • Every person over the age of 60 years living in Liverpool should have access to a communal space, garden, allotment or raised bed within 500 metres of where they live, so that they can grow plants and vegetables; and • The city takes steps to ensure that its Green Flag parks retain their status as high-quality spaces. Green Flag parks provide the city with nationally important spaces which can be used to promote the liveability and investment environment of Liverpool to external partners. <p>The loss of Stanley Park would cause Liverpool to lose Liverpool's third highest quality park (behind Calderstones Park and Sefton Park), one of its two Green Flag open spaces, a high value park for the local community, it would significantly increase the number of people outside of a 5-minute walk from an amenity green space catchment and put those outside of a catchment gap even further from any form of amenity green space. It would also contradict the recommendations set out in the Strategic Green and Open Space Review by losing the Green Flag park, putting a large number of local residents outside of the 300m catchment and locating a large number of elderly people away from a communal space/garden.</p>
Statutory Designations	
<p><i>Heritage</i></p>	<p>Stanley Park site is identified as a Grade II* listed Park and Garden and contains 16 Grade II listings including Pavilion at East End of Main Section of Screen Wall, Bridge to North Of East End of Lake, Bridge Over Lake, Bridge at East End of Lake, Conservatory, Bandstand in Front of Conservatory, Bridge to North West of Pavilion to the East of Lake, Pavilion at West End of Main Section of Screen Wall, Shelter at East End of Park, Small Iron Pavilion to North of Bowling Greens, Terrace to North of Screen Wall, Boathouse on the East Side of the Lake in Stanley Park, Bridge to East of Pavilion, Lodge on Anfield Road Lodge to Stanley Park, Screen Wall and Shelter to South East of Lake.</p> <div data-bbox="1435 868 2033 1353">  <p>Historic England Map Search, 2019</p> </div>

<p><i>Flood Risk</i></p>	<p>The site lies in Flood Zone 1.</p>	 <p><i>Flood Map for Planning, 2019</i></p>
<p><i>Ecology</i></p>	<p>As desktop survey identifies that the site is affected by:</p> <ul style="list-style-type: none"> • Priority Habitat Inventory - Deciduous Woodland, • National Forest Inventory — Broadleaved, • Wood pasture and Parkland BAP Priority Habitat, • Priority Species for CS Targeting — Lapwing, • Lapwing Habitat, and • Highly Sensitive - Seabird Oil Sensitivity index 2016. <p>It is not considered that there are any ecology issues that would ultimately prevent the development of the car park site to the east of Stanley Park, subject to suitable mitigation. However, the Historic Park itself has significant ecology and habitat value.</p>	 <p><i>Magic Maps, 2019</i></p>
<p><i>Landscape</i></p>	<p>It is not considered that there are any landscape issues that would ultimately prevent the development of the car park site to the east of Stanley Park, subject to suitable mitigation. However, the Historic Park itself has clear landscape value within its setting.</p>	

Strategic and Regeneration Context

Strategic and Regeneration Policy

The North Liverpool and South Sefton SRF (2010)

The site sits within **Area 6** of the SRF (City Family Suburbs - Anfield and Breckfield) and is identified as one of two major urban parks in the area. A key objective for Area 6 is to “implement an extensive green infrastructure plan that seeks to maximise access to and the use of Walton Hall Park and Stanley Park and creates links with other green infrastructure.”

Additionally, the SRF identifies the need to radically improve green spaces in North Liverpool and South Sefton as a priority to establish the areas as attractive and desirable places to live, work, invest and visit. The SRF sets out to radically improve the green environment in the area through a strategy to enhance and extend existing green resources.

It is clear that the SRF considers Stanley Park to be a key piece of Green Infrastructure in the north of the City.

Anfield Spatial Regeneration Framework (April 2014)

The Anfield Spatial Regeneration Framework has been produced by Liverpool City Council with the purpose of delivering comprehensive and sustainable regeneration of the Anfield area. The SRF offers Planning and Design Guidance for development within Anfield area, these include:

SRF1 Uses: The SRF seeks to deliver regeneration through appropriate development consistent with the policies of the adopted developed plan. Support will be given to uses that raise the economic prosperity of the area and improve accessibility for local residents. All new development must show how it positively addresses one or more of the key SRF principles:

SRF2 Design & Quality: New development should:

- Positively respect the character, identity and context of Anfield;
- Positively contribute to the area’s identity in terms of scale, massing, design and layout;
- Preserve its special historic interest and protect long distance views of historic landmarks and vistas; and
- Positively address Stanley Park.



	<p>SRF9 Heritage Assets: Great weight will be given to the conservation of the Grade II* registered park and gardens of Stanley Park and Anfield Cemetery. The SRF identifies several areas where principles apply.</p> <ul style="list-style-type: none"> a) Stanley Park East: The SRF supports the introduction of new activities to provide vitality, vibrancy and activity into this part of Stanley Park. In determining future planning applications, any development will need to consider the desirability of sustaining and enhancing the significance of the park and securing uses which are consistent with its conservation. b) Stanley Park Car Park: Improvement of the Stanley Park car park, in terms of materials, physical condition, landscaping and integration with the rest of the Park will be encouraged. Opportunities for alternative active temporary uses adding to the vibrancy of the Park will also be supported. 	
	<p>North Liverpool Mayoral Development Zone (MDZ)</p> <p>The North Liverpool MDZ is the largest of the Mayoral Development Zones, North Liverpool covers the area stretching from the expanse of Liverpool's docks in the north to the edge of the City Centre's commercial business core. Not only does it include a swathe of traditional industrial and warehousing sites alongside the river, it also reaches eastwards into Everton Valley to encompass rapidly regenerating residential suburbs and district shopping centres.</p> <p>Anfield, Liverpool FC's stadium sits within the North Liverpool MDZ and the stadium proposals are part of a £360 million regeneration of the Anfield area that will see over 600 terraced homes refurbished or redeveloped, along with improvements to existing shops, a business hub, a new public square and a proposed new hotel.</p>	
<p><i>Socio-Economic Profile</i></p>	<p>In 2019 the site has an IMD ranking of 1,029 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 1,281 out of 32,844 (10% most deprived in the country). The site is in the 10% most deprived neighbourhoods.</p>	


Planning and Development Context

Planning History

Both recent and historic planning consents within the area are minor and relate to individual landownerships with the exception of Liverpool FC's applications to expand into Stanley Park, relocate to Stanley Park and an application to accommodate music concerts at Anfield Football Stadium. Historic/relevant planning applications within the site are set out below.

Application Number	Date	Decision	Details
18F/1632	09-10-2018	Approve with Conditions	To allow stadium to host up to 6 music concerts or other major events in any calendar year.
15F/2790	18-01-2016	Approve with Conditions	To carry out improvement works to Stanley Park, east of Mill Lane, works include resurfacing and car park improvements, new and improved footpath links, repairs and improvements to boundary walls, new railings and gateposts removal, landscaping works, drainage works including attenuation tank, and new street furniture.
14F/1262	26-09-2014	Approve Subject to a Legal Agreement	A hybrid application (directly adjacent to the site at LFC's Anfield ground) for: (i) Full planning permission for expansion of the Main Stand for an additional c. 8,300 seats including: - conference and banqueting facilities - accommodation/facilities for players, officials, media and LFC - club shop - car parking for c.60 vehicles together with access, surface car parking and highway improvement works; public realm and boundary treatment; lighting and associated stadium related development including new outside broadcast area (ii) Outline planning permission for expansion of Anfield Road Stand to provide an additional c.4,800 seats together with car parking; public realm; lighting; landscaping and associated development. The upper level of the extended stand to comprise residential apartments (c.8) or commercial use (c.1,160 sqm) (external appearance/landscaping reserved for subsequent determination).
14F/1757	17-10-2014	Approve with Conditions	To provide additional facilities to existing 'family zone', relocate fence line to boundary with car park and new boundary alterations to Stanley Park and Anfield Road.
07F/2191	19-06-2008	Approve with Conditions	A Hybrid Planning Application for: -

				<p>1: Full planning application for a new 60,000 seater football stadium, incorporating community partnership centre; club museum and shop; club offices; ancillary conference and banqueting facilities; car park for c. 970 vehicles together with access; landscaping works; the provision of a new electricity substation; outside broadcast area and emergency services muster area; tennis courts and multi-use games area; new pathways and upgraded access points in Stanley Park; and ground re-levelling in Stanley Park.</p> <p>2: Outline planning application for a mixed-use development (comprising hotel, commercial offices, retail uses, food and drink uses, community uses, and housing) and open space on the site of the existing football stadium</p>
<i>Development Status</i>	The surrounding area has been subject to regeneration in line with the Anfield Spatial Regeneration Framework (2014). Developments include the extension of Liverpool FC’s Stadium, the refurbishment-led regeneration / selective demolition of 300 terraced properties at Anfield Village / Rockfield Regeneration Area, the 60 bed Venmore Dementia Centre and the New commercial and office premises around Anfield Square, along with a new 100 bed training hotel and new homes.			
<i>Landowner / Developer Aspirations</i>	<p>Liverpool City Council are clear that the historic Stanley Park is a key park in the North of the City.</p> <p>There are a number of logistical, practical, amenity and policy reasons why LCC will not permit the development of two stadia directly next to each other.</p>			
Accessibility				
<i>Access to National Network</i>	The site has reasonable access to the M57 around 5km away via the A580.			
<i>Access to Public Transport Nodes</i>	<p>The site is well connected by bus with eight bus stops bordering the site which provide access to Liverpool, Bootle, Aigburth Vale and Fazakerley Aintree Hospital.</p> <p>Kirkdale train station lies more 1.5km to the north west of Stanley Park and gives the site access to the Merseyrail network, which connects the site to the City Centre and National Rail Network. Sandhills Station is located 2km away and provides access to the Merseyrail Network and National Rail via interchange.</p>			

<i>Pedestrian and Cycle Accessibility</i>	<p>There is pedestrian and cycle access surrounding Anfield Stadium, Arkles Lane and within Stanley Park. National Cycle route (810) exists within the park, on-road signed cycle routes exist on Priory Road and Utting Avenue.</p>	
<i>Highways Capacity and Access</i>	<p>Stanley Park lies adjacent to the LFC’s Anfield Stadium and Everton’s Goodison Park Stadium, and therefore much of the matchday access strategy is established and in-place, including: An extensive Matchday Parking Zone, which effectively protects residents parking and reduces traffic impact in the vicinity; a bus access strategy for before and after games; and traffic management. However, the recent application for concert use at Anfield (18F/1632) generated significant community opposition due to potentially an increase in impacts to their amenity from additional events at the Anfield Stadium — this would be significantly exacerbated with the introduction of a new stadium in such close proximity.</p> <p>The car park area of Stanley Park under consideration is also the main matchday car park for Anfield Stadium and Goodison Park, providing about 1,000 spaces. This car park is predominately used by hospitality ticket holders on LFC matchdays but more general access on Everton matchdays. The impact of the loss of this parking for LFC matchdays would need to be evaluated if it is not possible to re-provide this elsewhere. Given spatial constraints in the Anfield area, it is likely that re-provided spaces would need to be provided in a multi-storey car park rather than the current surface car park. Multi-storey car parks suffer from increased egress times compared to surface car parks, prolonging matchday impacts on residential neighbourhoods.</p>	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• The recent application for concert use at Anfield (18F/1632) generated significant community opposition.• Massing and amenity impacts on Stanley Park and Anfield Cemetery.• Amenity issues with surrounding residential area.• Close proximity of two football Clubs — would not be acceptable to either Club and would generate significant logistical, management and safety issues.	

	<ul style="list-style-type: none">Under paragraph K.6.5 of the Premier League handbook, ground registration can only be consented where the league are satisfied that there would not to any material extent adversely affect Clubs (or Football League clubs) having their registered grounds in the immediate vicinity of the proposed location.	
Fit with Everton’s Requirements		
Connection to North Liverpool	The site is well connected to the Clubs’ Goodison Park and surrounding community. It retains cultural ties with both Goodson Park and provides a suitable location for Everton in terms of its requirement to stay physically, socially and culturally connected to its current home. The site is located approximately to the south of Goodison Park.	
Iconic Location	Due to the site’s proximity to Anfield Football Stadium the site does not provide an iconic location.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The Site is allocated as a Historic Park (HD15 and HD1) in the adopted and emerging Local Plan, which seeks to protect and enhance Historic Parks and prevent built development on part or all of any green space unless the proposed development can be accommodated without material harm. However, planning policy and the NPPF does not preclude development within a Historic Park. Any substantial harm to the park and its heritage assets would require ‘clear and convincing’ justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits.The site is also allocated as greenspace (OE11 and OE12) and open space (GI3) in the adopted and emerging plan respectively. If assessed against adopted or emerging policy, a stadium development would need to address key open space polices as well as the NPPF with regard to the loss of open space (pp’s 96-101).The Liverpool City Council Open Space Assessment Report (2017) identifies Stanley Park as “being of particularly excellent quality” this is recognised by the park having a Green Flag Award status; a national mark for open spaces and is only awarded if they are managed and maintained to a high standard. The loss of Stanley Park would cause Liverpool to lose Liverpool’s third highest quality park (behind Calderstones Park and Sefton Park), one of its two Green Flag open spaces, a high value park for the local community.The North Liverpool and South Sefton SRF considers Stanley Park to be a key piece of Green Infrastructure in the north of the City and the development of a further stadium on the site is not supported by Anfield Spatial Regeneration Framework (April 2014).

		<ul style="list-style-type: none"> Part of the site adjacent to Anfield (car parking) has the precedent of being granted planning consent for a 60,000-seater stadium. However, this envisaged the relocation of LFC, not two stadia side-by-side. Development would generate significant amenity issues and the loss of essential parking for LFC. In addition, the previous consent also sought to mitigate the loss of parkland associated with the new stadium by providing open space on the footprint of the existing stadium (which could no longer be provided). The area surrounding the site is largely residential, which could create additional amenity issues for surrounding residents (over and above those created by Anfield on match/event days). It is also considered that the key stakeholders (and fans) would require distance between LCC and Everton's grounds. Two stadia within close proximity could generate additional safety and stadium management issues. K.6.5 of the Premier League Handbook also requires Premier League Board approval that the relocation of two stadia, side-by-side, would not have an adverse effect on either club.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> Stanley Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes (subject to transport and parking strategy)	<ul style="list-style-type: none"> The site lies adjacent to LFC's Anfield Stadium and as such has an established matchday access strategy providing links to the City Centre; access to the rail stations of Sandhills and Kirkdale; a wide area Football Match Parking Zone; and matchday traffic management. However, the previous application did not envisage two football clubs being located side-by-side and a stadium adjacent to Anfield (on the Stanley Park car park) would result in the loss of around 1,000 spaces LFC currently use on matchdays. A mitigation and replacement strategy would need to be considered.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There may be visual and environmental impact on the Historic Park – however, it was demonstrated in the LFC application that these impacts could be mitigated.

Summary and Conclusions

Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?

Summary Assessment


In summary, the key considerations when assessing the site include:

- Availability — Stanley Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.
- Planning policy constraints — the site is allocated as a Historic Park in the adopted and emerging Local Plan. Whilst planning policy, including the NPPF not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and any loss or adverse impact on this use would need to be tested against the relevant adopted / emerging policies and the NPPF given that is considered to be a park of “*particularly excellent quality*” in the Liverpool City Council Open Space Assessment Report (2017).
- Adjacency to Anfield — whilst the site has previous has consent for a stadium, this did not consider the development of two stadia, side by side. This could generate transport (loss of c1,000 LFC parking spaces), amenity and operational issues (which would require Premier League Board approval under rule K.6.5 of the Premier League Handbook to consider any potential adverse impacts on either club)

Conclusion & Comparison with BMD


The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available.**

Site 6: Walton Hall Park

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
Site Outline	
Site Details	
Site Area	The site is approximately 56 hectares.
Existing Site Uses	The site's current uses include Open Space, Woodland, Sports Pitches and a Gym/Sports Club House used by Liverpool County FA.
Surrounding Uses	<ul style="list-style-type: none"> To the north of the site lies semi-detached and terraced residential units, Sainsbury's, Walton Children's Centre and Northcote Primary School. To the east of the site lies a public footpath, industrial units, terraced residential units and a vacant plot of land.

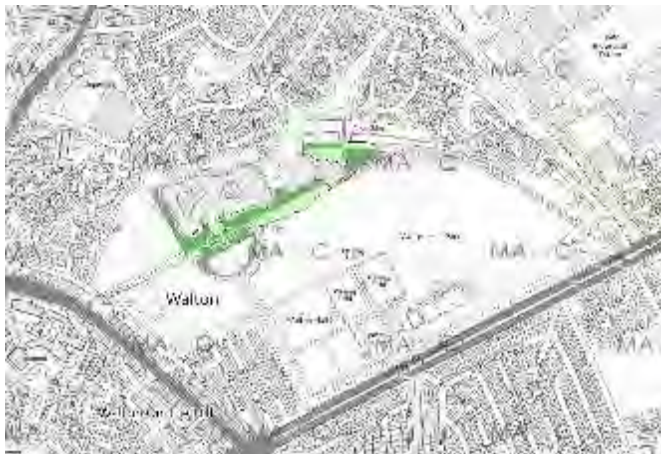
	<ul style="list-style-type: none"> • To the south of the site lies terraced residential units, open space, Florence Milly Community Primary School, Anfield Cemetery, ASDA and B&M Home Store. • To the west of the site lies Alsop High School, Daisy Chain Nursery, Dandelion Days Nursery and terraced residential units.
<i>Site Ownership</i>	<p>The sites freeholder is Liverpool City Council. Three leasehold titles also exist over the land which includes:</p> <ul style="list-style-type: none"> • Alt Valley Community Trust Limited, • SP Manweb PLC, and • An unknown leaseholder (MS414190).
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy OE8 - New Countryside Area; • Policies OE11 and OE12 - Green Space; and • Policy C8 - Existing Sports/Recreation Centre





<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policies GI 1 and policy GI 3 - Open Space. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ol style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Community Uses</u></p> <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Natural Environment</u></p> <p>Paragraph 174 seeks to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</p>	

	<p>Paragraph 175 states that when determining planning applications, local planning authorities should apply the following principles</p> <ul style="list-style-type: none"> • Biodiversity (175a) - if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. <p><u>Residential Amenity</u></p> <p>Paragraph 180 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development</p> <p>Sport England</p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • and which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions (which includes the re-provision of facilities). <p>Liverpool City Council Open Space Assessment Report and Standards (2017)</p> <p>Liverpool City Council Open Space Assessment Report and Standards (2017) recognises Walton Hall Park as a very high-quality park which is “<i>aesthetically pleasing and well maintained with plenty of appeal to a variety of users for different reasons; play, exercise, wildlife and relaxation.</i>” Walton Hall Park is considered as having high value due to the opportunities it presents for local communities and people to socialise.</p> <p>The report identifies locations outside of a 5-minute walk from an amenity green space over 0.2 ha, the inner north of Liverpool is recognised as having a dense population and containing several catchment gaps which are served by Walton Hall Park due to its size and quality.</p> <p>Strategic Green and Open Spaces Review Board (2016)</p> <p>The Strategic Green and Open Spaces Review confirms that where the integrity of Walton Hall Park is threatened by development, public opposition campaigns were held which saw a broad range of local people of all ages come together to protect locally important spaces from housing or larger developments. The Chair of the Strategic Green and Open Spaces Review Board supports the decision to ensure that Walton Hall Park will be retained for future generations.</p> <p>The high quality and high value of Walton Hall Park, alongside the benefits the site brings in helping areas meet the amenity green space requirements is established in LCC’s evidence base, which is transposed into the merging Local Plan. It is established that Walton Hall Park is a crucial area of green space serving the north of the City and its retention is clearly supported by LCC and the Mayor of Liverpool.</p>
--	---

Statutory Designations		
<i>Heritage</i>	<p>No listed buildings lie on the site. However, 275m to the west of the site lies a cluster of seven Grade II listed buildings/monuments and 400m to the south of the site lies Anfield Cemetery a Grade II* listed Park and Garden.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The site lies in Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>

<i>Ecology</i>	<p>A desktop assessment identifies that the site is affected by:</p> <ul style="list-style-type: none">• Priority Habitat Inventory - Deciduous Woodland,• National Forest Inventory — Broadleaved,• Priority Habitat Inventory - No main habitat but additional habitat exists (England),• Priority Species for CS Targeting — Lapwing,• Lapwing habitat, and Extremely High - Seabird Oil Sensitivity index 2016. <p>It is not considered that there are any ecology issues that would ultimately prevent the development of parts of Walton Hall park (particularly those which are developed), subject to suitable mitigation. However, the wide park itself provides important ecology and habitat value in the inner city.</p>	 <p><i>Magic Maps, 2019</i></p>
<i>Landscape</i>	It is not considered that there are any landscape issues that would ultimately prevent the development of parts of Walton Hall park (particularly those which are developed), subject to suitable mitigation.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	<p>The North Liverpool and South Sefton SRF (2010)</p> <p>The SRF identifies the need to radically improve green spaces in North Liverpool and South Sefton as a priority to establish the areas as attractive and desirable places to live, work, invest and visit. The SRF sets out to radically improve the green environment in the area through a strategy to enhance and extend existing green resources.</p> <p>It is clear that the SRF considers Walton Hall Park to be a key piece of Green Infrastructure in the north of the City.</p>	
	<p>North Liverpool Mayoral Development Zone</p> <p>The North Liverpool MDZ is the largest of the Mayoral Development Zones, North Liverpool covers the area stretching from the expanse of Liverpool’s docks in the north to the edge of the City Centre’s commercial business core. Not only does it include a swathe of traditional industrial and warehousing sites alongside the river, it also reaches eastwards into Everton Valley to encompass rapidly regenerating residential suburbs and district shopping centres.</p>	

<i>Socio-Economic Profile</i>	<p>The site lies across two LSOAs, in 2019 the first LSOA has an IMD ranking of 2,924 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 3,823 out of 32,844 (20% most deprived in the country).</p> <p>In 2019 the second LSOA has an IMD ranking of 1,632 out of 32,844 (20% most deprived in the country) and an Employment Deprivation Domain of 1,657 out of 32,844 (20% most deprived in the country).</p> <p>A large section of the site is located within the 10% most deprived LSOAs in the country, therefore the stadium development has the potential to have a significant catalytic impact on the regeneration of the area.</p>	 <p><i>Indices of Multiple Deprivation Explorer, 2019</i></p>		
Planning and Development Context				
<i>Planning History</i>	Both recent and historic planning consents within the area are minor and relate to works and development associated with the Park. Historic/relevant planning applications within the site are set out below.			
	Application Number	Date	Decision	Details
	19F/1549	19-09-2019	Approve with Conditions	To extend and convert existing terraced stand to create a 500 all seated stand. 2 no. new turnstiles, new dugouts and TV gantry, perimeter fencing raised in height to one elevation and opaque material applied to all perimeter fencing, lay out new areas of hardstanding for Everton’s ladies’ team.
	11F/2488	27-02-2012	Approve with Conditions	To erect new single storey clubhouse and outdoor artificial floodlit pitches.
	08DC/2842	06-01-2009	Withdrawn	To create new vehicular access to Walton Hall Park Allotments and layout car parking bays.

<i>Surrounding Development Context</i>	The area surrounding the site is not subject to significant development activity – with the most significant development being Mulbury Homes proposed 195 dwellings proposed for Riverside Housing and One Vision Housing.	
<i>Landowner / Developer Aspirations</i>	Liverpool City Council has indicated that it is critical to safeguard LCC’s city parks from development. Furthermore, investment has recently been made in Walton Hall Park, including investment in the Football Centre and playing pitches. £350,000 has been invested in a joint venture between Liverpool City Council and the FA to bring new 3G pitches which is home of Liverpool County FA who operate at the sports facility. Liverpool County FA have worked in partnership with Everton ladies at Walton Hall Park which will see a new 500-seater stand and ground, including standing areas upgraded and VIP and press sections, which will allow the ground to become the home ground of Everton ladies.	
Accessibility		
<i>Access to National Network</i>	The site has good access to the strategic highways network as the site borders Queens Drive (A5058) and Walton Hall Avenue (A580), giving the site access to the M57 via the A580.	
<i>Access to Public Transport Nodes</i>	<p>The site connected to the public transport network by bus stops located along the site boundary on Walton Hall Avenue providing regular servicing to Liverpool, Kirkby, Knowsley Industrial Park, Aigburth Vale, Speke and Bootle.</p> <p>About 1.5km from the site are the Walton and Rice Lane rail stations which give access to the Merseyrail network, which connects the site to the City Centre and the National Rail network. The site is therefore not well connected to the heavy rail network.</p>	
<i>Pedestrian and Cycle Accessibility</i>	As discussed further below, although the site lies within an established urban area, pedestrian access on matchday may be significantly compromised by Walton Hall Avenue and Queens Drive due to severance resulting from traffic volumes and the nature of the roads themselves.	

<i>Highways Capacity and Access</i>	<p>For a major stadium event location, Walton Hall Park is very constrained from a highways access perspective. To the north is dense residential, principally made up of cul-de-sac developments; to the west is residential fronting the A5058 Queens Drive; to the east is Blackthorne Road which is effectively a cul-de-sac access to a residential area; and to the south is the A580 Walton Hall Avenue / East Lancashire Road.</p> <p>Both the A5058 and A580 are proposed to be classified as part of the Major Road Network by the Department for Transport, which tend to be the busiest and most economically important local authority 'A' roads. Therefore, it may be impractical to close these roads before and after an event, which raises questions on highway safety of people walking to and from the stadium on roads which already have road safety issues.</p> <p>Consequently, extensive traffic management measures would likely be required along these roads to manage pedestrian and vehicle movements which will likely result in a non-optimum environment for people walking and significant delay and congestion on the road network over a wide area.</p> <p>The residential areas surrounding Walton Hall Park are only partially covered by the existing Football Match Parking Zone, and consequently the zone would need to be significantly increased in size to help protect the amenity of local residents.</p>
Other Development Issues	
<i>Other Potential Constraints</i>	<ul style="list-style-type: none"> • Loss of parkland and open space that is used by the local community. • Significant public opposition was generated when Everton considered this as a potential site for a new stadium. This included significant objection from the local community who view Walton Hall Park as an important City Park and critical area of open space. • Amenity issues with surrounding residential communities. • Loss of sports pitches and grassroots sports facilities that have been (and are currently) subject to significant investment.
Fit with Everton's Requirements	
<i>Connection to North Liverpool</i>	<p>The site is well connected to North Liverpool and sits within the North Liverpool and South Sefton regeneration area (in the County ward). It retains cultural ties with both Goodison Park and L4 and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.</p> <p>The site is located approximately 800m to the north of Goodison Park.</p>
<i>Iconic Location</i>	<p>The site does not provide an iconic location for Everton and is surrounded by residential communities.</p>

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is allocated as Green Space and for Recreational Uses (Policy OE8, OE11, OE12 and C8) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy GI1 and GI3), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities). In terms of its use and quality, the North Liverpool and South Sefton SRF focuses on radically improving green space in this area and The Liverpool City Council Open Space Assessment Report and Standards (2017) recognised Walton Hall Park as a very high-quality park which is <i>"aesthetically pleasing and well maintained with plenty of appeal to a variety of users for different reasons: play, exercise, wildlife and relaxation."</i> Important context in terms of its use and value to the community was demonstrated during previous proposals at Walton Hall Park have been met with significant opposition in the Local Community. The Strategic Green and Open Spaces Review Board (2016) identified that where development threatened the integrity of Walton Hall Park, campaigns were witnessed with a groundswell of public engagement which saw a broad range of local people of all ages come together to protect locally important spaces from housing or larger developments. The Chair of the Strategic Green and Open Spaces Review Board supported the decision to ensure that Walton Hall Park will be retained for future generations. The site contains deciduous woodland, ponds and open space which provide important wildlife habitats and would be require to address impact on habitats in planning policy and in national policy (NPPF pp 174-175). The site is largely bound by residential uses, which could create amenity impacts with the surrounding community which would need to be addressed.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> Walton Hall Park is in the ownership of LCC and is a key open space and community asset of high value that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. The site is valued by the community and delivers significant public benefits, with recent investments being made in its sports provision (including £350,000 invested in new 3G pitches which are the home of Liverpool's County FA and investment by the FA and Everton ladies to bring new facilities which will see a new 500-seater stand, standing areas upgraded and VIP and press sections).

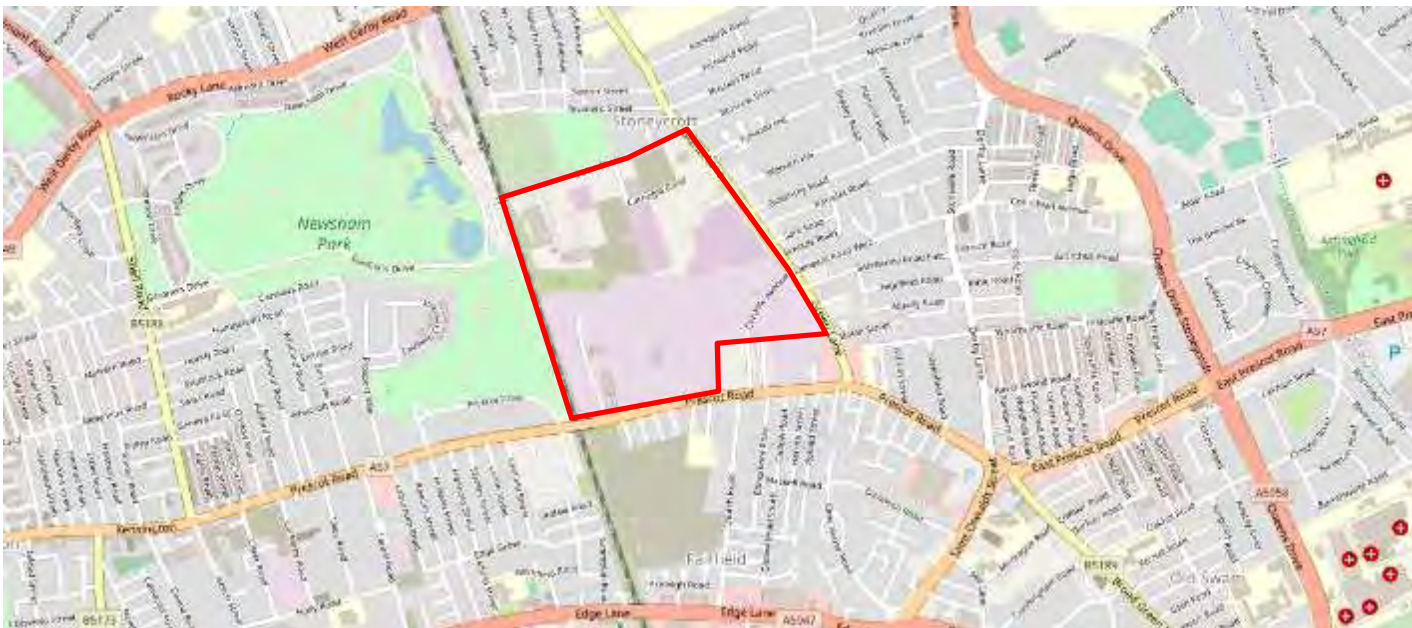
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes (subject to mitigation and a comprehensive Transport Strategy)	<ul style="list-style-type: none"> Walton Hall Park is constrained from a highways access perspective. To the north is dense residential, principally made up of cul-de-sac developments; to the west is residential fronting the A5058 Queens Drive; to the east is Blackthorne Road which is effectively a cul-de-sac access to a residential area; and to the south is the A580 Walton Hall Avenue / East Lancashire Road. The closure of these strategic roads would be unlikely and generate major highway safety issues. The site is not in a highly sustainable location nor well connected to the heavy rail network, with Walton and Rice Lane rail stations approximately 1.5km from the site. Development of the site would require a comprehensive transport strategy to understand how these issues could be resolved.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any environmental or visual impacts that would prevent the development of part of the site, subject to suitable mitigation.
<i>Summary and Conclusions</i> <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<u>Summary Assessment</u> In summary, the key considerations when assessing the site include: <ul style="list-style-type: none"> Availability — Walton Hall Park is in the ownership of LCC and is a key open space and community asset, serving a large catchment in the north of the City, that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — there is evidence to suggest that Walton Hall Park is a high quality recreational space that well used and is afforded high value by its community, including: <ul style="list-style-type: none"> The Liverpool City Council Open Space Assessment Report and Standards (2017) recognises Walton Hall Park as a very high-quality park which is “<i>aesthetically pleasing and well maintained with plenty of appeal to a variety of users for different reasons; play, exercise, wildlife and relaxation.</i>”. 	

- Recent investments being made in its sports provision (including £350,000 invested in new 3G pitches which are the home of Liverpool's County FA; and investment by the FA and Everton ladies to bring new facilities which will see a new 500-seater stand, standing areas upgraded and VIP and press sections). As such the site is an important location in the City Region for FA grass roots and women's football.
- The Strategic Green and Open Spaces Review Board (2016) identified that where development threatened the integrity of Walton Hall Park campaigns were witnessed with a groundswell of public engagement which saw a broad range of local people of all ages come together to protect locally important spaces from housing or larger developments. The Chair of the Strategic Green and Open Spaces Review Board supported the decision to ensure that Walton Hall Park will be retained for future generations.
- Highways and transport - the site is constrained from a highways access perspective. To the north is dense residential, principally made up of cul-de-sac developments; to the west is residential fronting the A5058 Queens Drive; to the east is Blackthorne Road which is effectively a cul-de-sac access to a residential area; and to the south is the A580 Walton Hall Avenue / East Lancashire Road. Development of the site would require a comprehensive transport strategy to understand how these issues could be resolved.


Conclusion & Comparison with BMD


The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available.**


Site 7: Prescott Road



ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 33.1 hectares.
<i>Existing Site Uses</i>	The site contains a mix of fragmented industrial uses, including logistics, storage, a national grid substation and a Household Waste Recycling Centre. Additionally, the site includes St Anne's Church.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north of the site lies open space, football playing fields, allotments, vacant land, terraced residential units, Church View Care Home and Lister Drive Infant School and Junior School. To the east of the site lies a large number of terraced and semidetached residential units and two small industrial units.


	<ul style="list-style-type: none"> • To the south lies terraced residential units, a vacant plot of land, a new residential development by Bellway Homes (named “Newsham Gardens”), ASDA, Tesco and St Cuthberts Catholic Primary School. • To the west, the site borders a railway line and beyond the railway line lies Newsham Park and terraced and semi-detached residential units.
<i>Site Ownership</i>	<p>The site has a complex and fragmented ownership, freeholders of the site include:</p> <ul style="list-style-type: none"> • AJ Bell Trustees Limited; • Arriva Merseyside Limited; • CHIU WAH Limited; • Dynamic Assistance Limited; • Fenwell Estates Limited; • Generic Traffic Limited; • Good UK Properties Limited; • Liverpool City Council; • National Grid Electricity Transmission PLC; • New Foods of Liverpool LTD; • Recovery of North West Limited; • Saint-Gobain Buildings Distribution Limited; • SP Manweb PLC; and • A number of unknown freeholds. <p>Several leasehold titles exist over the site which include</p> <ul style="list-style-type: none"> • JCUK Property Limited; • Lister Steps Limited; • M & A beer Holdings Limited; • Merseyside Waste Disposal Authority;

	<ul style="list-style-type: none"> • Orsted Ess Mersey Limited; • SAKA Limited; • Selmar Properties Limited; • Shaw-Energi Ltd; • SP Manweb PLC; • Tarmac Trading Limited; • The First Secretary of State; and • Veolia Es Merseyside & Halton Limited; and • A number of unknown leaseholds.
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E1 - ‘Primarily Industrial Area’ and a ‘Site for Industrial / Business Development’ with allocations E61 and E107. 


<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy EC2 - 'Primarily Industrial Area' 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Employment (employment allocation)</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that In determining applications, local planning authorities should take account of:</p> <ol style="list-style-type: none"> the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of</p> <ol style="list-style-type: none"> grade II listed buildings, or grade II registered parks or gardens, should be exceptional; assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional 	

	<p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p>Liverpool's Employment Land Study (2017)</p> <p>Liverpool's Employment Land Study (2017) identifies that the site is located within the north of the Edge Lane Corridor an existing employment area considered to be functioning reasonably well, with vacancy levels at a healthy level to provide for market churn. The site contains 3.46 ha of potentially available land which equates to 6% of Liverpool's identified supply.</p> <p>The Employment Land Study (2017) states that <i>"The current B Class uses in the existing employment sites in this area (includes the site) should be retained and protected to ensure these sites are not lost to alternative uses."</i> and recommends that <i>"the existing industrial areas within the Edge Lane Corridor North should be protected and the loss of existing Class B employment space should be resisted."</i></p>	
Statutory Designations		
Heritage	<p>The site contains two Grade II listed buildings/monuments, named Andrew Carnegie Library and the Wall and Gatepiers to West Derby Library. The site borders Newsham Park, a Grade II listed Park and Garden. Various listed buildings lie in close proximity to the site including the Grade II Church of St Anne which borders the site.</p>	 <p>Historic England Map Search, 2019</p>

<p><i>Flood Risk</i></p>	<p>The site lies in Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>
<p><i>Ecology</i></p>	<p>The site is affected by species and habitats including Broadleaved/Deciduous Woodland and Lapwing Habitat. It is not considered that there are any ecology issues that would ultimately prevent the development of the site.</p>	 <p>Magic Maps, 2019</p>
<p><i>Landscape</i></p>	<p>It is not considered that there are any landscape designations that would prevent the development of the site.</p>	

Strategic and Regeneration Context				
Strategic and Regeneration Policy	Mayoral Development Zones (MDZ) The site lies within the Central Liverpool MDZ, which straddles either side of Edge Lane, the city’s principal road corridor that links the City Centre with the M62 and the motorway network. The Stanley Industrial Estate to the north of the zone contains the Liverpool Meat and Fish Market, as well as both Scottish Power and United Utilities installations, and an Arriva bus depot. In 2009, Network Rail built a £15million maintenance depot at Picton Road; it is now used by Alstom to maintain Virgin’s Pendolino trains.			
	Socio-Economic Profile In 2019 the site has an IMD ranking of 901 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 770 out of 32,844 (10% most deprived in the country). The site lies within the 10% most deprived areas of the country therefore, the development of a stadium has the potential to have a catalytic impact on the regeneration of the area.			
Planning and Development Context				
Planning History	Both recent and historic planning consents within the area are minor and relate to individual landownerships apart from the development of a household waste recycling centre in application 14F/2980. Historic/relevant planning applications within the site are set out below.			
	Application Number	Date	Decision	Details
	19F/0626	02-05-2019	Approve with Conditions	To erect up to 20 containerised battery energy storage units including ancillary equipment over 2 phases on a 0.5 ha site.
	18F/3269	19-02-2019	Approve with Conditions	To erect 2 a storey modular house, show unit with attached care/exhibition space and cafe use.

	16F/2680	15-12-2016	Approve with Conditions	To erect 5 battery energy storage units including electrical ancillary equipment on a circa. 0.3 ha site.
	14F/2980	24-12-2014	Approve with Conditions	To develop land as household waste recycling centre with associated works including covered bulk recycling area, waste enclosure, incorporating re-use shop, site office, car parking, recycling areas, fencing and associated works. (Alternative application to 14F/0203 with revised access route for operational vehicles from Prescott Road via Amey depot).
	09F/0113	06-03-2009	Approve with Conditions	To retain portable buildings for office and storage, diesel tank, material bays and layout parking area, smoking area, external lighting and hardstanding in connection with provision of on-site repair and maintenance.
	07F/1550	13-09-2007	Approve with Conditions	To erect a single-storey block comprising 13 no. warehouse units (within use class B8); a single-storey block comprising 5 no. warehouse units (within use class B8); a two-storey block for warehouse/office use (within use classes B8/B1); a part single/part two-storey block for warehouse/office use (within use class B8/B1); together with associated parking, landscaping, and ancillary works
<i>Surrounding Development Context</i>	The area has been subject into two medium sized development proposals with the introduction of Newsham Gardens (residential development) to the south west of the site and the household waste recycling centre on site.			
<i>Landowner / Developer Aspirations</i>	The site contains multiple and complex landownerships. Recent applications and development history demonstrates that the site is in use and operational.			
Accessibility				
<i>Access to National Network</i>	<p>The site is reasonably connected to the strategic road network. It borders Prescott Road (A57) to the south, a road network which provides two lanes and connects the site to J4 of the M62. The site therefore has good proximity to the strategic and primary road network, however local to the site vehicle access would be significantly constrained by the district centres of Old Swan and Fairfield where congestion is prevalent on a day-to-day basis.</p> <p>Edge Lane to the south of the site gives the main east / west highway connection between the city centre and the M62 and is therefore of significant importance to the functionality of the City. Consequently, the road experiences high traffic volumes and is sensitive to delay and congestion.</p>			
<i>Access to Public Transport Nodes</i>	Prescot Road is one of the City’s primary bus corridors with frequent services between the city centre and Huyton / St Helens. Weekday services are approximately one bus every two minutes in each direction, which would therefore give the site good bus based public transport connectivity to a large catchment of Liverpool.			

	<p>In terms of rail, the closest station is Wavertree Technology Park which is on the Chat Moss rail line – approximately 1km from the site. This station gives access to a good frequency of services between Liverpool city centre, Wigan, Warrington and Crewe which again would aid the public transport connectivity of the site.</p>	
<p><i>Pedestrian and Cycle Accessibility</i></p>	<p>The site is within an established urban area where all roads operate to 30 mph, have street lights and footways. Junctions incorporate pedestrian facilities, and there are several recognised cycle routes in the vicinity – such as through Newsham Park and along Prescott Road. Pedestrian and cycle facilities in the locality are therefore good.</p>	 <p>Mersey Travel, Liverpool Cycle Map, 2013</p>
<p><i>Highways Capacity and Access</i></p>	<p>This potential development site lies beyond the extents of the existing Controlled Parking Zones which exist to help protect residential amenity during events. Consequently, a significant extension to the Controlled Parking Zones is very likely to be required around this site to manage car parking during football matches and other events.</p> <p>As mentioned previously, Prescott Road is a very important bus corridor with around one bus in each direction every two minutes. It is very likely that these services will need to be maintained during events as they serve such a large population catchment. If no suitable event diversion route can be found, the services may need to continue run along Prescott Road which would require significant traffic management measures to be in-place.</p> <p>Edge Lane will be the primary highway access route into the area from many directions, however it already experiences high traffic flows and congestion. It is likely that a stadium in this location will exacerbate this issue.</p> <p>Edge Lane also lies between the nearest rail station and the possible stadium site, and therefore the movement of pedestrians across this road will need to be carefully managed.</p>	

Other Development Issues		
<i>Other Potential Constraints</i>		<ul style="list-style-type: none"> • Potential contamination issues as the site is used as a power station and has various industrial uses on site. • Various amenity issues associated with the stadium on matchdays on nearby residential dwellings and Newsham Park. • Existing household waste recycling centre on the site would have to be relocated. • National Grid substation would need to be relocated.
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>		<p>The site is reasonably well connected to Goodison Park and the Club's surrounding community. It retains some cultural ties with both Goodson Park and provides a suitable location for Everton to some extent in terms of its requirement to stay physically, socially and culturally connected to its current home.</p> <p>The site is located approximately 3km to the south-east of Goodison Park.</p>
<i>Iconic Location</i>		The site currently sits within an industrial context, surrounded by a historic park and residential units therefore this does not provide an iconic location for stadium development.
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> ▪ The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> ▪ The site is allocated for employment uses in the adopted UDP and emerging Local Plan. If assessed against adopted policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policy EC2) as well as the NPPF with regard to employment (pp's 80-82). ▪ It is noted that the Employment Land Study (2017) also recommends that <i>"the existing industrial areas within the Edge Lane Corridor North should be protected and the loss of existing Class B employment space should be resisted."</i> ▪ The site accommodates a range of industrial and utilities uses which would require relocation or re-provision (including a Household Recycling Centre, which was developed in 2015 and National Grid utilities). ▪ There the potential for contamination subject to the impact and legacy of longstanding industrial uses on the site. ▪ The site is bound by residential uses, which could create amenity impacts with the surrounding community.


<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> ▪ The site is in active use for a range of industrial uses and is in multiple landownerships, which would require significant land assembly, including CPO to be considered available. As such, it is not considered that the site could be made available to meet the immediate needs of the Club to relocate to a new stadium. ▪ It would also not be reasonable or realistic to expect the Club to consider a lengthy land assembly process. There would be significant development costs associated with CPO and land assembly (with more than 30 individual freedhold and leasehold titles) — as well as a critical impact on programme and therefore year-on-year revenue for Everton. There is therefore no reasonable prospect of acquisition within a reasonable or realistic time period to meet the immediate needs of the Club.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	No	<ul style="list-style-type: none"> ▪ The costs of acquisition, CPO and relocation could generate significant expense to the Club. The likely long-term timeframe for any CPO / land assembly would also have a significant year on year revenue impact for the Club if it were to remain at Goodison Park in the medium to long term.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> ▪ Edge Lane will be the primary highway access route into the area from many directions, however it already experiences high traffic flows and congestion. It is likely that a stadium in this location will exacerbate this issue. Access to sustainable modes of transport, such as Edge Lane station would need to be carefully managed. ▪ However, subject to mitigation, it is not considered that this would prevent the development of the site.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> ▪ There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation (such as the impact on Newsham Park).
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	Summary Assessment <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Availability — the site is not available nor deliverable due to its complex land ownership situation. The site is in active use for a range of industrial uses and is in multiple landownerships (with more than 30 individual freehold and leasehold titles), which would require significant land assembly and CPO to be considered available. There is therefore no reasonable prospect of acquisition within a reasonable or realistic time period to meet the needs of the Club. • Planning policy constraints — the site is allocated and is operational for employment uses in the adopted and emerging Local Plan. Whilst planning policy and guidance does not preclude development on employment sites, any development would require justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. It is noted that Liverpool's Employment Land Study (2017) identifies that the site is located within the north of the Edge Lane Corridor an existing employment area considered to be functioning well. The Study recommends that "the existing industrial areas within the Edge Lane Corridor North should be protected and the loss of existing Class B employment space should be resisted." 	



- Highways and transport - the site is constrained from a highways access and pedestrian access perspective. Development of the site would require a comprehensive transport strategy to understand how these issues could be resolved.
- Residential amenity — the site has the potential to generate significant impacts on surrounding residential areas. A comprehensive mitigation strategy would be required to understand if these issue could be addressed.

Conclusion & Comparison with BMD


The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use. However, for the reasons stated in this proforma, **the key consideration is that the site is not available (owing to the complex land ownership situation) and would incur unacceptable costs on the Club in terms of land acquisition, the cost of a lengthily CPO process and the year-on-year and ongoing cost of a delayed stadium move that would be borne by the Club.**

Site 8: Everton Park


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<p><i>Site Outline</i></p>	
<p>Site Details</p>	
<p><i>Site Area</i></p>	<p>The site is approximately c. 22 ha.</p>
<p><i>Existing Site Uses</i></p>	<p>The site comprises of open public space, Everton Park Playground, The Peoples Church, The Former Everton Lock Up, Everton Park & Garden Liverpool, Car Parking and wooded areas.</p>
<p><i>Surrounding Uses</i></p>	<ul style="list-style-type: none"> To the north of the site lies The Beacon Church of England Primary School, St. George's Everton Church, Our Lady Immaculate Catholic Primary School, Everton Library, terraced housing and a three-storey apartment block. To the east of the site lies North Liverpool Academy and semi-detached housing.

	<ul style="list-style-type: none">To the south of the site lies further open space, Liverpool Provincial Club, Glory Worship Church, industrial units and semi-detached and terraced housing.To the west of the site lies open space, semi-detached bungalows, Everton Skate Park and Everton Pump Track.	
Site Ownership	The site freeholder is Liverpool City Council, SP Manweb PLC (0.1 ha) and an unknown land owner (likely to be within the People’s Church ownership).	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">Policy OE5 - Regionally Important Geological/Geomorphological Sites (RIGS),Policy OE11 & Policy OE12 - Green Space, andPolicy H2 - Housing Action Trust.	
Emerging Policy	<p>The May 2018 Submission Draft Local Plan Policies Map proposes to allocate the site as:</p> <ul style="list-style-type: none">Policies GI 1 & GI 3 - Open Space;Policies GI 1 & GI 5 - A Local Wildlife Site (LWS); andPolicies GI 1 & GI 5 - Regionally Important Geological/Geomorphological Sites.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Community</u></p> <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Natural Environment</u></p> <p>Paragraph 174 seeks to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</p> <p>Paragraph 175 states that when determining planning applications, local planning authorities should apply the following principles</p> <p>Biodiversity (175a) - if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p> <p>Liverpool City Council’s Open Space Assessment Report and Standards (2017)</p> <p>Everton Park within Liverpool City Council’s Open Space Assessment Report and Standards (2017) was identified as a high-quality park and garden with a high value attached to it from the community. Furthermore, Everton Park is a park and garden which helps to serve a gap in the provision of amenity greenspace within the surrounding area of the park. The Park has also benefited from a new ‘Action Sports Hub’ catering for BMX riders which was established in autumn 2015, this sits adjacent to the site to the west.</p> <p>The high quality and high value of Everton Park, alongside the benefits the site brings in helping areas meet the amenity green space requirements is established in LCC’s evidence base, which is transposed into the merging Local Plan. It is established that Everton Park is a crucial area of green space serving the north of the City and its retention is clearly supported by LCC.</p>
---	---

Statutory Designations		
<i>Heritage</i>	<p>The grade II listed Former Lock Up is located on the site.</p> <p>In the surrounding area of the site sits the Church of St George (Grade I listed), Everton Library and Mere Bank Public House (Grade II listed buildings) to the north. To the south, several Grade II listed buildings are located, including the and 105, 107, 115, 117 and 119 Shaw Street.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The site is located within Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	<p>Whilst the site is not subject to significant ecological designations, the wider park itself provides important ecology and habitat value in the inner city.</p>	
<i>Landscape</i>	<p>The topography of the site acts as a constraint to development but the site is not affected by any statutory landscape designations.</p>	


Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	<p>North Liverpool Mayoral Development Zone (MDZ)</p> <p>The North Liverpool MDZ is the largest of the Mayoral Development Zones, North Liverpool covers the area stretching from the expanse of Liverpool's docks in the north to the edge of the City Centre's commercial business core. Not only does it include a swathe of traditional industrial and warehousing sites alongside the river, it also reaches eastwards into Everton Valley to encompass rapidly regenerating residential suburbs and district shopping centres, including Everton Park.</p> <p>Project Jennifer has delivered a game changing vision to Everton Valley to create a desirable suburb in which to live — with a new food supermarket and additional shops, new homes, new school, and a new indoor market amongst several facilities.</p>
<i>Socio-Economic Profile</i>	<p>In 2019 the site has an IMD ranking of 521 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 865 out of 32,844 (10% most deprived in the country). The site is located within the 10% most deprived in the country therefore, the stadium development has the potential to have a significant catalytic impact on the regeneration of the area.</p>
Planning and Development Context	
<i>Planning History</i>	<p>No recent relevant planning consents exist on the site.</p>
<i>Surrounding Development Context</i>	<p>The area surrounding the site is subject to development activity associated with Project Jennifer which includes a new district centre with Sainsburys superstore, petrol station, B&M plus other non-food retail units, McDonalds, open market, community facilities and leisure use, light industrial units. Other notable developments include 70 apartments at Salisbury Place and the six-storey student block named "The Quadrant".</p>
Accessibility	
<i>Access to National Network</i>	<p>The A5050 (Heyworth Street) bounds the site to the east which links the site to the City Centre and the A59.</p>
<i>Access to Public Transport Nodes</i>	<p>Eight bus stops are located on the site's boundary, providing with regular services to Liverpool and Fazakerley.</p> <p>Liverpool Lime Street is located 1.2 km to the south east of the site. Liverpool Lime Street Station provides the site access to the National Rail Network and Merseyrail.</p>



<i>Pedestrian and Cycle Accessibility</i>	<p>The site contains an off-road cycle track with National Cycle Network route number 810 and a footpath. The surrounding roads provide on-road signed cycle routes and on-road cycle lanes and cycle crossing points.</p>	 <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	<p>The site has multiple potential access points and opportunities to feed into the strategic highways network. However, stadium development would require careful mitigation and potential road closures on key strategic highways around the park.</p>	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Steep and challenging topography,• Impact on residential amenity, and• Loss of community amenity.	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	<p>The site is well connected to the Club’s Goodison Park and surrounding community. It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirement to stay physically, socially and culturally connected to its current home as the Former Lock Up, the listed building present on Everton’s crest sits to the south of the site.</p> <p>The site is approximately 2km from Goodison Park.</p>	
<i>Iconic Location</i>	<p>Within proximity to Goodison Park but not in a location that is iconic or unique.</p>	

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is allocated as Green Space and for Recreational Uses (Policy OE11, OE12 and C8) in the adopted UDP and as Green Infrastructure and Open Space (Policy G11 and G13) and a Local Wildlife Site (Policy G15) in the emerging Local Plan, which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities). In terms of its use and quality, Liverpool City Council's Open Space Assessment Report and Standards (2017) identifies Everton Park as a 'high-quality' park and garden with a 'high value' attached to it from the community. The site is identified as a Local Wildlife Site, which has important wildlife habitats. Any development of this part of the site would need to address impact on habitats in planning policy (adopted Policy OE5 and emerging Policy G5) and in national policy in relation to the natural environment (NPPF pp 174-175). The site is characterised by steep topography, which would be a significant constraint to development and is identified as a site of regional importance in terms of geology / geomorphology.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> Everton Park is in the ownership of LCC and is a key open space and community asset of high value that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site. (subject to topography issues)
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> Subject to mitigation and planning. Whilst the site may be accessible it is not immediately accessible to the rail network and is not in a more sustainable than what is proposed (with Liverpool Lime Street being more than 1.2km to the south).



<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No (subject to mitigation and a comprehensive assessment of visual impact)</p>	<ul style="list-style-type: none"> ▪ The development of the site would potentially have a significant impact on an important greenspace and have a visual impact on the remainder of Everton Park, which would require sensitive design and mitigation.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Availability — Everton Park is in the ownership of LCC and is a key open space and community asset, serving a large catchment in the north of the City, that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. • Planning policy constraints — the site is allocated as an open space and Local Wildlife Site in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing recreational facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. • Usage and quality — there is evidence to suggest that Everton Park is a high quality recreational space that well used. Liverpool City Council’s Open Space Assessment Report and Standards (2017) identifies Everton Park as a ‘high-quality’ park and garden with a ‘high value’ attached to it from the community <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>	

Site 9: The Loop


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<p><i>Site Outline</i></p>	
<p>Site Details</p>	
<p><i>Site Area</i></p>	<p>The site is approximately 4 ha.</p>
<p><i>Existing Site Uses</i></p>	<p>The site contains a cash and carry with associated service yard, open space, woodlands and an access road.</p>
<p><i>Surrounding Uses</i></p>	<ul style="list-style-type: none"> • To the north lies St Martin's Market, offices and terraced housing. • To the west lies a three-storey apartment block and detached and semidetached housing. • To the south lies open space and Grosvenor house (office building), vacant plots of land and industrial units. • To the east lies Milstead School, hotels and Everton Skate Park.

Site Ownership	The sites freeholder is Bestway Northern Limited additionally, two titles exist over the land with unknown owners with title numbers MS664597 and MS670227.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policy E1 - Primarily Industrial Area; and• Policy E1/E49 - site for Industrial / Business Development.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policy EC2 - Primarily Industrial Area; and• Policy EC1 & EC2 - Site for Industrial / Business Development with allocation E8.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Employment</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p> <p><u>Highways</u></p> <p>Paragraph 108 states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p> <ul style="list-style-type: none"> a. appropriate opportunities to promote sustainable transport modes can be — or have been — taken up, given the type of development and its location; b. safe and suitable access to the site can be achieved for all users; and c. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. <p>Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>Liverpool's Employment Land Study (2017)</p> <p>Identifies an employment requirement of approximately 20-30 ha for industrial uses (B1c-B2), and around 60-80 ha of warehouse and distribution (B8) land. The site is located in the Great Howard Street A565 Corridor East and contains a 2.12 ha employment site (3% of Liverpool's identified supply). The report identifies that the site is a relatively large vacant plot close to the City Centre which could support B2 or B8 development, therefore it should be retained for Class B2 or B8 uses.</p>
---	--

Statutory Designations		
<i>Heritage</i>	There are no listed buildings lie on the site or in the immediate vicinity of the site.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site sits within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	

Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	<p>The North Liverpool and South Sefton SRF (2010)</p> <p>The purpose of the SRF is to create sustainable communities and to maximise North Liverpool's contribution to the City's competitiveness over the next 20 years and beyond. The SRF acts as an 'umbrella document' to provide the strategic context for more detailed delivery plans which will follow to guide change in the short term and at the local level.</p>
	<p>North Liverpool Mayoral Development Zone (MDZ)</p> <p>The North Liverpool MDZ is the largest of the Mayoral Development Zones, North Liverpool covers the area stretching from the expanse of Liverpool's docks in the north to the edge of the City Centre's commercial business core. Not only does it include a swathe of traditional industrial and warehousing sites alongside the river, it also reaches eastwards into Everton Valley to encompass rapidly regenerating residential suburbs and district shopping centres.</p>
<i>Socio-Economic Profile</i>	<p>In 2019 the site sits within one LSOA area with an IMD ranking of 116 out of 32,844 in England (10% most deprived in the country) and an Employment Deprivation Domain of 176 out of 32,844 (10% most deprive in the country). Redevelopment of the site could have a catalytic effect on the regeneration of the area.</p>
Planning and Development Context	
<i>Planning History</i>	<p>Both recent and historic planning consents within the area are minor and relate to works and development associated with the existing site uses.</p>
<i>Development Status</i>	<p>The area surrounding the site has been subject to a number of development proposals. Major developments in the surrounding area include Phoenix Place (a 348 bed student accommodation development), Fox Street Student Village (a 400 bedroom development), Soller Two Limited's proposed 277 apartments at Virgil Street/ Homer Street and Pointfield Development's proposed 325 apartments at Fox Street/St Anne's Street.</p>
<i>Landowner/ Developer Aspirations</i>	<p>Unknown — the site is under the ownership of Bestway and is currently in use.</p>
Accessibility	
<i>Access to National Network</i>	<p>The site is adjacent to the A59 providing access to Liverpool and J4 of the M57 in 15 minutes.</p>
<i>Access to Public Transport Nodes</i>	<p>Rose Place bus stop is located 100m to the south of the site, providing services to Liverpool. Liverpool Lime Street is located 1km to the south of the site, providing access to Mersey Rail, the City Centre and National Rail Services.</p>

<i>Pedestrian and Cycle Accessibility</i>	Great Homer Street provides an on-road cycle lane and a footpath is provided to the west of the site.	 <p>Mersey Travel, Liverpool Cycle Map, 2013</p>
<i>Highways Capacity and Access</i>	<ul style="list-style-type: none">• The site is surrounded by the A59 an important highway corridor.• The surrounding A59 acts as a pedestrian barrier and the size of the site along with surrounding highways infrastructure.• The A59 is a road which experiences high flows of traffic therefore a comprehensive traffic management strategy would be required if access is provided directly to it.	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Access constraints• Physical infrastructure barriers	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	<p>The site is reasonably well connected to the Club’s Goodison Park and surrounding community. It retains some cultural ties with both Goodison Park and the Docks and provides a suitable location to some extent for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.</p> <p>The site is located approximately 2.5 km from Goodison Park.</p>	
<i>Iconic Location</i>	<p>The site would not provide an iconic location due to being surrounded by significant highways infrastructure.</p>	

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	No	<ul style="list-style-type: none"> The site is not of a sufficient size to accommodate a stadium development (c.4ha).
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site is allocated for employment uses in the adopted UDP and emerging Local Plan. If assessed against adopted policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policy EC2) as well as the NPPF with regard to employment (pp's 80-82). The site is bound by highways infrastructure which would be a physical constraint and generate significant highways impacts.
<i>Is site acquisition a realistic proposition?</i>	Unknown	<ul style="list-style-type: none"> Unknown – the site is currently in the ownership of Bestway.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> Unknown – the site would require significant infrastructure works / realignment.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> Whilst bus stops serve the site, it is more than 1km from Lime Street Station.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.

Summary and Conclusions

Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?

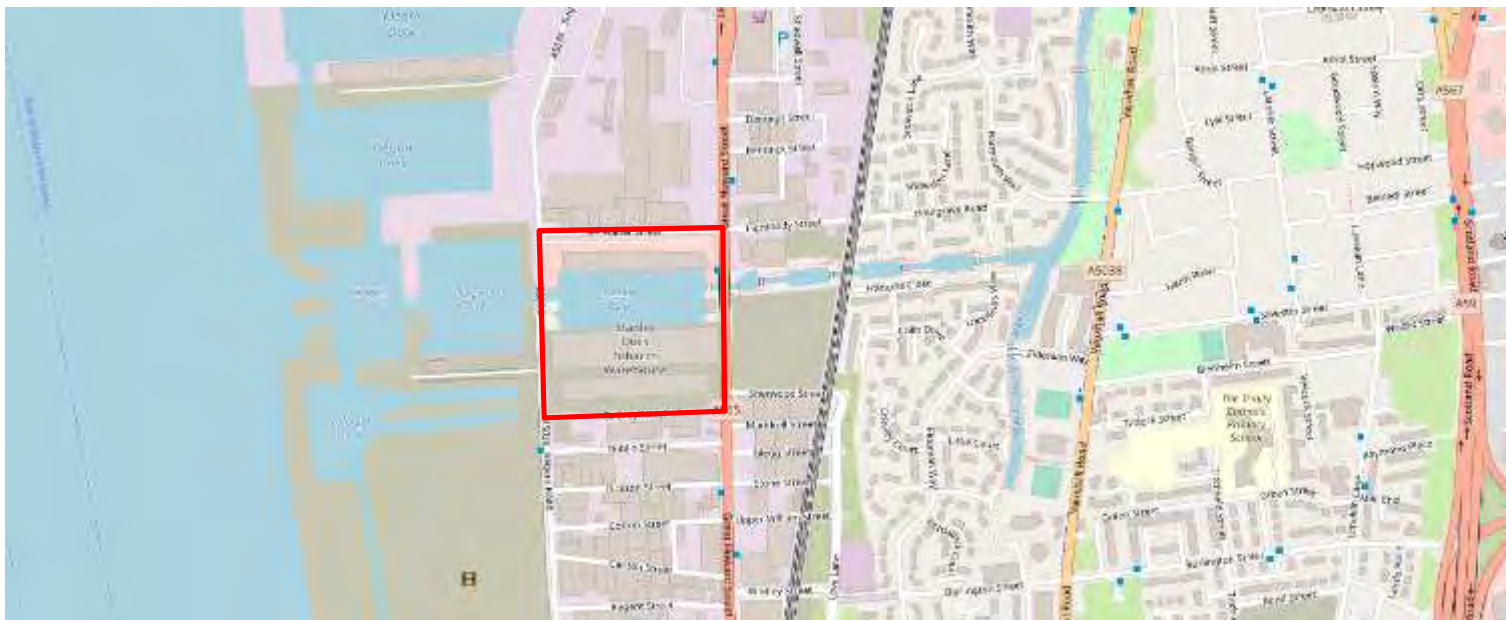
Summary Assessment


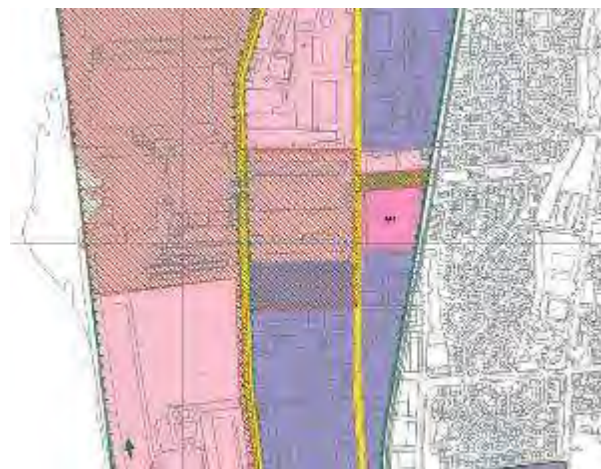
The site is only included as it was reviewed (and discounted) as part of a previous site search by the Club prior to its proposed move to Kirkby, and by LFC in its 2007 ASA. Fundamentally, the site is constrained by surrounding highways infrastructure and is not of a sufficient size to accommodate a stadium development (c.4ha).

Conclusion & Comparison with BMD

The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not of a sufficient size to accommodate a stadium development (c.4ha).**

Site 10: Stanley Dock

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately five hectares.
<i>Existing Site Uses</i>	The site contains Stanley Dock, the Titanic Hotel and the Tobacco Warehouse (which is undergoing redevelopment to deliver over 500 apartments).
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies a mix of fragmented industrial uses, including logistics, storage and timber supply businesses. To the west lies Collingwood Dock. To the south lies industrial units of various sizes. To the east lies Liverpool Water Witch Marine & Engineering Co. Ltd., the canal, and a vacant plot of land.

Site Ownership	The sites freeholder is Stanley Dock Properties Limited. The leaseholders on the site include Stanley Dock (all suite) regeneration LLP, Stanley Dock Hotel Limited and Stanley Dock Properties Limited.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policy E6 - A Site for Various types of development with allocation M65 which is suitable for A1 /A3/B1 /C3/O2 uses and Leisure development; and• Policy HD7 - A Proposed Extension or Proposed New Conservation Area.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policy EC6 - Mixed-Use Area; and• Policy HD2 - World Heritage Site. <p>Also, Policy CC13 (Ten Streets) states that the council will support uses which maximise the economic potential of the area with a focus on creative businesses and light employment uses together with ancillary uses focused on key frontages and streets.</p>	

Statutory Designations

National Policy and Other Material Considerations

NPPF (2019)

Historic Environment

Paragraph 192 states that in determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.

Paragraph 194 states that **any harm to, or loss of, the significance of a designated heritage asset** (should require clear and convincing justification. Substantial harm to or loss of

- A. grade II listed buildings, or grade II registered parks or gardens, should be exceptional; and
- B. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.



Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).

Flood Risk

Paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

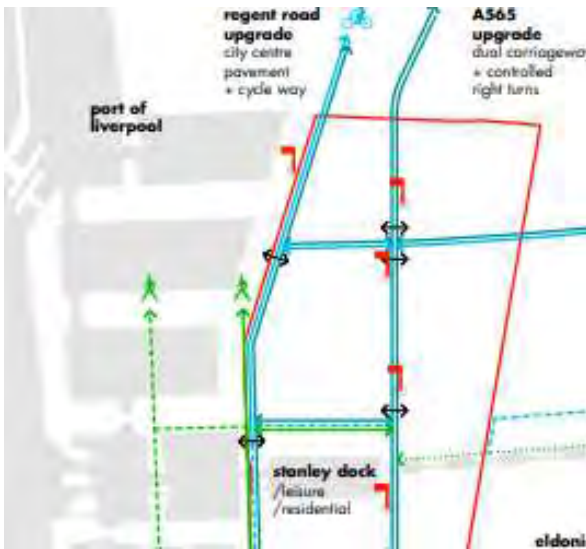
Paragraph 163 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and

	e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan	
<i>Heritage</i>	<p>The site sits within the World Heritage site and contains six grade II listed buildings or monuments, which include:</p> <ul style="list-style-type: none"> • Great Howard Street Bridge over the Leeds and Liverpool Canal at Head of Stanley Dock; • Tobacco Warehouse on South Side of Stanley Dock; • Entrance to Leeds and Liverpool Canal at Head of Stanley Dock; • Entrance to Stanley Dock at North End; • Hydraulic Tower to West of Former North Warehouse, Stanley Dock; and • Entrance to Stanley Dock at North End. <p>Additionally, a Grade II* listed building lies on the site of the Former Warehouse on North Side of Stanley Dock.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The dock area within assessment site is located within Flood Zone 3, the remainder of the site is located within Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	<p>The species on site include Priority Species for CS Targeting — Lapwing and Lapwing. It is not considered that there are any ecology designations that would prevent the development of the site.</p>	
<i>Landscape</i>	<p>It is not considered that there are any landscape designations that would prevent the development of the site.</p>	

Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	<p>The North Liverpool and South Sefton SRF (2010)</p> <p>The site sits within Area 2 of the North Liverpool and South Sefton SRF (Liverpool Waters and Hinterland). Liverpool Waters is the largest proposed development scheme in the city, a key challenge is to ensure that the development complements investment in the city centre and anchors the regeneration of North Liverpool. This area is critical in ensuring this occurs by knitting Liverpool Waters into the surrounding fabric of the area.</p>
	<p>Atlantic Corridor Development Framework (2016)</p> <p>Five-character zones are identified within the framework, the site sits within the City Fringe Zone. The City Fringe Zone is an area proposed to offer a transition into the city centre, with a wider range of uses encouraged, including creative/artist space, hybrid units and ancillary mixed uses (leisure and residential) focused along key frontages and streets, together with light employment uses.</p>
	<p>World Heritage Site SPD (2009)</p> <p>The World Heritage Site SPD provides guidance for protecting and enhancing the outstanding universal value (OUV) of Liverpool Maritime Mercantile City World Heritage Site, whilst encouraging investment and development which will secure regeneration for the area. The SPD aims to provide guidance which will harmonise the differing priorities for regeneration and conservation.</p> <p>The WHS site is divided into six-character areas, the site sits within area three ‘Stanley Dock Conservation Area’, an area which is mostly derelict and disused. The area has massive potential to fulfil the city’s housing requirements and other aspirations through extensive heritage-based regeneration. Development should deliver active docksides and water spaces, better internal and external connections and integration with the immediate hinterland, the city centre and its communities. The SPD recognises that the regeneration of this part of the WHS will require very significant levels of private investment, without which the tangible cultural heritage will continue to deteriorate.</p> <p>The Stanley Dock complex will be revitalised by a mixed-use scheme that will bring new life into the area and through the implementation of a Conservation Management Plan will also ensure the long-term conservation of the key historic buildings in the complex.</p>
	<p>Ten Streets SRF (2018)</p> <p>The site is located within the Stanley Dock Complex character area, the area represents the heritage heart of the framework area and encompasses a number of important listed heritage assets within the UNESCO World Heritage Site. It is important that Listed Buildings, including the Tobacco Warehouse and Stanley Dock remain visual markers. Any development should:</p> <ul style="list-style-type: none"> • Retain Listed Buildings at their existing height and scale. • Ensure that new development to the east of Great Howard Street is lower in scale than the Listed Buildings in Stanley Dock. <p>Where proposals seek to exceed the height parameters, a robust justification should be made that addresses planning policy and sets out how the proposal would impact on the character of the area, its heritage assets and the vision and objectives of this SRF.</p>

	Liverpool City Enterprise Zone Liverpool City Enterprise Zone consists of the city’s Commercial Office District, the waterfront area with the Three Graces, the Historic Downtown Area, and part of the north city docklands reaching as far as Stanley Dock. The zone contains the greatest concentration of employment in the city region, and is home to several local, national and international firms with expertise in banking, professional services and the creative and media sectors.			
<i>Socio-Economic Profile</i>	In 2019 the site has an IMD ranking of 2,641 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 2,085 out of 32,844 LSOAs in England (10% most deprived). As the site is within the 10% most deprived areas in England the development of a stadium has the potential to have a catalytic effect on the regeneration area.			
Planning and Development Context				
<i>Planning History</i>	The recent and historic consents are outline below.			
	Application Number	Date	Decision	Details
	15F/2438	18th August 2016	Approve with Conditions	To alter, extend and convert Tobacco Warehouse to create 538 residential apartments (C3) New 13th floor level of single storey penthouse apartments, 1725 sqm public exhibition space (D1) and 4,290 sqm office (B1) 186 space car park to existing basement level; provide external parking areas and carry out ancillary works associated with the above.
	15L/2437	18th August 2016	Approve with Conditions	To carry out internal and external works, including works of partial demolition in connection with alteration, extension and conversion of Tobacco Warehouse into a mixed use development with basement car park.
	12F/0321	26th March 2012	Approve with Conditions	To demolish warehouse extension and change use of listed warehouse to 150 no. room hotel (Use Class C1); convert ground floor and basement for hotel use, retail (Class A1) restaurants and bars (Class A3/A4) and gymnasium/leisure uses (Class D2); to install pontoons, carry out landscaping, lay out car parking and associated external works.
	12L/0322	26th March 2012	Approve with Conditions	To demolish warehouse extension, carry out works to listed warehouse and undertake external works in connection with conversion to a hotel and associated uses.
<i>Development Status</i>	The area surrounding the site has been subject to a number of major proposals. Major developments in the surrounding area include the conversion of the Southern Warehouse at Stanley Dock to 256-bedroom aparthotel, conversion of Tobacco Warehouse to 538 apartments, 74 apartments at Vauxhall Wharf and the adjacent Liverpool Waters major regeneration project.			

Landowner / Developer Aspirations	The site is recently developed and undergoing development for apartment development which will complete the regeneration and renewal of the site	
Accessibility		
Access to National Network	The site borders Great Howard Street (A565) which connects the site to Liverpool within 2 km and the M58 within 11 km.	
Access to Public Transport Nodes	<p>Three bus stops are located along the site boundary, providing irregular services to Seaforth, Bootle and Liverpool. Regular services along Vauxhall Road, provide services to Netherton, Thornton and Liverpool.</p> <p>Sandhills train station is located 500m north-east of the site, providing access to Merseyrail services, which connect to the City Centre and the National Rail network.</p>	
Pedestrian and Cycle Accessibility	<p>Pedestrian access via Derby Road, Regent Road, Boundary Street, Walter Street and Blackstone Street is currently limited. There are no cycle lane surrounding the site. However, the proposals within the Ten Streets SRF and the proposed improvements to Regent Road/Waterloo Road (A5036), Derby Road/Great Howard Street (A565) and the roads connecting the two sites, set to improve accessibility to the site for pedestrians and cyclists.</p>	 <p>Ten Streets SRF, 2017</p>
Highways Capacity and Access	<p>A transport assessment and event day transport strategy would be required to support the scheme to review and potentially mitigate the following issues:</p> <ul style="list-style-type: none">Great Howard Street is an important north / south highway corridor and experiences high traffic flows on a day to day basis. There will be significant pedestrian movement across this road on event days. It's possible that the road will need to be temporarily closed on event days for a significant period. The duration of the closure would be subject to further detailed analysis, but it is likely that LCC would resist a closure lasting duration of the supporter arrival and departure period. This presents a significant planning risk to this site.	

	<ul style="list-style-type: none">Regent Road will be the focus of significant transport movement on event days. As such, an effective transport management strategy will be required complementary to Great Howard Street. The strategy is likely to require a range of event specific road closures;This site currently lies outside of the existing Controlled Parking Zone surrounding the Goodison Park and Anfield Stadiums. It is also outside of the city centre Controlled Parking Zone. Extensions to these zones are likely to be required to help protect the amenity of residents on event days. However, large areas of land are also non-residential industrial / commercial uses which may not need to be protected by a parking zone; <p>Sandhills is the closest rail station, passenger demand will be significant on event days. There will therefore need to be a management strategy in place to handle the likely high demand for rail on event days.</p>	
Other Development Issues		
Other Potential Constraints	<ul style="list-style-type: none">Site is undergoing development / regeneration into alternative use (Residential / hotel), andPotential contamination / remediation	
Fit with Everton’s Requirements		
Connection to North Liverpool	<p>The site retains cultural ties with both Goodison Park and surrounding community, therefore the site provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.</p> <p>The site is approximately 2.8 km away from Goodison Park.</p>	
Iconic Location	<p>The site would provide an iconic location for Everton to relocate.</p>	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	No	<ul style="list-style-type: none">The site is not of a sufficient size to accommodate a stadium development (c.5ha).

<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site contains iconic listed buildings (including the Tobacco Warehouse, which is the world’s largest brick built warehouse), which would require demolition. These assets form the most important elements of the Stanley Dock Conservation Area and are considered to be the “heritage heart” of the Tens Streets SRF.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is not available as it includes the Titanic Hotel and the Tobacco Warehouse which is currently undergoing redevelopment to deliver over 500 apartments. Stanley Dock Properties therefore, wish to bring forward its own proposals on a large proportion of the site.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> Unknown due to dock infill, demolition and remediation costs.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is accessible by sustainable modes of transport – and is within proximity to Sandhills Station and the City Centre.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No (subject to mitigation)	<ul style="list-style-type: none"> The site would require the demolition of iconic listed buildings which frame the Ten Streets skyline.
Summary and Conclusions		<u>Summary Assessment</u>


Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?


The site is only included as it was reviewed (and discounted) as part of a previous site search by the Club prior to its proposed move to Kirkby, and by LFC in its 2007 ASA. Fundamentally, the site is unavailable (under development and restoration), and is not of a sufficient size to accommodate a stadium development (c.5ha). The site is not therefore considered to be a feasible, practical or realistic option for a new stadium development.


Conclusion & Comparison with BMD


The applicant contends that in comparison to BMD, the site would have a greater heritage harm than BMD. However, **the key consideration is that the site is not of a sufficient size to accommodate a stadium development (c.4ha) and is not available.**


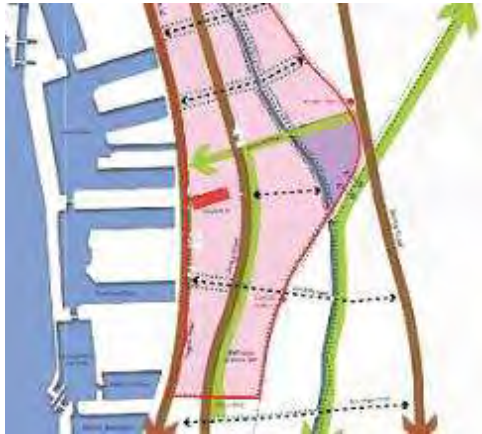
Site 11: Sandhills Lane

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 9.3 hectares.
<i>Existing Site Uses</i>	The site contains a variety of industrial units of various sizes and a fuel storage area.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies Canada Dock, a vacant industrial site with dilapidated buildings and a metal recycling area (S. Norton). • To the west lies Huskisson Dock and Henty Oil Ltd a fuel storage company which contains a Notifiable Hazardous Installation. • To the south lies Sandon Half Tide Dock, Wellington Dock, UU's treatment plant and various industrial units.

	<ul style="list-style-type: none">• To the east lies several industrial units and a railway line.
Site Ownership	<p>The site's freeholder is Merseyside Docks and Harbour Company Limited.</p> <p>Several leasehold titles exist on the site, the owners include:</p> <ul style="list-style-type: none">• Calor Gas Limited,• E D & F Man Liquid Products UK Limited,• MTS (Tank Cleaning) Limited,• New Britain Oils Limited,• Roanza Limited,• SP Manweeb PLC,• Speedy Asset Services Limited,• United Molasses Group Limited, and• Several unknown leasehold owners.
Planning Policy	
Adopted Policy	<p>In the UDP proposals map the site is allocated as a:</p> <ul style="list-style-type: none">• Policy E1 - Primarily Industrial Area; and• Policy EP10 - a Notifiable (Hazardous) Installation.
	

<p><i>Emerging Policy</i></p>	<p>In the May 2018 Submission Draft Liverpool Local Plan Policies Map the site is allocated as:</p> <ul style="list-style-type: none"> • Policies EC1 and EC2 - a site for Industrial/Business Development with allocation E20; • Policy EC2 - A Primarily Industrial Area; • Policy R2 - Notifiable Hazardous Installation; and • Policy HD2 - World Heritage Site Buffer Zone. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> A. grade II listed buildings, or grade II registered parks or gardens, should be exceptional; B. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p>	

	<p><u>Employment</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p> <p>Liverpool Employment Land Study (2017)</p> <p>The site is located within the north of the Great Howard Street A565 Corridor, the character of the area is that of purpose-built employment uses. The Employment Land Study recommends that <i>"loss of Class B employment space within the Great Howard Street A565 Corridor North should be resisted."</i></p> <p>The site is identified with reference PIA 11 'Bankfield Street' which is identified as being in active use by industry, and loss to other non-Class B uses on the whole of the site should be resisted.</p>
Statutory Designations	
Heritage	<p>The site contains a Grade II* listed building named the Sugar Silo and the site is within the World Heritage Zone buffer zone and borders the World Heritage Zone. Furthermore, 350m north east of the site lies the Canal Warehouse a grade II listed building.</p> <div data-bbox="1480 639 1995 1118">  </div> <p>Historic England Map Search, 2019</p>

<i>Flood Risk</i>	The site is located within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	<p>The North Liverpool and South Sefton SRF (2010)</p> <p>The purpose of the SRF is to create sustainable communities and to maximise North Liverpool’s contribution to the City’s competitiveness over the next 20 years and beyond.</p> <p>The site is located within the Port Hinterland of the SRF and is characterised by a mix of predominantly low-grade light industrial and retail trade employment use. Tate & Lyle is located on the site and is considered as a key feature of the area.</p>	

Atlantic Corridor Development Framework (2016)

The ACDF identifies five-character zones, the site sits within the **Liverpool 2 and Port character zone**. The Liverpool 2 and the Port Character Neighbourhood is the focus for port related uses and activities including logistics, storage and distribution, recycling and processing and supporting engineering and mechanical workshops and hybrid units.

Peel Ports have set out a 20-year growth plan for increasing port trade in the Mersey Ports Masterplan (2011).



Mersey Ports Master Plan (2011)


The Mersey Ports Master Plan identifies the potential future land requirements for Mersey Ports from 2008 – 2030 for Port related and complementary requirements. Three aspects to the future land requirements have been considered:

- Amount of land needed to serve the Port's traffic growth;
- Amount of land required to serve the needs of port centric distribution; and
- Amount of land required to serve complimentary sectors (energy, waste, off-shore wind sector, processing activities).

The site is identified as an area of **"Port Estate Unchanged"** over the period of the masterplan and should be safeguarded from redevelopment during the period of the masterplan.



<i>Socio-Economic Profile</i>	In 2019 the site sits within an LSOA which has an IMD of 2,641 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 2,085 out of 32,844 (10% most deprived in the country). As the site is located within one of the ten percent most deprived locations in England, the development of a stadium has the potential to provide a catalytic impact on the regeneration of the area.			
Planning and Development Context				
<i>Planning History</i>	Application Number	Date	Decision	Details
	180/2485	10-09-2018 (registered)	n/a	Outline application with matters of landscaping and external appearance reserved to construct a 12-storey hotel.
	15F/0068	20-02-2015	Approve with Conditions	To erect vehicle showroom with associated works following demolition of existing building.
	12F/2384	13-11-2012	Approve with Conditions	To use property for storage and hire of construction equipment with ancillary offices and trade counter and carry out associated external alterations, including formation of customer entrance, installation of wash bay and gas cage and ancillary works.
<i>Development Status</i>	Key developments in the surrounding area include New Britain Oils new packing warehouse, United Utilities new secondary water treatment plant, Olleco’s new warehouse and the proposed 12-storey hotel (planning application ‘180/2485’) at the Atlantic Corner Hotel directly to the south of the site.			
Accessibility				
<i>Access to National Network</i>	The site borders Regent Road, Sandhills Lane and Derby Road which give the site access to Liverpool within two miles, the M58 and M57 within six miles.			
<i>Access to Public Transport Nodes</i>	The site borders three bus stops which provide irregular bus services to Liverpool, Bootle and Seaforth. However, 700m to the east of the site lies Stanley Road which provides bus services to Liverpool (25 services per hour), Netherton (seven per hour), Aintree (three per hour), Preston (two per hour), Crossens (two per hour) and Southport (one per hour). 200m east of the site lies Sandhills train station which gives the site access to the Merseyrail network which gives the site access to the City Centre and National Rail Services.			

<i>Pedestrian and Cycle Accessibility</i>	<p>An off-road track is set to be complete in 2019 which will provide the site with good pedestrian and cycle accessibility to the city centre and to north Liverpool.</p> <p>Additionally, the Liverpool and Leeds Canal is located 330m to the east of the site, gives the site pedestrian and cycle access to the north and the city centre.</p>	 <p>Mersey Travel, Liverpool Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	<p>A transport assessment and event day transport strategy would be required to support the scheme to review and potentially mitigate the following issues:</p> <ul style="list-style-type: none">• Derby Street is an important north / south highway corridor and experiences high traffic flows on a day to day basis. There will be significant pedestrian movement across this road on event days. It's possible that the road will need to be temporarily closed on event days for a significant period. The duration of the closure would be subject to further detailed analysis.• Sandhills is the closest rail station, passenger demand will be significant on event days. There will therefore need to be a management strategy in place to handle the likely high demand for rail on event days.	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Land contamination;• Amenity issues and surrounding industrial use; and• Impact on Liverpool SuperPort.	


Fit with Everton's Requirements		
Connection to North Liverpool	The site is well connected to the Club's Goodison Park and surrounding community. It retains strong cultural ties with both Goodison Park and provides a suitable location for Everton in terms of its requirement to stay physically, socially and culturally connected to its current home. The site is approximately 2km away from Goodison Park.	
Iconic Location	The site is primarily industrial and would not provide an iconic location for Everton's new stadium.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The site is allocated for employment uses in the adopted UDP and emerging Local Plan. If assessed against adopted and emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policies EC1 and EC2) as well as the NPPF with regard to with regard to heritage (WHS buffer zone and heritage assets (pp.192 onwards) and employment (pp's 80-82).The site is a key part of the Mersey Ports Masterplan. The site is an integral part of supporting the additional demand of the Super Port, as the Employment Land Study (2017) and the Employment Land Evidence Base (2017) both recognise that the development of the SuperPort (within which the site sits) will have a major impact on the sub regional distribution and warehouse market as it is anticipated it will generate an additional sub-regional demand of 634 ha of additional B2 and B8 uses within Liverpool City Region. The site is located within the north of the Great Howard Street A565 Corridor, within which the character of the area is purpose-built employment uses.The site is likely subject to contamination and is the location of a notifiable hazardous installation. The emerging Local Plan (Policy R2) notes that “proposed development within the defined consultation zones surrounding existing locations or pipelines with Hazardous Substances Consent will not be permitted if it would result in a significant increase in the number of people living in, working in or visiting the area, or would otherwise cause unacceptable risk”. A stadium would include the use of the site by significant numbers of people and further investigation would be required to understand the hazardous risk presented by the site.
Is site acquisition a realistic proposition?	No	<ul style="list-style-type: none">The site is currently an operational industrial site by Merseyside Docks and Harbour Company Limited and is a key part of the Mersey Ports Masterplan. The site is in active use for a range of industrial uses and is in multiple leaseholds, which would require significant land assembly.

<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> Further investigation would be required due to potential hazardous contamination.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is well connected, including to Sandhills station and the rail network.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There are not considered to be any unacceptable environmental or visual impact that would prevent the redevelopment of the site.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>The key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is not considered to be available. The site is in the ownership of the Mersey Docks and Harbour Company and is a key part of the Mersey Ports Masterplan. Planning policy — the site is allocated for employment uses in the adopted UDP and emerging local Plan. If assessed against adopted and emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policies EC1 and EC2) as well as the NPPF with regard to with regard to heritage (WHS buffer zone and heritage assets (pp.192 onwards) and employment (pp's 80-82). Need — The site is a key part of the Mersey Ports Masterplan. The site is an integral part of supporting the additional demand of the Super Port, as the Employment Land Study (2017) and the Employment Land Evidence Base (2017) both recognise that the development of the SuperPort (within which the site sits) will have a major impact on the sub regional distribution and warehouse market as it is anticipated it will generate an additional sub-regional demand of 634 ha of additional B2 and B8 uses within Liverpool City Region. The site is located within the north of the Great Howard Street A565 Corridor, within which the character of the area is purpose-built employment uses. Hazardous substances and contamination - the site is likely subject to contamination and is the location of a notifiable hazardous installation. The emerging Local Plan (Policy R2) notes that “proposed development within the defined consultation zones surrounding existing locations or pipelines with Hazardous Substances Consent will not be permitted if it would result in a significant increase in the number of people living in, working in or visiting the area, or would otherwise cause unacceptable risk”. A stadium would include the use of the site by significant numbers of people and further investigation would be required to understand the hazardous risk presented by the site. 	


Conclusion & Comparison with BMD


The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available**. Notwithstanding this, the site has a notifiable hazardous installation which could (subject to further investigation) preclude the development of a use which supports the congregation of large numbers of people.



Site 12: Anfield Community Centre & Edinburgh Park

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<p><i>Site Outline</i></p>	
<p>Site Details</p>	
<p><i>Site Area</i></p>	<p>The site is approximately 14.2 hectares.</p>
<p><i>Existing Site Uses</i></p>	<p>The site contains open space, grass football pitches, Edinburgh Park and Anfield Sport & Community Centre with an associated café, gym, indoor sports hall, 3G 11 aside and 5 aside football pitches. £2.2 million has been invested into the park for a new 3G pitch and ancillary features in recent years. Land to the north west is disused scrubland that is being developed for housing.</p>

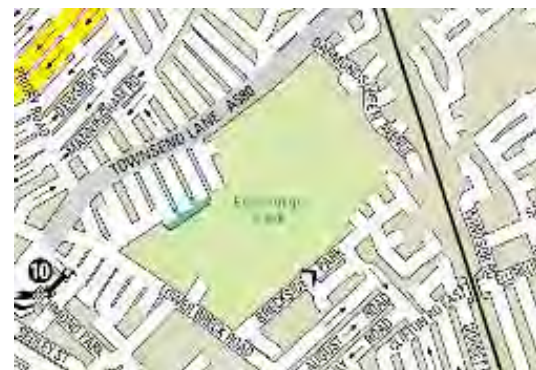
<i>Surrounding Uses</i>	<ul style="list-style-type: none">• To the north lies bungalows, semidetached and detached residential units and Walton Clubmoor Recreation Ground.• To the east lies a railway line, Marlborough Gardeners Club (allotments), detached, semidetached and detached residential units.• To the south lies Edinburgh Park Dementia Nursing Home, St Margaret’s Anfield Church of England Primary School and semidetached residential units.• To the west lies terraced residential units, Holy Trinity Parish Church Walton Beck, Merseyside Christian Fellowship and retail units.
<i>Site Ownership</i>	<p>The site is owned by Liverpool City Council is the primary landowner (9.6 ha) alongside an unknown freehold site (MS321145) (5 ha) which Persimmon Homes has control over and has submitted a planning application.</p> <p>Additionally, two titles exist over the land with unknown owners (MS664597 & MS671006).</p>
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policies OE11 & OE12 - Green Space. 

<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policies GI 1 & GI 3 - Open Space. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Promoting healthy and safe communities</u></p> <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ol style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p>	

	<p><u>Sports England</u></p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions. <p>Liverpool City Council Open Space Assessment Report and Standards April 2017</p> <p>LCC's Open Space Assessment identifies the site as an Amenity Greenspace with provision for children and young people within the Inner North, known as Lower Breck Recreation Ground. Amenity greenspaces comprise grassed areas with no significant facilities and generally few features over 0.2 ha.</p> <p>Lower Breck Recreation Ground is considered to be of a High Quality and is regarded as one of the highest scoring sites for value within the Open Space Assessment Report. The high value is recognised for the accessible recreational opportunity they offer at an excellent standard of quality for a wide range of users.</p>
Statutory Designations	
<i>Heritage</i>	<p>No listed buildings or monuments lie on the site or in the immediate vicinity of the site.</p> <div data-bbox="1487 772 2042 1187">  </div> <p><i>Historic England Map Search, 2019</i></p>

<i>Flood Risk</i>	The site is located entirely within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site.	
<i>Landscape</i>	There are no statutory landscape designations that would impact on the development of the site.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	N/A	
<i>Socio-Economic Profile</i>	<p>The site sits across three LSOAs. Each LSOA has an IMD ranking out of 32,844 LSOAs across England, the IMD ranking of each LSOA in 2019 are as follows:</p> <p>1 – 118 (within the 10% most deprived);</p> <p>2 – 617 (within the 10% most deprived); and</p> <p>3 – 1,463 (within the 10% most deprived).</p> <p>Each LSOA's Employment Deprivation Domain ranking out of 32,844 LSOAs across England in 2019 are as follows:</p> <p>1 – 361 (within the 10% most deprived);</p> <p>2 – 1,014 (within the 10% most deprived); and</p>	

	3 – 2,795 (within the 10% most deprived). All three LOSA's are within the 10% most deprived locations within England therefore, redeveloping the site to accommodate a football stadium has the potential to offer catalytic benefits to regenerate the area.			
Planning and Development Context				
Planning History	The eastern part of the site (which is disused scrubland) is proposed to be redeveloped for housing development and a care home.			
	Application Number	Date	Decision	Details
	18F/0111	15-01-2018 (registered)	Undecided (as of Dec 2019)	To erect 232 dwelling houses with associated parking and access. (Persimmon development on Edinburgh Park).
	17F/3515	22-03-2018	Approve with Conditions	To erect three storey block comprising 35 bed residential care centre with associated car parking and landscaping.
	14F/1661	10-09-2014	Approve with Conditions	To extend sports/community centre. Refurbish Nursery area creating new Office area. Refurbish existing offices, new 3G pitch to rear and re-form existing all-weather/5 a side pitches to upgraded surface.
	08F/2588	01-12-2008	Approve with Conditions	To vary condition 14 attached to planning permission 08F/0776, to allow use of the car park for match day parking for both Everton and Liverpool FC fixtures.
	08F/0776	16-06-2008	Approve with Conditions	To erect extensions to existing building, lay out parking area, and carry out associated works.
	04DC/4229	21-12-2004	Approve with Conditions	To erect single-storey extension for use as changing facilities, and a two-storey extension for use as a storeroom; to refurbish amenities block and sports hall, including new roof; and to lay out permanent access from Lower Breck Road with associated security gates.
	04F/2879	14-09-2004	Approve with Conditions	To lay out 2 synthetic turf multi-courts (adjacent to Anfield Youth Centre) with associated 3-metre high fencing and 6 no. floodlights.
Development Status	Developments in the surrounding area include the redevelopment of the former bowling green on Walton Breck Road to a 77-bed nursing home which completed in Spring 2019.			

<i>Landowner / Developer Aspirations</i>	<p>Liverpool City Council note that the playing fields and community centre are an essential community resource. £2.2 million has been invested into the park for a new 3G pitch and ancillary features in recent years.</p> <p>Persimmon Homes is seeking to develop the part of the site under their control (which was disused land and not part of the high quality parkland and amenity provision).</p>	
Accessibility		
<i>Access to National Network</i>	<p>The site has access to the strategic highways network via Townsend Lane and Queens Drive and is six kilometres away from Liverpool, J5 of the M62 is located five kilometres away and J4 of the M57 is located seven kilometres away.</p>	
<i>Access to Public Transport Nodes</i>	<p>Bus services run along Townsend Lane and Lower Breck Road. Services along Townsend Lane provide access to Liverpool, Gillmoss and Tower Hill. Services along Lower Breck Road provide access to Aigburth Vale and Bottle.</p> <p>Kirkdale train station is located approximately 2.8 km to the north and Edge Hill train station is located approximately 2.8km to the north – the site is therefore severely disconnected from the rail network.</p>	
<i>Pedestrian and Cycle Accessibility</i>	<p>There are no designated cycle lanes or routes in the vicinity of the site.</p>	 <p>Mersey Travel, Liverpool Cycle Map, 2013</p>
<i>Highways Capacity and Access</i>	<p>Access to the site is via Townsend Lane, which is a lower order road. The site is surrounded by residential streets and would require significant traffic management to accommodate major events.</p>	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">Loss of an active community centre (Everton and Liverpool hold events for the community in the community centre).	

	<ul style="list-style-type: none">• Loss of open space.• Trees on site.• Requirement to meet Sport England re-provision.• Site constrained by residential dwellings and would have a significant impact on amenity.	
Fit with Everton's Requirements		
Connection to North Liverpool	The site is well connected to the Club's Goodison Park and surrounding community. It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home. The site is approximately 1.8 km away from Goodison Park.	
Iconic Location	The site is in a residential area and would not provide an iconic location for a stadium development.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">▪ The development of the Persimmon Homes site will reduce the size of the site to below 9ha. Whilst the site is theoretically large enough, the siting, shape and orientation of the site, as well as the requirement for suitable access, is considered to make the site unsuitable for a stadium development.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">▪ The Site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy GI1 and GI3), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities).▪ In terms of its use and quality, the site is considered as High Value Green Space as the Liverpool City Council Open Space Assessment Report and Standards April 2017 identifies the site as an Amenity Greenspace with provision for children and young people within the Inner North, known as Lower Breck Recreation Ground (the western part of the site). Lower Breck Recreation Ground is considered to be of a High Quality and is regarded as one of the highest scoring sites for value within the Open Space Assessment Report. The high value is recognised for the accessible recreational opportunity they offer at an excellent standard of quality for a wide range of users.▪ A stadium development could generate a significant impact on the amenity of the surrounding community — the site is bounded on all sides by residential development. As discussed above, whilst the site is theoretically large enough, the siting, shape and orientation of the site, as well as the requirement for suitable access in the context of its residential setting — the site is considered to be site unsuitable for a stadium development.


<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The majority of the site is owned by Liverpool City Council who is committed to retaining the site as an important community resource. Underlining this commitment, £2.2 million has been invested into the park for a new 3G pitch and ancillary features in recent years. LCC will not consider the sale of the site to Everton and therefore the site is not available.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> The site is physically accessible by road and bus. However, the site is located 2.8km away from Kirkdale and Edge Hill Train Stations and has poor pedestrian and cycle access and is therefore in an unsustainable location. The existing access is considered unsuitable to facilitate the proposed development. The site is also accessed by Townsend Lane, surrounded by residential streets and would require significant traffic management to accommodate major events.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> It is not considered that there would be any environmental or visual impacts that would prevent the site coming forward for development, subject to suitable mitigation and notwithstanding other identified development issues.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	Summary Assessment <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — part of the site is being developed by Persimmon for 232 new homes. The remainder of the site (c.9ha) is in the ownership of LCC, which has recently invested £2.2 million into the park for a new 3G pitch and ancillary features. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Size, amenity and access — a stadium development could generate a significant impact on the amenity of the surrounding community — the site is bounded on all sides by residential development. Whilst the site is theoretically large enough, the siting, shape and orientation of the site, as well as the requirement for suitable access in the context of its residential setting — the site is considered to be site unsuitable for a stadium development. The site is also in an unsustainable location, more than 2.8km from a rail station. 	



- Usage and quality — there is evidence to suggest that Walton Hall Park is a high quality recreational space that well used and is afforded high value by its community. It is considered as High-Quality Open Space as the Liverpool City Council Open Space Assessment Report and Standards April 2017 which identifies the site as an Amenity Greenspace with provision for children and young people within the Inner North, known as Lower Breck Recreation Ground (the western part of the site). Lower Breck Recreation Ground is considered to be of a High Quality and is regarded as one of the highest scoring sites for value within the Open Space Assessment Report. The high value is recognised for the accessible recreational opportunity they offer at an excellent standard of quality for a wide range of users.

Conclusion & Comparison with BMD

The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available and is not of a sufficient size to accommodate a stadium when considering its surrounding uses and demonstrable constraints.**


Site 13 : Newsham Park


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 49.6 hectares.
<i>Existing Site Uses</i>	The site contains Newsham Park, which contains Park Lodge, Park View Medical Centre, Gardner's Drive, Cafeteria, skatepark, open space, woodland and waterbodies.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies terraced and semidetached residential units, St Margaret's Anfield Church of England Primary School and Priory Medical Centre. To the west lies terraced and semidetached residential units, the Academy of Saint Francis of Assisi and Benim medical centre.

	<ul style="list-style-type: none">To the south lies terraced and semidetached residential units.To the east lies various industrial units, a National Grid substation, a Household Waste Recycling Centre, allotments, a railway line and terraced and semidetached residential units.	
Site Ownership	Liverpool City Council own the freehold over the land.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">Policies OE11 and OE12 – Green Space; andPolicies HD7 to HD14 - Conservation Area.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">Policy HD1 - A Historic Park;Policies GI 1 and GI 3 – Open Space;Policy HD1 - Conservation Area.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Promoting healthy and safe communities</u></p> <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Historic Environment</u></p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> A. grade II listed buildings, or grade II registered parks or gardens, should be exceptional; B. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional . <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p>Liverpool City Council Open Space Assessment Report and Standards (2017)</p> <p>The Open Space Assessment Report identifies that the site is Park and Garden with provision for children and young people within the Inner North. Newsham Park is identified as having a high quality and high value.</p> <p>Newsham Park has received recent investment by receiving a new ‘Action Sports Hub’ to provide play facilities for older ages. The Park also acts to help serve a gap in provision for amenity greenspace for the Inner North outside of the five-minute walk catchment.</p>
---	--

Statutory Designations		
<i>Heritage</i>	The site contains a grade II listed park and garden and contains one grade II listed monument named Bandstand to the west end of Newsham Park. Seven listed buildings lie in close proximity to the site.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site lies in Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>


<i>Ecology</i>	<p>Habitats located on the site include Priority Habitat Inventory - Deciduous Woodland, Wood pasture and Parkland BAP Priority Habitat and National Forest Inventory – Broadleaved.</p> <p>It is considered that the site offers important woodland and habitats for ecology in the north of the City.</p>	 <p>Magic Maps, 2019</p>
<i>Landscape</i>	There are not considered to be any statutory landscape designations that would prevent the development of the site.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	There is no relevant strategic or regeneration policy that applies to Newsham Park.	
<i>Socio-Economic Profile</i>	In 2019 the site has an IMD ranking of 2,433 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 4,329 out of 32,844 (10% most deprived in the country). The site lies within one of the 10% most deprived areas of the country therefore the stadium development has the potential to have a significant catalytic impact on the regeneration of the area.	
Planning and Development Context		
<i>Planning History</i>	The are no recent applications which exist on the site.	
<i>Development Status</i>	The area surrounding the site has been subject to proposals including provision of 98 dwellings (Bellway, completed March 2019) and 28 dwellings by Riverside Housing (completed September 2019).	
<i>Landowner / Developer Aspirations</i>	Liverpool City Council are committed to retaining what is an important historic park and key community asset.	



Accessibility	
<i>Access to National Network</i>	The site has access to the strategic highways network, via Rocky Lane and Prescott Road, which provide access to Liverpool and J4 of the M62.
<i>Access to Public Transport Nodes</i>	<p>Bus services run along Rocky Lane and provide regular services to Liverpool, Stockbridge Village, Huyton and Croxteth Park.</p> <p>The south of the site is 1.25km away from Wavertree Technology Park train station. This provides northern services to Liverpool Lime Street (four per hour), Wigan North Western (two per hour), Warrington Bank Quay (one per hour) and Crewe (one per hour).</p>
<i>Pedestrian and Cycle Accessibility</i>	<p>The site is accessible for pedestrians and cyclists - the site contains a designated on-road cycle lane, footpath and borders a designated on-road signed cycle route.</p>  <p><i>Mersey Travel, Liverpool Cycle Map, 2013</i></p>
<i>Highways Capacity and Access</i>	Access to the site is constrained. It would be likely that properties along Rocky Lane would need to be acquired to gain suitable access to the site. Rocky Lane would be the focus of significant transport movement on event days. As such, an effective transport management strategy would be required. The strategy is likely to require a range of event specific road closures.
Other Development Issues	
<i>Other Potential Constraints</i>	<ul style="list-style-type: none"> • Loss of open space. • Trees and waterbody's on site. • Residential amenity.

Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>	The site is reasonably well connected to the Club's Goodison Park and surrounding community. It retains some cultural ties with both Goodison Park and provides a suitable location for Everton to some extent in terms of its requirement to stay physically, socially and culturally connected to its current home. The site is approximately 2.5 km away from Goodison Park.	
<i>Iconic Location</i>	The site would not provide an iconic location due to the surrounding residential context.	
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The Site is allocated within a Conservation area (HD7 and HD114) in the adopted policy and a Conservation Area and Grade II Listed Historic Park in the emerging local Plan (HD1), which seeks to protect and enhance Historic Parks/heritage assets and prevent built development on part or all of any green space unless the proposed development can be accommodated without material harm. However, planning policy and the NPPF (pp 194) does not preclude development within a Historic Park. Any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits.The site is also allocated as greenspace (OE11 and OE12) and open space (GI3) in the adopted and emerging plan respectively. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies as well as the NPPF with regard to the loss of open space (pp's 96-101).The Liverpool City Council Open Space Assessment Report (2017) identifies Newsham Park as high value and high quality. Newsham Park has also received recent investment by receiving a new 'Action Sports Hub' to provide play facilities for older ages. The Park also acts to help serve a gap in provision for amenity greenspace for the Inner North outside of the five-minute walk catchment.A stadium development could generate a significant impact on the amenity of the surrounding community – the site is bounded by residential development on 3 sides.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none">Stanley Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.It would be likely that residential properties would also need to be acquired to allow suitable access to the site, if it was available.



<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is physically accessible by road and bus and is located 1.25km away from Wavertree Technology Park Train Station.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No (subject to assessment and clear justification)	<ul style="list-style-type: none"> The development would have a significant visual impact on the Grade II Listed Park, as well as impacting on ecology, species and habitats – which would require clear and convincing justification.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – Newsham Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints – the site is allocated as a Grade II Listed Historic Park and within a Conservation Area in the adopted and emerging Local Plan. Whilst planning policy, including the NPPF not preclude development within a Historic Park or CA, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and any loss or adverse impact on this use would need to be tested against the relevant adopted / emerging policies and the NPPF given that is considered to be a park of “<i>high value</i>” in the Liverpool City Council Open Space Assessment Report (2017). <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>	

Site 14: Walton Clubmoor Recreation Ground


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 10 hectares.
Existing Site Uses	The site contains Open Space with several football pitches, changing facilities and trees.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north of the site lies terraced and semi-detached residential units, open space and McDonalds. To the west of the site lies a railway line, terraced and semi-detached residential units and Pinehurst Primary School.

	<ul style="list-style-type: none">To the south of the site lies Clubmoor Community Centre (LMH Clubmoor), the Poppy Centre Social Club (Age Concern Liverpool), Beacon Counselling Trust Liverpool, open space with 11 aside football pitches and terraced and semi-detached residential units.To the east lies terraced and semi-detached residential units, St Matthew’s Catholic Primary School and Clubmoor Presbyterian Church.	
Site Ownership	The sites freeholder is Liverpool City Council. Two titles exist over the land with unknown owners (MS664597 & MS671009).	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">Policies OE 11 and OE 12 - Green Space.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as</p> <ul style="list-style-type: none">Policies GI 1 & GI 3 - Open Space.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Promoting healthy and safe communities</u></p> <p>Paragraph 92 (c) seeks to safeguard social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Residential amenity</u></p> <p>Paragraph 180 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development</p> <p><u>Natural Environment</u></p> <p>Paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p><u>Sports England</u></p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.
---	--

	Liverpool City Council Open Space Assessment Report and Standards (2017) The Open Space Assessment identifies that the site as Amenity Greenspace within the Outer North of Liverpool with high value and a high quality. Walton Clubmoor is identified as helping to serve the gap in provision of Natural/semi-natural space.	
Statutory Designations		
Heritage	No listed buildings or monuments lie on the site.	 Historic England Map Search, 2019
Flood Risk	The site contains areas in Flood Zone 1, 2 and 3.	 Flood Map for Planning, 2019


<i>Ecology</i>	Whilst the site provides inner city wildlife habitat, it is not considered that there are any ecological issues that would prevent the development of the site.
<i>Landscape</i>	There are not considered to be any statutory landscape designations that would prevent the development of the site.
Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	None applicable.
<i>Socio-Economic Profile</i>	In 2019 the sites LSOA has an IMD ranking of 1,642 out of 32,844 LSOA's (10% most deprived) in England and an Employment Deprivation Domain of 1,793 out of 32,844 LSOA's (10% most deprived) in England. As the site is located within one of the 10% most deprived neighbourhoods in England, the development of a football stadium has the potential to have a significant catalytic effect on the regeneration of the area.
Planning and Development Context	
<i>Planning History</i>	N/A
<i>Surrounding Development Context</i>	The surrounding area of the site has not been subject to significant development, save from the proposed conversion of a former hotel to a care home/ extra care scheme which secured planning permission in April 2018.
Accessibility	
<i>Access to National Network</i>	The site can be connected to Liverpool within 4 miles, J4 of the M57 within 3 miles and J4 of the M62 within 3 miles.
<i>Access to Public Transport Nodes</i>	<p>The site is not in a sustainable location when compared to what is proposed.</p> <p>Two bus stops sit along Townsend Lane, these provide access to Croxteth (ten per hour), Tower Hill (two per hour), Liverpool (seven per hour) and Mann Island (six per hour).</p> <p>The site is severely disconnected from rail access - Kirkdale is the closest train station 2.57km west of the site, providing access to Merseyrail services, providing access to the City Centre and National Rail Services.</p>



<i>Pedestrian and Cycle Accessibility</i>	<p>The site is connected by bicycle as the site borders an on-road signed National Cycle Network route number 810.</p>  <p><i>Mersey Travel, Liverpool Cycle Map, 2013</i></p>
<i>Highways Capacity and Access</i>	<p>Access to the site is via Townsend Lane, which is a lower order road — however, this would likely require the acquisition and demolition of community assets along Townsend Lane, including Clubmoor Community Centre (LMH Clubmoor), the Poppy Centre Social Club (Age Concern Liverpool), Beacon Counselling Trust Liverpool. The site is also surrounded by residential streets and would require significant traffic management to accommodate major events.</p>
Other Development Issues	
<i>Other Potential Constraints</i>	<ul style="list-style-type: none"> • Loss of open space. • Playing pitch re-provision (Sport England). • Site constrained by residential dwellings.
Fit with Everton's Requirements	
<i>Connection to North Liverpool</i>	<p>The site is well connected to the Clubs Goodison Park and surrounding community. It retains cultural ties with Goodison Park, the Everton community and the site is physically, socially and culturally connected to the Everton community. However, the loss of grass roots football pitches would be a major loss for the community and contrary to Everton's ethos.</p> <p>The site is approximately 1.75km away from Goodison Park.</p>
<i>Iconic Location</i>	<p>The site would not provide an iconic location due to the surrounding residential context.</p>

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size in area to accommodate a stadium; however, it's irregular shape, orientation and hard boundaries (rail line and residential) could generate issues with stadium siting and orientation (which would require further assessment).
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy G11 and G13), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities). In terms of its use and quality, the site is considered as High Value Green Space as the Liverpool City Council Open Space Assessment Report and Standards April 2017 identifies the site as high quality and high value green space that helps to serve the gap in provision of natural/semi-natural space. A stadium development could generate a significant impact on the amenity of the surrounding community – the site is bounded on all sides by residential development. There is the potential to generate a significant impact on the amenity of the surrounding community in terms of traffic, noise, visual impact and event day disruption. There is limited access to the site from the strategic highways network – full access would likely require the acquisition and demolition of community assets along Townsend Lane, including Clubmoor Community Centre (LMH Clubmoor), the Poppy Centre Social Club (Age Concern Liverpool) and Beacon Counselling Trust Liverpool.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. It would be likely that community facilities would also need to be relocated to allow suitable access to the site – requiring land assembly and potentially CPO.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is physically accessible by road and bus. However, the site is in an unsustainable location that is severely disconnected from rail access - Kirkdale is the closest train station 2.57km west of the site. A comprehensive transport strategy would be required to manage the sustainable movement of people.

<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No</p>	<ul style="list-style-type: none"> There are not considered to be any unacceptable environmental or visual impacts that would prevent the redevelopment of the site, subject to suitable mitigation and notwithstanding other identified development issues.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City.. LCC will not consider the sale of the site to Everton and therefore the site is not available. In addition, redevelopment of the site would require the acquisition and demolition of community assets along Townsend Lane, including Clubmoor Community Centre (LMH Clubmoor), the Poppy Centre Social Club (Age Concern Liverpool) and Beacon Counselling Trust Liverpool to allow suitable access to the site. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Sustainable access — the site is in an unsustainable location, situated more than 2.5km from a rail station. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. It is considered as a High Value Green Space as the Liverpool City Council Open Space Assessment Report and Standards April 2017 identifies the site as high quality and high value green space that helps to serve the gap in provision of natural/semi-natural space. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>	


Site 15: Rice Lane Recreation Ground


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 10.3 ha.
<i>Existing Site Uses</i>	The site contains Archbishop Beck Tennis Centre, a five aside football pitch, woodlands, open space and a public footpath.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies railway line, residential apartments, an office block, Blessed Sacrament Catholic Primary School, woodlands, terraced and semidetached residential units and Rice Lane Primary School. • To the west lies Rice Lane train station, retail units (McDonalds and Farmfoods), Liverpool Progressive School and terraced and semidetached residential units. • To the south lies St Nathanael's Church, Rice Lane High Street and terraced residential units. • To the east lies industrial units with a variety of sizes, a pond and open space.

Site Ownership	The sites landowner is Liverpool City Council.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policies OE11 and OE12 - Green Space, and• Policy OE8 - A New Countryside Area.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policies GI 1 & GI 3 - Open Space, and• Policies GI 1 & GI 5 - a Local Wildlife Site (LWS).	
National Policy and Other Material Considerations	<p>NPPF (2019)</p> <p><u>Promoting healthy and safe communities</u></p> <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p>	

	<p>Paragraph 98 states that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Natural Environment</u></p> <p>Paragraph 175 states that when determining planning applications, local planning authorities should apply the following principles: Biodiversity (175a) - if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused</p> <p><u>Sports England</u></p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions. <p>Liverpool City Council Open Space Assessment Report and Standards (2017)</p> <p>The Open Space Assessment Report identifies Rice Lane as within the Outer South and considers the site to have a high quality despite signs of misuse. Rice Lane is also identified as having one of the highest scoring sites for value within the city due to the site offering a number of features such as sports provision and play facilities (e.g. pitches, a Skate Park, and good paths) that meet the recreational needs of a variety of people.</p>
--	---

Statutory Designations		
<i>Heritage</i>	The site contains no listed buildings or monuments however, 200m west of the site lies two grade II listed buildings in 32-54 Hornby Road and 2 Hornby Place.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site is located within Flood Zone 1 therefore there is little risk of flooding.	 <p>Flood Map for Planning, 2019</p>

Ecology	The habitats located on the site include Priority Habitat Inventory - Deciduous Woodland and National Forest Inventory – Broadleaved.				 <p>Magic Maps, 2019</p>
Landscape	It is not considered that there are any landscape designations that would prevent the development of the site.				
Strategic and Regeneration Context					
Strategic and Regeneration Policy	N/A				
Socio-Economic Profile	In 2019 the sites LSOA has an IMD ranking of 3,999 out of 32,844 LSOA's (20% most deprived) in England and an Employment Deprivation Domain of 4,443 out of 32,844 LSOA's (20% most deprived) in England. As the site is located within one of the 20% most deprived neighbourhoods in England, the development of a football stadium has the potential to have a significant catalytic effect on the regeneration of the area.				
Planning and Development Context					
Planning History	Application Number	Date	Decision	Details	
	07F/2625	02-11-2007	Approve with Conditions	To erect single-storey viewing gallery, club room, store, and community room.	
	05F/0023	29-04-2005	Approve with Conditions	To lay out 3 no. tennis courts with 8 no. associated floodlights.	

	04F/0290	05-03-2004	Approve with Conditions	To erect single-storey building for use as an indoor tennis centre and sports hall; lay out associated outdoor tennis courts, car parking, landscaping, and perimeter fencing; and to create new vehicular access from Crescent Road (alternative scheme to that approved under permission 03F/2456)
	03F/2456	18-11-2003	Approve with Conditions	To erect single-storey building for use as an indoor tennis and sport centre, lay out associated outdoor tennis courts, car parking and landscaping, and create a new vehicular access from Crescent Road
	01F/2566	24-07-2002	Approve with Conditions	To develop former school site by the erection of 42 dwellings including associated estate roads and including area to allow for future vehicular access off Crescent Road to Rice Lane Recreation Ground
Development Status	The area surrounding the site has not been subject to any major development proposals.			
Landowner / Developer Aspirations	Liverpool City Council is committed to retaining the City’s green spaces and sports provision for the local community.			
Accessibility				
Access to National Network	The site borders Rice Lane which gives the site access to Liverpool, the M57 / M58 roundabout and J6 of the M57.			
Access to Public Transport Nodes	Rice Lane is well served by several bus services which provide access to Bootle, Dale Street, Liverpool, Mossley Hill, Northwood, Skelmersdale, Southport, Tower Hill and Waddicar.			
	The site is 80m away from Rice Lane train station. This gives the site access to the Merseyrail network which gives the site access to the city centre and the national rail network.			
Pedestrian and Cycle Accessibility	Pedestrian and cycle access surrounding Rice Lane Recreation Ground provides a footpath and an off-road cycle track which is part of National Cycle Network route number 62 and the Trans Pennine Trail. Rice Lane provides an on-road cycle lane and Hornby Road provides an on-road signed cycle route.			
	Mersey Travel, Cycle Map Liverpool, 2017			

Highways Capacity and Access	Access to the site is constrained and would require the acquisition and demolition of properties on Rice Lane. Event day mitigation would also be required on surrounding roads.	
Other Development Issues		
Other Potential Constraints	<ul style="list-style-type: none">• Loss of open space.• Loss of playing pitches (Sport England).• Hard boundary constraints (rail line).• Trees on site.• Residential amenity.	
Fit with Everton’s Requirements		
Connection to North Liverpool	<p>The site is well connected to the Clubs Goodison Park and surrounding community. It retains cultural ties with both Goodison Park and the Docks and provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.</p> <p>The site is approximately 2 km away from Goodison Park.</p>	
Iconic Location	The site would not provide an iconic location due to the surrounding uses.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">▪ The site is of sufficient size in area to accommodate a stadium; however, it’s irregular shape, orientation and hard boundaries (rail line and residential) could generation issues with stadium siting and orientation (which would require further assessment).

<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> ▪ The Site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as a Local Wildlife Site (GI5) and Green Infrastructure and Open Space in the emerging Local Plan (Policy GI1 and GI3), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities). ▪ In terms of its use and quality, site is identified as Green Space and is an important community recreation asset. The Liverpool City Council Open Space Assessment Report (2017) identifies that Rice Lane has one of the highest scores for value within the city due to the site offering a number of features such as sports provision and play facilities (e.g. pitches, a Skate Park). ▪ A stadium development could generate a significant impact on the amenity of the surrounding community – the site is bounded by residential development. There is the potential to generate a significant impact on the amenity of the surrounding community in terms of traffic, noise, visual impact and event day disruption. ▪ There is limited access to the site from the strategic highways network – full access would require the acquisition and demolition of residential properties on Rice Lane.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> ▪ The site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. ▪ It would be likely properties would also need to be acquired to allow suitable access to the site – requiring land assembly and potentially CPO.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> ▪ It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> ▪ The site is in close proximity to Rice Lane Rail Station.
<i>Would there be any unacceptable environmental or visual impacts?</i>	Yes	<ul style="list-style-type: none"> ▪ There are not considered to be any unacceptable environmental or visual impacts that would prevent the redevelopment of the site, subject to suitable mitigation and notwithstanding other identified development issues.

Summary and Conclusions

Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?

Summary Assessment


In summary, the key considerations when assessing the site include:



- Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. In addition, the site is inaccessible and it would be likely properties would need to be acquired to allow suitable access to the site — requiring land assembly and potentially CPO.
- Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere.
- Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. It is identified as high value open space in the Liverpool City Council Open Space Assessment Report (2017), due to the site offering a number of features such as sports provision (playing pitches) and play facilities (e.g. pitches, a Skate Park).

Conclusion & Comparison with BMD



The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available.**

Site 16: Former Fruit and Veg Market

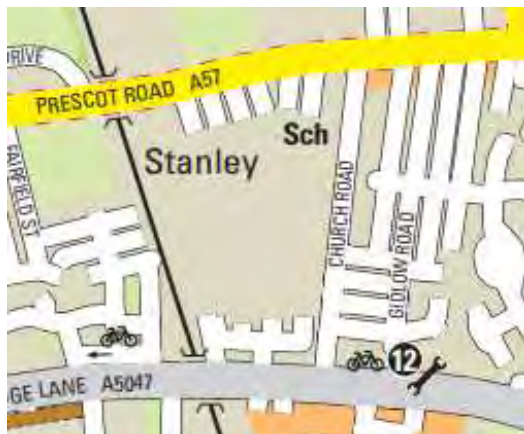
ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 7.35 hectares.
<i>Existing Site Uses</i>	The site is a vacant industrial site.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north of the site lies terraced residential units, a variety of industrial units, household waste recycling centre and Newsham Park. To the west of the site lies a railway line, a new residential development by Bellway Homes named “Newsham Gardens” and terraced residential units. To the south of the site lies terraced and semidetached residential units and Liverpool Shopping Park. To the east of the site lies St Cuthberts Catholic Primary & Nursery School and terraced and semidetached residential units.

Site Ownership	The sites freeholder is Liverpool City Council and the Police and Crime Commissioner for Merseyside. UK Power Distribution Limited hold a leasehold on the site	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policy E1 - a Primarily Industrial Area, and• Policy E62 - a Site for Industrial / Business Development.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policy H2 - a site for Housing Development with allocation H9 (capacity of 150 homes), and• Policy EC6 - a Mixed-Use Area (the Mixed-Use Area profiles identify that the site is suitable for B1/B2/B8/C3/D1 uses).	

<p><i>National Policy and Other Material Considerations</i></p>	<div data-bbox="526 199 2045 534"> <p>NPPF (2019)</p> <p><u>Residential Amenity (surrounded by residential)</u></p> <p>Paragraph 180 states that decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.</p> <p><u>Employment</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p> </div> <div data-bbox="526 534 2045 1380"> <p>Liverpool's Strategic Housing Land Availability Assessment (SHLAA) (2017)</p> <p>Liverpool's SHLAA identifies the north of the site as suitable for housing. The site scores maximum for suitability, availability and achievability, leading to the site being awarded a draft housing allocation.</p> <div data-bbox="1467 534 2004 1013"> </div> <p><i>Liverpool SHLAA Update, 2017</i></p> </div>
---	---

Statutory Designations		
<i>Heritage</i>	No listed buildings or monuments exist on the site, however, 100m to the north west of the site Newsham Park, a grade II listed Park and Garden sits and 220m north east of the site sits the Church of St Anne a grade II listed building.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site sits in flood zone 1 therefore flood risk is low.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	


Strategic and Regeneration Context				
Strategic and Regeneration Policy	Central Liverpool Mayoral Development Zone (MDZ) The site lies within the Central Liverpool MDZ, which straddles either side of Edge Lane, the city’s principal road corridor that links the City Centre with the M62 and the motorway network. Few areas of the city have seen as dramatic a transformation as Edge Lane. In the past decade, more than £45million has been spent on striking public realm improvements, improved junctions, and better pedestrian and cycle access. Recent work has also included the construction of Innovation Boulevard, a new link between Edge Lane and Wavertree Technology Park. The Former Fruit and Veg Market site is identified as a site with potential to generate employment uses in the future.			
	Socio-Economic Profile In 2019 the site has an IMD ranking of 901 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 770 out of 32,844 (10% most deprived in the country). The site lies within the 10% most deprived areas of the country therefore the stadium development has the potential to have a significant catalytic impact on the regeneration of the area.			
Planning and Development Context				
Planning History	The recent and historic consents are outlined below. Following the relocation of the old Fruit and Vegetable Market to Gilmoor, a planning application has been approved on the southern part of the site for a new Police Hub.			
	Application Number	Date	Decision	Details
	17PM/3548	22-02-2018	Prior Approval Given	To carry out demolition works.
	17F/0656	08-06-2017	Approve with Conditions	To erect new vehicle maintenance and patrol facility on 4.3 ha of the site.
	09F/0333	20-03-2009	Approve with Conditions	To carry out partial demolition works, and undertake external works to the remaining units
Development Status	The area surrounding the site has been subject to a number of proposals. Developments in the surrounding area include Phase O of Edge Lane Retail Park, House Waste Recycling Centre and 12 new retail and restaurant units in the Western Quarter of Liverpool shopping park.			


Landowner / Developer Aspirations	The site is under development (southern part) as the new Merseyside Police patrol hub and repair facility. The northern part of the site is allocated for housing development in the emerging Local Plan.	
Accessibility		
Access to National Network	The site borders Prescott Road (A57) to the north, a road network which provides two lanes and connects the site to Liverpool and J4 of the M62.	
Access to Public Transport Nodes	Two bus stops sit along Prescott road which provides services to Liverpool, St Helens and Huyton. 720m to the south sits Wavertree Technology Park train station. This gives the site access to national rail services to Crewe, Liverpool Lime Street, Manchester Victoria, Warrington Bank Quay and Wigan North Western.	
Pedestrian and Cycle Accessibility	An on-road signed cycle route exists along Prescott Road. Edge Lane provides two cycle parking stations and a bike shop.	 <p>Mersey Travel, Cycle Map Liverpool, 2017</p>
Highways Capacity and Access	Edge Lane will be the primary highway access route into the area from many directions, however it already experiences high traffic flows and congestion. It is likely that a stadium in this location will exacerbate this issue. Access to the site is constrained and would require the acquisition of residential properties to the north, east or south to provide suitable access for a stadium use.	


Other Development Issues		
<i>Other Potential Constraints</i>		<ul style="list-style-type: none"> • Current development proposals. • Adjacent to rail line (west). • Residential amenity.
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>		<p>The site is reasonably well connected to Goodison Park and surrounding community. It retains some cultural ties with both Goodson Park and provides a suitable location for Everton to some extent in terms of its requirement to stay physically, socially and culturally connected to its current home.</p> <p>The site is approximately 3.5 km away from Goodison Park.</p>
<i>Iconic Location</i>		The site would not provide an iconic location due to the surrounding residential uses.
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	No	<ul style="list-style-type: none"> ▪ The site unlikely to be able to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> ▪ The site is allocated for housing and a mix of uses in the emerging local plan. ▪ The site is potentially contaminated due to the impact and legacy of longstanding industrial uses on the site. ▪ The site is bound by residential uses, which would create amenity impacts with the surrounding community. ▪ Notwithstanding the above, if it were of sufficient size, the site could be considered to be deliverable in policy terms due to its proposed allocation for a mix of uses.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> ▪ The site is not available. The southern part of the site (4.3ha) has planning consent (2017) and is currently being developed to deliver a new Metropolitan Police Hub. The northern part of the site is now proposed for housing development.



		<ul style="list-style-type: none"> Access to the site is constrained and would require the acquisition of residential properties to the north, east or south to provide suitable access for a stadium use — likely requiring CPO.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> There are not considered to be any unaffordable development costs that would prevent the development of the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> Edge Lane will be the primary highway access route into the area from many directions, however it already experiences high traffic flows and congestion. It is likely that a stadium in this location will exacerbate this issue. Access to the site via sustainable modes of transport would need to be carefully managed and justified.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation and notwithstanding other identified development issues.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p>Summary Assessment</p> <p>The southern part of the site (4.3ha) has planning consent (2017) and is currently being developed to deliver a new Metropolitan Police Hub. The northern part of the site (c.3ha) is now proposed for housing development and will be allocated for this use in the emerging Local Plan. Notwithstanding other site specific issues (such as size, circulation and access), the site is fundamentally not available.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available, nor is it of sufficient size or in a suitable location to accommodate a stadium.</p>	


Site 17: John Moores & NTL Site

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 26 hectares.
<i>Existing Site Uses</i>	Wavertree Technology Park is currently located on the site, which provides industrial, office, leisure, retail and business continuity services space.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies Phoenix Primary School, Sy Sebastian's Catholic Primary School and residential units which make up Fairfield. • To the west lies Wavertree Botanic Gardens, Littlewoods Studios and office space. • To the south lies several industrial units and a railway line; and • To the east lies Liverpool Shopping Park.

<p><i>Site Ownership</i></p>	<p>The site has a complex and fragmented ownership, with freeholders including:</p> <ul style="list-style-type: none"> • ACB Property Investments Limited; • Derwent Holdings Limited; • Homes and Communities Agency; • Liverpool City Council; • Sunflower Industrial Property Nominee 2 Limited; • United Biscuits (UK) Limited; • Valedown Limited; • Ven4 Limited; and • Several Unknown Freeholders. <p>Additionally, the site has 21 leasehold titles.</p>
<p>Planning Policy</p>	
<p><i>Adopted Policy</i></p>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E1 - a Primarily Industrial Area, • Policy E1 - a Site for Industrial/Business Development, and • Policy E6 - a Site for Various Types of Development (suitable for A1 / C1 /D2 use classes). 

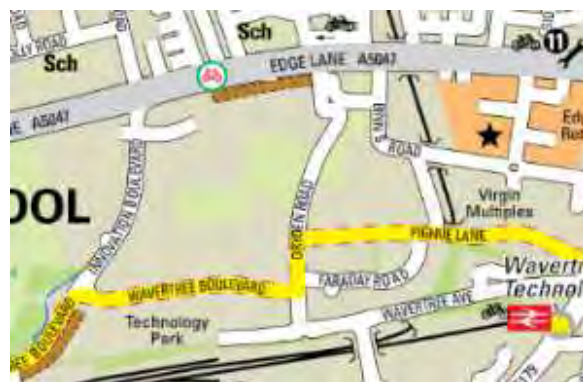
<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policies EC1 & EC2 - Site for Industrial/Business Development with allocations E19 and E22, • Policy EC2 - Primarily Industrial Area, and • Policy SP6 - Out of Centre Shopping Park. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019) <u>Employment</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>	
	<p>Liverpool's Employment Land Study (2017)</p> <p>Liverpool's Employment Land Study (2017) identifies the site within the Edge Lane Corridor Lane Central. The report states that the "<i>area provides high quality mixed industrial area and several well-functioning business parks supporting a range of B Class uses</i>". Therefore, the report recommends that existing employment uses within the Edge Lane Corridor Central should be protected and the loss of Class B employment space should be resisted.</p>	

Statutory Designations		
<i>Heritage</i>	<p>No listed buildings or monuments lie on the site however, on the south eastern border of the site, Wavertree Park, a grade II* listed park and garden is located, which contains two Grade II listed buildings, the Lodge to Botanic Gardens and a Fountain in the Middle of the Park.</p> <p>To the north west of the site from Dean Road to Laurel Road there is a cluster of 21 Grade II listed buildings.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site is located within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	

Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	<p>Central Liverpool Mayoral Development Zone (MDZ)</p> <p>The site lies within the Central Liverpool MDZ, which straddles either side of Edge Lane, the city's principal road corridor that links the City Centre with the M62 and the motorway network. Few areas of the city have seen as dramatic a transformation as Edge Lane. In the past decade, more than £45million has been spent on striking public realm improvements, improved junctions, and better pedestrian and cycle access. Recent work has also included the construction of Innovation Boulevard, a new link between Edge Lane and Wavertree Technology Park.</p> <p>Central Liverpool MDZ Enjoys some of the highest take-up rates anywhere in the city. Major employers include Nutricia Liverpool, the worldwide lead in Advanced Medical Nutrition for use in dietary support. Barclays Bank chose the area for one of its busiest call centres, the life-changing Roy Castle Lung Foundation's research hub is based here, along with the game-changing tech of Human Recognition Systems.</p>	
<i>Socio-Economic Profile</i>	<p>The site sits across two LSOAs, the first LSOA in 2019 has an Index of Multiple Deprivation (IMD) ranking of 796 (amongst the 10% most deprived) and an employment deprivation ranking of 1,121 (amongst the 10% most deprived) out of 32,844 LSOAs in England.</p> <p>The second LSOA in 2019 has an IMD ranking of 796 (amongst the 10% most deprived) and an employment deprivation Domain of 1,121 (amongst 10% most deprived) out of 32,844 LSOAs in England.</p> <p>The site lies within the 10% most deprived areas within England therefore, the development of a football stadium has the potential to have a significant catalytic impact on the regeneration of the area.</p>	

Planning and Development Context				
<i>Planning History</i>	There are a number of recent planning applications that are relevant to the site and which demonstrate its ongoing development as an employment and retail destination.			
	Application Number	Date	Decision	Details
	19F/1105	04-06-2019	Approve with Conditions	To use units 3 and 4 for storage purposes for temporary period.
	18F/1510	03-08-2018	Approve with Conditions	To erect single storey drive through restaurant and coffee shop, including access, car park and landscaping.
	17F/1443	08-03-2018	Approve with Conditions	To alter and convert building (Building 3) for retail purposes (within Use Class A1) including new shop front and recladding; to alter and convert part of building (Building 19) to hotel (within Use Class C1); erect single storey drive through restaurant; and carry out associated works including servicing, car park and new vehicular and pedestrian accesses.
	16F/1532	08-12-2016	Approve with Conditions	To demolish existing office building and erect boundary fencing (retrospective application).
	14F/2046	03-11-2014	Approve with Conditions	To demolish buildings and reconfigure car park to provide additional spaces and improved access to buildings 2, 16 & 17.
	13F/2504	04-12-2013	Approve with Conditions	To use units 101 and 102 as a children's play centre and for non-food retail, erect mezzanine floor in unit 102 and form access to unit 101.
	12F/0278	22-03-2012	Approve with Conditions	To use part of ground floor of premises as a fitness gymnasium.
	11F/2817	11-01-2012	Approve with Conditions	To demolish existing compactor store building and erect new substation, part demolish existing generator room and erect extension.
	09F/1620	25-09-2009	Approve with Conditions	To erect two phase pharmaceutical production facility with 2 storey office accommodation and ancillary storage buildings and plant, associated car parking, vehicle loading facilities landscaping, fencing and gates (alternative to application no. 08F/2276)

	08F/2276	17-11-2008	Approve with Conditions	To erect a pharmaceutical production facility comprising two-storey office/laboratory accommodation, 16.5-metre high spray dryer tower and storage facility and lay out car parking and associated works.
	040/4494	22-03-2005	Approve with Conditions	To develop sites (including provision of necessary physical infrastructure) so as to create fully serviced development land for use as a Science Park, comprising offices/light industrial use (use Class B1) and General Industrial Use (use Class B2); to construct a new distributor road and associated new junctions with Edge Lane and Wavertree Boulevard, carry out alterations to Wavertree Boulevard at junction with Wavertree Road, and associated engineering operations; to construct associated utility and drainage infrastructure and associated engineering operations; and to lay out landscape infrastructure, car parking, circulation and secondary access and circulation roads, and associated engineering operations (Outline Application)
	04F/2543	25-08-2004	Approve with Conditions	To use second floor of buildings no.2 and no.16 for mixed uses as office, research and development, and undergraduate teaching uses.
<i>Surrounding Development Context</i>	<p>The site and the area surrounding the site has been subject to a number of development proposals due to the site’s key strategic location which gives the area one of the highest take up rates in the country.</p> <p>Some key developments in the surrounding area include 12 new retail units within the Western Quarter of Liverpool Shopping Park, refurbishment and development of film and television studios, the proposed conversion of building 19 of Liverpool Innovation Park as a new film and television studios known as Littlewoods Film Studios and 19 retail and restaurant units proposed within the Eastern Quarter of Liverpool Shopping Park. This context demonstrates the evolving character of the Edge Land Corridor for a mix of employment and retail uses.</p>			
Accessibility				
<i>Access to National Network</i>	The site is well situated as it borders Edge Lane which connects the site to Liverpool City Centre within 10 minutes and J4 of the M62 in 5 minutes making it a key strategic location for employment development.			
<i>Access to Public Transport Nodes</i>	<p>The site borders two bus stops at West Bank Road and Milton Road which provide two services per hour to Warrington and three services per hour to Liverpool.</p> <p>The site also lies 290m away from Wavertree Technology Park train station which is connected to National Rail Services linking the site to Liverpool, Wigan, Crewe and Warrington.</p>			

<i>Pedestrian and Cycle Accessibility</i>	The site contains an on-road signed cycle route, an off-road cycle track and a cycle crossing point.	 <p>Mersey Travel, Cycle Map Liverpool, 2017</p>
<i>Highways Capacity and Access</i>	Edge Lane will be the primary highway access route into the area from many directions, however it already experiences high traffic flows and congestion. It is likely that a stadium in this location will exacerbate this issue. The movement of pedestrians across Edge Lane would need to be carefully managed.	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Impact on business and retail uses• Land assembly.	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	The site is not closely connected to the Clubs Goodison Park and surrounding community and therefore, cultural ties with both Goodison Park and the Docks are limited. It may not be considered as a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home. The site is approximately 4 km away from Goodison Park.	
<i>Iconic Location</i>	The site would not provide an iconic location due to the surrounding uses.	

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site is allocated for employment uses in the adopted UDP and emerging local Plan. If assessed against adopted and emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policies EC1 and EC2) as well as the NPPF with regard to employment (pp's 80-82). The site is allocated in emerging policy for employment uses and is considered to form a key part of the City's employment land supply. The development of the site for stadium uses would be a departure from adopted policy and would not align with emerging policy.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site comprises Wavertree Technology Park, which has been developed for a range of employment and retail uses and which forms a key employment location in the City. There are a number of recent planning applications which demonstrate its ongoing "live" development as an employment and retail destination. Notwithstanding this, the site has a series of complex and fragmented freeholds and leaseholds which would require acquisition and land assembly.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> There are not considered to be any unaffordable development costs that would prevent the development of the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is well located in terms of sustainable transport. Edge Lane will be the primary highway access route into the area from many directions, however it already experiences high traffic flows and congestion. It is likely that a stadium in this location will exacerbate this issue.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.

Summary and Conclusions Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?


Summary Assessment



The site was previously considered by the Club as an alternative site (prior to its redevelopment for employment and retail uses), and by LFC in its 2007 ASA. However, it has since been developed for a range of employment and retail uses and which forms a key employment location in the City — as part of Wavertree Technology Park. There are a number of recent planning applications and “live” developments on the site which demonstrate its ongoing development as a key employment and retail destination along the Edge Lane Corridor. Notwithstanding this active use, the has a series of complex and fragmented freeholds and leaseholds which would require acquisition and land assembly.

Conclusion & Comparison with BMD

The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site has been developed for commercial and retail uses since it was considered in previous site search assessments and is not available.**



Site 18: Wavertree Botanic Gardens


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 18 hectares.
<i>Existing Site Uses</i>	The site contains open space, play facilities, sports playing pitches, the Botanic Lodge Nursery and woodlands.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies Edge Lane, Devonshire House Hotel, Shell Petrol Station, Industrial units, Hindu Cultural Organisation, St Sebastian's Catholic Primary School and terraced residential units. To the west lies Jelli Studios, Wavertree Retail Park (Home Bargains, Pound Stretcher and Buzz Bingo), Edge Hill Train Station and semi-detached and terraced residential units. To the south lies Railway lines, industrial units, four storey apartments, semidetached and terraced residential units. To the east lies Littlewoods Studios, office space, vacant land and Liverpool Innovation Park.


<i>Site Ownership</i>	The site freeholder is Liverpool City Council. Three titles exist over the land with unknown landowners and three leasehold titles, two owned by SP Manweb PLC and one leasehold with title ref. MS599933 — which is likely to be leased to the Botanic Lodge Nursery.	
Planning Policy		
<i>Adopted Policy</i>	In the Liverpool UDP (2002), the site is allocated as: <ul style="list-style-type: none">• Policy OE11 and OE12 - Green Space.	
<i>Emerging Policy</i>	The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as: <ul style="list-style-type: none">• Policy HD1 - Historic Park.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> A. grade II listed buildings, or grade II registered parks or gardens, should be exceptional; B. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p>
	<p>Sport England</p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or

	land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.
	Liverpool City Council Open Space Assessment (2017) The Open Space Assessment identifies that LCC regard Wavertree Botanic Park as having a high quality and a high value and an area with provision for children and young which is of a high quality and a high value. The site is located within the Inner South and helps serve catchment gaps (5-minute walk) of amenity greenspace.
	Liverpool’s Strategic Green and Open Spaces Review (2016) The Green and Open Space Review recommends that stakeholders should work together to develop a vital green web link between Newsham Park and Wavertree Botanic Gardens.
Statutory Designations	
Heritage	<p>The site is a grade II* listed Park and Garden, which contains a grade II listed monument named the fountain in the middle of the park and the grade II listed building named the Lodge to Botanic Gardens. With seven listed buildings sitting within 200m a radius of the site.</p>  <p>Historic England Map Search, 2019</p>

<p><i>Flood Risk</i></p>	<p>The site lies within Flood Zone 1 therefore flood risk is low.</p>	 <p>Flood Map for Planning, 2019</p>
<p><i>Ecology</i></p>	<p>The habitats located on the site include Priority Habitat Inventory - Deciduous Woodland, National Forest Inventory – Broadleaved and Wood pasture and Parkland BAP Priority Habitat.</p> <p>The site contains a number of important inner-city wildlife and ecological habitats.</p>	 <p>Magic Maps, 2019</p>
<p><i>Landscape</i></p>	<p>There are no Statutory Land-Based Designations affecting the site.</p>	

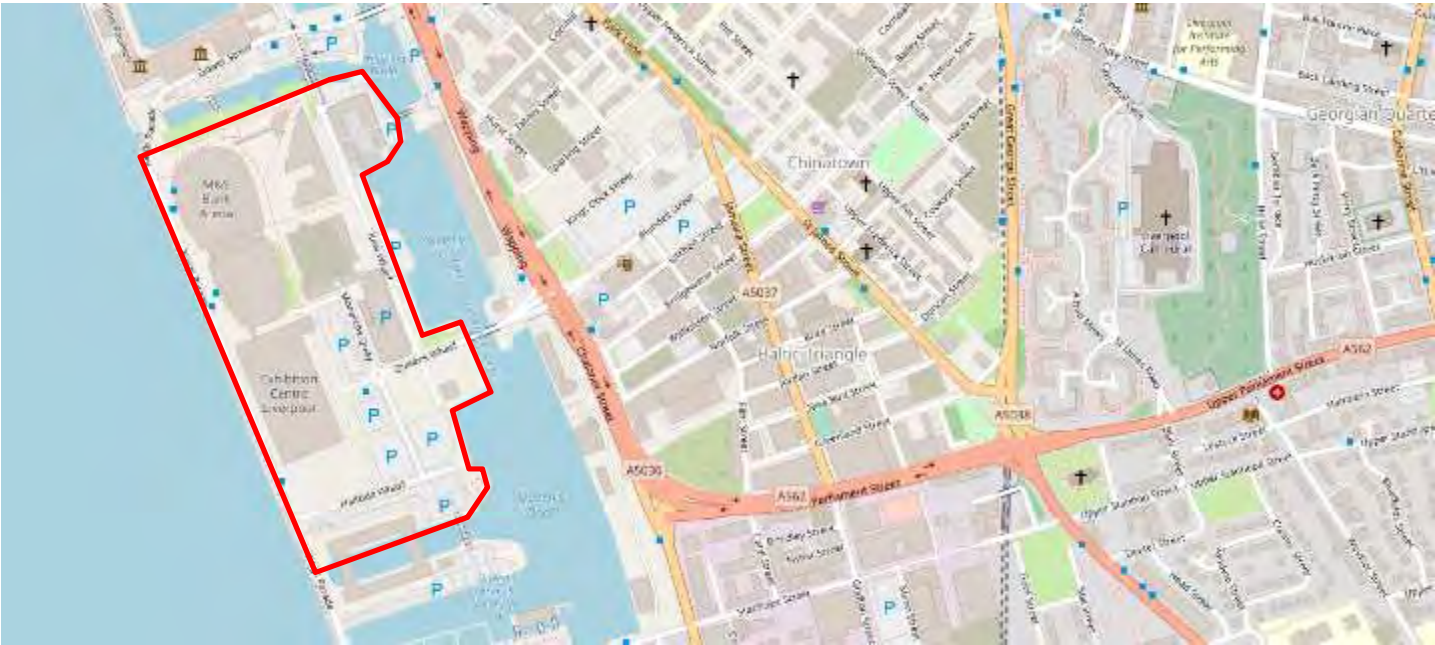
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	<p>Central Liverpool Mayoral Development Zone (MDZ)</p> <p>The site lies within the Central Liverpool MDZ, which straddles either side of Edge Lane, the city's principal road corridor that links the City Centre with the M62 and the motorway network. Few areas of the city have seen as dramatic a transformation as Edge Lane. In the past decade, more than £45million has been spent on striking public realm improvements, improved junctions, and better pedestrian and cycle access. Recent work has also included the construction of Innovation Boulevard, a new link between Edge Lane and Wavertree Technology Park.</p>	
<i>Socio-Economic Profile</i>	<p>In 2019 the site has an Index of Multiple Deprivation (IMD) ranking out of 796 (amongst the 10% most deprived) and an employment deprivation ranking of 1,121 (amongst the 10% most deprived). The site lies within the 10% most deprived areas within England therefore, the development of a football stadium has the potential to have a significant catalytic impact on the regeneration of the area.</p>	 <p><i>Indices of Deprivation: 2019 and 2015</i></p>
Planning and Development Context		
<i>Planning History</i>	The site contains no recent major planning applications.	
<i>Development Status</i>	Developments in the surrounding area include the phased refurbishment of Barclays 120,000 sq. ft call centre, the phased refurbishment and development of the Former Littlewoods Building as new film and television studios and five new non-food retail units proposed at Wavertree Retail Park.	
<i>Landowner/Developer Aspirations</i>	Liverpool City Council is fully committed to retaining the site as an important Historic City Park.	



Accessibility	
<i>Access to National Network</i>	The site has access to the strategic highways network via Edge Lane which gives the site access to Liverpool City Centre within three miles and J4 of the M62 within 2.3 miles.
<i>Access to Public Transport Nodes</i>	<p>A coach stop borders the site on Edge Lane which gives the site access to Leeds every hour.</p> <p>Bus services run along Edge Lane and provide services to Liverpool (two per hour) and to Warrington (two per hour).</p> <p>The north of the site sits 225m away from Edge Hill train station. This gives the site access to National Rail services, linking the site to Liverpool, Wigan, Crewe and Warrington.</p>
<i>Pedestrian and Cycle Accessibility</i>	<p>The site benefits from an on-road signed cycle route, an off-road cycle track and a cycle crossing point to the south of the site. However, to the north cycling provision is limited along Edge Lane.</p>  <p>Mersey Travel, Cycle Map Liverpool, 2017</p>
<i>Highways Capacity and Access</i>	Edge Lane will be the primary highway access route into the area from many directions, however it already experiences high traffic flows and congestion. It is likely that a stadium in this location will exacerbate this issue.
Other Development Issues	
<i>Other Potential Constraints</i>	<ul style="list-style-type: none"> • Inner city habitat and ecological value. • High value and high-quality open park with heritage value. • Removal of sports playing facilities (Sport England).

Fit with Everton’s Requirements		
Connection to North Liverpool	The site is located approximately 3.6km away from Goodison Park and its surrounding community therefore, its cultural ties to Goodison Park are limited. The site is approximately 4km away from Goodison Park.	
Iconic Location	The site does not provide an iconic location due to the surrounding uses.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The Site is a Grade II* Listed Historic Park, where policy seeks to protect and enhance Historic Parks/heritage assets and prevent built development on part or all of any green space unless the proposed development can be accommodated without material harm. However, planning policy and the NPPF (pp 194) does not preclude development within a Historic Park. Any substantial harm to the park and its heritage assets would require ‘clear and convincing’ justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits.The site is also allocated as greenspace (OE11 and OE12) in the adopted and emerging plan respectively. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies as well as the NPPF with regard to the loss of open space (pp’s 96-101), nd Sport England with regard to the loss of playing pitches.The Liverpool City Council Open Space Assessment Report (2017) identifies Wavertree Botanic Park as having a high quality and a high value and an area with provision for children and the young.The site contains mature woodland and trees and is an important ecological habitat in the inner city.
Is site acquisition a realistic proposition?	No	<ul style="list-style-type: none">Wavertree Botanic Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.
Can the stadium be built without incurring unaffordable development costs on the site?	Yes	<ul style="list-style-type: none">It is not considered that unaffordable development costs would prevent the development of a stadium on the site.



<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is within close proximity to Edge Lane Station.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No (subject to further investigation and mitigation)	<ul style="list-style-type: none"> The development would have a significant visual impact on the Grade II Listed Park, as well as impacting on ecology, species and habitats — which would require clear and convincing justification.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — Wavertree Botanic Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as a Grade II* Historic Park. Whilst planning policy, including the NPPF not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and any loss or adverse impact on this use would need to be tested against the relevant adopted / emerging policies and the NPPF given that is considered to be a park of “<i>high value</i>” in the Liverpool City Council Open Space Assessment Report (2017). <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>	


Site 19: Kings Dock


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Kings Dock</i>	
Site Details	
<i>Site Area</i>	The site is approximately 16.6 hectares.
<i>Existing Site Uses</i>	The site comprises of the Echo Arena, the Ferris Wheel of Liverpool, Mersey Waterfront Apartments, Office Space, the 'eastZest' restaurant, the Exhibition Centre, Car Parking, Hotel Campanile, Zevo Seven One Bar & Base and Grosvenor Casino.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies Dukes Dock, the Royal Albert Dock, Merseyside Maritime Museum, Tate Liverpool, the Beatles Story, Premier Inn, Salthouse Dock and Miller & Carter Albert Dock. To the east lies Wapping Dock and Huskisson Welding & Engineering.

	<ul style="list-style-type: none">• To the south lies The Keel Apartments, Queens Dock and Liverpool Watersports Centre.• To the west lies the River Mersey.	
Site Ownership	<p>The site is currently owned by the Homes and Communities Agency. The site contains 296 leasehold titles, notable leaseholders include:</p> <ul style="list-style-type: none">• Ash & Raja Holdings Limited• Liverpool City Council.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policy E6 - a Site for Various Types of Development (Schedule 6.3 - B1 / C3 / D2 use classes), and• Policy OE4 - a Developed Coastal Zone.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) allocates the site as:</p> <ul style="list-style-type: none">• Policy EC6 - a Mixed-Use Area - 'the Waterfront and its Fringes' — supports leisure-led mixed-use development within this location.	


<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Coastal</u></p> <p>Paragraph 168 states that development in a Coastal Change Management Areas will be appropriate only where it is demonstrated that:</p> <ul style="list-style-type: none"> a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change; b) the character of the coast including designations is not compromised; c) the development provides wider sustainability benefits; and d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast. <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> A. grade II listed buildings, or grade II registered parks or gardens, should be exceptional; B. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p><u>Natural Environment</u></p> <p>Paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p>
---	--

Statutory Designations		
Heritage	<p>The site lies within the World Heritage Zone buffer area and contains or is directly adjacent to four Grade II listed buildings / monuments:</p> <ul style="list-style-type: none"> • Dock Retaining wall to Dukes Dock; • Wapping Basin; • Hydraulic Tower at Wapping Dock; and • Gatekeeper's Lodge at Entrance to Wapping Dock. 	 <p>Historic England Map Search, 2019</p>
Flood Risk	<p>The western border of the site sits within Flood Zone 3 and the remaining area of the site sits within Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>

<i>Ecology</i>	A desktop search identifies that the site is located within an extremely high Seabird Oil Sensitivity location and within a Priority Species for CS Targeting - Lapwing. It is not considered that there are any ecological designations that would prevent the development of the site.	
<i>Landscape</i>	A desktop assessment identifies that the Statutory Land based designation affecting the site include a Wild Bird General Licence Exclusion Zone. It is not considered that there are any landscape designations that would prevent the development of the site.	 <p>Magic Maps, 2019</p>
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	<p>Liverpool City Enterprise Zone</p> <p>Liverpool City Enterprise Zone consists of the city's Commercial Office District, the waterfront area with the Three Graces, the Historic Downtown Area, and part of the north city docklands reaching as far as Stanley Dock. The zone contains the greatest concentration of employment in the city region, and is home to several local, national and international firms with expertise in banking, professional services and the creative and media sectors.</p>	

<i>Socio-Economic Profile</i>	<p>In 2019 the site has an IMD ranking of 22,439 out of 32,844 (40% least deprived in the country) and an Employment Deprivation Domain of 32,057 out of 32,844 (10% least deprived in the country). A such, the site could have a lesser regeneration impact than more deprived areas of the City.</p>	 <p>IMD, 2019</p>		
Planning and Development Context				
<i>Planning History</i>	<p>The site has been subject to a number of planning applications which have transformed King’s Dock into a tourist and leisure destination. Notable recent and historic consents are outlined below.</p>			
	Application Number	Date	Decision	Details
	19F/1002	26-06-2019	Approve with Conditions	To use vacant unit as cafe bar/deli (A3 use)
	18F/1444	10-12-2018	Approve with Conditions	To erect building containing 586 space multi-storey car park over four levels to replace existing car park with existing sub-station to be retained.
	17F/3261	24-04-2018	Approve Subject to a Legal Agreement	To erect a mixed-use development, including a Commercial Building, comprising an Interpretation Centre with flexible A1, A2, A3, A4, D1 uses (Lower and Upper Ground Floors) and B1 Office use (Upper Floors), and a Six Storey Apartment Block, comprising of 102no. one, two and three-bedroom apartments, with ground floor commercial use and 33no. car parking spaces and associated landscaping / public realm works.


	17F/2490	10-01-2018	Approve with Conditions	To erect a four-storey commercial building, providing commercial office and cafe (A3) use at ground floor and commercial offices at the upper three floors, including car parking, public realm / landscaping and associated works.
	14F/0399	21-03-2014	Approve with Conditions	To continue to use land for the siting of large observation wheel together with base podium and associated structures for a further temporary period until 30 September 2018.
	13F/0531	31-07-2013	Approve with Conditions	To redevelop site by the erection of a 16,296 sqm. exhibition centre (Use Class D2) with ancillary uses within Classes A1, A3, A4, A5 & B1 (maximum floorspace of 2,100 sqm.), a 12,304 sqm. hotel with restaurant bar, hotel lobby, back of house facilities and roof top plant, and upper floor bridge link to the Arena & Convention Centre Liverpool, along with associated vehicular drop-off/pick up area, service area, public realm, landscaping and access works, including a reconfigured highway arrangement to Queens Wharf/Half-tide Wharf.
	13F/0377	02-05-2013	Approve with Conditions	To change use from commercial offices (Use Class B1) to 240 no. one, two and three-bedroom residential apartments (Use Class C3) with associated car parking, landscaped amenity space, resident's community centre, children's play area and ancillary plant and storage. buildings.
	12F/1858	17-10-2012	Approve with Conditions	To continue to use land for the siting of large observation wheel together with base podium and associated ancillary structures for a further temporary period from February 2013 to February 2015.
	11F/1037	13-06-2011	Approve with Conditions	To continue to use land for the siting of a large observation wheel together with base podium and associated ancillary structures for a further temporary period from February 2012 to February 2013.
	10F/0910	09-06-2010	Approve with Conditions	To continue to use land for the siting of giant observation wheel and associated ancillary structures until February 2012.
	040/2574	08-03-2005	Approve with Conditions	A hybrid application, full details submitted for the erection of a mixed use development, including multi-use arena, conference centre, exhibition area, public piazza with pavilion and multi-storey car park; with ground floor retail space (within use Class A1), bars and restaurants (Class A3), 96 dwellings (Class C3), 2 no. electricity substations, pedestrian bridge, riverfront walkway and associated highway works; together with outline proposals for residential use (Class C3) for up to 1704 units, two hotels with ground floor retail use (Class A1), bars and restaurants (Class A3), public open space and commercial offices (Classes A2, B1), shops, bars and restaurants, community facilities; and associated servicing, highway works and landscaping.



<i>Development Status</i>	Major developments in the surrounding area include the refurbishment of 310-bed Jurys Inn Hotel, the refurbishment of 70,000 sq ft of Grade A office floor space at Edward Pavilion, the proposed multi-storey Monarchs Quay Car Park with 1,450 car parking spaces and the proposed phase 2 of the Keel of 257 PRS apartments.	
<i>Landowner / Developer Aspirations</i>	LCC and operators will retain the current uses on site as the site is a leisure destination. Part of the site (7.6 acres or circa 3.07ha) is currently be marketed for a mix of uses and is expected to be developed in 2020. This comprises a series of development plots on the eastern edge of Kings Dock.	
Accessibility		
<i>Access to National Network</i>	The site sits 175m to west of Chaloner Street / Wapping, providing access to Liverpool within 2km and the M62 within 8km.	
<i>Access to Public Transport Nodes</i>	Four bus stops sit on the site boundary which give the site access to Mossley Hill. Additionally, two bus stops sit on Wapping (100m from the site), providing services to Liverpool, Belle Vale and Murdishaw. The north of the site is located 720m away from James Street train station. This gives the site access to the Merseyrail network, which connects the site to the National Rail network.	
<i>Pedestrian and Cycle Accessibility</i>	The Trans Pennine Trail and route 56 of the National Cycle Network runs along the western boundary of the site. Additionally, the land surrounding the arena is pedestrianised, making the site highly accessible for pedestrians and cyclists.	 Mersey Travel, Cycle Map Liverpool, 2017
<i>Highways Capacity and Access</i>	The site is accessed via the A5036. However, the site is in a sustainable city centre location.	



Other Development Issues		
<i>Other Potential Constraints</i>		<ul style="list-style-type: none"> Impact on existing uses.
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>		The site is located approximately 4.7 km away from Goodison Park therefore, the sites connection to Goodison Park and the surrounding community is limited. Due to the site's distance from Goodison Park it provides a limited location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.
<i>Iconic Location</i>		The site would provide an iconic location along the waterfront.
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	No	<ul style="list-style-type: none"> The site is in a mixed-use area in the emerging Local Plan.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site contains a number of existing developments, such as the M&S Arena, and the site has already experienced successful regeneration. There is no longer the available land at Kings Dock that could accommodate a stadium development. Part of the site (7.6 acres) is being marketed for a mix of uses, but these remaining development plots are not of sufficient size to accommodate a new stadium development and will be brought to market early in 2020. The site is developed and is no longer available.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is in a sustainable City Centre location.


<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No</p>	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.
<p><i>Summary and Conclusions</i></p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p><u>Summary Assessment</u></p> <p>Whilst the site is in an iconic waterfront location and it was considered by the Club in the early 2000's (before its regeneration and development for its existing uses), it is fundamentally not available and no longer contains the available land to develop a new stadium — the site contains a number of existing developments, such as the M&S Arena and Conference Centre, and the site has already experienced successful regeneration over the past 20 years as part of its evolution as a City Centre leisure and visitor destination.</p> <p>Part of the site (7.6 acres) is presently (December 2019) being marketed for a mix of uses, but these remaining development plots are not of sufficient size to accommodate a new stadium development and will be brought to market early in 2020.</p> <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, the site is less constrained in policy terms and could to be suitable for a stadium use, however the key consideration is that the site has been redeveloped since it was considered in previous site search assessments and is not available.</p>	

Site 20: Edge Lane Retail Park



ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 10.2 hectares.
<i>Existing Site Uses</i>	The site is currently used as Edge Lane Retail Park, which contains national retail and leisure occupiers such as Boots, Card Factory, Chiquito, Clarks, Drome / Footasylum, Frankie & Benny's, Greggs, H&M, Hollywood Bowl, JD, M&S Food Hall, Next, Outfit, Pets at Home, Regatta, River Island, Smyths, Subway, Superdrug, Theworks.co.uk, TK Max, TUI and Wilko operate. The site also contains vacant development plots earmarked for further expansion of the retail park.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies of the site are further retail units, occupied by KFC, B&M Home Store, Halfords, Starbucks and Kwik Fit operate. Semidetached and terraced residential units and the former fruit and veg market site are also located to the north. To the east lies industrial units, tennis courts, open space and terraced residential units.

	<ul style="list-style-type: none">To the south lies woodlands, a railway line, Wavertree Technology Park train station and office space.To the west lies a railway line, Liverpool Innovation Park which contains a mix of office and industrial space.	
Site Ownership	The sites freeholder is Derwent Holdings Limited however, 31 leasehold titles exist on the site.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">Policy S11 - Retail Warehouse Park, andPolicy E6 - Site for Various Types of Development - Schedule 6.3 - A1 / C1 / D2.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">Policy SP6 - an Out of Town Shopping Park.	

Statutory Designations		
<i>Heritage</i>	No listed buildings lie on the site or in the immediate vicinity.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site is located within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	There are not considered to be any ecological constraints which would prevent the development of the site.	
<i>Landscape</i>	There are not considered to be any statutory landscape designations within or immediately adjacent to the site which would act as a constraint to development.	

Strategic and Regeneration Context				
Strategic and Regeneration Policy	Central Liverpool Mayoral Development Zone (MDZ) The site lies within the Central Liverpool MDZ, which straddles either side of Edge Lane, the city’s principal road corridor that links the City Centre with the M62 and the motorway network. Few areas of the city have seen as dramatic a transformation as Edge Lane. In the past decade, more than £45million has been spent on striking public realm improvements, improved junctions, and better pedestrian and cycle access. Recent work has also included the construction of Innovation Boulevard, a new link between Edge Lane and Wavertree Technology Park. Central Liverpool MDZ Enjoys some of the highest take-up rates anywhere in the city. Major employers include Nutricia Liverpool, the worldwide lead in Advanced Medical Nutrition for use in dietary support. Barclays Bank chose the area for one of its busiest call centres, the life-changing Roy Castle Lung Foundation’s research hub is based here, along with the game-changing tech of Human Recognition Systems.			
	Socio-Economic Profile The first LSOA in 2019 has an Index of Multiple Deprivation (IMD) ranking out of 974 (amongst the 10% most deprived) and an employment deprivation ranking of 1,694 (amongst the 10% most deprived). The second LSOA in 2019 has an IMD ranking of 2,338 (amongst the 10% most deprived) and an employment deprivation Domain of 2,637 (amongst 10% most deprived). The site lies within areas which are the 10% most deprived areas within England therefore, stadium development has the potential to have a significant catalytic impact on the regeneration of the area.			
Planning and Development Context				
Planning History	The recent and historic consents are outlined below:			
	Application Number	Date	Decision	Details
	18F/2965	26-03-2019	Approve with Conditions	To erect 16 no. retail units (A1) and 2 no. restaurant units (A3) with associated servicing, access and car parking.

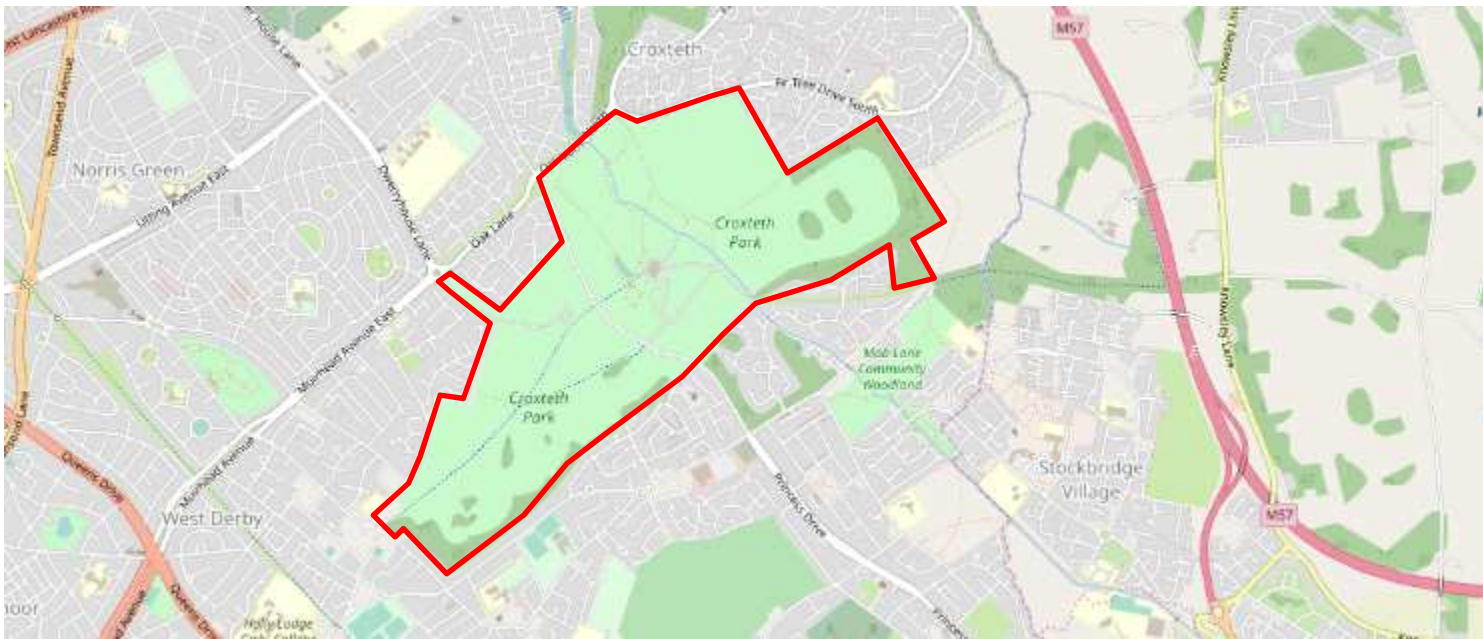
	18F/2831	27-02-2019	Approve with Conditions	To vary conditions 2, 9, 11, 17, 22, 23 and 24 attached to 17F/0237 (to erect/remodel buildings to provide 4 no. retail units (A1); 3 no. leisure units (D2); exhibition space (D1) and 9 no. food and drink units (A3) so as to allow changes to leisure/restaurant block (Phase 2.2) and car park; to replace 3 no. restaurant units with D2 (leisure) floor space (gymnasium) and vary conditions relating to acoustic treatment, operating hours of external plant, hours of opening and servicing hours.
	17F/0237	27-07-2017	Approve with Conditions	To erect new buildings and remodel/extend existing buildings to provide 4 no. retail units (A1); 3 no. leisure units (cinema, bowling and climbing wall) (D2); exhibition space (D1) and 9 no. food and drink units (A3), together with associated car parking, landscaping and access works.
	16F/2027	10-04-2017	Approve with Conditions	1). To vary condition 2 attached to 13F/2313 (To erect 31 no. retail units (A1), 7 no. restaurant units (A3). retain and remodel units with landscaping, parking, access and highway works) So as to allow changes to the size, number and layout of retail and restaurant units and reconfigure internal road and parking layout on land to the west of Montrose Way and to consider as a separate phase of development (The Western Quarter). 2). To vary conditions nos. 10; 23, 33 & 34 and remove conditions nos. 37 & 40 attached to 13F/2313 so as to allow: i. Trading hours of 0700 to 2200 Mondays to Saturdays and 0800 to 1700 on Sundays and Bank Holidays for units in the Western Quarter; ii. Servicing hours between 0500 and 2345 for units in the Western Quarter; iii. Retail sales of ranges of ancillary goods, subdivision of retail units and to allow concessionary sales within retail units.
	13F/2313	06-03-2015	Approve with Conditions	To demolish existing buildings and erect 31 no. retail units (Use Class A1) and 7 no. restaurant units (A3). Retain 4 no. retail units and remodelling of former MFI unit, to provide 4 no. non-food retail units with associated landscaping, parking, access and highway works. (Additional retail information and amended layout plan and master plan)
<i>Development Status</i>	Major developments in the surrounding area include phase O of Edge Lane Retail Park which includes 15,7000 sq. ft of retail space over four retail units, refurbishment and reconfiguration of B&M Store, refurbishment of Space 170 a 170,000 sq. ft distribution warehouse, new B&Q Store at Liverpool Shopping Park, 12 new retail units at the Western Quarter of Liverpool Shopping Park and refurbishment of part of building 19 (21,500 sq. ft).			


<i>Landowner / Developer Aspirations</i>	<p>The site is fully operational as a retail park. Derwent Holdings have aspirations to carry out further phases of development for the retail park as demonstrated by their masterplan for Edge Lane.</p>	 <p>https://liverpoolshoppingpark.co.uk/development/siteplan/</p>
Accessibility		
<i>Access to National Network</i>	<p>The site borders Edge Lane which connects the site to Liverpool City Centre within five km and J4 of the M62 within three km.</p>	
<i>Access to Public Transport Nodes</i>	<p>A coach stop borders the site, providing hourly services to Leeds.</p> <p>One bus stop borders the site and two bus stops sit within close proximity of the site along Edge Lane, providing regular services to Liverpool and Warrington.</p> <p>The south of the site is located 150m away from Wavertree train station, which provides National Rail services to Liverpool Lime Street, Wigan North Western, Crewe and Warrington Bank Quay.</p>	
<i>Pedestrian and Cycle Accessibility</i>	<p>An on-road signed cycle route lies to the south of the site.</p> <p>Cycle parking is located to the north of the site.</p>	 <p>Mersey Travel, Cycle Map Liverpool, 2017</p>
<i>Highways Capacity and Access</i>	<p>Access to the site is via Edge Lane, where there are existing traffic management issues, and which have required new junctions and mitigation.</p>	


Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">A number of leasehold titles would have to be surrendered to permit development.	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	The site is located approximately 4.1 km away from Goodison Park therefore, the sites cultural ties with both Goodison Park and the Docks is limited and does not provide as suitable a location as site’s in North Liverpool for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.	
<i>Iconic Location</i>	The site would not provide an iconic location for a new stadium due to the surrounding uses.	
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The site allocated for retail uses within the adopted UDP and the emerging Local Plan. Redevelopment of the site for alternative uses would not preclude development; however, the loss of existing uses would require justification against National and Local Policy.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none">The site is a recently developed and established retail park which is not available for development.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none">It is not considered that unaffordable development costs would prevent the development of a stadium on the site.

<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is in an accessible location with access the rail network.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> It is unlikely that a stadium development would cause unacceptable environmental or visual impacts, subject to suitable mitigation.
<i>Summary and Conclusions</i> <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p><u>Summary Assessment</u></p> <p>Whilst the site was considered by the Club (and LFC in its 2007 ASA) some years ago (before its regeneration and redevelopment for retail uses), the site is fundamentally no longer available. It has recently been recently developed for out-of-town retail uses, as Edge Lane Retail Park.</p> <p><u>Conclusion & Comparison with BMD</u></p> <p>The applicant contends that in comparison to BMD, the site is less constrained in policy terms and could to be suitable for a stadium use, however the key consideration is that the site has been redeveloped as an out-of-town retail park since it was considered in previous site search assessments and is not available.</p>	

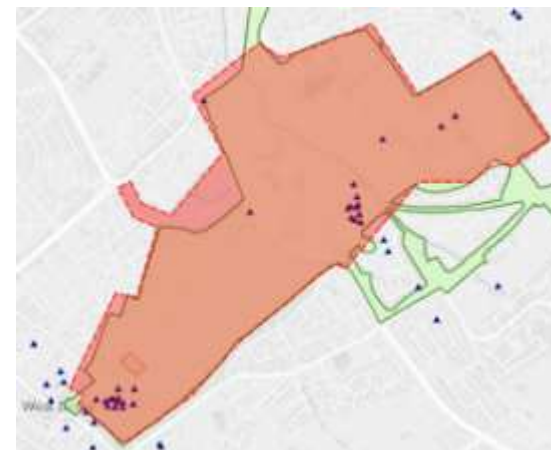
Site 21: Croxteth Country Park


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 187.5 hectares.
<i>Existing Site Uses</i>	The site contains Croxteth Hall, open space, woodlands, the River Alt, Croxteth Park, Myerscough College Local, Home Farm Lodge, Croxteth Petting Farm, a children's play area, a walled garden and a number of businesses including: Long Pond, Jungle Park Ltd, Croxteth Park Riding Centre, The Kennels and Nature to Nurture.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north of site lies, St Cuthbert's Church, Emmaus Church of England and Catholic Primary School, the River Alt, The De La Salle Academy, woodlands and detached and semi-detached housing. To the east lies Saint Albert's Church, Saint Albert's Roman Catholic Primary School, detached housing, Knowsley Brook, open space and woodlands.


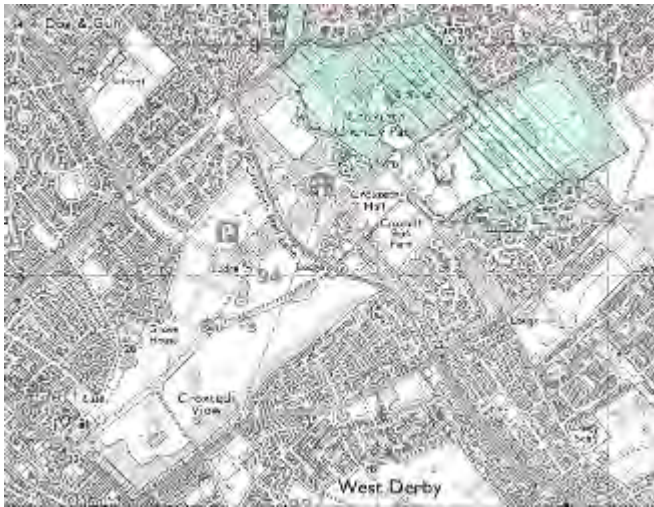
	<ul style="list-style-type: none"> To the south of the site lies St Paul R C Church, St Timothy's Parish Club, Melwood Training Ground Liverpool, Tesco Superstore and detached, semidetached and terraced residential dwellings. To the west lies Bill Shankly Recreation Ground, detached and semidetached residential dwellings, Monksdown Primary School, St Mary C of E Church and Norris Green Park.
<i>Site Ownership</i>	<p>The site's main freeholder is Liverpool City Council.</p> <p>Four Leaseholders exist on the site, including:</p> <ul style="list-style-type: none"> Mysercough College Further Education Corporation; MS557732; MS566525; and MS579007.
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> Policy OE1 & OE2 - Greenbelt, Policy OE5 & OE6 - Site of Nature Conservation Value, Policy OE7 - Local Nature Reserve and Potential Local Nature Reserve, Policy HD7 - a Proposed Extension or Proposed New Conservation Area, and Policy HD15 - a Historic Park.
	



<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy GI 1 - Greenbelt, • Policies GI 1 & GI 3 - Open Space, • Policies GI 1 & GI 5 - a Local Wildlife Site, • Policies GI 1 & GI 5 - Local Nature Reserve, and • Policy HD1 - a Historic Park. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ol style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Belt</u></p> <p>Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, paragraph 144 requires that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p><u>Natural Environment</u></p> <p>Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in</p>	

	<p>these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> A. grade II listed buildings, or grade II registered parks or gardens, should be exceptional; B. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional . <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p>Liverpool Open Space Assessment Report and Standards (2017)</p> <p>Liverpool City Council Open Space Assessment Report and Standards (2017) identifies Croxteth Hall and Country Park as the single largest park in Liverpool which has both a high-quality score and a high value score.</p> <p>The report scores Croxteth Hall & Country Park as one of the highest scoring parks and gardens in terms of quality in Liverpool due to the aesthetically pleasing and well-maintained environment with plenty of appeal to a variety of users for different reasons; play, exercise, wildlife and relaxation. The Park contains provision for children and young people, this provision is regarded as high value and as having the joint highest quality in the whole of Liverpool.</p>
--	--


	<div>Liverpool’s Strategic Green and Open Spaces Review Board Final Report (2016)</div> <div>Strategic Green and Open Spaces Review Board Final Report 2016 devotes a whole section to Croxeth Country Park and Hall which states that the site is “one of Liverpool’s most important heritage sites.”</div> <div>In 2015, a consultation event was held to increase the attractions available at the Park and generate additional income. The consultation proposed two options, the first was to see Croxteth Hall and Country Park to be transferred into the city-wide Charitable Parks Trust or into a Croxteth Hall and Country Park Trust with a Board based on a tripartite structure, split between representatives from the council, local stakeholder and independents. The report also recommends creating a Green Corridor known as the Everton-Anfield corridor linking the City Centre, Everton Valley, Anfield and Croxteth Country Park.</div>	
Statutory Designations		
Heritage	<div>The site Croxteth Hall Park is a Grade II listed Park and Garden and the site contains four Grade II* buildings or monuments, named:</div> <div><ul style="list-style-type: none">• Croxteth Hall;• Dairy;• Laundry and Laundry Cottage; and• Stable Block to the north and west of the Stable Yard.</div> <div>Additionally, the site contains 15 Grade II listed buildings or monuments which include:</div> <div><ul style="list-style-type: none">• Aintree Lodge to Croxteth Hall;• Bantam House;• Bull Box in Paddock;• Bridge over the path to Croxteth Hall;• Carriage Washing Shelter in Stable Yard;• The Cottage;• Croxteth Hall Home Farmhouse;• Entrance to the North Side of Stable Yard;• Farm Lodge to Croxteth Hall;</div>	<div></div> <div>Historic England Map Search, 2019</div>

	<ul style="list-style-type: none"> • Head Game Keepers Cottage; • Kennels; • Lodge to Croxteth Hall with Railings and Gateway to the north west of the Lodge; • Riding School to North of Stable Yard; • Row of Cottages on the east side of the Stable Yard; and • Street Lamp and Fountain in front of Croxteth Park Entrance. 	
<i>Flood Risk</i>	<p>The site is located largely within Flood Zone 1. However, parts of the site surrounding the River Alt (a Main River) fall within Flood Zone 2 and Flood Zone 3.</p>	 <p><i>Flood map for planning, 2019</i></p>

<p><i>Ecology</i></p>	<p>The site contains Priority Habitat - Deciduous Woodland, Traditional Orchards, Wood pasture and Parkland BAP Priority Habitat.</p> <p>Furthermore, the site provides habitat for Priority Species including Lapwing, Grey Partridge and Tree Sparrow.</p> <p>The site is an important ecological asset to the City of Liverpool.</p>	 <p>Magic Maps, 2019</p>
<p><i>Landscape</i></p>	<p>The site sits within a Local Nature Reserve (shown on adjacent plan).</p>	 <p>Magic Maps, 2019</p>

Other	<p>Natural England's Agricultural Land Classification Map identifies the site as Grade 2 (Very Good) therefore UDP policy OE2 of the Liverpool UDP (2002) applies.</p>	 <p>Agricultural Land Classification Map North West Region, 2011</p>
Strategic and Regeneration Context		
Strategic and Regeneration Policy	n/a	
Socio-Economic Profile	<p>The site contains seven LSOAs, in 2019 the IMD ranking out of 32,844 LSOAs in England are as follows:</p> <ul style="list-style-type: none"> 1 – 19,293 (50% least deprived neighbourhoods) 2 – 9,726 (30% most deprived neighbourhoods) 3 – 6,670 (30% most deprived neighbourhoods) 4 – 5,647 (40% most deprived neighbourhoods) 5 – 16,109 (50% most deprived neighbourhoods) 6 – 4,213 (20% most deprived neighbourhoods) 7 – 6,888 (20% most deprived neighbourhoods) 	 <p>Indices of Deprivation 2015 explorer</p>

	The Employment Deprivation Domain ranking of the seven LSOAs pictured out of 32,844 LSOAs in England in 2019 are as follows: 1 – 16,266 (50% most deprived neighbourhoods) 2 – 9,643 (30% most deprived neighbourhoods) 3 – 8,077 (20% most deprived neighbourhoods) 4 – 4,506 (20% most deprived neighbourhoods) 5 – 10,699 (40% most deprived neighbourhoods) 6 – 2,947 (10% most deprived neighbourhoods) 7 – 6,037 (20% most deprived neighbourhoods)				
Planning and Development Context					
Planning History	The recent and historic consents are outlined below.				
	Application Number	Date	Decision	Details	
	16F/1456	08-11-2016	Approve with Conditions	To demolish two buildings, erect new buildings for further education comprising animal studies teaching block, equine stables, storage shed. Animal housing. Conversion of two further buildings to use as animal housing and dog grooming.	
Development Status	The area surrounding the site has not been subject to any relevant major development.				
Landowner / Developer Aspirations	Liverpool City Council is fully committed to retaining the site as an important Historic City Park.				
Accessibility					
Access to National Network	Croxteth Hall Lane runs through the site and Oak Lane North borders the site to the north, giving the site access to Liverpool within 5.5 miles, J4 of the M57 within 2.5 miles and J3 of the M57 within 2.5 miles.				

<i>Access to Public Transport Nodes</i>	<p>Bus services run along Oak Lane North, providing regular services to Liverpool, Walton, Woolfall Heath and Fazakerley.</p> <p>Fazakerley train station is located 3.7 km to the north of the site, which gives the site access to the Merseyrail network and connects the site to the City Centre and the national rail network. Roby train station lies 3.8 km to the south which gives the site access to the national rail services to Liverpool Lime Street, Manchester Victoria, Wigan North Western, Warrington Bank Quay, Crewe and Earlestown.</p>	
<i>Pedestrian and Cycle Accessibility</i>	<p>The site provides multiple off-road cycle tracks, footpaths and both Melwood Drive and Almonds Green provide on-road signed cycle routes.</p>	 <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	<p>The site has numerous potential points of access. The site benefits from existing access off Croxteth Hall Lane which also provides access to residential properties. Development of a stadium on the site would likely create conflict on the local highway network and create significant issues for local residents.</p>	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Community asset of significant value• ACL (Grade 2)• Ecological value• Identified as one of Liverpool’s most important heritage sites• Surrounding residential amenity	

Fit with Everton's Requirements		
Connection to North Liverpool	The site is not very well connected to the Club's Goodison Park and surrounding community. It does not retain strong cultural ties with Goodison Park and the Docks and does not provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home. The site is approximately 4km away from Goodison Park.	
Iconic Location	The site does not provide an iconic location for Everton's stadium.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of a sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The Site is a Grade II listed Historic Park and contains 15 listed buildings. Planning policy (national and local) which seeks to protect and enhance Historic Parks/heritage assets and prevent built development on part or all of any green space unless the proposed development can be accommodated without material harm. However, planning policy and the NPPF (pp 194) does not preclude development within a Historic Park or in the vicinity of heritage assets. Any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits.The site is also allocated as Green Belt (OE1 and OE2) greenspace (OE11 and OE12) in the adopted and emerging Development Plan (GI1, GI3) respectively; as well and being identified as a Local Nature Reserve (OE7 and GI5 respectively). If assessed against adopted or emerging policy, a stadium development would need to address key open space polices as well as the NPPF with regard to the loss of open space (pp's 96-101) and demonstrate very special circumstances in accordance with Green Belt Policy (NPPF para 143).The Liverpool City Council Open Space Assessment Report and Standards (2017) identifies Croxteth Hall and Country Park as the single largest park in Liverpool which has both a high-quality score and a high value score. The report scores Croxteth Hall & Country Park as one of the highest scoring parks and gardens in terms of quality in Liverpool due to the aesthetically pleasing and well-maintained environment with plenty of appeal to a variety of users for different reasons; play, exercise, wildlife and relaxation.Liverpool's Strategic Green and Open Spaces Review Board Final Report 2016 states that the site is "one of Liverpool's most important heritage sites".
Is site acquisition a realistic proposition?	No	<ul style="list-style-type: none">Croxteth Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.


<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> This site is in an unsustainable location with no immediate access to rail - Fazakerley train station is located 3.7 km to the north of the site. The site benefits from existing access off Croxteth Hall Lane which also provides access to residential properties. Development of a stadium on the site would likely create conflict on the local highway network and create significant issues for local residents.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> Subject to investigation and mitigation. There could be significant unacceptable environmental or visual impacts associated with the development of the site due to the Green Belt designation of the site and its importance as a heritage asset.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	Summary Assessment <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — Croxteth Park is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site has significant policy constraints. The site is allocated as a Grade II Historic Park in the adopted and emerging Local Plan and contains a number of designated heritage assets. Whilst planning policy, including the NPPF not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and as Green Belt. The development of Green Belt would require very special circumstances to be demonstrated (NPPF para 143) and any loss or adverse impact on open space use would need to be tested against the relevant adopted / emerging policies and the NPPF given that is considered to be a park of "high value" in the Liverpool City Council Open Space Assessment Report (2017). Quality and use — Croxteth Park is the single largest park in Liverpool which has both a high-quality and a high-value within the Liverpool City Council Open Space Assessment Report and Standards (2017). The report also scores Croxteth Hall & Country Park as one of the highest scoring parks and gardens in terms of quality in Liverpool due to the aesthetically pleasing and well-maintained environment with plenty of appeal to a variety of users for different reasons; play, exercise, wildlife and relaxation. It is identified as "one of Liverpool's most important heritage sites" as identified in Liverpool's Strategic Green and Open Spaces Review Board Final Report 2016. 	



- Unsustainable location - Fazakerley train station is located 3.7 km to the north of the site and the park is in peripheral suburban location that would likely create conflict on the local highway network and create significant issues for local residents.

Conclusion & Comparison with BMD



The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available.**


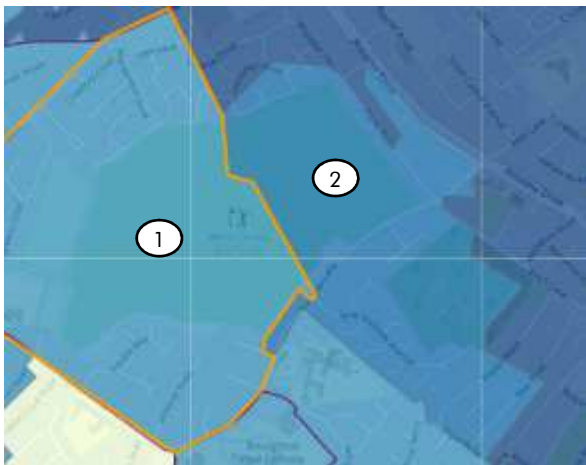
Site 22: West Derby Golf Club

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 36.4 hectares.
<i>Existing Site Uses</i>	The site contains West Derby Gold Club, areas of woodland, a stream and a number of established trees are interspersed across the site.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies a Tesco Superstore and recently developed residential dwellings containing townhouses, semidetached and detached dwellings. To the west lies Sefton Rugby Union Club, West Derby Children's Centre, Melwood Training Ground, West Derby Medical Centre and semidetached residential dwellings. To the south lies St Vincent's School, Broughton Hall Catholic High School, Yewtree Cemetery, Blackmoor Park Junior School and semidetached and detached residential dwellings. To the east lies Mab Lane Primary School, St Likes Church & Community Centre and semidetached and detached residential dwellings.

Site Ownership	The site is owned by: <ul style="list-style-type: none">West Derby Golf Club (Trustee Number 1) Limited; andWest Derby Golf Club (Trustee Number 2) Limited.	
Planning Policy		
Adopted Policy	In the Liverpool UDP (2002), the site is allocated as: <ul style="list-style-type: none">Policy OE11 and OE12 - Green Space.	
Emerging Policy	The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as: <ul style="list-style-type: none">Policies GI 1 & GI 3 - Open Space.	

Other	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts</p> <p><u>Residential Amenity</u></p> <p>Paragraph 180 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development’.</p> <p><u>Natural Environment</u></p> <p>Paragraph 175 states that when determining planning applications, local planning authorities should apply the following principles: Biodiversity (175a) - if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p>
-------	---

Statutory Designations		
<i>Heritage</i>	<p>The site contains no listed buildings however, 500m to the north lies Croxteth Hall Park a Grade II listed park and Garden. In the immediate vicinity of the site lies 67 Leyfield Road a Grade II listed building and Rice House (Part of Saint Vincent School for the Blind) a Grade II listed building.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The majority of the site is located within Flood Zone 1 however the site is bisected by a Main River — River Alt. The central northern part of the site and the area surrounding the River Alt, falls within Flood Zone 2 and 3.</p>	 <p>Flood Map for Planning, 2019</p>


Ecology	The site contains Priority Habitat — Deciduous Woodland and Young Trees.	 <p>Magic Maps, 2019</p>
Landscape	There are no landscape designations which would be considered to prevent the development of the site.	
Strategic and Regeneration Context		
Strategic and Regeneration Policy	n/a	
Socio-Economic Profile	<p>In 2019 the first LSOA has an IMD ranking of 12,861 out 32,844 (40% most deprived neighbourhoods in the country) and has an Employment Deprivation Domain of 9,165 out of 32,844 (30% most deprived neighbourhoods) in England.</p> <p>The second LSOA in 2019 has an IMD of 6,713 out of 32,844 (30% most deprived neighbourhoods in the country) and an Employment Deprivation Domain of 5,421 out of 32,844 (20% most deprived neighbourhoods) in England.</p>	


Planning and Development Context	
<i>Planning History</i>	There is no relevant recent planning history
<i>Development Status</i>	Development proposals coming forward in the area surrounding the site include FBMUK Ltd/Lovells proposed 107 homes at Ackers Hall Avenue/ Denford Road (app. 18F/2390 approved Feb. 2019), 160 homes at Melwood Training Ground (outline app. '170/1955' granted Feb. 2018) and Osco Homes proposed 19 homes at the north of Baycliffe Gardens (app. '18F/1369' registered May 2018).
<i>Landowner / Developer Aspirations</i>	The site is currently operational as a Golf Club.
Accessibility	
<i>Access to National Network</i>	The site sits adjacent to Yew Tree Lane, which gives the site access to Liverpool within 5.5 miles and J3 of the M57 within 2.5 miles.
<i>Access to Public Transport Nodes</i>	<p>Two bus stops sit adjacent to the site along Yew Tree Lane, which provides hourly services to Broadgreen/Woolfall Heath and Fazakerley and irregular services to Croxteth. More frequent services lie on Leyfield Road which provide four services per hour to Bootle and five services per hour Aigburth Vale.</p> <p>The south of the site is 2.5km away from Broad Green train station and 2.8km away from Roby train station. Both of which give the site access to national rail services.</p>
<i>Pedestrian and Cycle Accessibility</i>	<p>On site pedestrian and cycle access is available to the north of the site along a footpath and Yew Tree Lane provides an on-road signed cycle route.</p> <div data-bbox="1442 863 2018 1236" data-label="Image"> </div> <p>Mersey Travel, Cycle Map Liverpool, 2017</p>


<i>Highways Capacity and Access</i>	The site is surrounded by residential properties on all sides and sits within a predominantly residential area. Access to the site for a stadium use would generate significant impacts on the local area and on the local highways network.	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Established Trees• Limited regenerative catalytic effects of a new stadium• Flooding• Sports re-provision	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	The site is approximately five km away from Goodison Park therefore, the cultural ties with Goodison Park and the Docks is limited and does not provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.	
<i>Iconic Location</i>	The site would not provide an iconic location for Everton due to the surrounding residential uses.	
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none">▪ The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">▪ The site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy G11 and G13), which seeks to protect the City’s green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space polices; as well as the NPPF with regard to the loss of open space (pp’s 96-101) and the tests of Sport England.▪ Residential dwellings surround the site on all sides and as such development on the site for stadium use is likely to create significant amenity issues for local residents.▪ The site includes protected priority habitat and established trees.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none">▪ The site is owned by West Derby Golf Club and is in active use. There is no indication that the site is available for redevelopment.



<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> The site is in an unsustainable location — it is poorly connected by public transport including rail, being both disconnected from the City Centre and more than 2.5km away from Broad Green train station. It is in a peripheral suburban location that would generate significant traffic and amenity impact on the local community.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation. Stadium Development is unlikely to cause any unacceptable environmental or visual impacts on the site, subject to suitable mitigation.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by West Derby Golf Club and is in active use. There is no indication that the site is available for redevelopment. Planning policy constraints — The site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy GI1 and GI3), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England. Location and sustainability - The site is in an unsustainable location for a stadium use. It is poorly connected by public transport including rail, being both disconnected from the City Centre and more than 2.5km away from Broad Green train station. It is in a peripheral suburban location that would generate significant traffic and amenity impacts on the local community. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key considerations are that the site is in a wholly unsustainable location for a major movement and activity generating use, and is in active use and not considered to be available.</p>	

Site 23: Gilmooss A

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 44.64 hectares.
<i>Existing Site Uses</i>	The site contains eight industrial units of various sizes which are in active use.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north of the site lies Knowsley Brook, open space and Junction 6 of the M57; • To the west of the site lies River Alt, industrial units, Field Lane Park and semidetached and terraced residential units; • To the south lies the A580 East Lancashire Road and residential dwellings; and • To the east lies open space and Junction 4 of the M57.


<i>Site Ownership</i>	<p>The site's landownerships include:</p> <ul style="list-style-type: none"> • BRABCO 1309 Limited; • The Electricity Network Company Limited; • F&C Commercial Property Holdings; • Glenvale Transport Limited; • SP MANWEB PLC; and • T.J. Morris Limited. <p>Several Leaseholds exist on the site, including:</p> <ul style="list-style-type: none"> • Exel Europe Limited; • Iceland Foods Limited; • Smyths Toys UK Limited; and • SP Manweb PLC.
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E1 - a Site for Industrial/Business Development; and • Policy E1 - a Primary Industrial Area. 

<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy EC2- a Primarily Industrial Area. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Employment</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p> <hr/> <p>Liverpool's Employment Land Study (2017)</p> <p>The site is located within the A580 Stonebridge Cross Corridor East Employment Corridor, which is characterised by high quality environment and high quality purpose-built large-scale logistics warehouses accessed via the East Lancashire Road. Therefore, the Employment Land Study (2017) report recommends that due to the site's strategic location and quality of existing development, that the "area should be safeguarded for employment uses and proposals for alternative uses should be resisted. Similarly, loss of existing Class B employment space within the A580 Stonebridge Cross Corridor East should also be resisted".</p>	

Statutory Designations		
<i>Heritage</i>	No listed buildings sit on the site or sit within close proximity to the site.	 <p>Historic England Map, 2019</p>
<i>Flood Risk</i>	The site sits within Flood Zone 1; however, the site is bounded by Main Rivers to the north, east and west (River Alt and Knowsley Brook).	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	

Strategic and Regeneration Context				
Strategic and Regeneration Policy	Stonebridge Cross Mayoral Development Zone (MDZ)			
	The site sits within Stonebridge Cross Mayoral Development Zone which is located on either side of the East Lancashire Road that connects Liverpool to Greater Manchester. Stonebridge Cross is the city’s longest-established manufacturing zone. Considerable site assembly, infrastructure and environmental enhancement works has been undertaken which now offers high quality services plots and new business units available for commercial and industrial use, making Stonebridge appealing to businesses.			
Socio-Economic Profile	The Stonebridge Cross Mayoral Development Zone holds the city’s largest single site in public ownership at Stonebridge Cross which is available for a significant international employer, with capacity to bring between 500 to 1,000 new jobs. The site is clearly identified as a major employment site within the City.			
In 2019 the sites LSOA is ranked as 2,353 in the Index of Multiple Deprivation (IMD) (10% most deprived) and 2,858 in the Employment Deprivation Domain (10% most deprived). Therefore, the development of a football stadium has the potential to offer a catalytic effect on the regeneration of the area.				
Planning and Development Context				
Planning History	Application Number	Date	Decision	Details
	17F/3258	25-05-2018	Approve with Conditions	To vary conditions 2,13,14 and 15 attached to 17F/1007 so as to allow variations to the approved plans (subdivision of Unit B to create an additional unit (Unit C), the creation of a non-trading mezzanine level of 98sqm and alterations to the western elevation), to allow for the extended hours of 0700 hours and 2300 hours for the period 1st November to 23rd December for Units A and C and to allow the sale of convenience goods and ancillary goods from Unit C only.
	17F/1007	02-10-2017	Approve with Conditions	To vary conditions 2, 15 and 16 attached to 15F/3120 so as to allow for variation of plans to allow mezzanine floorspace and extended hours of operation between 1 November and 23 December for Unit A.
	16F/2726	22-12-2016	Approve with Conditions	To create additional floor space at first floor level, ground floor extension, carry out external alterations, external plant and refuse area and alterations to existing car park entrance in connection with conversion of existing training centre to offices.
	15F/3120	17-07-2016	Approve with Conditions	To convert existing training centre to offices (within Use Class B1); to convert existing car hypermarket building to form retail training centre with associated accommodation at first and second floor levels and 2 no. retail units (within Class A1) for bulky goods with associated external alterations and changes to site layout including revised parking and servicing, new access from Portal Way roundabout and external display area; and to carry out ancillary works including sprinkler tank and pumphouse.

	15F/0296	21-07-2015	Approve with Conditions	To erect warehouse building and offices, vehicle maintenance unit, staff gym & sports facility, gate house with service yards, car parking, fencing and landscaping. *Amended site area and additional fencing, landscaping and noise assessment received 28/04/2015*.
	13F/1839	08-10-2013	Approve with Conditions	To erect building (max height 17m) for distribution use with ancillary offices (within Use Class B8) erect overhead link to existing distribution centre, erect sprinkler tanks and pump house, erect gatehouse, layout service yard, car park area and access road, landscaping, acoustic bund (with associated 3m acoustic fence) and associated works.
	07F/0676	12-06-2007	Approve with Conditions	To erect 3 no. buildings for distribution use with ancillary offices (within Use Class B8), and lay out vehicle parking area, landscaping, and associated works
<i>Development Status</i>	There are a number of recent major developments and development proposals within the Stonebridge Cross area these include several industrial developments carried out by St. Modwen, including 70,000 sq. ft developed for parcel delivery firm DPD/ Geopost, Liverpool City Council’s development of a wholesale fruit and vegetable market and Gallon Stoford’s proposed development at Stonebridge Cross (‘13F/1838’ approved Nov. 2013).			
<i>Landowner Aspirations</i>	As demonstrated by the planning history of the site, it is now developed and occupied for a number of new operational employment uses and is no longer available for development.			
Accessibility				
<i>Access to National Network</i>	The site is well situated as it borders the A580 which connects the site to Liverpool within 6 miles and St Helens within 7miles. The site also lies approximately 0.5 miles to the west of J4 of the M57 linking the site to Widnes within 12 miles and the M62 within 7 miles.			
<i>Access to Public Transport Nodes</i>	<p>The site is served by four bus stops border the site which provide 12 bus services per hour to Liverpool and regular services to a variety of other locations such as Tower Hill, Knowsley Industrial Park, Croxteth Park, Fazakerley. Walton and Woolfall Heath.</p> <p>The site is not as well served by train networks because the nearest train station is 2.2 km to the north west of the site, this provides access to the Merseyrail network and provides four services per hour to Liverpool and four services per hour to Kirkby.</p>			

<i>Pedestrian and Cycle Accessibility</i>	<p>The site has off-road cycle routes to the north, west and south of the site’s boundaries, making accessibility to Kirkby possible.</p>	 <p><i>Mersey Travel, Cycle Map Liverpool, 2017</i></p>
<i>Highways Capacity and Access</i>	<p>The A580 East Lancashire Road is part of the Department for Transport's proposed Major Road Network which is classified as being one of the busiest and most economically important local authority 'A' roads. This road forms the southern boundary of the site and is very likely to need to remain open and functional during the period of events.</p> <p>Overall, the site has many transport and access issues which could reduce the accessibility of the stadium to non-car modes. Whilst the relative ease of access by car to the site is likely to result in off-site traffic impacts and congestion. The importance of the A580 road may mean that it would not be practical to close during events which would result in road safety concerns for supporters before and after events.</p>	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Key strategic employment location• Fragmented land ownerships.• Residential amenity.	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	<p>The site is approximately 5 km away from Goodison Park therefore, its connection to Goodison Park and the surrounding community is limited. It does not retain cultural ties with Goodison Park or the Docks and does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.</p>	
<i>Iconic Location</i>	<p>The site would not provide an iconic location for Everton due to the site’s close proximity to the M57.</p>	

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of a sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site is allocated for employment uses in the adopted UDP and emerging Local Plan. If assessed against adopted or emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policy EC2) as well as the NPPF with regard to employment (pp's 80-82). The site is located within the A580 Stonebridge Cross Corridor East Employment Corridor, which is characterised by high quality environment and high quality purpose-built large-scale logistics warehouses accessed via the East Lancashire Road. Therefore, the Employment Land Study (2017) report recommends that due to the site's strategic location and quality of existing development, that the "<i>area should be safeguarded for employment uses and proposals for alternative uses should be resisted. Similarly, loss of existing Class B employment space within the A580 Stonebridge Cross Corridor East should also be resisted</i>". The site accommodates a range of industrial and utilities uses which would require relocation or re-provision (including a Household Recycling Centre, which was developed in 2015 and National Grid utilities).
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> As demonstrated by the recent planning and development history of the site, it is now developed and occupied for a number of new operational employment uses and is no longer available for development.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> The site has a range of significant transport and access issues which would need to be adequately mitigated to make it suitable for a new stadium for Everton. In particular: the proximity of the A580 sterilising one side of the site; the long walking distance to the nearest rail station; and the lengthy journey times for buses and taxis from the City Centre. Combined with the ease of highway access, would likely mean that travel to and from the site would be car dominated which is likely to result in significant traffic impact and congestion on event days.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> Stadium Development is unlikely to cause any unacceptable environmental or visual impacts on the site, subject to suitable mitigation.

Summary and Conclusions

Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?


Summary Assessment

This site is included as it has been previously assessed by Everton and LFC (in its 2007 ASA) as part of a review of alternative sites. Whilst the site is of sufficient size, it is now occupied for employment uses and, as demonstrated by the recent planning and development history of the site, it has been recently developed for a range of new operational employment uses and is fundamentally no longer available for development. In addition, this site is in an unsustainable location for a stadium development – in terms of highways, sustainability and accessibility by sustainable modes of transport. It is fundamentally disconnected from the rail network and situated more than 2.2km from Fazakerley Rail Station. The ease of highway access would likely mean that travel to and from the site would be car dominated which is likely to result in significant traffic impact and congestion on event days.



Conclusion & Comparison with BMD

The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site has been redeveloped for employment uses since it was considered in previous site search assessments and is not available.**


Site 24: Gillmoss B

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 28.2 hectares.
<i>Existing Site Uses</i>	The site contains several industrial units alongside some undeveloped plots.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies semi-detached residential units which form part of Fazakerley, the River Alt and Field Lane Park. • To the west lies a waste water treatment plant, woodlands and the River Alt. • The southern boundary is bounded by A580 East Lancashire Road and Vikings Landing Pub. Stonebridge Cross (a vacant development site) lies to the south. • To the east lies several industrial units, open space and the M57.


<i>Site Ownership</i>	<p>The site's landowners include:</p> <ul style="list-style-type: none"> • Merseyside Waste Disposal Authority; • St Modwen Developments Limited; and • Liverpool City Council. <p>23 Leasehold Titles exist on the site, notable leaseholders include:</p> <ul style="list-style-type: none"> • Euro Foodbrands Exports Limited; • Hurst Bros. (Produce Merchants) Limited; • Key Property (Developments) Limited; • Liverpool City Council; • Mersey Travel; • SP Manweb PLC; • The Neighbourhood Services Company Limited; • Torus62 Limited; • Total Produce Limited; • Veolia Es Merseyside & Halton Limited; and • Weybright Limited.
-----------------------	---

Planning Policy		
Adopted Policy	<p>Within the UDP policies map the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E1 - a Site for Industrial/Business Development, and • Policy E1 - a Primary Industrial Areas. 	
Emerging Policy	<p>The May 2018 Draft Local Plan Policies Map proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy EC2 - a Primarily Industrial Area, • Policies EC1 & EC2 - a Site for Industrial/Business Development, with employment allocations (E2, E3, E24, E25, E26). 	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Employment</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p> <p>Liverpool's Employment Land Study (2017)</p> <p>The Study identifies an employment requirement of approximately 25-30 ha for office uses (B1a/b), 20-30 ha for industrial uses (B1c-B2), and around 60-80 ha of warehouse and distribution (B8) land. The Employment Land Evidence Base (2017) recognises that 36.7 ha - 54.7 ha of B1a/b office and R&D, 23.5 ha of B1c & B2 Light & General Industrial, 10.2 for small scale B8 and 35.2 ha - 45.4 ha of large scale B8 Warehouse /Distribution Land is required between 2013-33 (higher end of the range is recommended).</p> <p>The Employment Land Study (2017) and the Employment Land Evidence Base (2017) both recognise that the development of the SuperPort will have a major impact on the sub regional distribution and warehouse market as it is anticipated it will generate an additional sub-regional demand of 634 ha of additional B2 and B8 uses within Liverpool City Region. However, such large-scale Warehouses/Distribution uses generated from the SuperPort will require large plots, excellent access to the motorway network, HGV suitable access, and often all-night operation.</p> <p>The site is located within the A580 Stonebridge Cross Corridor East Employment Corridor, which is characterised by high quality environment and high quality purpose-built large-scale logistics warehouses accessed via the East Lancashire Road. Therefore, the Employment Land Study (2017) report recommends that due to the site's strategic location and quality of existing development, that the " <i>area should be safeguarded for employment uses and proposals for alternative uses should be resisted. Similarly, loss of existing Class B employment space within the A580 Stonebridge Cross Corridor East should also be resisted</i>".</p>
<p>Statutory Designations</p>	
<p><i>Heritage</i></p>	<p>No listed buildings or ancient monuments sit on the site or are in close proximity to the site.</p> <div data-bbox="1411 986 1984 1337" data-label="Image"> </div> <p>Historic England Map Search, 2019</p>

<i>Flood Risk</i>	<p>The site predominantly sits within Flood Zone 1 although the south western corner of the site is constrained as the Sugar Brook flows through the site. The River Alt is a Main River and is located to the north of the site, beyond the site red line.</p>	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	<p>Stonebridge Cross Mayoral Development Zone (MDZ)</p> <p>The site sits within Stonebridge Cross Mayoral Development Zone which is located on either side of the East Lancashire Road that connects Liverpool to Greater Manchester. Stonebridge Cross is the city’s longest-established manufacturing zone. Considerable site assembly, infrastructure and environmental enhancement works has been undertaken which now offers high quality services plots and new business units available for commercial and industrial use, making Stonebridge appealing to businesses.</p> <p>The Stonebridge Cross Mayoral Development Zone holds the city’s largest single site in public ownership at Stonebridge Cross which is available for a significant international employer, with capacity to bring between 500 to 1,000 new jobs. The site is clearly identified as a major employment site within the City.</p>	
<i>Socio-Economic Profile</i>	<p>In 2019, the site’s LSOA is ranked as 2,353 in the Index of Multiple Deprivation (IMD) (10% most deprived) and 2,858 in the Employment Deprivation Domain (20% most deprived). Therefore, the development of a football stadium has the potential to cause a significant catalytic effect on the regeneration of the area.</p>	


Planning and Development Context				
<i>Planning History</i>	Application Number	Date	Decision	Details
	18F/1249	30-07-2018	Approve with Conditions	To erect flow forge plant cage/compound and refrigeration/air conditioning plant and form 4 new openings to area.
	17F/2894	19-01-2018	Approve with Conditions	To erect industrial/warehouse unit with ancillary office space with associated car parking, access and landscaping.
	16F/1902	24-11-2016	Approve with Conditions	To erect single storey building and growers stand for distribution and business uses in connection with wholesale fruit and vegetable market with gate house, new access, parking and associated servicing, landscaping and ancillary works.
	14F/0738	27-08-2014	Approve with Conditions	To erect industrial building for B8 use together with associated loading areas, car parking and landscaping.
	130/0656	25-06-2013 (date of committee)	n/a	To erect 6,600msq superstore (A1) and petrol filling station, local centre (1,780msq including mixed use A1, A2, A3 and A5) and mixed-use development with food, drink and hotel provision (maximum combined floor space 1,700msq, A4, A5 and C1 uses) with associated car parking and landscaping works (Outline application)
	08F/3196	21-04-2009	Approve with Conditions	To erect an 18-metre high building (maximum height) comprising a material recovery facility and offices, with associated car parking, landscaping, fencing, and access; to form a landscaped bund to rear of properties at 28-62 Longdown Road and carry out associated works.
	07RM/0424	21-12-2007	Approve without Conditions	To erect 4 no. single-storey (9-metres high) industrial units, within use classes B1 (offices), B2 (general industrial) and B8 (warehousing) of the Use Classes Order - details of reserved matters submitted
	030/4000	26-01-2006	Approve with Conditions	To develop land for use as a Business Park comprising offices/light industrial use (use class B1), general industrial use (class B2), storage and distribution use (class B8), and other ancillary uses; To lay out public open space, new vehicular access and circulation roads, car parking and servicing, landscaping works; To carry out partial widening of the River Alt, realignment and naturalisation of Sugar Brook, and other associated engineering operations



<i>Development Status</i>	The surrounding area has been subject to a number of developments and development proposals including Home Bargains New Distribution Warehouse and training centre by T.J. Morris Ltd and a number of industrial developments by St Modwen including the 70,000 sq. ft industrial development for DPD/Geopost.	
<i>Landowner Aspirations</i>	As demonstrated by the planning history of the site, it is now developed and occupied for a number of new operational employment uses and, apart from a limited number of remaining development plots, is no longer available for development.	
Accessibility		
<i>Access to National Network</i>	The site borders the A580 approximately one km to the west of J4 of the M57, the A580 connects the site to Liverpool within 6 miles and St Helens within 7 miles.	
<i>Access to Public Transport Nodes</i>	<p>Four bus stops border the site which provide 12 bus services per hour to Liverpool and regular services to a variety of other locations such as Tower Hill, Knowsley Industrial Park, Croxteth Park, Fazakerley, Walton and Woolfall Heath.</p> <p>The site's nearest train station is 1.9 km to the north west of the site, this provides access to the Merseyrail network and National Rail services.</p>	
<i>Pedestrian and Cycle Accessibility</i>	<p>Off-road cycle paths run through the site making accessibility to Kirkby possible. However, the cycle paths which run adjacent to the River Alt are narrow, unlit and overgrown with vegetation.</p>	 <p>Mersey Travel, Cycle Map Liverpool, 2017</p>
<i>Highways Capacity and Access</i>	<p>The A580 East Lancashire Road is part of the Department for Transport's proposed Major Road Network which is classified as being one of the busiest and most economically important local authority 'A' roads. This road forms the southern boundary of the site and is very likely to need to remain open and functional during the period of events.</p> <p>Overall, the site has many transport and access issues which could reduce the accessibility of the stadium to non-car modes. Whilst the relative ease of access by car to the site is likely to result in off-site traffic impacts and congestion. The importance of the A580 road may mean that it would not be practical to close during events which would result in road safety concerns for supporters before and after events.</p>	

Other Development Issues		
<i>Other Potential Constraints</i>		<ul style="list-style-type: none"> • Key strategic employment location. • Fragmented land ownerships.
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>		<p>The site is not well connected to the Club's Goodison Park and surrounding community. It does not retain cultural ties with Goodison Park or the Docks and does not provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.</p> <p>The site is approximately 5 km away from Goodison Park.</p>
<i>Iconic Location</i>		Due to the site's location adjacent to the M57, the site would not provide an iconic location for Everton.
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> ▪ The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> ▪ The site is allocated for employment uses in the adopted UDP and emerging Local Plan. If assessed against adopted or emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policy EC2) as well as the NPPF with regard to employment (pp's 80-82). ▪ The site is located within the A580 Stonebridge Cross Corridor East Employment Corridor, which is characterised by high quality environment and high quality purpose-built large-scale logistics warehouses accessed via the East Lancashire Road. Therefore, the Employment Land Study (2017) report recommends that due to the site's strategic location and quality of existing development, that the "area should be safeguarded for employment uses and proposals for alternative uses should be resisted. Similarly, loss of existing Class B employment space within the A580 Stonebridge Cross Corridor East should also be resisted". ▪ Residential dwellings to the north west and south could lead to significant amenity issues.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> ▪ The site is owned by multiple landowners and is occupied by a number of leaseholders. As demonstrated by the recent planning and development history of the site, it is now developed and occupied for a number of new operational employment uses and is no longer available for development (apart from a limited number of remaining development plots which are of insufficient size and within the heart of the industrial area).

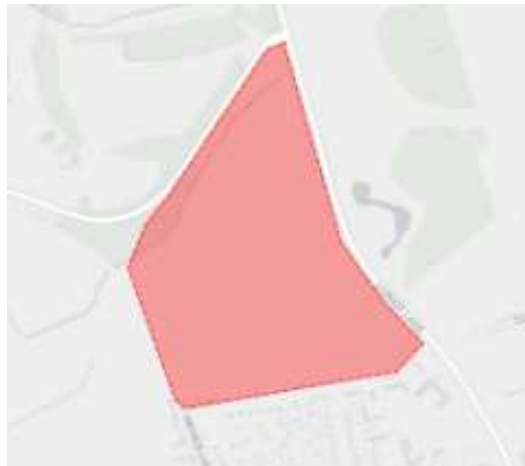

<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> The site has a range of significant transport and access issues which would need to be adequately mitigated to make it suitable for a new stadium for Everton. In particular: <ul style="list-style-type: none"> the proximity of the A580 sterilising one side of the site; the long walking distance to the nearest rail station; and the lengthy journey times for buses and taxis from the City Centre. Combined with the ease of highway access, would likely mean that travel to and from the site would be car dominated which is likely to result in significant traffic impact and congestion on event days.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>This site is included as it has been previously assessed by Everton and LFC (in its 2007 ASA) as part of a review of alternative sites. Whilst the site is of sufficient size, it is now occupied for employment uses and, as demonstrated by the recent planning and development history of the site, it has been recently developed for a range of new operational employment uses and is fundamentally no longer available for development. In addition, this site is in an unsustainable location for a stadium development – in terms of highways, sustainability and accessibility by sustainable modes of transport. It is fundamentally disconnected from the rail network and situated more than 1.9km from the closest Rail Station. The ease of highway access would likely mean that travel to and from the site would be car dominated which is likely to result in significant traffic impact and congestion on event days.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been redeveloped for employment uses since it was considered in previous site search assessments and is not available.</p>	

Site 25: Joe Stone Playing Fields


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 12.4 hectares.
<i>Existing Site Uses</i>	The site contains football playing fields, open space and woodland areas.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies Fazakerley Brook, open space, woodland areas and the University Hospital Aintree. • To the west lies Redbridge High School, open space, woodland areas, HMP Altcourse, and Bank View School. • To the south lies Long Lane Medical Centre, Long Lane Police Station, Our Lady & St Philomena's Catholic Primary School, semi-detached and terraced residential units. • To the east lies open space, woodland areas, a tributary of the Fazakerley River, DPD's distribution warehouse, Solar Panels and a sewage Treatment Plan.
<i>Site Ownership</i>	The site's owner is Liverpool City Council.

Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policies OE11 & OE12 - Green Space, and • Policy OE8 - a New Countryside Area. 	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policies GI 1 & GI 3 - Open Space, and • Policies GI 1 & GI 5 - a Local Wildlife Site. 	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, dsports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Natural Environment</u></p> <p>Paragraph 174 seeks to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</p> <p>Paragraph 175 (a) states that When determining planning applications, local planning authorities should apply the principle that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p> <p>Liverpool's Open Space Assessment (2017)</p> <p>The Open Space Assessment considers Joe Stone Playing Fields, part of Fazakerley Ecology Park, to be a natural and semi-natural greenspace which is considered to have both a high quality and a high value. The natural and semi-natural greenspace serves walk time gaps of amenity green space and parks and gardens.</p>
---	---

Statutory Designations		
<i>Heritage</i>	No listed buildings or monuments lie on the site or within close proximity to the site.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site sits within Flood Zone 1, however to the east of the site sits areas within Flood Zone 2 and Flood Zone 3. A Main River is located to the east.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site, however, the site has the potential to be an important local habitat.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	


Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	N/A
<i>Socio-Economic Profile</i>	<p>In 2019 the site has an IMD ranking of 815 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 1,383 out of 32,844 (10% most deprived in the country).</p> <p>Due to the site being located in the 10% most deprived areas in England, the development of a football stadium has the potential to offer a catalytic effect on the regeneration of the area.</p>
Planning and Development Context	
<i>Planning History</i>	No recent planning consents exist for the site.
<i>Development Status</i>	Major developments in the surrounding area include St. Modwen industrial developments at Stonebridge Business Park including their 70,000 sq. ft for DPD/Geopost, Cobalt HA 24 houses and 30 apartments at Alt Meadow View and Countryside Sigma Limited / Countryside's proposed 200 homes at Queen Mary Place.
<i>Landowner / Developer Aspirations</i>	Liverpool City Council is committed to retaining the site as open space and football playing fields.
Accessibility	
<i>Access to National Network</i>	The site borders Lower Lane which leads to East Lancashire Road and connects the site to Liverpool City Centre within 9 km and J4 of the M57 within 4km.
<i>Access to Public Transport Nodes</i>	<p>Bus services run along Brookfield Drive to the north and Lower Lane to the east.</p> <p>Brookfield Drive provides irregular services to Aintree and Norris Green.</p> <p>Lower Lane provides regular services to Liverpool, Fazakerley Aintree Hospital, Mossley Hill, Penny Lane, Bootle, Knowsley Industrial Park and Woolfall Heath.</p> <p>The north of the site is 1.1km away from Fazakerley train station. This gives the site access to the Merseyrail network which gives the site access to the City Centre and National Rail Networks.</p>

<i>Pedestrian and Cycle Accessibility</i>	Limited pedestrian and cycle access provision is provided in the area surrounding the site.	 <p>Mersey Travel, Liverpool Cycle Map, 2017</p>
<i>Highways Capacity and Access</i>	Access to the site is constrained. Access is via local roads including Lower Lane, Brookfield Drive and Higher Lane. Residential uses separate the site from the A580, which provides the closest access to the strategic highways network. The A580 East Lancashire Road is part of the Department for Transport's proposed Major Road Network which is classified as being one of the busiest and most economically important local authority 'A' roads.	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Residential amenity• Access issues• Adjacent to sewage treatment plant and a prison.	
Fit with Everton Requirements		
<i>Connection to North Liverpool</i>	The site is located 3.4km away from Goodison Park therefore the site has a limited connection to Goodison Park and the surrounding community therefore, the site does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.	
<i>Iconic Location</i>	The site would not provide an iconic location for Everton due to the site being located next to a sewage treatment plant and a prison.	



Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is allocated as Green Space and for Recreational Uses (Policy OE11, OE12) in the adopted UDP and as Green Infrastructure and Open Space (Policy G11 and G13) and a Local Wildlife Site (Policy G15) in the emerging Local Plan, which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities). In terms of its use and quality, Liverpool City Council Open Space Assessment Report undertaken in 2017 confirms that the site provides high quality open space which is a valued resource. The site is identified as a Local Wildlife Site, which has important wildlife habitats. Any development of this part of the site would need to address impact on habitats in planning policy (adopted Policy OE5 and emerging Policy G5) and in national policy in relation to the natural environment (NPPF pp 174-175). A stadium development could generate a significant impact on the amenity of the surrounding community (in terms of traffic, noise, visual impact and event day disruption). There is limited access to the site from the strategic highways network – with access required from local roads with limited opportunity for suitable access and egress.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> Everton Park is in the ownership of LCC and is a key open space and community asset of high value that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is within 1.1 km of Fazakerley Station but has a range of significant transport and access issues which would need to be adequately mitigated to make it suitable for a new stadium for Everton.



<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No</p>	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan, as well as a Local Wildlife Site in the emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude the development of open space or existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Impacts on the habitats and the natural environment would also require assessment and mitigation. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. The Liverpool's Open Space Assessment (2017) considers Joe Stone Playing Fields, part of Fazakerley Ecology Park, to be a natural and semi-natural greenspace which is considered to have both a high quality and a high value. Location and sustainability — the site is in a predominately residential area would likely result in traffic issues on the local highway network and would require a comprehensive transport assessment to test its feasibility. In addition, this site is disconnected from the A580 frontage and is accessed via local roads only. The site is also in a location that could generate amenity issues with surrounding residential areas. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>	


Site 26: Long Lane 1


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 12.7 hectares.
<i>Existing Site Uses</i>	The current uses of the sites include several industrial units of various sizes and vacant industrial development plots.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies various industrial units, green open space/playing fields, Everton Cemetery, a running track and allotments. • To the west lies various semi-detached residential, a public pathway and open space. • To the south lies various industrial units and beyond these units lies a large quantity of terraced residential units which make up Norris Green. • To the East lies Jeffrey Humble Playing Field, terraced residential units, a gym and Fulwood Shooting Club.

<i>Site Ownership</i>	<p>The lands freeholders are predominantly unregistered however, two parcels of land have known freeholders which include:</p> <ul style="list-style-type: none"> • Euroway Homes Limited, • Rockspring UK Value 2 Caisson (Jersey) Limited, • Standmode Limited, • Unknown freeholder (MS186209). <p>Leaseholders include:</p> <ul style="list-style-type: none"> • Coulton's Bread Limited, • Eurowide Distribution Limited, • Hornport Construction Limited, • MJF SSAS Trustees Limited, • Rockspring UK Value 2 Caisson (Jersey) Limited, • Standmode Limited, • Target Scaffolding Limited, • Taskers DIY Limited, • Taskers PLC, • Union Pension Trustees Limited, • Unknown leasehold titles MS619545, MS76122, MS13342, MS168109, MS326598 & MS36501.
-----------------------	---

Planning Policy		
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E1 - a Site for Industrial / Business Development, and • Policy S11 - Retail Warehousing Park. 	
<i>Emerging Policy</i>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policies EC1 & EC2 - site for Industrial/Business Development, and • Policy EC2 - Primarily Industrial Area. 	
<i>National Policy and Other Material Considerations</i>	<p>NPPF</p> <p><u>Employment</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>	

	<p>Liverpool's Employment Land Study (2017)</p> <p>Liverpool's Employment Land Study (2017) identifies that the site is located within the A580 Stonebridge Cross Corridor West, the area is made up of a series of industrial estates accessed via Long Lane. These estates contain largely small-scale light industrial uses. The quality of the building stock varies but the majority of the units are occupied and is functioning well. Occupancy rates are generally good and, while there were a number of vacancies being advertised at the date of assessment, the report therefore considers vacancy levels to be at a healthy level and that B Class employment uses within the A580 Stonebridge Cross Corridor West should be retained.</p> <p>There is a circa 5ha site (shown across) identified within Long Lane, within the existing industrial area. Due to the sites size, it will be attractive to a variety of possible end users as access is already established. The Employment Land Study recommends that <i>"light industrial and warehouse / distribution uses would be suitable (Use Classes B1c, B2, B8), and these uses should be supported. Loss to other non-B Class uses should be resisted"</i>.</p>	 <p>Liverpool's Employment Land Study (2017)</p>
Statutory Designations		
<p><i>Heritage</i></p>	<p>No listed buildings or monuments remain on site however, approximately 70m north of the site lies a cluster of three grade II listed buildings which includes the Entrance to Everton Cemetery Entrance to Long Lane, South Chapel and the Lodge to Everton Cemetery Long Lane Lodge.</p>	 <p>Historic England Map Search, 2019</p>

<i>Flood Risk</i>	The site is located within Flood Zone 1.				 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	There are no statutory designations affecting the site. It is not considered that there are any ecology designations that would prevent the development of the site.				
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.				
Strategic and Regeneration Context					
<i>Strategic and Regeneration Policy</i>	n/a				
<i>Socio-Economic Profile</i>	In 2019 the site has an IMD ranking of 3,367 out of 32,844 LSOAs (20% most deprived in the country) and an Employment Deprivation Domain of 3,590 out of 32,844 LSOAs (20% most deprived in the country). Due to the site being located in the 20% most deprived areas in England, the development of a football stadium has the potential to have a catalytic effect on the regeneration of the area.				
Planning and Development Context					
<i>Planning History</i>	The sites recent and historic applications are outlined below:				
	Application Number	Date	Decision	Details	
	16F/1425	06-09-2016	Approve with Conditions	To alter and extend existing unit including provision of click and collect point with associated works.	
	08F/2275	28-10-2008	Approve with Conditions	To erect two-storey building and lay out associated car parking, for use as a vehicle rescue and recovery unit	

	04F/3105	08-02-2005	Approve with Conditions	To develop site by the erection of 6 no. two-storey blocks comprising 34 no. industrial units, for uses within classes B1, B2, and B8 of the Town and Country Planning (use classes) Order 1987; together with associated estate roads, parking, landscaping, and ancillary works
	04F/3158	15-09-2004	Approve with Conditions	To erect extension to existing warehouse premises
Development Status	Limited development activity has taken place in the vicinity of the site; however, one large development has occurred which is the Countryside Sigma Limited / Countryside development of 200 homes at Queen Mary Place.			
Landowner / Developer Aspirations	The site is largely developed for a number of operational industrial uses.			
Accessibility				
Access to National Network	The site borders Long Lane which provides access Liverpool within 4.8 miles and J4 of the M57 within 2.8 miles.			
Access to Public Transport Nodes	Bus stops are located along Long Lane and provide services Aigburth Vale (five per hour) and Bootle (five per hour). Rice Lane train station is located 1.3 km to the north west of the site and provides access to the Merseyrail network which provides access to the City Centre and the national rail network.			
Pedestrian Cycle Accessibility	The site borders an off-road cycle track which is part of the National Cycle Network route number 62 and the Trans Pennine Trail. Additionally, Long Lane provides an on-road signed cycle route.			
Mersey Travel, Liverpool Cycle Map, 2017				

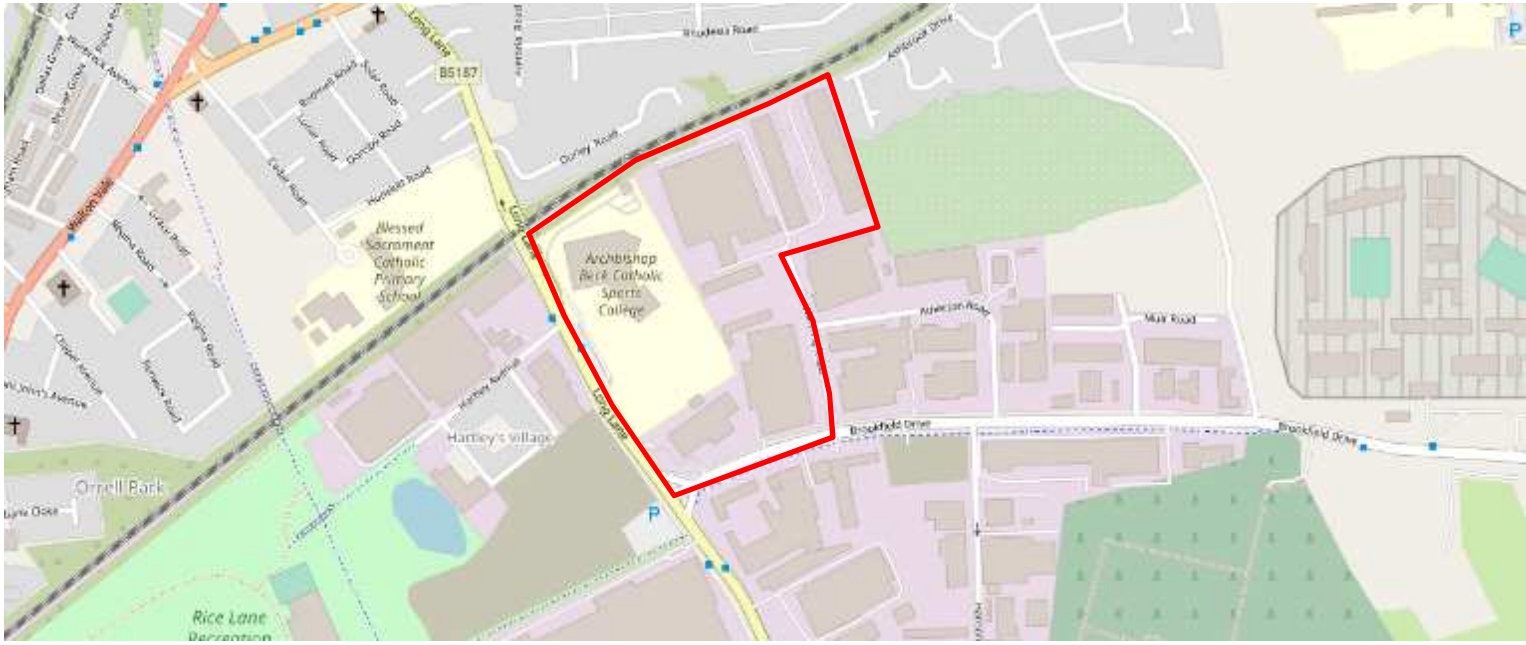
Highways Capacity and Access	Primary access to the site is via Long Lane, which connects into the A580. Industrial and residential uses separate the site from the A580, which provides the closest access to the strategic highways network. The A580 East Lancashire Road is part of the Department for Transport's proposed Major Road Network which is classified as being one of the busiest and most economically important local authority 'A' roads. This road forms the southern boundary of the site, and is very likely to need to remain open and functional during the period of events.	
Other Development Issues		
Other Potential Constraints	<ul style="list-style-type: none">Industrial context and characterFragmented landownerships.	
Fit with Everton Requirements		
Connection to North Liverpool	The site is located 2.25 km away from Goodison Park therefore, it retains some cultural ties with both Goodison Park and provides a suitable for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.	
Iconic Location	Due to the site's location being predominantly in an industrial and retail warehouse location, the site does not provide an iconic location for Everton's football stadium.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The site is allocated for employment uses (Policy E1) and retail warehousing uses (Policy S11) in the adopted UDP, and for industrial development (Policy E1) and as a Primarily Industrial Area (Policy EC2) and emerging Local Plan. If assessed against adopted or emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policy EC2) as well as the NPPF with regard to employment (pp's 80-82).Liverpool's Employment Land Study (2017) identifies that the site is located within the A580 Stonebridge Cross Corridor West. A c.5 ha employment site is identified as being available on the site for industrial uses and sits in the heart of the industrial estate. Due to the site's size, it is identified as being attractive to a variety of possible end users as part of the wider industrial estate. The Employment Land Study recommends that "light industrial and warehouse / distribution uses would be suitable (Use Classes B1c, B2, B8), and these uses should be supported. Loss to other non-B Class uses should be resisted".


<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned by multiple landowners and is occupied by a number of leaseholders. As demonstrated by the recent planning and development history of the site, it is now developed and occupied for a number of new operational employment uses and is no longer available for development. A c.5 ha employment site is identified as being available within the site for industrial uses, which sits in the heart of the industrial estate and would not be appropriate for a stadium, or for non-industrial uses.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> Subject to mitigation and investigation. The site sits at least 1.3km away from the closest rail station and would need an effective travel plan to be acceptable. In addition, the relative ease of access by car to the site could result in off-site traffic impacts and congestion.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	Summary Assessment This site is included as it has been previously assessed by Everton and LFC (in its 2007 ASA) as part of a review of alternative sites. Whilst the site is of sufficient size in its entirety, it is not considered to be a feasible, practical or realistic option for a new stadium development. The site is not available — it is occupied for employment uses and, as demonstrated by the recent planning and development history of the site, it has been now been developed for a range of new operational employment uses and is no longer available. Liverpool's Employment Land Study (2017) identifies that the site is located within the A580 Stonebridge Cross Corridor West — which is a key employment and industrial corridor in the north east of the City where non B-Class uses should be resisted. A c.5 ha employment site is identified as being available within the site for industrial uses, which sits in the heart of the industrial estate and would not be appropriate for a stadium, or for non-industrial uses.	


Conclusion & Comparison with BMD



The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been redeveloped for employment uses since it was considered in previous site search assessments and is not available.

Site 27: Long Lane 2


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 9 hectares.
<i>Existing Site Uses</i>	The site contains Archbishop Beck Catholic Sports College and several industrial units.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies a railway line and beyond this lies a variety of terraced and semi-detached residential units and Kirkdale Cemetery. • To the west lies Blessed Sacrament Catholic Primary School, several industrial units, open space, a large pond and a square of terraced and semi-detached industrial units. • To the south lies several industrial units • To the east lies several industrial units, allotments, Tue Brook and woodland areas.

<p><i>Site Ownership</i></p>	<p>The sites freeholders are predominantly unregistered however, Liverpool City Council are the freeholders for 4 ha of the site.</p> <p>Several Leaseholds exist over the site which include:</p> <ul style="list-style-type: none"> • Barclay Estates Limited, • Barclay Property Trading LLP, • Centaur Property Investments Limited, • Lexton Investments Limited, • Linde Sterling Limited, • Liverpool Roman Catholic Archdiocesan Trustees Incorporated, • NHS Property Services Limited, • North West Home Care Limited, • Royal Mail Group Limited, • SP Manweb PLC, and • Zurich Assurance Ltd.
<p>Planning Policy</p>	
<p><i>Adopted Policy</i></p>	<p>In the UDP policies map the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E1 - a Primarily Industrial Area; and • Policy E1 - a Site for Industrial/Business Development. 

<p><i>Emerging Policy</i></p>	<p>The draft May 2018 Liverpool Local Plan Policies Map proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policies EC1 & EC2 - a site for industrial/business development; and • Policy EC6 - a mixed-use area (the College). 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Employment</u></p> <p>Paragraph 82 states that decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>	
	<p>Liverpool's Employment Land Study (2017)</p> <p>Liverpool's Employment Land Study (2017) identifies that the site is located within the A580 Stonebridge Cross Corridor West, the area is made up of a series of industrial estates accessed via Long Lane. These estates contain largely small-scale light industrial uses. The quality of the building stock varies but the majority of the units are occupied and is functioning well. Occupancy rates are generally good and, while there were a number of vacancies being advertised at the date of assessment, the report therefore considers vacancy levels to be at a healthy level and that B Class employment uses within the A580 Stonebridge Cross Corridor West should be retained.</p>	

Statutory Designations		
<i>Heritage</i>	<p>No listed buildings or monuments lie on the site however, 100m west of the site lies three Grade II listed buildings which includes the Dining Hall, Engine House and Chimney at Hartley's Factory and Hartley's Factory and Entrance Gateway and Pavilions.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The site is located within Flood Zone 1. Tue Brook, a Main River is located to the north and east of the site and appears to be culverted within the north eastern corner of the site.</p>	 <p>Flood Map for Planning, 2019</p>


Ecology	There are no statutory designations affecting the site. It is not considered that there are any ecology designations that would prevent the development of the site.			
Landscape	It is not considered that there are any landscape designations that would prevent the development of the site.			
Strategic and Regeneration Context				
Strategic and Regeneration Policy	N/A			
Socio-Economic Profile	The site has an IMD ranking of 7,111 out of 32844 (30% most deprived in the country) and an Employment Deprivation Domain of 7,8203 out of 32,844 (30% most deprived in the country).			
Planning and Development Context				
Planning History	Application Number	Date	Decision	Details
	13RM/0325	11-04-2013	Approve with Conditions	To erect new sports college with associated community facilities, including sports centre, playing fields, landscaping and associated works. (Application for approval of reserved matters, details of access, appearance, landscaping, layout and scale).
	090/0687	10-07-2009	Approve with Conditions	To erect new sports college with associated community facilities, including sports centre and playing fields and associated works of up to three storeys (Outline application).
	07F/1338	15-07-2007	Approve with Conditions	To use premises for non-residential, education, and training purposes (within use class D1), and carry out associated alterations to external appearance
Development Status	Limited development activity has taken place in the vicinity of the site; however, 200 homes have been developed by Countryside Sigma Limited / Countryside at Queen Mary Place and 22 houses and 12 flats have been erected at Leighton Dene, the former nursing home by Liverpool Mutual Homes.			
Landowner / Developer Aspirations	The site is fully developed for employment and educational uses. The Archbishop Beck Catholic Sports College development was completed in October 2014 at a cost of £18m which is now operational.			



Accessibility		
Access to National Network	The east of the site borders Long Lane which gives the site access to the A506 and the A580, giving the site access to the centre of Liverpool and J6 of the M57 and J4 of the M57.	
Access to Public Transport Nodes	<p>Two bus stops border the site along Long Lane which provide frequent services running to Bootle, Aigburth Vale, Thornton and Norris Green.</p> <p>The nearest railway station is Orrell Park which is located 750m to the west of the site. Orrell Park train station links the site to the Merseyrail network which connects the site to the City Centre and the National Rail Network.</p>	
Pedestrian and Cycle Accessibility	An off-road cycle track is located to the south of the site and an on-road cycle route is located to the east of the site. Additionally, the site is in close proximity to National Cycle route number 62 which is also connected to the Tran Pennine Trail.	 <p>Mersey Travel, Liverpool Cycle Map, 2017</p>
Highways Capacity and Access	Primary access to the site is via Long Lane, which connects into the A580. Industrial and residential uses separate the site from the A580, which provides the closest access to the strategic highways network. The A580 East Lancashire Road is part of the Department for Transport's proposed Major Road Network which is classified as being one of the busiest and most economically important local authority 'A' roads.	
Other Development Issues		
Other Potential Constraints	<ul style="list-style-type: none">• Archbishop Beck Catholic Sports College would have to be relocated• Constrained by railway line to North	

Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>		The site is located 2.75 km away from Goodison Park therefore, it retains some cultural ties with both Goodison Park and provides a suitable for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.
<i>Iconic Location</i>		The site would not provide an iconic location due to the surrounding uses.
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site is allocated for employment uses (Policy E1) and in the adopted UDP, and for employment (Policy E1) and a mix of uses (Policy EC6 – college site) and emerging Local Plan. If assessed against adopted or emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policy EC2) as well as the NPPF with regard to employment (pp's 80-82). Liverpool's Employment Land Study (2017) identifies that the site is located within the A580 Stonebridge Cross Corridor West, the area is made up of a series of industrial estates accessed via Long Lane and seeks to retain the employment elements of the site for employment uses. The proposed mixed use element of the site has been developed as The Archbishop Beck Catholic Sports College.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> As demonstrated by the recent planning and development history of the site, the site is now developed and occupied by a number of new operational educational and employment uses and is no longer available for development. The Archbishop Beck Catholic Sports College development was completed in October 2014 at a cost of £18m on 4 hectares to the west of the site with industrial uses developed on land to the west of the site. The site is now developed and fundamentally not available.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.

<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The site is located within 750m of Orrell Park train station.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p>Summary Assessment</p> <p>This site is included as it has been previously assessed by Everton and LFC (in its 2007 ASA) as part of a review of alternative sites. As demonstrated by the recent planning and development history of the site, it is now developed and occupied for a number of new operational educational and employment uses and is no longer available for development. The Archbishop Beck Catholic Sports College development was completed in October 2014 at a cost of £18m on 4 hectares to the west of the site with industrial uses developed on land to the west of the site. The site is now fully developed and is fundamentally not available.</p> <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site has been redeveloped for recent educational and employment uses since it was considered in previous site search assessments and is not available.</p>	

Site 28: Jeffreys Humble Playing Fields

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 13.21 hectares.
<i>Existing Site Uses</i>	The site contains football playing fields, three artificial 3G playing fields (opened October 2018), changing facilities, car parking, a running track, Fulwood Shooting Club and an 80-station gym.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies Everton Cemetery, open space, woodlands and Aintree Industrial Estate. • To the west lies Everton cemetery, a vacant plot of land and several industrial units of various sizes. • To the south lies industrial units of various sizes and semidetached and terraced residential units. • To the east lies Redbridge High School, Bank View School, terraced and semidetached residential units and Joe Stone Playing Fields.
<i>Site Ownership</i>	The site is owned by Liverpool City Council.

Planning Policy		
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy OE8 - a New Countryside Area; and • Policies OE11 and OE12 - Green Space. 	
<i>Emerging Policy</i>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy GI 1 & GI 3 - Open Space. 	
<i>National Policy and Other Material Considerations</i>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ol style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p>	

Sports England

Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.

Liverpool's Strategic Green and Open Spaces Review (2016)

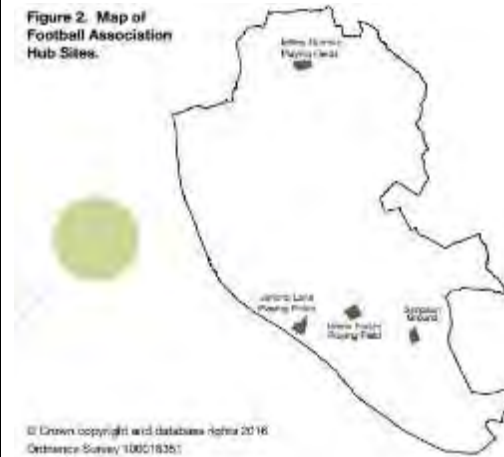
The Strategic Green and Open Space Review states that through the FA's Investment Programme, Liverpool's Playing Pitch Strategy aims to:



- Determine the future requirements of sites/pitches where there is currently no recorded football play and/or spare capacity at education sites to address overplay on senior, youth and mini pitches;
- Identify strategic grass pitch sites and improve football pitch quality in order to increase capacity to accommodate unmet and future demand for youth 11 vs 11 and adult 11 vs 11 football;
- Meet a current shortfall of one full size 3G (third generation) Artificial Grass Pitches (AGPs) to service unmet demand for football in the north of the city; and
- Deliver a phased implementation of new 3G Artificial Grass Pitches (AGPs) and changing facilities on strategic hub sites to meet the FA Chairman's England Commission priorities and be the catalyst to address shortfalls in provision in the city e.g. shortfall of adult pitches in the south of the city.

To achieve this the City Council have entered in an investment partnership with the Football Association, the Premier League and Sport England. The external parties committed a funding contribution of £12.6 million and the City Council committed a capital contribution of £4.4 million, totalling £17 million. The funds from the investment partnership are committed to the development and construction of the new third generation (3G) pitches and ancillary facilities.


The FA model is based around all grass roots football delivery in an area being focused on floodlit 3G pitches and a small number of high-quality grass pitch hub sites. The ownership of the improved sites after the investment has been undertaken would be transferred from council ownership to a new city-wide local delivery vehicle (Football Trust) responsible for maintenance and management of football in the city.

Figure 2. Map of Football Association Hub Sites.



	<p>The proposal in Liverpool is to invest in up to 4 hub sites across the city; each consisting of three floodlit artificial grass pitches, three grass pitches, associated changing provision and extensive car parking. The sites that have been identified are Jeffrey Humble Playing Fields, Heron Eccles Playing Fields, Jericho Lane Playing Fields and the Simpson Ground. At least two of these sites would include a health and fitness offer.</p> <p>Jeffrey-Humble Playing Field is therefore a key playing pitch as it is the only FA Hub Site within North Liverpool. The site has recently received a portion of the £17 million funding from the investment partnership to deliver 3G Sports Pitches and ancillary facilities. The site is considered as a key site to meet the shortfall in Artificial Grass Pitches in the north of Liverpool.</p>	
Statutory Designation		
<i>Heritage</i>	<p>The site contains no listed buildings or monuments, however to the west of the site sits three Grade II listed buildings or monuments which includes:</p> <ul style="list-style-type: none"> • the Lodge to Everton Cemetery Long Lane Lodge, • the Entrance to Everton Cemetery, and • South Chapel. 	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The site sits within Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>

Ecology	To the north of the site sits a Local Wildlife Site. There are no statutory designations within the site. It is not considered that there are any ecology designations that would prevent the development of the site.			
Landscape	It is not considered that there are any landscape designations that would prevent the development of the site.			
Strategic and Regeneration Context				
Strategic and Regeneration Policy	n/a			
Socio-Economic Profile	In 2019 the site has an IMD ranking of 815 out of 32,844 (10% most deprived in the country) and an Employment Deprivation Domain of 1,383 out of 32,844 (10% most deprived in the country). Due to the site being located in the 10% most deprived areas in England, a football stadium has the potential to offer a catalytic effect on the regeneration of the area.			
Planning and Development Context				
Planning History	The recent and historic consents are outlined below and confirms the use of the site for sports facilities/ playing field land.			
	Application Number	Date	Decision	Details
	16F/1052	19-08-2016	Approve with Conditions	To extend existing changing pavilion to provide additional changing rooms and health and fitness facilities. Install 3, 3G artificial grass football pitches with associated flood lighting, perimeter fencing and hardstanding. Extend car park to provide 250+ spaces and install new perimeter/gates.
	13F/0228	15-03-2013	Approve with Conditions	To erect new build changing/community facilities with associated car park.
	12LP/1609	19-07-2012	Certificate of Lawfulness - Granted	Application for a Lawful Development Certificate to install new solar panels to building.
	07F/1002	22-05-2007	Approve with Conditions	To carry out various environmental improvements including removal and replacement of fencing and gates, and surface and boundary treatment works.
Development Status	Surrounding development proposals include Queen Mary Place (a 200-home development by Countryside Sigma Limited / Countryside), four industrial units totalling 62,000 sq. ft at Stonebridge West by St. Modwen Developments Limited and 24 houses and 46 flats by Cobalt HA at Landford Avenue.			


<i>Landowner / Developer Aspirations</i>	LCC is committed to retaining the site for active uses. A new state of the sports facility has opened in October 2018 as part of a £20m development to improve grassroots football in Liverpool (the Parklife Project). The Jeffrey Humble Playing Fields features three floodlit third generation (3G) artificial grass pitches (AGP), changing facilities, car parking and an 80-station gym with group exercise classes available. The site is now an important community recreational resource and is not available for development by LCC. The site at Jeffrey Humble will become the home for the Walton and Kirkdale Junior Football League, the Liverpool County FA Girls League and the North Liverpool Junior League ¹ .	
Accessibility		
<i>Access to National Network</i>	Long Lane lies to the south east of the site, connecting the site to Liverpool City Centre within 4.8 miles and J4 of the M57 within 2.8 miles.	
<i>Access to Public Transport Nodes</i>	Two bus stops are located along Long Lane and provide regular services Aigburth Vale (five per hour) and Bootle (five per hour). Rice Lane train station is located 1.5 km to the north west of the site and provides access to the Merseyrail Network which provides access to the City Centre and the National Rail Network.	
<i>Pedestrian and Cycle Accessibility</i>	<p>An on-road signed cycle route is provided along Long Lane. Additionally, an off-road cycle track which is part of the National Cycle Network route number 62 and the Trans Pennine Trail is within close proximity to the site.</p> <p>A public footpath is provided on site which connects the site to the east through to Jeffrey Humble Playing Fields.</p>	 <p>Mersey Travel, Cycle Map Liverpool, 2017</p>
<i>Highways Capacity and Access</i>	Primary access to the site is via Long Lane, which connects into the A580. Industrial and residential uses separate the site from the A580, which provides the closest access to the strategic highways network. The A580 East Lancashire Road is part of the Department for Transport's proposed Major Road Network which is classified as being one of the busiest and most economically important local authority 'A' roads which could experience congestion during events.	
Other Development Issues		


¹ <https://www.liverpoolecho.co.uk/news/liverpool-news/liverpools-new-state-art-football-15239646>



<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Vital sports facility for north Liverpool in providing 3G sports provision and enables the vision of Liverpool Active City Strategy 2014-21 (2019) of Liverpool becoming the Most Active City in England by 2022.• Adjacent to cemetery.	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	The site is approximately 2.6 km away from Goodison Park therefore, it retains some cultural ties with both Goodison Park and provides a suitable for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.	
<i>Iconic Location</i>	The site would not provide an iconic location due to the surrounding uses being predominately housing and industrial uses.	
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none">▪ The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">▪ The Site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and Green Infrastructure and Open Space in the emerging Local Plan (Policy G11 and G13), which seeks to protect the City’s green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp’s 96-101) and the tests of Sport England (for playing pitches and sports facilities).▪ In terms of its use and quality, site is identified as Green Space and is an important community recreation asset. A new state of the sports facility has opened in October 2018 as part of a £17m investment partnership to improve grassroots football in Liverpool (Parklife Project). The Jeffrey Humble Playing Fields features three floodlit third generation (3G) artificial grass pitches (AGP), changing facilities, car parking and an 80-station gym with group exercise classes available.▪ A stadium development would generate significant impact on the amenity of the surrounding community (in terms of traffic, noise, visual impact and event day disruption).
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none">▪ Jeffreys Humble is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available.

<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> Subject to mitigation and investigation. The site at least 1.5km from the closest rail station and would need an effective travel plan to be acceptable. In addition, the relative ease of access by car to the site could result in off-site traffic impacts and congestion.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude the development of open space or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. The Liverpool's Open Space Assessment (2017) considers the site to be of high quality. A new state of the sports facility has opened in October 2018 as part of a £20m development to improve grassroots football in Liverpool (the Parklife Project). The Jeffrey Humble Playing Fields features three floodlit third generation (3G) artificial grass pitches (AGP), changing facilities, car parking and an 80-station gym with group exercise classes available. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available.</p>	



Site 29: Neighbourhood Services Ltd Site


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<p><i>Site Outline</i></p>	
<p>Site Details</p>	
<p><i>Site Area</i></p>	<p>The site is approximately 42.7 hectares.</p>
<p><i>Existing Site Uses</i></p>	<p>The site contains Croxteth Brook (a Main River), Larkins Farm, a wind turbine, Green Open Space and Woodlands.</p>
<p><i>Surrounding Uses</i></p>	<ul style="list-style-type: none"> To the north lies woodlands and J4 of the M57, open space, woodlands and Shroggs Farm. To the west lies semidetached and terraced residential properties, the River Alt, Croxteth Community Primary School, St Paul The Apostle C of E Church, Croxteth Sports Centre and Croxteth Park Care Home.

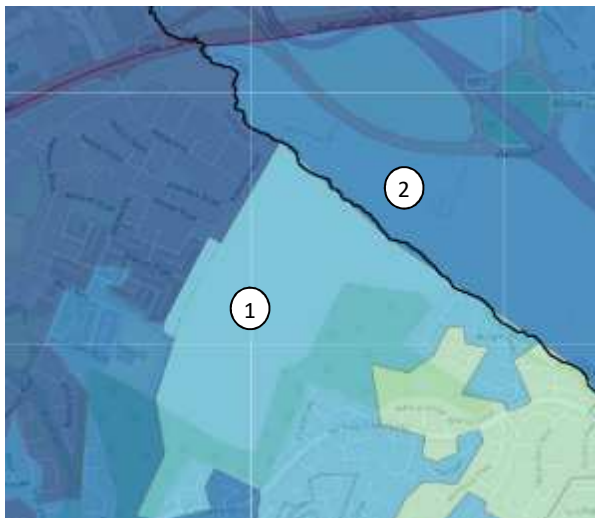
	<ul style="list-style-type: none">• To the south lies woodlands of Croxteth County Park, detached and semidetached residential properties and Croxteth County Park.• To the east lies woodlands, open space, open space (Green Belt) and detached and semidetached residential properties.	
Site Ownership	The site is owned by the Neighbourhood Services Company Limited.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policy OE1 & OE2 - Greenbelt;• Policy OE5 and OE6 - a Site of Nature Conservation Value;• Policy OE8 - New Countryside Area; and• Policies OE11 and OE12 - Green Space.	


	<p>Knowsley Local Plan Policy Map identifies that the site is allocated as:</p> <ul style="list-style-type: none"> • Policy CS5 - Green Belt. 	
<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy GI 1 — Greenbelt; • Policies GI 1 & GI 3 - Open Space; and • Policies GI 1 & GI 5 - a Local Wildlife Site. 	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Green Belt</u></p> <p>Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, paragraph 144 requires that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’</p> <p><u>Natural Environment</u></p> <p>Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). When determining planning applications, paragraph 175a states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p>
---	---

Statutory Designations		
Heritage	<p>No listed buildings, monuments, parks or gardens sit on the site, however the site borders Croxteth Hall Park, a Grade II listed park and garden, which is located to the south.</p> <p>Stand Farm Lodge (a Grade II listed building) lies approximately 260m to the east a grade II listed building.</p> <p>Gellings Farmhouse (Grade II listed) is located to the north east of the site, north of M57.</p>	 <p>Historic England Map Search, 2019</p>
Flood Risk	<p>The site predominantly sits within Flood Zone 1 however, the land surrounding the Knowsley Brook (a Main River) are located within Flood Zone 2 and Flood Zone 3.</p>	 <p>Flood Map for Planning, 2019</p>

<i>Ecology</i>	<p>The site is identified as an important habitat, including:</p> <ul style="list-style-type: none"> • Priority Habitat Inventory - Deciduous Woodland • National Forest Inventory (GB) — Broadleaved. • Arable Assemblage Farmland Birds rating of 3, • Grassland Assemblage Farmland Birds (England) — Grey Partridge, Lapwing, Tree Sparrow, 	
<i>Landscape</i>	<p>The site is located within a Community Forest and a Source Protection Zone (Outer area) to protect groundwater. No other statutory designations sit on the site.</p>	
<i>Agriculture</i>	<p>England's Agricultural Land Classification Map identifies that the site is considered as 2 'Very Good' therefore, UDP Policy OE2 of the Liverpool UDP (2002) applies.</p>	 <p><i>Agricultural Land Classification Map North West Region, 2011</i></p>

Strategic and Regeneration Context						
Strategic and Regeneration Policy		n/a				
Socio-Economic Profile		<p>The site sits within two LSOAs, in 2019 the first LSOA has an IMD ranking of 14,894 out of 32,844 (50% most deprived) in England and an Employment Deprivation Domain ranking of 11,422 out of 32,844 (20% most deprived) in England.</p> <p>In 2019 the second LSOA has an IMD ranking of 4,755 out of 32,844 (20% most deprived) in England and an Employment Deprivation Domain of 3,850 out of 32,844 (20% most deprived) in England.</p>				
Planning and Development Context						
Planning History		The recent and historic consents are outline below.				
		Council	Application Number	Date	Decision	Details
		Knowsley	12/00318/FUL	09 Jan 2013	Granted	Erection of 15-metre-high 10-kilowatt wind turbine.
		Knowsley	10/00294/FUL	01 Sep 2010	Granted	Erection of 15 metre, 6-kilowatt wind turbine.
Development Status		Major developments in the surrounding area include developments in the Stonebridge corridor to the west, including Home Bargains new Distributions Warehouse and training centre by TJ Morris, St Modwen Developments 70,000 sq. ft industrial unit for DPD/Geopost, Liverpool City Councils new Fruit and Vegetable Market and the anticipated 188 home development at Park View.				

Landowner / Developer Aspirations	Unknown	
Accessibility		
Access to National Network	If the site can be accessed via East Lancashire Road or J4 of the M57 roundabout the site will be able to access Liverpool within 6.5 miles and will have immediate access to J4 of the M57.	
Access to Public Transport Nodes	<p>Bus stops along Parkview Road to the west of the site provides access to Walton and Croxteth Park. East Lancashire Road provides 12 bus services per hour to Liverpool and services to a variety of other locations such as Tower Hill, Knowsley Industrial Park, Croxteth Park, Fazakerley, Walton and Woolfall Heath.</p> <p>The nearest train station is Fazakerley Train Station which is 2.2 km to the north west of the site, this provides access to the Merseyrail network and provides four services per hour to Liverpool and four services per hour to Kirby.</p>	
Pedestrian and Cycle Accessibility	East Lancashire Road provides off-road cycle tracks to Kirby. Additionally, to the south and east of the site an off-road cycle route exists which is part of national cycle route 862 which leads south to West Derby and under the M57 to Kirkby.	 <p>Mersey Travel, Liverpool Cycling and Walking Map, 2017</p>
Highways Capacity and Access	The site would require significant highways infrastructure to achieve a suitable access from either the A580 or Junction 4 of the M57. Any development would place significant pressure on this junction during major events and require significant remodelling of the existing junction configuration. Beyond this, access to the site would be from local residential roads only.	

	<p>The combination of a lack of convenient pedestrian access to a major transport hub (or the City Centre of Liverpool), plus the close proximity of the Strategic Road Network of the M57 / M58 / M62 would likely encourage a high proportion of people to drive to an event. This would mean that suitable volumes of car parking would need to be provided to reduce impacts to surrounding residential communities.</p> <p>Overall, the site has many transport and access issues which could reduce the accessibility of the stadium to non-car modes. Whilst the relative ease of access by car to the site would encourage unsustainable modes of transport.</p>	
Other Development Issues		
Other Potential Constraints	<ul style="list-style-type: none">• Significant access issues• Site crosses local authority boundaries	
Fit with Everton’s Requirements		
Connection to North Liverpool	The site is outside of North Liverpool (as defined by the North Liverpool and South Sefton SRF) and as such does not retain the same connection to Goodison Park and L4 as other sites in North Liverpool which connect better with the existing community at Goodison Park. The site is located close to the boundary with Knowsley and shares more of a relationship with residential areas around the M57 corridor and into Kirkby. The site is also disconnected from the City Centre and the Docks.	
Iconic Location	The site is located adjacent to the M57 and sits within a predominately residential location, as such it is considered that the site would not provide an iconic location for Everton.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">▪ The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">▪ The site is allocated as Green Belt (OE1 and OE2), Green Space (OE11 and OE12) and a site of Nature Conservation Value (OE5 and OE6) in the adopted UDP, and in the emerging Local Plan as Green Belt (GI1), Open Space (GI1, GI3) and a Local Wildlife Site (GI5). If assessed against adopted or emerging policy, a stadium development would need to address key local green belt, open space and nature conservation policies as well as the NPPF with regard to the loss of open space (pp’s 96-101) and natural environment (pp’s 174-175) and demonstrate very special circumstances in accordance with Green Belt Policy (NPPF para 143).▪ Croxteth Brook runs through the site and a proportion of the land is within Flood Zone 3, which would require mitigation and assessment.▪ The site provides a valuable habitat for ecology and includes woodland and community forest.

		<ul style="list-style-type: none"> Residential dwellings bound the site to the west and could lead to significant amenity issues. The site has no suitable existing access.
<i>Is site acquisition a realistic proposition?</i>	Unknown	<ul style="list-style-type: none"> The availability of the site is currently not known (owned by Network Services Ltd).
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> The majority of the site is clear, therefore it is not considered that unaffordable development costs would prevent the development of a stadium on the site, although consideration would be needed with regards to flood risk.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> The site is not within close proximity to existing public transport to the site and is 2.2km to the nearest local train station which, coupled with the ease of highway access off M57 would likely mean that travel to and from the site would be car dominated. This would likely result in significant traffic impact and congestion on event days. The combination of a lack of convenient pedestrian access to a major transport hub (or the City Centre of Liverpool), plus the close proximity of the Strategic Road Network of the M57 / M58 / M62 would likely encourage a high proportion of people to drive to an event. This would mean that suitable volumes of car parking would need to be provided to reduce impacts to surrounding residential communities. Overall, the site has many transport and access issues which could reduce the accessibility of the stadium to non-car modes whilst the relative ease of access by car to the site would encourage unsustainable modes of transport.
<i>Would there be any unacceptable environmental or visual impacts?</i>	Subject to further assessment and consideration	<ul style="list-style-type: none"> As a large proportion of the site is within Green Belt, the visual impact of the proposed development would be a key consideration which would need to be mitigated.

Summary and Conclusions

Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?

Summary Assessment


In summary, the key considerations when assessing the site include:

- Availability — site is in private ownership and its availability is unknown.
- Planning policy constraints — the site is allocated as Green Belt, Open Space and as a site with nature conservation value in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF does not strictly preclude development in the Green Belt, any development would require the demonstration of very special circumstances. Whilst planning policy and guidance, including the NPPF, does not strictly preclude the development of open space or wildlife sites, any development would require convincing justification and mitigation. It may need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits, that alternative provision could be provided elsewhere and that impact could be mitigated. The site also has constraints in terms flood risk which would require detailed assessment and mitigation.
- Location and sustainability — this site is in a wholly unsustainable location for a stadium development. It is not within close proximity to existing public transport and is 2.2km to the nearest local train station (with no clear walking route) which, coupled with the ease of highway access off M57 (if accessible) would mean that travel to and from the site would be car dominated and that suitable volumes of car parking would need to be provided to reduce impacts to surrounding residential communities. This would likely to result in significant traffic impact and congestion on event days. The site is also in a residential location with no existing access to the site at present. Access to the site from the strategic highway network would be challenging to implement and new access would be required from A580/M57.

Conclusion & Comparison with BMD


The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including Green Belt) which would need to be addressed to be suitable for a stadium use. However, **the key consideration is that the site is in a wholly unsustainable location, with no immediate access and within close proximity to peripheral suburban residential uses.** The availability of the site is unknown. The site does not represent a better or more realistic alternative to what is proposed at BMD even if it were to be made available.


Site 30: Mab Lane Youth Centre


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 10.4 hectares.
<i>Existing Site Uses</i>	The site is currently used as Mab Lane Adventure Playground, Mab Lane Community Woodland and playing field land/Public Open Space.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies the Ploughman Public House, St Brigid's Catholic Primary School, Open Space, established trees and Semi-Detached and Terraced Residential properties • To the west lies Mab Lane Primary School, Semi-Detached and Terraced Residential properties. • To the south lies Yewtree Cemetery, St Luke's Church & Community Centre, Open Space and Semi-Detached and Terraced Residential properties. • To the east lies Open Space, St Brigid's Catholic Primary School and Terraced Residential Units.

Site Ownership	The site is owned by Liverpool City Council.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policy OE11 & OE12 - Green Space.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policies GI 1 & GI 3 - Open Space.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Community Uses</u></p> <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p>Paragraph 182 states that decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p>
	<p>Sports England</p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.
	<p>Liverpool’s Open Space Assessment Report (2017)</p> <p>The Open Space Assessment Report identifies Mab Lane as a Natural and Semi-Natural Greenspace which provides high quality open space which is deemed as one of the highest scoring Natural and Semi-Natural Greenspace in terms of value.</p>

Statutory Designations		
<i>Heritage</i>	No listed buildings or monuments are within or in close proximity to the site.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site is located within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>


Ecology	Habitats affecting the site comprise woodland and young trees providing an important urban habitat.				 <p>Magic Maps, 2019</p>
Landscape	There are not considered to be any statutory landscape designations within or immediately adjacent to the site which would act as a constraint to development.				
Strategic and Regeneration Context					
Strategic and Regeneration Policy	N/A				
Socio-Economic Profile	The site sits within one LSOA which in 2019 has an IMD rank of 471 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 388 out of 32,844 LSOAs in England (10% most deprived).				
Planning and Development Context					
Planning History	The planning history of the site confirms that the site has been developed for use as public open space and community woodland.				
	Application Number	Date	Decision	Details	
	10F/1169	09-07-2010	Approve with Conditions	To carry out various works, including erection of timber shelter, decking, installation of cycle stands and fencing and laying out of footpath.	


	09DC/0524	02-09-2009	Approve with Conditions	To develop land as new community woodland and carry out associated works including boundary treatments and hard surfacing.
Development Status	Developments in the surrounding area include the proposed 95 developments at Colwell Road, Markbuild Limited’s proposed 19 apartments and two houses at 49 Ruscombe Road and Osco Homes proposed 19 dwellings at Baycliff Gardens (‘18F/1369’ registered May 2018).			
Landowner / Developer Aspirations	Liverpool City Council is committed to retaining the site as an important community and ecological resource.			
Accessibility				
Access to National Network	The site borders Croxdale Road West which gives the site access to Deysbrook Lane which provides access to A5049 into Liverpool City Centre. The site is also within 3km of J3 M57 to provide access to the wider strategic road network.			
Access to Public Transport Nodes	The site is within 200m of bus stops on Princess Drive which provides regular services to Knowsley Industrial Park, Stockbridge Village, Woolfall Heath and Tuebrook, and within 500m of bus stops providing services to Liverpool and limited services to Stockbridge Village. The site is more than 2.5km from Roby train station.			
Pedestrian and Cycle Accessibility	The site borders an on road signed cycle route and an off-road cycle track.			
				Mersey Travel Liverpool Cycle Map,
Highways Capacity and Access	The site is served by local access roads only and is situated in a predominantly residential area. The site is also disconnected from the strategic highways network and any major development would have a significant impact on the highways network. Access to the site is extremely constrained and could require the acquisition of residential properties.			

Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Access issues.• Mab Lane Mixed Primary School amenity issues.• Paying pitch re-provision.	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	The site is located outside of North Liverpool (as defined by the North Liverpool and South Sefton SRF) and as such does not retain the same connection to Goodison Park and L4 as other sites in North Liverpool which connect better with the existing community at Goodison Park. The site is located close to the boundary with Knowsley and shares more of a relationship with residential areas around the M57 corridor and into Kirkby.	
<i>Iconic Location</i>	The site currently sits within a predominately residential area and is close to the border with Knowsley. As such, it is considered that the site does not provide an iconic location for Liverpool.	
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none">▪ The site is sufficient to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking. However, it is surrounded by residential properties and would likely require the acquisition of surrounding land, property and highways.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">▪ The site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy GI1 and GI3), which seeks to protect the City’s green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp’s 96-101) and the tests of Sport England.▪ Liverpool’s Open Space Assessment Report (2017) identifies Mab Lane as Natural and Semi-Natural Greenspace which provides high quality open space which is deemed as one of the highest scoring Natural and Semi-Natural Greenspace in terms of value.▪ Residential dwellings surround the site on all sides and as such development on the site for stadium use is likely to create significant amenity issues for local residents. Acquisition of residential properties would likely be required.▪ The site includes important habitats and established trees which provide an important resource in the inner city.

<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is in the ownership of LCC and is a key open space and community asset that the Council wishes to retain. LCC will not consider the sale of the site to Everton and therefore the site is not available. Acquisition of residential properties and highways would likely be required.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> The site is an unsustainable location in terms of public transport, including rail. The site is disconnected from the City Centre, in a suburban location and more than 2.5km from Roby train station.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There would unlikely to be any unacceptable environmental or visual impacts associated with the development of the site, subject to suitable mitigation.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as a key community recreation and open space asset in the City. LCC will not consider the sale of the site to Everton and therefore the site is not available. The site would also require significant acquisition / CPO to accommodate a stadium use. Planning policy constraints — the site is allocated as an open space and recreation asset (including playing pitches) in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development of an important park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Sustainability and location — the site is in an unsustainable location (in a predominately residential area) in terms of public transport, including rail. The site is disconnected from the City Centre and more than 2.5km from Roby train station. This site is also in a location that would likely result in traffic issues on the local highway network and create significant amenity issues in a predominantly residential / suburban area (being surrounded by residential uses on all sides). <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. This site is also in a wholly unsustainable location for a stadium development.</p>	

Site 31: Derby Park

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 8.9 hectares.
<i>Existing Site Uses</i>	The site is currently used as a Victorian public park with associated tennis court, football 'knockabout' area, zip area, statues, play facilities, green open space, wooded areas and bowls pitch.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies St Monica RC Church and Parish Centre, predominantly terraced houses and Sefton Council – Hawthorne Road Depot. To the west lies Christ Church, a cluster of predominantly terraced residential units, open space, a cluster of new build apartments (3-storeys), townhouses and semidetached residential units.

	<ul style="list-style-type: none">To the south lies Oxford Road Youth and Community Centre, Christ Church Bootle, Early Learners Day Nursery, terraced residential units, three-storey residential apartments, Oxford House a 15-storey residential apartment block and Bedford Primary School.To the east lies semi-detached residential units, Hillside High School and Playing Field, Activity for All (Sports Centre) and Open Space.	
Site Ownership	The sites freeholder is Sefton Borough Council. SP Manweb hold four leasehold titles over the site.	
Planning Policy		
Adopted Policy	<p>In the Sefton Local Plan (2017), Bootle and Crosby proposals map, the site is allocated as:</p> <ul style="list-style-type: none">Policy NH5 – Open Space,Policy NH8 – Mineral Safeguarding Area,Policy NH12 – Conservation Areas, andPolicy NH13 – Registered Parks and Gardens.	
National Policy and Other Material Considerations	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none">A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; orB. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; orC. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.	

Historic Environment

Paragraph 192 states that in determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.

Paragraph 194 states that **any harm to, or loss of, the significance of a designated heritage asset** (should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings, or grade II registered parks or gardens, should be exceptional; assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional .

Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).

Mineral Safeguarding

Paragraph 206 states that local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working

Natural Environment

Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). When determining planning applications, paragraph 175a states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Derby Park Conservation Area Appraisal (2007)

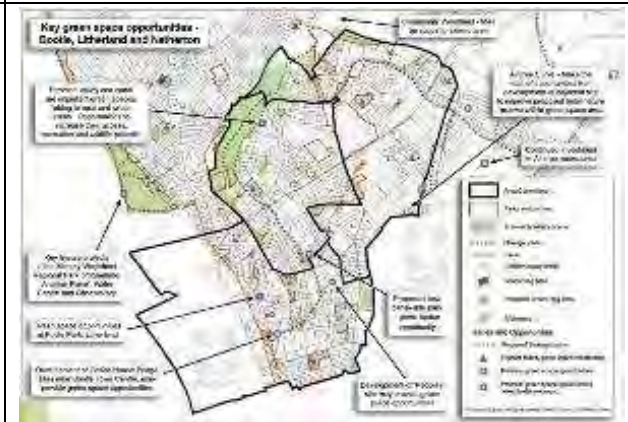
Derby Park was designated as a Conservation Area in 1990, due to its largely Victorian urban landscape.




Derby Park Conservation Area Appraisal (2007)



Green Space Strategy for Sefton (2009)



The Green Space Strategy identifies the site as a Proposed Green Flag site. The Council aim for the site to received Green Flag status through allocating £300,000 from the Neighbourhood Regeneration Fund (NRF), £100,000 from the Single Regeneration Budget (SRB), £250,000 from the Council and £100,000 from the Sefton Children's Fund.



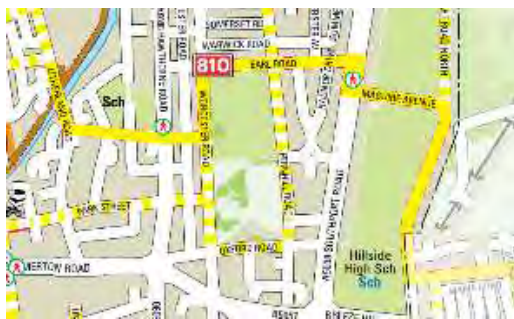
Green Space Strategy for Sefton (2009)

	Sefton Open Space and Recreation Study (2015) The Open Space and Recreation Study identifies that nine parks achieved the Green Flag award in 2015-16 of which Derby Park was one of these and that Derby Park is on the national Register of Historic Parks and Gardens.
	Sefton Playing Pitch Strategy: Strategy & Action Plan (2015) The Playing Pitch Strategy identifies that Derby Park contains a one crown green assessed as good quality, likely to be able to accommodate additional members, the report recommend that the pitch is maximised to cater for potential future demand and that it is protected.
Statutory Designations	
Heritage	<p>The site is a Grade II Registered Park and Garden, but no listed buildings or monuments sit on the site.</p> <p>Immediately north of the site sits the Grade I listed Roman Catholic Church of St Monica.</p> <p>To the south west of the site sits three grade II listed buildings named:</p> <ul style="list-style-type: none">• Old Hall,• Christ Church, and• 1 Merton Road.
	 <p>Historic England Map Search, 2019</p>

<p><i>Flood Risk</i></p>	<p>The site is located within Flood Zone 1 therefore flood risk is not an issue.</p>	 <p>Flood Map for Planning, 2019</p>
<p><i>Ecology</i></p>	<p>The habitats located on site include:</p> <ul style="list-style-type: none"> • Wood pasture and Parkland BAP Priority Habitat, • Priority Habitat Inventory - Deciduous Woodland, • National Forest Inventory – Broadleaved, and • Priority Habitat Inventory - No main habitat but additional habitat exists. <p>The site is therefore an important urban ecological site.</p>	 <p>Magic Maps, 2019</p>
<p><i>Landscape</i></p>	<p>There are no statutory land-based designations which affect the site.</p>	

Strategic and Regeneration Context		
<p><i>Strategic and Regeneration Policy</i></p>	<p>The North Liverpool and South Sefton SRF (2010)</p> <p>The SRF identifies that the historic parks and gardens of North Liverpool are a treasured legacy of the 19th century, as places for recreation. Anfield Cemetery, Stanley Park and Derby Park are included on English Heritage's Register of Historic Parks and Gardens of Special Historic Interest.</p> <p>The site sits within the Bootle and environs area of the SRF, the SRF identifies the benefits the area gains from its "attractive public parks".</p>	 <p>The North Liverpool and South Sefton SRF (2010)</p>
<p><i>Socio-Economic Profile</i></p>	<p>In 2019, the sites LSOA has an IMD ranking of 8,082 out of 32,844 LSOAs (30% most deprived) in England.</p>	


Planning and Development Context				
<i>Planning History</i>	The site contains major live planning applications, relating to the redevelopment of the site and the 60 hectares of former dock land which is part of the Liverpool Waters scheme surrounding the site. The recent and historic consents are outlined below.			
	Application Number	Date	Decision	Details
	S/2007/0577	23 Aug 2007	Approve with Conditions	Change of use from potting sheds/office/workshop compound to horticultural training centre including meeting and training rooms, IT suite and office/equipment storage, together with erection of a single storey toilet building and raised beds and polytunnels
<i>Development Status</i>	The area surrounding the site has been subject to a limited number of large development proposals.			
<i>Landowner / Developer Aspirations</i>	The site is an important Sefton Borough Council asset which is a Grade II Registered Park and Garden.			
Accessibility				
<i>Access to National Network</i>	The site borders Oxford Road which connects the site to Hawthorne Road, connecting the site to Liverpool City Centre in 6 km and J4 of the M57 within 7km via Breeze Hill.			
<i>Access to Public Transport Nodes</i>	<p>The site borders Fernhill Road which provides several bus stops which provides irregular services to Aintree, Litherland and Bootle. However, regular services can be found along Breeze Hill which provide very regular services to Bootle, Mossley Hill, Aigburth Vale and Speke.</p> <p>Bootle New Strand Train Station sits 800m to the west of the site and connects the site to Merseyrail services connecting the site to Liverpool City Centre and National Rail Services. Additionally, Walton Train Station and Kirkdale Train Station sit within a 1km radius of the site.</p>			


<i>Pedestrian and Cycle Accessibility</i>	<p>Suggested cycle routes border the site and the 810-cycle route is located along Earl Road.</p>	 <p>Mersey Travel, Sefton Cycle Map, 2013</p>
<i>Highways Capacity and Access</i>	<p>The site is surrounded by local roads and is in a predominantly residential area. Major events and associated traffic would likely generate significant transport and traffic impacts in the surrounding area.</p> <p>Acquisition of residential properties (which bound the site on all sides) would likely be required to accommodate suitable access.</p>	
Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none"> • Ecological and Habitat issues, including significant mature tree cover • Grade I Church of St Monica located directly north of the site, • Residential amenity 	
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>	<p>The site is well connected to North Liverpool and sits within the North Liverpool and South Sefton regeneration area (in the Bootle area). It retains cultural ties with both Goodison Park and the Docks but is located within Sefton and Liverpool, therefore the site provides a suitable location for Everton to some extent in terms of its requirements to stay physically, socially and culturally connected to its home.</p> <p>The site is located approximately 1.4km to the north-west of Goodison Park.</p>	
<i>Iconic Location</i>	<p>Due to the surrounding uses the site would not provide an iconic location for Everton.</p>	

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	No	<ul style="list-style-type: none"> Whilst the site is 8.9ha in size, it is only 180m in width. It is not considered that it is of sufficient size or orientation in the context of surrounding constraints, to accommodate a stadium. The site is tightly bounded by residential uses on all sides and could not provide the access and egress to support a high capacity use.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is a Grade II listed Historic Park and within a Conservation Area (Policies NH5, NH12 and NH13 in the Sefton Local Plan). Planning policy (national and local) which seeks to protect and enhance Historic Parks/heritage assets and prevent built development on part or all of any green space unless the proposed development can be accommodated without material harm. However, planning policy and the NPPF (pp 194) does not preclude development within a Historic Park or that may have an impact on heritage assets. Any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. In terms of need and quality, the loss of the Open Space without replacement outside of the Derby area would lead to the area being below the approved target figure of 1.2 hectares per thousand of the population. Derby Park was awarded Green Flag Status in 2015-16, which was as a result of significant investment and SBC policy support and is now on the national Register of Historic Parks and Gardens. The Playing Pitch Strategy identifies the bowls playing pitches as good quality and would therefore, need to be re-provided (by Sport England). A stadium development would likely generate a significant impact on the amenity of the surrounding community (in terms of noise, visual impact and event day disruption) – the site is bounded by residential development on all four sides and the Grade I St Monica Church directly to the north. The site is surrounded by local roads and is in a predominantly residential area. Acquisition of residential properties (which bound the site on all sides) would likely be required to accommodate suitable access.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned by Sefton Borough Council who has successfully had the site awarded Green Flag Status. The site is an important community asset in the south of the Borough. It is not considered to be available.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> The closest rail station is approximately 800m away.

<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No</p>	<ul style="list-style-type: none"> There are not considered to be any unacceptable environmental impacts that would prevent the redevelopment of the site.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Size & location – whilst the site is 8.9ha in size, it is only 180m in width. It is not considered that it is of sufficient size or orientation in the context of surrounding constraints, to accommodate a stadium. The site is tightly bounded by residential uses on all sides and could not provide the access and egress to support a high capacity use. Availability – the site is a Grade II Listed Historic Park within a Conservation Area that has been supported for Green Flag Status by SBC. It is not considered to be available. Planning policy constraints – the site is allocated as a Grade II Historic Park and within a Conservation Area. Whilst planning policy, including the NPPF not preclude development within a Historic Park, any substantial harm to the park and its heritage assets would require 'clear and convincing' justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits. The site is also allocated as greenspace/open space and any loss or adverse impact on this use would need to be tested against the relevant adopted / emerging policies and the NPPF. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints (including heritage) which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not of a sufficient size, in terms of its orientation and setting, being just 180m wide and tightly constrained by established residential uses on all sides.</p>	

Site 32: South Park / Bootle South Recreational Ground

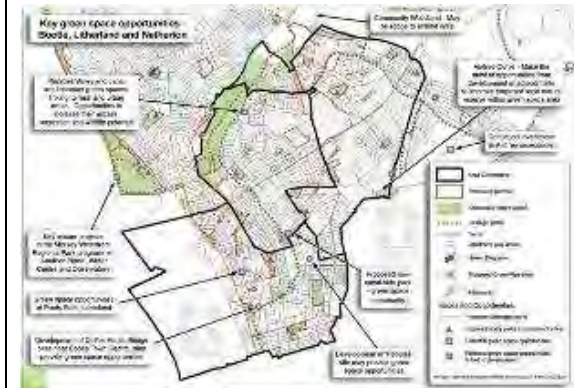
ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 8.5 hectares.
<i>Existing Site Uses</i>	The site contains Bootle South Recreation Ground which contains, Kings Gardens, Open Space, Woodlands, Bootle War Memorial, Play Facilities, Basketball Court, Football Cage Facility and Firwood Bootle Cricket Club and Function Rooms.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> ▪ To the north of the site lies Balliol Road, L20 - Hugh Baird University Centre, St. Anne's House (nine-storey office block), a four-storey office block, St Hugh's a six-storey office block, a four-storey residential apartment building, Bootle Protestant Free Church and semi-detached residential units. ▪ To the east of the site lies Bedford Primary School with associated open space and play facilities, Cambridge Nursery School, Hawthorne Road Sheltered Housing and terraced residential units. ▪ To the south of the site lies terraced residential units. ▪ To the west of the site lies Hugh Baird College (7-storeys), Lifestyle Fitness Bootle and terraced and semi-detached residential units.

Site Ownership	The sites landowner is Sefton Borough Council. The site has three leaseholder titles, two to SP Manweb PLC and one leasehold title with an unknown owner which covers the cricket clubs land.	
Planning Policy		
Adopted Policy	<p>In the Sefton Local Plan, Bootle and Crosby Policy Map the site is allocated as:</p> <ul style="list-style-type: none">• Policy NH5 - Open Space.	
National Policy and Other Material Considerations	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none">a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; orb) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; orc) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use <p><u>Community</u></p> <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p>	

	<p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> • grade II listed buildings, or grade II registered parks or gardens, should be exceptional; • assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional . <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p><u>Residential Amenity</u></p> <p>Paragraph 180 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development</p> <p>Sport England</p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.
--	--

Sefton Green Space Strategy SMBC (2009)

The Green Space Strategy identifies that the site is located within the Bootle, Litherland and Netherton – key green space opportunity area, South Park is identified as a Highest Priority Parks Improvement Site.



Sefton Green Space Strategy SMBC (2009)



Sefton Green Space and Recreation Study (2009)


The Green Space and Recreation Study identifies that South Park was a park and garden prioritised for improvement within the Parks and Green Spaces Asset Management Strategy, until 2010/11. The site sits within the Linacre and Derby area of the study which has a park provision that falls short of the approved target figure of 1.2 hectares of park per one thousand people.

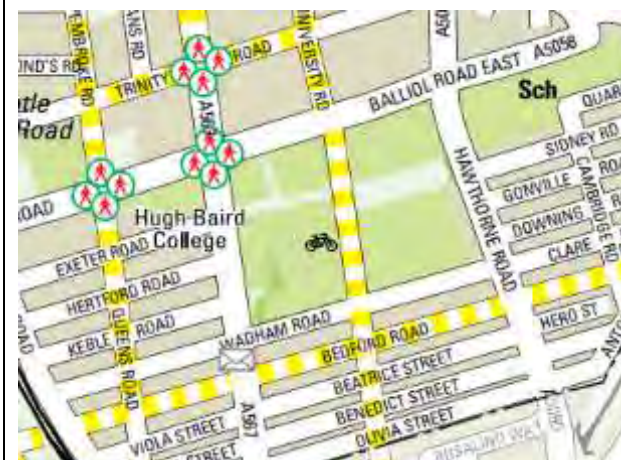
Sefton Playing Pitch Strategy: Strategy & Action Plan (2015):

The Playing Pitch Strategy identifies that cricket demand within Bootle and Netherton's is being met. However, Firwood Bootle CC have aspirations to introduce a women's cricket team, but additional pitches would have to be secured to enable an additional team to be accommodated, the Strategy does recognise that additional pitches could be accommodated at Savio Salesian College.

The current status of Firwood Bootle CC is that “*One pitch (14 grass wickets) assessed as good quality. Pitch is currently being played to capacity. Changing provision available and rated as good quality although the Club reports that additional non-turf practice nets and a mobile batting cage are required.*”(page 46) Furthermore, the Strategy and Action Plan recommends that existing cricket pitches should be protected, unless equivalent alternative provision is provided.

Statutory Designations		
<i>Heritage</i>	<p>The Grade II* listed Bootle War Memorial, including flight of steps and flanking stone tablets and the grade II Statue of Edward VII is located on the site.</p> <p>Additionally, to the north east of the site sits three grade II listed buildings and Derby Park the grade II listed Park and Garden.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The site is located within Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	<p>It is not considered that there are any ecology issues that would ultimately prevent the development of the site, subject to suitable mitigation.</p>	
<i>Landscape</i>	<p>There are no statutory landscape designations within or immediately adjacent to the site which would act as a constraint to development</p>	

Strategic and Regeneration Context				
Strategic and Regeneration Policy	North Liverpool and South Sefton SRF 2010 The SRF identifies that the site sits within the Bootle and environs area of the SRF. The Bootle benefits from its “attractive public parks” and identifies the site as important greenspace.			 North Liverpool and South Sefton SRF 2010
	Socio-Economic Profile			
The site sits across one LSOA and in 2019 the site has and IMD ranking of 807 out of 32,844 LSOAs in England (10% most deprived) and Employment Deprivation Domain of 709 out of 32,844 LSOAs in England (10% most deprived).				
Planning and Development Context				
Planning History	Recent consents within the area are minor and relate to the use of the park and its historic assets. Historic/relevant planning applications within the site are set out below.			
	Application Number	Date	Decision	Details
	DC/2019/01697	17 Oct 2019	Approve with Conditions	Erection of a detached hut within the centre of the park to be used as a multi-purpose facility for local community groups (alternative to DC/2019/00507 approved 06.06.2019).
	DC/2019/00507	06 Jun 2019	Approve with Conditions	Erection of a detached hut within the centre of the park to be used as a multi-purpose facility for local community groups (part retrospective).
	DC/2016/00138	09 Mar 2016	Approve with Conditions	Listed building consent for repair and level access to the Bootle War Memorial

Surrounding Development Context	There is limited surrounding major development context of relevance.	
Landowner / Developer Aspirations	The site is an important Sefton Borough Council asset which provides important sport and recreation uses.	
Accessibility		
Access to National Network	The site borders Balliol Road and Stanley Road, two key access roads in Bootle, which connects the site to Liverpool City Centre in 5km, J6 of the M57 in 7km and J14 of the M57 in 7km.	
Access to Public Transport Nodes	The site border Balliol Road which provides regular bus services to Speke, Mossley Hill and Bootle. Kirkdale Train Station sits 350m south of the site, Bootle Oriol Road train station sits 500m north west of the site and Bank Hall train station sits 650m south of the site, all of which are connected to the Merseyrail network which connects the site to Liverpool City Centre and the National Rail Network.	
Pedestrian and Cycle Accessibility	A suggested cycle route runs through the site and a large number of pedestrian crossing points are available via the busy Balliol Road and Stanley Road.	 <p>Mersey Travel, Sefton Cycle Map, 2013</p>
Highways Capacity and Access	<ul style="list-style-type: none">Balliol Road and Stanley Road are important highway corridors which experience high flows of traffic.Rail services at Kirkdale Train Station and Bootle Oriol Road are within proximity to the site.	

Other Development Issues		
<i>Other Potential Constraints</i>	<ul style="list-style-type: none">• Important recreation space.• Sports England requirement for the cricket club to be relocated to another site.• Impact on Bootle War Memorial and Statue of Edward VII.• Hugh Baird University Centre may need to be relocated.• Residential amenity of local residents.	
Fit with Everton’s Requirements		
<i>Connection to Goodison Park and L4</i>	<p>The site is well connected to North Liverpool and sits within the North Liverpool and South Sefton regeneration area (in the Bootle ward). It retains cultural ties with both Goodison Park and the Docks, but the site is located within Sefton and not Liverpool therefore, the site is to some extent a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home.</p> <p>The site is located approximately 1km to the north of Goodison Park.</p>	
<i>Iconic Location</i>	<p>The site would not provide an iconic location for Everton.</p>	
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	No	<ul style="list-style-type: none">▪ Whilst the site is 8.5ha in size, it is not considered that it is of sufficient size or orientation in the context of surrounding constraints, to accommodate a stadium. The site is constrained by the L20 Hugh Baird University Centre (part of Hugh Baird College) to the north west and Hawthorne Road Sheltered Housing to the south east. Bootle South Recreation Ground contains Kings Gardens, Open Space, Woodlands, Bootle War Memorial, Play Facilities, Basketball Court, Football Cage Facility and Firwood Bootle Cricket Club and Function Rooms - all of which are important community and recreational assets.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment — to address the relevant national and local policy tests and site	<ul style="list-style-type: none">▪ The site is also allocated as Open Space (Policy NH5) in the adopted Sefton Local Plan. If assessed against adopted policy, a stadium development would need to address key open space policies as well as the NPPF with regard to the loss of open space (pp’s 96-101), and Sport England with regard to the loss of playing pitches. The site also contains two Grade II* listed buildings and the impact on them would need to be considered in planning policy and the NPPF (pp 194).▪ The Sefton Green Space Strategy SMBC (2009) identifies that the site is located within the Bootle, Litherland and Netherton — key green space opportunity area, South Park is identified as a Highest Priority Parks Improvement Site.▪ A stadium development could generate significant impact on the amenity of the surrounding community (in terms of traffic, noise, visual impact and event day

	specific issues	<p>disruption) — the site is bounded by residential development on three sides, offices to the north and Hugh Baird College to the west.</p> <ul style="list-style-type: none"> ▪ Bootle War Memorial and Statue of Edward VII are on the site and mitigation or relocation would need to be considered. ▪ Loss of the Open Space would lead to the Derby area being located below the approved target figure of 1.2 hectares per thousand population.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> ▪ The site is owned by Sefton Borough Council and it is a key community recreation and open space asset in the Borough. It is not considered to be available. ▪ It would be likely that L20 Hugh Baird University Centre (part of Hugh Baird College) and Hawthorne Road Sheltered Housing would need to be acquired to allow the site to suitably come forward.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> ▪ It is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> ▪ Frequent bus services run to the north of the site and three train stations are located within a kilometre radius of the site.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> ▪ There are not considered to be any unacceptable environmental or visual impact that would prevent the redevelopment of the site.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Size & location — whilst the site is 8.5ha in size, it is not considered that it is of sufficient size or orientation in the context of surrounding constraints, to accommodate a stadium. The site constrained by the L20 Hugh Baird University Centre (part of Hugh Baird College) to the north west and Hawthorne Road Sheltered Housing to the south east. Bootle South Recreation Ground contains Kings Gardens, Open Space, Woodlands, Bootle War Memorial, Play Facilities, Basketball Court, Football Cage Facility and Firwood Bootle Cricket Club and Function Rooms — all of which are important community and recreational assets. • Availability — the site is an important open space and recreation asset. The Sefton Green Space Strategy SMBC (2009) identifies that the site is located within the Bootle, Litherland and Netherton — key green space opportunity area, South Park is identified as a Highest Priority Parks Improvement Site. It is not considered to be available. It is considered that 	

the acquisition of property would also be required.

- Planning policy constraints — the site is allocated as open space and contains sport and recreation facilities. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude the development of important park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. The site also contains two Grade II* listed buildings and the impact on them would need to be considered in planning policy and the NPPF.


Conclusion & Comparison with BMD



The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not of a sufficient size, in terms of its orientation and setting, and is a key recreation asset that is not available.**

Appendix 2: Site Assessment Proformas


Wider Area of Search (South Liverpool)


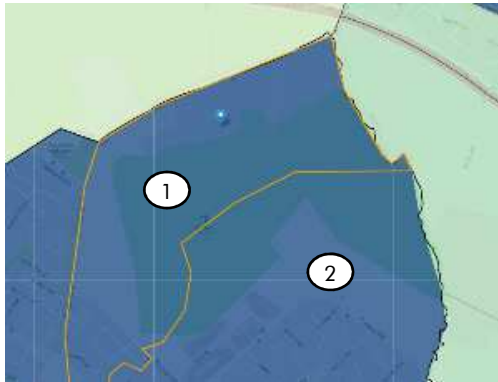
Site 33: Childwall Golf Course

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 43.4 hectares.
<i>Existing Site Uses</i>	The site contains Childwall Golf Course.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies Lakeside School, detached residential units, farmland, woodlands and the M62. • To the west lies New Heights High School, Caldway playing fields and semi-detached and terraced residential units. • To the south Industrial Units, Liverpool Golf Centre & Driving Range, a vacant site with planning consent for a nine-hole par 3 golf course and semidetached and terraced residential units; and • To the east lies Netherley Brook, farmland/open space, solar power plants and a waste water treatment plant.


Site Ownership	The site's freeholder is Childwall Golf Club.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policies OE1 & OE2 - Green Belt.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policy GI 1 - Green Belt.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ol style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Belt</u></p> <p>Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, paragraph 144 requires that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p><u>Natural Environment</u></p> <p>Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). When determining planning applications, paragraph 175a states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p> <p><u>Amenity</u></p> <p>Paragraph 180 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development</p> <p><u>Highways</u></p> <p>Paragraph 108 - In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p> <ul style="list-style-type: none"> appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
---	--

	Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	
Statutory Designations		
Heritage	No listed buildings or monuments exist on the site or within the immediate vicinity of the site.	 <p>Historic England Map Search, 2019</p>
Flood Risk	The site sits within Flood Zone 1; however, the site borders the Netherley Brook which runs in a north to south direction immediately to the east which sits within Flood Zone 3.	 <p>Flood Map for Planning, 2019</p>

<i>Ecology</i>	<p>Habitats designations located on the site include Priority Habitat Inventory - Deciduous Woodland and National Forest Inventory — Broadleaved.</p> <p>Species designations located on the site include:</p> <ul style="list-style-type: none">• Priority Species for CS Targeting — Lapwing,• Priority Species for CS Targeting — Redshank,• Arable Assemblage Farmland Birds rating of 3,• Grey Partridge,• Lapwing,• Tree Sparrow, and• An 'Extremely High' Seabird Oil Sensitivity index 2016. <p>The golf course itself provides important ecology and habitat value in the City as part of the Green Belt.</p>	 <p>Magic Maps, 2019</p>
<i>Landscape</i>	There are no statutory landscape designations within or immediately adjacent to the site which would act as a constraint to development.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	n/a	
<i>Socio-Economic Profile</i>	<p>The site sits across two LSOAs, in 2019 the first LSOA has an IMD ranking of 2,573 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 2,189 out of 32,844 LSOAs in England (10% most deprived).</p> <p>The second LSOA in 2019 has an IMD ranking of 343 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 273 out of 32,844 LSOAs in England (10% most deprived).</p>	

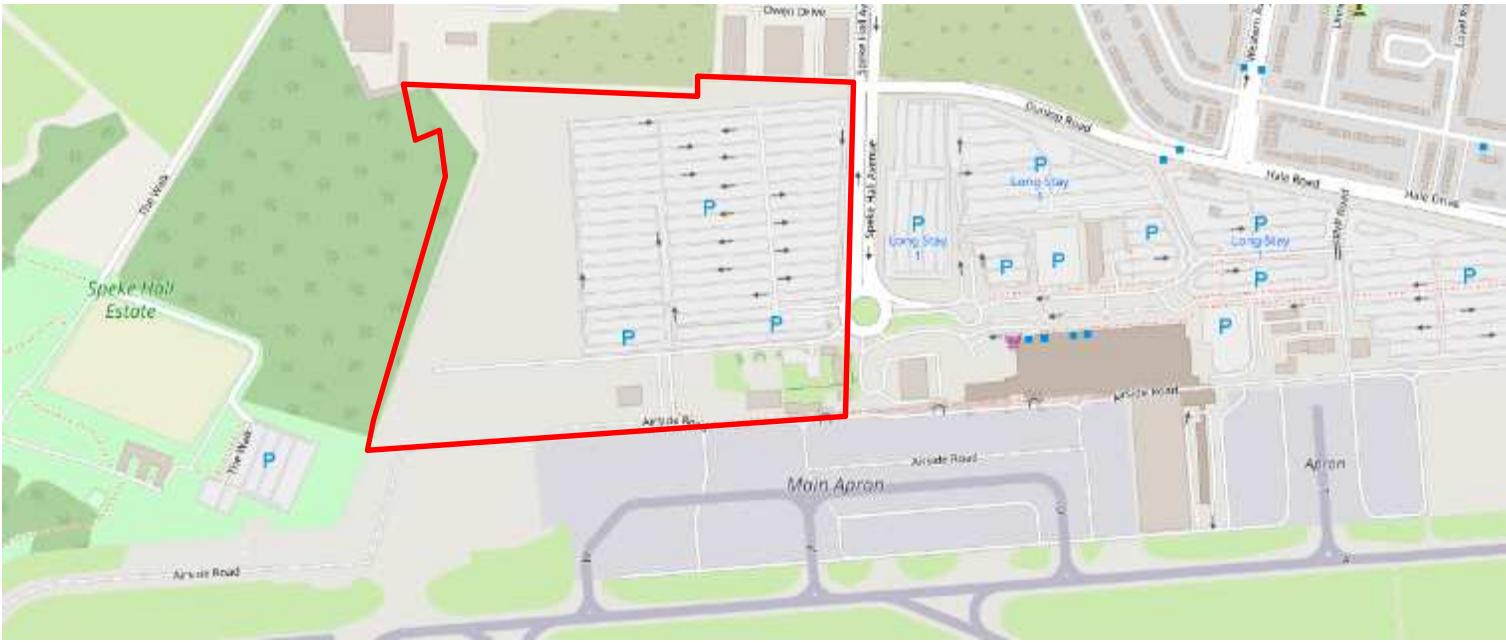
Planning and Development Context				
Planning History	Recent planning applications on Childwall Golf Course are outlined below:			
	Application Number	Date	Decision	Details
	17F/0286	23-03-2017	Approve with Conditions	To erect coaching studio and buggy store following demolition of existing trolley/buggy store and buggy sheds within green keepers' yard.
	11F/1895	20-10-2011	Approve with Conditions	To erect 2nd single storey buildings for machine storage and as a golf training facility.
Development Status	There are limited recent major development proposals in the surrounding area of Childwall Golf Course.			
Landowner / Developer Aspirations	The golf course is currently operational and in active use as evidenced by recent investment.			
Accessibility				
Access to National Network	Naylor's Road lies to the north of the site and gives the site access to Liverpool within 13 km and access to J5 of the M62 within 1 km.			
Access to Public Transport Nodes	Two bus stops sit on Naylor's Road which provide regular services to St Helens, Huyton Quarry, Huyton, Speke and Halewood. Huyton Train Station sits 2 km north of the site however, the M62 acts as a barrier to Huyton and pedestrian access is limited to a narrow overgrown pedestrian route.			



<i>Pedestrian and Cycle Accessibility</i>	<p>Pedestrian only footpaths are located to the north of the site which provide access over the M62 via a pedestrian footbridge to Huyton, additionally an on-road cycle route is provided to the south west of the site.</p>	 <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	<ul style="list-style-type: none">• The site is located in a primarily residential area approximately 1 km from Junction 5 of the M57; however, this route involves travelling to the site via Huyton to the north via Tarbock Road (A5080) (1x1 lane) where the highway network is unlikely to be able to cope with the volume of traffic generated on event days.• The surrounding area is primarily residential in character and there would be significant pedestrian and vehicular movement on event days. A comprehensive traffic management strategy would be required to control the movement of both pedestrians and vehicles.	
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>	<p>There is no connection with North Liverpool, and the site is not well connected with Goodison Park and the surrounding community being located approximately 9km away. Therefore, the site does not meet Everton's requirements to stay physically, socially and culturally located to its home.</p>	
<i>Iconic Location</i>	<p>There is no potential to provide an iconic location for Everton's new stadium due to:</p> <ul style="list-style-type: none">i. distance from existing Everton community/Goodison Park, andii. the sites surrounding uses.	


Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site allocated as Green Belt (OE1 and OE2) in the adopted and emerging Development Plan (GI1, GI3) respectively. If assessed against adopted or emerging policy, a stadium development would need to address the NPPF with regard to the loss of open space (pp's 96-101) and demonstrate very special circumstances in accordance with Green Belt Policy (NPPF para 143) and address the tests of Sports England. The area surrounding the site is largely residential, which could conflict with the proposed use. The site includes protected priority habitat and established trees.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned by Childwall Golf Club and is currently operational and in active use as evidenced by recent investment. The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> Given that the site is a greenfield site and is largely open, it is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> This site is in an unsustainable location with limited access to rail and sustainable modes of transport. The closest rail station at Huyton which is more than 2km from the site, and the site has limited connection to the City Centre.



<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No</p>	<ul style="list-style-type: none"> Subject to mitigation and investigation. Any development of the site would lead to environmental and visual impacts due to the site's status as Green Belt and the environmental designations which are on the site – these would need to be mitigated against and justification required as to the impacts of the development of the site on the openness of the Green Belt.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability – the site is owned by Childwall Golf Club and is in active use. There is no indication that the site is available for redevelopment. Planning policy constraints – the site is allocated as Green Belt in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF does not strictly preclude development in the Green Belt, any development would require the demonstration of very special circumstances. Location and sustainability – the site is in an unsustainable location and poorly connected to sustainable modes of transport, including rail, being both disconnected from the City Centre and more than 2km away from Huyton train station and in a predominantly residential area (where significant amenity issues would be generated). Preference of the Club and its supporters – the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario. <p>Conclusion & Comparison with BMD</p> <ul style="list-style-type: none"> The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key considerations are that the site is in a wholly unsustainable location for a major movement and activity generating use, and is in active use and not considered to be available. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD. 	

Site 34: Former Dunlop Site

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 12.4 hectares.
<i>Existing Site Uses</i>	The site contains brownfield land, surface car parking for Liverpool Airport and woodland.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> ▪ To the north lies brownfield land and industrial units of various sizes. ▪ To the west lies Speke Hall Garden & Estate, woodlands and open space. ▪ To the south lies Liverpool John Lennon Airport. ▪ To the east lies Liverpool John Lennon Car Parking.


Site Ownership	The site's freeholder is Liverpool Airport Limited, a company with a split ownership: <ul style="list-style-type: none">• 45% Peel,• 45% Ancala Group, and• 10% Liverpool City Council.	
Planning Policy		
Adopted Policy	In the Liverpool UDP (2002), the site is allocated as: <ul style="list-style-type: none">▪ Policy E1 - Site for Industrial/ Business Development - site ref. E94 Speke Hall Road, Former Dunlops Factory (Schedule 6.1).	
Emerging Policy	The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as: <ul style="list-style-type: none">• Policy EC2 - a Primarily Industrial Area.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Ecology</u></p> <p>Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). When determining planning applications, paragraph 175a states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p> <p><u>Agent of Change</u></p> <p>Decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.</p>	
	<p>Liverpool John Lennon Airport Master Plan to 2050 (adopted March 2018)</p> <p>The Master Plan designates the site as land for Car Parks and Retail and Leisure Uses and notes that there are opportunities for the following:</p> <ul style="list-style-type: none"> ▪ Opportunity to enhance and expand passenger parking facilities, and ▪ Opportunity for mixed-use development, such as new hotel facilities. 	 <p><i>Liverpool John Lennon Airport Master Plan to 2050 (2018)</i></p>

	Liverpool Employment Land Study (2017) This sub-area comprises employment land located to the south of the A561 (Speke Road and Speke Boulevard). This area is characterised by a series of business parks and large-scale manufacturing units many of which relate to Jaguar Land Rover. The report recommends that “ <i>the existing B Class employment space within Speke and Garston South should be protected and the loss of employment land to alternative uses should be resisted.</i> ”	
Statutory Designations		
<i>Heritage</i>	<p>No listed buildings or monuments fall within the site boundary; however, there are a group of historic buildings directly to the west of the site in and around the nationally important Speke Hall including:</p> <ul style="list-style-type: none">• Grade I listed Speke Hall,• Grade II listed bridge over the moat to the north of Speke Hall,• Grade II listed bridge over the moat to the east of Speke Hall,• Grade II listed outbuildings,• Grade II E-Shaped range of farm buildings to the East of Speke Hall, and• Grade II listed North Lodge to the north of Speke Hall.	 <i>Historic England Map Search, 2019</i>
<i>Flood Risk</i>	<p>The site is located within Flood Zone 1.</p>	 <i>Flood Map for Planning, 2019</i>

<i>Ecology</i>	<p>Habitats affecting the site include the National Forest Inventory – Felled Woodland.</p> <p>Species located on the site include:</p> <ul style="list-style-type: none">• Priority Species for CS Targeting – Lapwing and Redshank,• Arable Assemblage Farmland Birds ranking of 4,• Grassland Assemblage Farmland Birds rating of 2,• Corn Bunting,• Grey Partridge,• Lapwing,• Yellow Wagtail, and• an ‘Extremely High’ Seabird Oil Sensitivity index 2016. <p>It is not considered that there are any ecology issues that would ultimately prevent the development of the former Dunlop site, subject to suitable mitigation. However, the site does provide some important ecology and habitat features.</p>	 <p>Magic Maps, 2019</p>
<i>Landscape</i>	It is not considered that there are any landscape issues that would ultimately prevent the development of parts of the former Dunlop site subject to suitable mitigation.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	<p>South Liverpool MDZ</p> <p>The site is located within the South Liverpool Mayoral Development Zone, one of Liverpool’s most sought-after locations as it attracts high value jobs, significant levels of investment and modern, well-connected business premises.</p> <p>South Liverpool International Gateway SRF (2011)</p> <p>The site is located within South Liverpool International Gateway (SLIG) that states “<i>the ability of the local economy to grow will need to be safeguarded and nurtured through the provision of a range of appropriate employment sites and associated infrastructure as identified in the SRF Land Use Framework. The majority of employment land is to be retained for new employment led development over the next 15 to 20 years.</i>”(page 3)</p>	

<i>Socio-Economic Profile</i>	The site sits within one LSOA which has an IMD ranking of 1,142 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 3,269 out of 548 LSOAs in England (10% most deprived).			
Planning and Development Context				
<i>Planning History</i>	The recent planning consents are outlined below.			
	Reference	Date	Decision	Details
	14LP/0667	17-04-2014	Approved	Certificate of Lawfulness - Application for lawful development certificate for proposed new car park entry and access and reconfiguration of existing car park areas.
<i>Development Status</i>	The surrounding area has been subject to major recent development proposals which includes the refurbishment of 370,000 sq. ft of industrial space at Compass Industrial Estate by Network Space, development of 85 dwellings by Peel Investments (North) Limited at the land off Speke Hall Avenue, the development of eight storage sheds by Kirkby Tyres Limited and the proposed development of 23,000 sq. m of B2/B8 floorspace by Peel Logistics at HP Chemie Pelzer, Speke Hall Avenue. This context reflects the predominantly industrial character of the area.			
<i>Landowner / Developer Aspirations</i>	The site has a split ownership with Peel Group (45%), Ancala Partners (45%) and Liverpool City Council (10%) and forms a key part of the Airport Master Plan to 2050. Within the Master Plan, the site is identified for Car Parks, Retail and Leisure Uses. The Master Plan notes that there are opportunities to enhance and expand passenger parking facilities, and opportunity for mixed-use development, such as new hotel facilities. In summary, the site is currently an important car parking facility for the airport and supports its efficient operation.			
Accessibility				
<i>Access to National Network</i>	The site is adjacent to Speke Hall Avenue which gives the site access to Speke Boulevard connecting the site to J6 of the M62 and J1 of the M57 within 11 km and Liverpool within 15 km.			
<i>Access to Public Transport Nodes</i>	Two bus stops are located on Speke Hall Avenue which provide regular services to Speke and Liverpool (approximately ten per hour). Hunts Cross Station is located 2.3 km to the north of the site and provides Mersey Rail Services and National Rail Services which connect the site to Liverpool Lime Street and Manchester Oxford Road.			

<i>Pedestrian and Cycle Accessibility</i>	An off-road cycle track and an on-road cycle lane is provided along Speke Hall Lane.		 <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	<ul style="list-style-type: none">▪ The site has good access to the strategic highways network via Speke Hall Avenue,▪ A comprehensive transport assessment, traffic management system and event day strategy would be required as the option of temporarily closing roads on matchdays is not possible as continuous access to the Airport is required.▪ Speke Hall Avenue will be a route which will be the focus of significant transport movement.		
Fit with Everton's Requirements			
<i>Connection to North Liverpool</i>	There is no connection with North Liverpool, and the site is not well connected with Goodison Park and the surrounding community being located approximately 9.5 miles away. Therefore, the site does not meet Everton's requirements to stay physically, socially and culturally located to its home. The site is located approximately 13km to the south-east of Goodison Park.		
<i>Iconic Location</i>	The site location is primarily industrial and would not provide an iconic location.		
Site Assessment Summary			
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none">▪ The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.	

<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> ▪ The site is allocated for industrial/business development (Policy E1) in the adopted UDP, and in a Primarily Industrial Area (Policy EC2) in the emerging Local Plan. If assessed against adopted or emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policy EC2) as well as the NPPF with regard to employment (pp's 80-82). The site also forms part of the Airport Master Plan which encourages development for airport-related uses including car parking and retail/commercial uses including a possible hotel use. ▪ Liverpool's Employment Study (2017) identifies that site is located within the Speke and Garston sub-area. The Employment Land Study recommends that "<i>the existing B Class employment space within Speke and Garston South should be protected and the loss of employment land to alternative uses should be resisted.</i>" ▪ The site is located adjacent to Liverpool Airport and its primary runway and could have a significant adverse impact on its operation.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> ▪ The site forms a key part of the wider Airport Master Plan to 2050 and is currently in active use as an important parking resource for the Airport and is therefore, not considered available. ▪ The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> ▪ As the site is a brownfield site, whilst remediation may be required, it is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> ▪ The site has good public transport accessibility with two bus stops located on Speke Hall Avenue providing regular services to Speke and Liverpool (approximately ten per hour), and Hunts Cross Station located 2.3 km to the north of the site providing Mersey Rail Services and National Rail Services which connect the site to Liverpool Lime Street and Manchester Oxford Road. Due to proximity to the airport, it is anticipated that connectivity will be further improved in future years in line with the Airport Master Plan and the ASAS. ▪ Subject to appropriate transport improvements and a transport strategy, it is considered that the site could be appropriate for a new stadium development.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> ▪ Subject to sensitive design in the context of the adjacent heritage assets and environmental mitigation.
Summary and Conclusions	Summary Assessment In summary, the key considerations when assessing the site include:	


Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?



- Availability — the site is allocated for employment uses and is an important parking resource for the Airport.
- Planning policy constraints — the site is allocated as employment uses in adopted and emerging policy. Whilst planning policy and guidance, including the NPPF does not strictly preclude development on employment uses, it would need to provide justification for the loss of existing uses and potentially the impact on the operation of the airport. The Liverpool Airport Master Plan (allocated the site for employment and airport uses. This site comprises employment land located to the south of the A561 (Speke Road and Speke Boulevard). This area is characterised by a series of business parks and large-scale manufacturing units many of which relate to Jaguar Land Rover. The Employment Land Study (2017) recommends that *“the existing B Class employment space within Speke and Garston South should be protected and the loss of employment land to alternative uses should be resisted.”*
- Location — the site is immediately adjacent to Liverpool Airport and its runway and could have a significant impact on the operation Airport in terms of the scale of development, lighting impact and impact on traffic /operations on matchdays. This would require significant testing and investigation and could preclude such a use in this location.
- Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario.

Conclusion & Comparison with BMD


- The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available**. The site is also in a location which could have an unacceptable impact on the operation of the Airport and is wholly divorced from the Club’s traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a “real world” scenario.

Site 35: Former Festival Gardens Site



ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 47 hectares.
<i>Existing Site Uses</i>	The site contains Festival Gardens, woodlands, open space, brownfield land, The Britannia Inn Stonehouse Pizza & Carvery, public footpaths, car parking and ponds. The site is a former landfill.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north, beyond Riverside Drive, lies a residential area, King's Leadership Academy, Dingle Lane Children's Centre and the site of Herculaneum Dock; To the west lies the River Mersey; To the south lies is Otterspool Park and Otterspool Household Waste Recycling Centre; and To the east lies St. Michael's train station and residential area.

Site Ownership	The sites landowner is Liverpool City Council, United Utilities Limited and Mitchells & Butlers Retail Limited. With two leasehold titles, with owner's SP Manweb PLC and United Utilities Water Limited.	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policy OE3 - Green Wedge,• Policy OE4 - Undeveloped Coastal Zone,• Policy OE5 - a Regionally Important Geological/Geomorphological Site (RIGS),• Policies OE5 & OE6 - Site of Special Scientific Interest, Special Protection Area, Ramsar Site and Site of Nature Conservation Value.• Policy OE11 & OE12 - Green Space,• Policy OE17 - Key Recreational Route, and• Policies HD7-HD14 - Conservation Area (in part).	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policies GI 1 & GI 3 - Open Space,• Policies GI 1 & GI 2 - Green Wedge,• Policies GI 1 & GI 5 - Site of Special Scientific Interest, Special Protection Area, Ramsar Site,• Policies GI 1 & GI 5 - RIGS, and• Policy HD 1 - a Conservation Area (in part).	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Green Belt</u></p> <p>Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, paragraph 144 requires that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p><u>Coastal Change</u></p> <p>Paragraph 168 states that development in a Coastal Change Management Areas will be appropriate only where it is demonstrated that:</p> <ul style="list-style-type: none"> a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change; b) the character of the coast including designations is not compromised; c) the development provides wider sustainability benefits; and d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast. <p><u>Natural Environment</u></p> <p>Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). When determining planning applications, paragraph 175a states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p>
---	--

	<p>SSI (175b) - development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.</p> <p>Liverpool City Council Open Space Assessment (2017)</p> <p>The Open Space Assessment identifies that Festival Gardens has a high value and a high quality which provides civic spaces used for local community events. The site also serves identified gaps in amenity greenspace in the surrounding area.</p>
Statutory Designations	
<i>Heritage</i>	<p>No listed buildings or monuments sit on the site; however, Sefton Park, a Grade I listed park sits to the north of the site, 14 listed buildings and monuments sit on Fulwood Park and a cluster of 14 listed buildings and monuments lie to the north of the site surrounding St Michaels Road.</p> <div data-bbox="1435 544 2058 911">  </div> <p><i>Historic England Map Search, 2019</i></p>

<p><i>Flood Risk</i></p>	<p>The majority of the site sits within Flood Zone 1 apart from the land which adjoins the River Mersey.</p>	 <p>Flood Map for Planning, 2019</p>
<p><i>Ecology</i></p>	<p>Habitats located on the site include:</p> <ul style="list-style-type: none"> • Priority Habitat Inventory - Deciduous Woodland, and • National Forest Inventory — Broadleaved. <p>It is not considered that there are any ecology issues that would ultimately prevent the development of parts of the Former Festival Garden Site subject to suitable mitigation. However, the wide park itself provides important ecology and habitat value to Liverpool.</p>	 <p>Magic Maps, 2019</p>


<p><i>Landscape</i></p>	<p>Statutory Land-Based Designations which are located on the site includes:</p> <ul style="list-style-type: none"> • SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites, and • Wild Bird General Licence Exclusion Zone. <p>It is not considered that there are any landscape issues that would ultimately prevent the development of parts of the site, subject to suitable mitigation and incorporation of habitats.</p>	 <p>Magic Maps, 2019</p>
<p>Strategic and Regeneration Context</p>		
<p><i>Strategic and Regeneration Policy</i></p>	<p>n/a</p>	
<p><i>Socio-Economic Profile</i></p>	<p>The site sits across three LSOAs, in 2019 the first LSOA has an IMD ranking of 4,319 (20% most deprived) and an Employment Deprivation Domain (EDD) of 4,050 (20% most deprived) out of 32,844 LSOAs in England.</p> <p>The second LSOA in 2019 has an IMD ranking of 12,745 (40% most deprived) and an Employment Deprivation Domain (EDD) of 15,188 (50% most deprived) out of 32,844 LSOAs in England.</p> <p>The south eastern LSOA on the site has an IMD ranking of 8,753 (30% most deprived) and an Employment Deprivation Domain (EDD) of 11,200 (40% most deprived) out of 32,844 LSOAs in England.</p>	 <p>IMD Explorer, 2019</p>

Planning and Development Context

Planning History

The recent planning consents are outlined below, which sets out the “live” development context of the site which is proposed for significant remediation (from its former industrial use) and development.

Application Number	Date	Decision	Details
19F/3136	03-12-2019 (registered)	-	To carry out operational works to land within Liverpool Festival Gardens to include ground remediation, service and drainage removal / diversion, removal of unsuitable and surplus materials, installation of gas venting infrastructure, construction of a temporary internal haul road and re-landscaping of Southern Grasslands.
19EIA/2002	01-10-2019	Scoping opinion adopted	Liverpool Festival Gardens - Remediation and Landscaping Scheme.
09F/2356	10-12-2009	Approve with Conditions	To vary 5 conditions (nos. 6, 10, 21, 102 & 110) and remove 1 condition (no.107) attached to planning permission 060/3442 (granted by the Secretary of State on 9 July 2008) - "To erect mixed use development comprising 1374 dwellings with ancillary, retail, food and drink, office and primary care uses (Outline); to create a new public park, including restoration of the formal gardens (Full)" SO AS TO ALLOW the submission of details and commencement of development on the Phase 1 Garden Works (Oriental Gardens, Grand Access & Woodland Trails) and undertake design and boundary changes to the Bio Diversity Zone and The Hub so as to create a new Woodland Ridge Zone, prior to the submission of details on the remainder of the former Garden Festival site.
060/3442	09-07-2008	Approve Subject to a Legal Agreement	<p>i. OUTLINE PLANNING APPLICATION - To erect mixed use development comprising 1374 dwellings (1308 apartments and 66 townhouses) with supportive ancillary retail (A1), food and drink (A3/A4), offices (B1) and primary care (D1) uses; create new access roads and pedestrian accesses onto Riverside Drive and create temporary construction access onto Riverside Drive</p> <p>ii. FULL PLANNING APPLICATION - To create new public park comprising the restoration and enhancement of the formal gardens with improvements to the wider landscaped area; carry out improvements to existing highway infrastructure on Riverside Drive; layout carpark and other associated works; and to carry out environmental improvements to Priory Wood.</p>

<i>Development Status</i>	The surrounding area has been subject to a number of development projects which include Elan Homes Aigburth Grange development of 55 dwellings at Aigburth Road; The Turner Home development of 24 dwellings at Clifton Gardens; the proposed 12 apartments by Proactive Property Limited ('17F/2250' approved Feb 2019); and the proposed 16 apartments at the Former St Charles Parochial Centre by Sundial Omega Limited (application '18F/1250' approved March 2019).	
<i>Landowner / Developer Aspirations</i>	The site was acquired by Liverpool Council in 2015. A £10m government funding boost from Homes England (approved Feb 2019) will allow the Council to redevelop the site for residential development for up to 2,500 new homes, whilst preserving the Festival Gardens themselves and creating a “cultural garden suburb”. Developers ION and Midia are working with the Council to develop a detailed masterplan for the new residential zone, where there is an extant planning permission for 1,374 homes (ref. 060/3442).	
Accessibility		
<i>Access to National Network</i>	The site borders Riverside Drive which connects the site to the A561 (Aigburth Road) connecting the site to Liverpool within 3.7 miles, Widnes within 10.5 miles and J5 of the M62 within 7 km.	
<i>Access to Public Transport Nodes</i>	Two bus stops lie on the site which provide regular services to Liverpool and Murdishaw. The site borders St. Michaels train station connecting the site to the Merseyrail Network which connects the site to Liverpool and the National Rail Network.	
<i>Pedestrian and Cycle Accessibility</i>	The site benefits from being having the off-road cycle track route which is part of the cycle route 56 and the Trans Pennine Trail. To the north of the site on-road signed cycle routes and on-road cycle lanes exist.	 <i>Mersey Travel Cycling and Walking Map, 2017</i>
<i>Highways Capacity and Access</i>	The site is accessible via Riverside Drive — as demonstrated by the approved planning consent for residential development.	

Other Development Issues		
<i>Other Potential Constraints</i>		It is well documented that the site was a former landfill site and therefore there will be significant remediation costs associated with bringing the site forward for development.
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>		<p>The site is not connected to the existing home at Goodison Park and surrounding community. It does not retain strong cultural ties with Goodison Park and the Docks and does not provides a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.</p> <p>The site is approximately 7km away from Goodison Park.</p>
<i>Iconic Location</i>		The site would provide an iconic location on the banks of the River Mersey.
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is allocated as Green Wedge and Green Space (Policies OE3, OE11 & OE12) in the adopted UDP and Open Space and Green Wedge (Policy GI1, GI2 and GI3) in the emerging Local Plan, which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101). In terms of its use and quality, Liverpool City Council's Open Space Assessment Report and Standards (2017) identifies Festival Gardens as a 'high-quality' park and garden with a 'high value' attached to it from the community. The site is allocated as an Undeveloped Coastal Zone (Policy OE4) in the adopted UDP. If assessed against adopted policy, a stadium development would need to address Coastal Zone policies; as well as the NPPF with regard to Coastal Change (pp's 166-169). The site does have planning consent for residential development which details how the parts of the site can be remediated (from its former brownfield use), enhanced and the impact of development mitigated.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> There is an extant planning permission on the site which was called in by the SoS in 2008 and granted permission for up to 1,374 residential units. As such, the principle of development of part of the site for residential development has been established.


		<ul style="list-style-type: none"> ▪ The site has been acquired by the Council who are working together with their partners to develop a Master Plan for the redevelopment of part of the site for residential development and a £10m government funding grant from Homes England was approved Feb 2019. Site preparation and enabling is now being brought forward through “live” planning applications, which demonstrate the commitment to the development of the site. The site is not available. ▪ The site is outside of Everton’s traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a “real world” scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> ▪ Whilst there is potential contamination and remediation required, there are not considered to be any unaffordable development costs that would prevent the development of the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> ▪ This site is reasonably well connected, including to St. Michael’s station and the rail network, and served by a number of bus stations in the vicinity.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> ▪ There are not considered to be any unacceptable environmental or visual impact that would prevent the redevelopment of the site.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	Summary Assessment <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> • Availability — the site is owned by Liverpool City Council and being brought forward in part for residential development (the site will be remediated and currently suffers from significant contamination as the brownfield site of a former landfill). A £10m government funding grant from Homes England was approved Feb 2019 to support the site and the site is being remediated and brought forward for development. Site preparation and enabling is now being brought forward through “live” planning applications, which demonstrate the commitment to the development of the site. The site is fundamentally not available. • Planning policy constraints — the site is designated for a range of open space, Green Wedge and nature conservation policies in both the adopted and emerging development plan. However, this does not preclude development subject to meeting the relevant local and national policy tests — as evidence by current residential development proposals on the site. 	


- Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario.


Conclusion & Comparison with BMD



The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available**. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.



Site 36: Garston Dock


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<p><i>Site Outline</i></p>	
<p>Site Details</p>	
<p><i>Site Area</i></p>	<p>The site is approximately 56.2 hectares.</p>
<p><i>Existing Site Uses</i></p>	<p>The site contains a mixed-use port with three docks, the North Dock, Old Dock and Stalybridge Dock; a freightliner; Associated British Ports industrial sheds; part of Weaver Industrial Estate; residential units to the north west of the site; and some open space.</p>
<p><i>Surrounding Uses</i></p>	<ul style="list-style-type: none"> ▪ To the north lies a freightliner, open space, woodlands and detached, semi-detached and townhouse residential units. ▪ To the west lies Cressington Tennis Club, detached residential units and the River Mersey. ▪ To the south lies the River Mersey and Weaver Industrial Estate. ▪ To the east lies Weaver Industrial estate, brownfield land, open space, woodlands, St Michael's Church and terraced residential units.



<i>Site Ownership</i>	<p>The sites freeholder is Associated British Ports (ABP). In addition, 10 leaseholders exist on the site, these include:</p> <ul style="list-style-type: none"> ▪ Containercare Limited, ▪ Dudman (Garston) Limited, ▪ Freightliner Limited, ▪ Hanson Quarry Products Europe Limited, ▪ North West Stevedores Limited, ▪ Sims Group UK Limited, ▪ Tarmac Trading Limited, ▪ United Utilities Water Limited, and ▪ Vodafone Limited.
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E3 - a Port Zone, • Policy OE4 - Developed Coastal Zone, • Policies OE5 & OE6 - a Site of Special Scientific Interest, Special Protection Area, RAMSAR site, and • Policies OE11 & OE12 - Green Space. 

<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy H2 – Residential Development Site Allocation with allocation H19, • Policy R2 - two Notifiable Hazardous Installations, • Policy EC8 - a Port, and • Provides an allocation to refer to the Joint Merseyside & Halton Waste Local Plan for further details. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Natural Environment</u></p> <p>Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). When determining planning applications, paragraph 175a states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p> <p>SSI (175b) - development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.</p> <p>Paragraph 178 states that planning policies and decisions should ensure that a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation).</p> <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p>	


	<p><u>Coastal</u></p> <p>In coastal areas, paragraph 160 requires decisions to take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.</p> <p>The Joint Merseyside & Halton Waste Local Plan (2013)</p> <p>The Waste Local Plan identifies that the suggested waste management uses located on the site include a Re-Processor, WTS, Primary Treatment and an RRP.</p>	<p>L1 - Land off Stalbridge Road, Garston</p>  <table><tr><td>Suggested Waste Management Use</td><td>HWRC</td><td>Re-Processor</td><td>Thermal Treatment</td></tr><tr><td></td><td>WTS</td><td>Primary Treatment</td><td>RRP</td></tr></table> <p>The Joint Merseyside & Halton Waste Local Plan (2013)</p>	Suggested Waste Management Use	HWRC	Re-Processor	Thermal Treatment		WTS	Primary Treatment	RRP
Suggested Waste Management Use	HWRC	Re-Processor	Thermal Treatment							
	WTS	Primary Treatment	RRP							
Statutory Designations										
<p><i>Heritage</i></p>	<p>No listed buildings or monuments sit within the site boundary; however, the Church of St. Michael - a Grade II listed building - sits directly to the east of the site.</p>	 <p>Historic England Map Search, 2019</p>								

<p><i>Flood Risk</i></p>	<p>The land which borders the River Mersey and the dock water is located within Flood Zone 3, and the remainder of the site sits within Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>
<p><i>Ecology</i></p>	<p>Habitats located on the site include Intertidal Substrate Foreshore – Sand, Priority Habitat Inventory - Deciduous Woodland and National Forest Inventory – Broadleaved.</p> <p>Species located on the site include Priority Species for CS Targeting – Lapwing, Arable Assemblage Farmland Birds – 4, Corn Bunting, Grey Partridge, Lapwing, Tree Sparrow and Extremely High Seabird Oil Sensitivity Index.</p>	 <p>Magic Maps, 2019</p>

<p><i>Landscape</i></p>	<p>Statutory Land Based Designations which impact the site are SSSI Impact Risk Zone and a Wild Bird General Licence Exclusion Zone.</p>	 <p>Magic Maps, 2019</p>
<p>Strategic and Regeneration Context</p>		
<p><i>Strategic and Regeneration Policy</i></p>	<p>South Liverpool MDZ</p> <p>The site is located within the South Liverpool Mayoral Development Zone, one of Liverpool's most sought-after locations as it attracts high value jobs, significant levels of investment and modern, well-connected business premises.</p> <p>South Liverpool International Gateway (2011)</p> <p>The site is located within the South Liverpool International Gateway (SLIG) which identifies Garston Dock as a major piece of infrastructure hold great scarcity value and could play a strategic role in existing and future employment generation and should not be surrendered for short term gain. The SLIG that states "<i>the ability of the local economy to grow will need to be safeguarded and nurtured through the provision of a range of appropriate employment sites and associated infrastructure as identified in the SRF Land Use Framework. The majority of employment land is to be retained for new employment led development over the next 15 to 20 years.</i>"(page 3)</p>	

	<p>Garston Dock Masterplan (2013)</p> <p>The masterplan identifies that the housing and industrial areas are in a stable and improving condition that is likely to continue. The masterplan proposes that the land to the west of the site and to the north of the North Dock is proposed for housing, known as South Cressington.</p>	 <p>Garston Masterplan, 2013</p>
<p><i>Socio-Economic Profile</i></p>	<p>The site is located across three LSOAs identified on the right.</p> <p>In 2019 the first LSOA has an IMD ranking of 14,413 out of 32,844 LSOAs in England (50% most deprived) and an Employment Deprivation Domain (EDD) ranking of 11,626 out of 32,844 LSOAs in England (40% most deprived).</p> <p>In 2019 the second LSOA has an IMD ranking of 2,874 out of 32,844 LSOAs in England (10% most deprived) and an EDD ranking of 3,917 out of 32,844 LSOAs in England (20% most deprived).</p> <p>In 2019 the third LSOA has an IMD ranking of 1,359 out of 32,844 LSOAs in England (10% most deprived) and an EDD ranking of 1,861 out of 32,844 LSOAs in England (10% most deprived).</p>	 <p>English IMD Explorer, 2019</p>


Planning and Development Context				
<i>Planning History</i>	The recent and historic planning applications are outlined below:			
	Application Number	Date	Decision	Details
	14F/1944	26-11-2014	Approve with Conditions	To create 'wheeled sports hub' recreation facility incorporating skate park and bike track to upper level
	08F/2515	16-12-2008	Approve with Conditions	To vary plot nos.83 to 90 (part alternative to 06RM/0181) comprising erection of eight 3 storey dwelling houses
	07RM/3064	03-06-2008	Approve with Conditions	To erect 26 no two, three, four and five storey apartments with associated car parking and landscaping. Removal of plot 122 and minor amendments to plots 123/126 (Reserved matters application following grant of outline consent No. 020/1313 - to redevelop site for residential purposes and nature conservation area - granted 30th December 2004)
	06RM/0181	30-08-2006	Approve with Conditions	To erect 229 no. two and three storey dwellings and layout access road and landscaped buffers (reserved matters phase 2) following grant of outline consent No 020/1313 (to redevelop site for residential purposes and form nature conservation area) on 30/12/04.
	05RM/2510	02-11-2005	Approve with Conditions	To erect 64 no. two/three storey dwellings and lay out access road (reserved matters Phase 1) following grant of outline consent (to redevelop site for residential purposes and form nature conservation area) on 30/12/04
	020/1313	31-12-2004	Approve with Conditions	To erect approximately 300 dwellings plus associated roads, sewers, landscaping and car parking areas and to layout a nature reserve area (outline application)
	000/0835	29-05-2001	Approve with Conditions	To redevelop land for residential purposes, following regrading of site and demolition of premises * and to redevelop site of 'The Blackburn Arms' P.H. for uses within classes A1, A2, A3 or C3 (commercial, retail, or residential use)
<i>Development Status</i>	The surrounding area has been subjected to a number of developments which includes TJ Morris erecting 9,000 sq. m of B1(c), B2 & B8 uses at the Former Rayware Site and the proposed Backhouse Developments Ltd development of 169 houses at Blackburne Street.			


<i>Landowner / Developer Aspirations</i>	ABP intend to continue to operate from the Port of Garston; they have a statutory duty to operate the Port and would not consider development on its land which would prejudice its operations. However, there will be some consolidation of the port operations in the medium to long term which in turn will make land available for residential-led redevelopment to the north of the site in line with the Council endorsed Masterplan.	
Accessibility		
<i>Access to National Network</i>	Garston Way can be access via Dock Road which gives the site access to Liverpool City Centre within 11 km, Widnes within 13 km and J1 of the M578 and J6 of the M62 within 13 km.	
<i>Access to Public Transport Nodes</i>	Several bus stops sit along St Mary’s Road, 300m north of the site which provide regular services to Speke, Garston, Liverpool and Aigburth. Cressington Train Station sits approximately 300m north of the site is connected to the Mersey Rail Network which connects the site to Liverpool City Centre and National Rail Networks.	
<i>Pedestrian and Cycle Accessibility</i>	Limited Cycling and walking routes are provided surrounding the site apart from routes via King Street and Black to the east of the site which provide on-road signed cycle routes.	 <p>Mersey Travel Cycle Map, 2017</p>
<i>Highways Capacity and Access</i>	Access to the strategic highways network is available via Garston Way.	
Fit with Everton’s Requirements		
<i>Connection to North Liverpool</i>	Historically, Garston was cut off from the rest of Liverpool by the affluent suburbs around Sefton Park and has a very different character to inner city areas in which the existing stadium is located. The site does not possess any cultural ties with Everton and is located approximately 10km away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.	
<i>Iconic Location</i>	The site location is primarily industrial and would not provide an iconic location.	



Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site is allocated as a Port Zone (E3) and SSSI Protection Area (OE5 and OE6) and Developed Coastal Zone (OE4) in the adopted UDP. It is allocated for housing and as a port zone in the emerging Local Plan. If assessed against adopted policy, a stadium development would need to address Coastal Zone policies; as well as the NPPF with regard to Coastal Change (pp's 166-169). Notwithstanding this, convincing justification would be required to support the loss or relocation of existing (and future) uses on the site. The site is likely subject to contamination and is the location of two notifiable hazardous installation. The emerging Local Plan (Policy R2) notes that “proposed development within the defined consultation zones surrounding existing locations or pipelines with Hazardous Substances Consent will not be permitted if it would result in a significant increase in the number of people living in, working in or visiting the area, or would otherwise cause unacceptable risk”. A stadium would include the use of the site by significant numbers of people and further investigation would be required to understand the hazardous risk presented by the site. A masterplan for the site has been prepared and endorsed by the Council including therefore the development of the site for stadium uses would be contrary to the masterplan.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned by Associated British Ports (ABP) who has a statutory undertaking to continue the port operations, therefore the site is not available. Although there may be scope for residential-led redevelopment in the medium to long term to the north of the site, following consolidation of the port operations, which are proposed to remain operational for port-related use. The site is outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a “real world” scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> Whilst there is potential contamination and remediation required, there are not considered to be any unaffordable development costs that would prevent the development of the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is reasonably well connected, including to St. Michael's station and the rail network, and served by a number of bus stations in the vicinity.


<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No</p>	<ul style="list-style-type: none"> There are not considered to be any unacceptable environmental or visual impact that would prevent the redevelopment of the site.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Associated British Ports (ABP) who has a statutory undertaking to continue the port operations, therefore the site is not available. There may be scope for some residential-led redevelopment in the medium to long term to the north of the site, following consolidation of the port operations, which are proposed to remain operational for port-related use. Planning policy constraints — the site is allocated as a Port Zone (E3) and SSSI Protection Area (OE5 and OE6) and Developed Coastal Zone (OE4) in the adopted UDP. It is allocated for housing and as a port zone in the emerging Local Plan. Convincing justification would be required to support the loss or relocation of existing (and future) uses on the site. Notwithstanding this, the site is likely subject to contamination and is the location of two notifiable hazardous installation. The emerging Local Plan (Policy R2) notes that <i>“proposed development within the defined consultation zones surrounding existing locations or pipelines with Hazardous Substances Consent will not be permitted if it would result in a significant increase in the number of people living in, working in or visiting the area, or would otherwise cause unacceptable risk”</i>. A stadium would include the use of the site by significant numbers of people and further investigation would be required to understand the hazardous risk presented by the site. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. Notwithstanding this, the site has two notifiable hazardous installations which could (subject to further investigation) preclude the development of a use which supports the congregation of large numbers of people; and the site is in a location which is wholly divorced from the Club’s traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a “real world” scenario.</p>	

Site 37: Land at Speke Boulevard


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 35.5 hectares.
<i>Existing Site Uses</i>	The sites current use is as a car storage area, retail warehousing units which make up New Mersey Shopping Park, a freight line and woodlands.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies a heavy rail line, various industrial units of various sizes, retail warehouse units and vacant plots of land. To the west lies bungalows and semidetached residential units, office space and a hotel. To the south lies Crowne Plaza Liverpool John Lennon Airport (hotel), further industrial units with some vacant plots of land. To the east lies out of town retail units with companies such as John Lewis and Screwfix operating on site alongside industrial units.

<i>Site Ownership</i>	<p>The sites freeholders include:</p> <ul style="list-style-type: none"> • Westlink Holdings; • Towerbeg Limited; • Homes and Communities Agency; and • Three unknown freeholders - MS414313, MS237373, MS34770. <p>A large number of leaseholds exist on the site predominantly pertaining to retailers but additionally to:</p> <ul style="list-style-type: none"> • Ford Motor Co; • ANSA Logistics Limited; and • SP Manweb PLC.
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy S11 - a retail warehouse park, • Policy E1 - a site for various types of development with allocation E83 and E95, and • Policy E1 - a primarily industrial area. 

<i>Emerging Policy</i>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policy EC1 & EC2 - a Site for Industrial/Business Development, and• Policy SP6 - an Out of Centre Shopping Park.	
<i>National Policy and Other Material Considerations</i>	<p>Liverpool's Employment Land Study (2017)</p> <p>The Employment Land Study identifies that the site is located within the Speke and Garston Central Employment Area, the report recommends that the existing B Class employment space within Speke and Garston Central should be protected and the loss of employment land to alternative uses should be resisted.</p>	
Statutory Designations		
<i>Heritage</i>	<p>No listed buildings or monuments sit on the site however, three Grade II* listed buildings and two Grade II listed buildings sit to the south west of the site.</p>	 <p><i>Historic England Map Search, 2019</i></p>

<i>Flood Risk</i>	<p>The site sits within Flood Zone 1.</p>  <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	There are not considered to be any ecological constraints that would prevent the development of the site.
<i>Landscape</i>	There are not considered to be any landscape constraints that would prevent the development of the site.
Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	<p>South Liverpool MDZ</p> <p>The site is located within the South Liverpool Mayoral Development Zone, one of Liverpool's most sought-after locations as it attracts high value jobs, significant levels of investment and modern, well-connected business premises.</p>
	<p>South Liverpool International Gateway SRF (2011)</p> <p>The site is located within South Liverpool International Gateway (SLIG) that states "<i>the ability of the local economy to grow will need to be safeguarded and nurtured through the provision of a range of appropriate employment sites and associated infrastructure as identified in the SRF Land Use Framework. The majority of employment land is to be retained for new employment led development over the next 15 to 20 years.</i>"(page 3)</p>


<i>Socio-Economic Profile</i>	The site sits within one LSOA which in 2019 has IMD ranking of 7,096 out of 32,844 LSOAs in England (30% most deprived) and an Employment Deprivation Domain of 6,676 out of 32,844 LSOAs in England (30% most deprived).			
Planning and Development Context				
<i>Planning History</i>	The planning history of the site is outlined below:			
	Application Number	Date	Decision	Details
	19F/1150	11-06-2019	Approve with Conditions	To carry out external alterations in connection with subdivision of unit and for flexible use of one unit as Class A1 or Management facilities/customer facilities.
	17F/0169	02-03-2017	Approve with Conditions	To reconfigure car park and drive thru lane to accommodate the introduction of side by side ordering, including a new island for signage and install additional drive thru booths and fast forward corridor.
	17F/0152	28-06-2017	Approve with Conditions	To site various temporary structures with associated external seating to accommodate Class A1/A3/A5
	15F/0808	29-07-2015	Approve with Conditions	To erect new cinema and restaurants following demolition of existing retail units, reconfigure the B&Q unit, erect new retail units, undertake shop front improvements, erect customer services centre, reconfigure car park and relocate substation, so as to allow existing retail allowances across the retail park to be applied flexibly
<i>Development Status</i>	The recent developments within the surrounding area of the site include Speke Unit Trust’s developments at New Mersey Shopping Park of a new cinema and restaurants, reconfiguration of the B&Q unit, new retail units and reconfiguration of the car park; Valedown Limited’s development of eight industrial units, Merseyside Police’s proposed training venue (permission granted June 2018) and 15,000 sq. ft of office/light industrial at Estuary Business Park (‘180/1812’ approved October 2018).			
<i>Landowner / Developer Aspirations</i>	The majority of the site is currently in use for operational retail uses vehicle storage use (by the Ford Motor Company). Restrictive covenants exist on the Title of the vehicle storage land relating to the use of the land and the height of future built development.			



Accessibility	
<i>Access to National Network</i>	The sits adjacent to Speke Road which connects the site to Liverpool City Centre within 13 km, Widnes within 11 km and J1 of the M57 and J6 of the M62 within 11 km.
<i>Access to Public Transport Nodes</i>	Several bus stops sit on Speke Road which sits adjacent to the site and provides regular services to Speke, Barrows Green, Belle Vale and Liverpool. 650m north of the site sits Liverpool South Parkway which is connected to the Merseyrail network and National Rail networks connecting the site to Chester, Liverpool Lime Street, Norwich, Manchester Oxford Road and Manchester Airport.
<i>Pedestrian and Cycle Accessibility</i>	<p>An off-road cycle track is located adjacent to Speke Road.</p>  <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	Access to the strategic highways network and the site is via Speke Road.
Fit with Everton's Requirements	
<i>Connection to North Liverpool</i>	The site does not possess any cultural ties with Everton and is located approximately 11km away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.
<i>Iconic Location</i>	The site location is surrounded by residential and industrial development and would not provide an iconic location.

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site is allocated for employment uses in the adopted UDP and emerging local Plan. If assessed against adopted and emerging policy, a stadium development would need to address key employment policies (adopted policy E1 and emerging policies EC1 and EC2) as well as the NPPF with regard to employment (pp's 80-82). This site comprises employment land located to the south of the A561 (Speke Road and Speke Boulevard). This area is characterised by a series of business parks and large-scale manufacturing units many of which relate to Jaguar Land Rover. The Employment Land Study (2017) recommends that <i>"the existing B Class employment space within Speke and Garston South should be protected and the loss of employment land to alternative uses should be resisted."</i> The site is a key part of the City's employment supply. Liverpool's Employment Land Study (2017) identifies that the site is located within the Speke and Garston Central Employment Area, the report recommends that the existing B Class employment space within Speke and Garston Central should be protected and the loss of employment land to alternative uses should be resisted.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is in multiple ownerships and is in active employment and retail uses – including a retail park and vehicle storage use (by the Ford Motor Company). Restrictive covenants exist on the Title of the vehicle storage land relating to the use of the land and the height of future built development. The site is outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed. Is not in an iconic location befitting for a world class stadium.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> There are not considered to be any unaffordable development costs that would prevent the redevelopment of the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is reasonably well connected, including to Liverpool South Parkway and the rail network, and served by a number of bus stations in the vicinity.

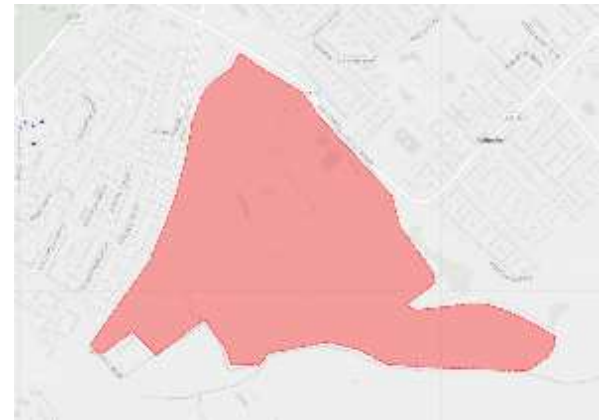

<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No</p>	<ul style="list-style-type: none"> There are not considered to be any unacceptable environmental or visual impacts that would prevent the redevelopment of the site.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site in multiple ownerships and is in active employment and retail uses — including a retail park and vehicle storage use (by the Ford Motor Company). Restrictive covenants exist on the Title of the vehicle storage land relating to the use of the land and the height of future built development. Planning policy constraints — the site is allocated as employment uses in adopted and emerging policy. Whilst planning policy and guidance, including the NPPF does not strictly preclude development on employment uses, it would need to provide justification for the loss of existing uses. This site comprises employment land located to the south of the A561 (Speke Road and Speke Boulevard). This area is characterised by a series of business parks and large-scale manufacturing units many of which relate to Jaguar Land Rover. The Employment Land Study (2017) recommends that “<i>the existing B Class employment space within Speke and Garston South should be protected and the loss of employment land to alternative uses should be resisted.</i>” Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location which is wholly divorced from the Club’s traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a “real world” scenario.</p>	


Site 38: Lee Park Golf Course


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 34.3 hectares.
<i>Existing Site Uses</i>	The site contains Lee Park Golf Course with associated woodlands, ponds and open space.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies open space and industrial units of various sizes, Caldway Playing Fields, Childwall Golf Club and semidetached and terraced residential units. To the west lies semidetached residential units, Belle Vale Primary School and Belle Vale Park. To the south lies Solar Panels, Sewage Treatment Plant, Open Space and woodlands. To the east lies Netherley Park, Valley Community Theatre, pitch and put golf course, semidetached residential units and Norman Pannell Primary School.


<i>Site Ownership</i>	The sites freeholder is Lee Park Golf Club Limited. An unknown title also exists over the land (MS606074).	
Planning Policy		
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policies OE1 & OE2 - Green Belt, and• Policy C8 - an Existing Sports Recreation Centre.	
<i>Emerging Policy</i>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policy GI 1 - as Green Belt, and• Policies GI 1 & GI 5 - a Local Wildlife Site.	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Belt</u></p> <p>Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, paragraph 144 requires that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p><u>Natural Environment</u></p> <p>Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). When determining planning applications, paragraph 175a states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p>
---	--

Statutory Designations		
<i>Heritage</i>	No listed buildings or monuments sit on the site or in close proximity to the site.	 <p>Historic England, Map Search</p>
<i>Flood Risk</i>	The site predominantly sits within Flood Zone 1 apart from the land to the south of the site which surrounds the tributary of the Netherley Brook which sits within Flood Zone 2.	 <p>Flood Map for Planning, 2019</p>

Ecology	Habitats located on site include National Forest Inventory – woodland, assumed woodland, broadleaved, woodland and young trees.	 <p>Magic Maps, 2019</p>
Landscape	The site is within the Green Belt and any development could have an impact on the openness of the site.	
Strategic and Regeneration Context		
Strategic and Regeneration Policy	n/a	


<i>Socio-Economic Profile</i>	<p>The site is located across two LSOAs. The first LSOA in 2019 has an IMD ranking of 2,573 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 2,189 out of 32,844 LSOAs in England (10% most deprived).</p> <p>The second LSOA has an IMD ranking of 860 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 515 out of 32,844 LSOAs in England (10% most deprived).</p> <p>The development of a football stadium has the potential to have a significant catalytic effect on the regeneration of the area.</p>	 <p>Indices of Multiple Deprivation 2019 Explorer</p>
Planning and Development Context		
<i>Planning History</i>	There is no relevant planning history on the site.	
<i>Development Status</i>	The surrounding area is subject to limited recent development activity apart from Pierhead Housing Associations development of 26 houses and 12 apartments at Holly Cottage.	
<i>Landowner / Developer Aspirations</i>	The golf course is currently operational and in active use.	
Accessibility		
<i>Access to National Network</i>	The site borders Childwall Valley Road which gives the site access to Liverpool within 11 km and J5 of the M62 within 5 km.	
<i>Access to Public Transport Nodes</i>	Childwall Valley Road borders the site and provides regular bus services to Liverpool, Woodlands, Windmill Hill, Wideness and Halewood. There is no train station in the immediate vicinity — the site is more than 2km from Halewood Train Station.	


<i>Pedestrian and Cycle Accessibility</i>	<p>To the south west of the site sits an off-road cycle track which is part of cycle route 62 and the Trans Pennine Trail. To the north west of the site on-road cycle lanes are provided via Belle Vale Road.</p>	 <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	<p>The site is in a wholly unsustainable location and is situated in a primarily residential area. Access to the site can only be achieved via local roads including the B5178 (Childwall Valley Road). Any major events in this location would have a significant adverse impact on the local highways network, particularly as a result of the lack of alternative modes of transport.</p>	
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>	<p>The site does not possess any cultural ties with Everton and is located approximately 10km away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.</p>	
<i>Iconic Location</i>	<p>The site would not provide an iconic location due to the surrounding uses.</p>	


Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The site allocated as Green Belt (OE1 and OE2) in the adopted and emerging Development Plan (GI1, GI3) respectively. If assessed against adopted or emerging policy, a stadium development would need to address the NPPF with regard to the loss of open space (pp's 96-101) and demonstrate very special circumstances in accordance with Green Belt Policy (NPPF para 143) and the tests of Sports England. The area surrounding the site is largely residential, which could conflict with the proposed use. The site includes protected priority habitat and established trees.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned by Lee Park Golf Club Limited and is currently in active use as a recreational golf facility. The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> As the site is a greenfield site and there are no known contamination issues, it is not considered that unaffordable development costs would prevent the development of a stadium on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	No	<ul style="list-style-type: none"> The site is in an unsustainable location. There is no train station in the immediate vicinity - the site is more than 2km from Halewood Train Station and in a predominantly residential area. Access to the site can only be achieved via local roads including the B5178 (Childwall Valley Road). Any major events in this location would have a significant adverse impact on the local highways network, particularly as a result of the lack of alternative modes of transport.


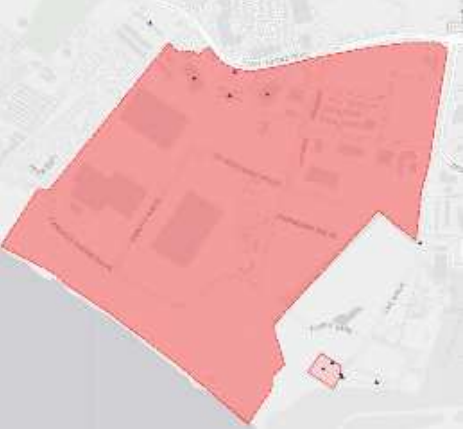
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There is the potential for unacceptable environmental and visual impacts — particularly on the openness of the Green Belt and the loss of a Local Wildlife Site and the associated habitats/ecology — these would require mitigation.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Lee Park Golf Club and is in active use. There is no indication that the site is available for redevelopment. Planning policy constraints — the site is allocated as Green Belt in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF does not strictly preclude development in the Green Belt, any development would require the demonstration of very special circumstances. The site also has constraints in terms of nature conservation and flood risk which would require assessment and mitigation. Location and sustainability — the site is in an unsustainable location and poorly connected to sustainable modes of transport. It has limited accessibility to the bus network and there is no accessible train station, with Halewood train station more than 2km away. Also, access to the site can only be achieved via local roads including the B5178 (Childwall Valley Road). The site is in a predominantly residential area and any major events in this location would have a significant adverse impact on the local highways network and residential amenity. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and therefore has limited ties to the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key considerations are that the site is in a wholly unsustainable location for a major movement and activity generating use than what is proposed, and is in active use and not considered to be available. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.</p>	



Site 39: Speke Northern Airfield


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 176 hectares.
<i>Existing Site Uses</i>	The site contains hotels, leisure units, restaurant, car parking, Speke and Garston Coastal Reserve, Liverpool Sailing Club, public footpath, brownfield land, open space and industrial units of various sizes.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies Speke Road, New Mersey Shopping Park, residential units, brownfield land and a car storage area. To the west lies office units, allotments, semidetached and terraced residential units and Weaver Industrial State. To the south lies the River Mersey. To the east lies Speke Hall Garden and Estate, woodlands, Liverpool John Lennon Airport, retail units and industrial units of various sizes.

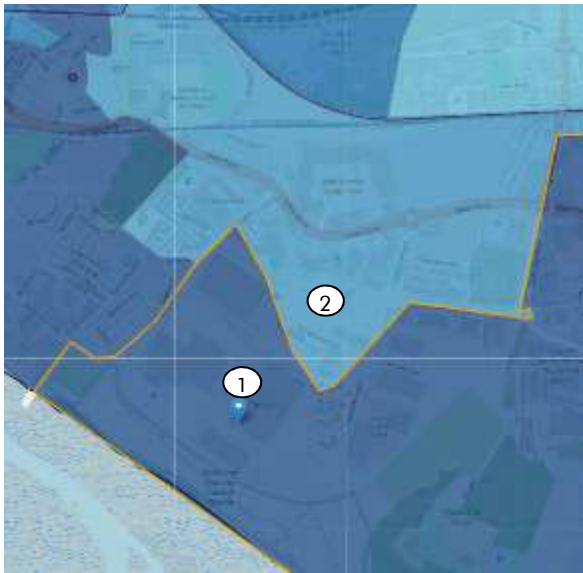
<i>Site Ownership</i>	<p>The sites freeholders include:</p> <ul style="list-style-type: none"> • Homes and Communities Agency; • Perseus GR Limited; • Peel Investments (North) Limited; • LSD Developments Limited; and • Prinovis Liverpool Limited. <p>501 leaseholds exist over the land.</p>
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy E1 - a Site for Industrial / Business Development, • Policy OE4 - Undeveloped Coastal Zone, • Policies OE5 & OE6 - a Site of Nature Conservation Area, and • Policy E6 - a Site for Various Types of Development. 

<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy EC1 & EC2 - a Site for Industrial/Business Development with allocations E12, E13, R14 & E15, and • Policy EC2 - Primarily Industrial Area. 	
<p><i>Other</i></p>	<p>NPPF (2019)</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ol style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. <p>The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> • grade II listed buildings, or grade II registered parks or gardens, should be exceptional; • assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. 	


	<p><u>Coastal</u></p> <p>In coastal areas, paragraph 160 requires planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.</p> <p>Liverpool Employment Land Study (2017)</p> <p>The Study identifies that the site is located within the Speke and Garston South Employment Area, comprises employment land located to the south of the A561 (Speke Road and Speke Boulevard). This area is characterised by a series of business parks and large-scale manufacturing units. The report recommends that the existing B Class employment space within Speke and Garston South should be protected and the loss of employment land to alternative uses should be resisted.</p> <p>The majority of the site is identified as the Former Northern Airfield, the report identifies that the site has successfully been developed in stages for employment uses. And, recommends “<i>The site is a key employment site and any remaining capacity of approximately 12 ha should be reserved for employment (B1, B2, and B8) uses. Changes of use to non-B Class should be resisted.</i>”</p> <div data-bbox="1435 341 2042 743">  </div> <p><i>Liverpool Employment Land Study (2017)</i></p>
Statutory Designations	
<p><i>Heritage</i></p>	<p>Three grade II* listed buildings or monuments sit on the site which include Liverpool Airport Hangar 1, Liverpool Airport Hangar 2 and the Former Liverpool Airport Control Tower. The grade II listed Four Gatepiers at the entrance to Liverpool Speke Airport also sits on the site.</p> <p>Seven listed buildings or monuments sit in the surrounding area of the site including the nationally important Grade I listed Speke Hall and associated structures and buildings.</p> <div data-bbox="1503 890 1980 1326">  </div> <p><i>Historic England Map Search, 2019</i></p>

<p><i>Flood Risk</i></p>	<p>The site predominantly sits within Flood Zone 1 apart from the land which borders the River Mersey.</p>	 <p>Flood Map for Planning, 2019</p>
<p><i>Ecology</i></p>	<p>Habitats located on site include Priority Habitat Inventory - Deciduous Woodland, National Forest Inventory – Woodland and Priority Habitat Inventory - Deciduous Woodland.</p>	 <p>Magic Maps, 2019</p>

<p><i>Landscape</i></p>	<p>Statutory Land-Based Designations which affect the site include SSSI Impact Risk Zones and a Wild Bird General Licence Exclusion Zone.</p>	 <p>Magic Maps, 2019</p>
<p>Strategic and Regeneration Context</p>		
<p><i>Strategic and Regeneration Policy</i></p>	<p>South Liverpool MDZ</p> <p>The site is located within the South Liverpool Mayoral Development Zone, one of Liverpool’s most sought-after locations as it attracts high value jobs, significant levels of investment and modern, well-connected business premises.</p> <p>South Liverpool International Gateway SRF (2011)</p> <p>The site is located within South Liverpool International Gateway (SLIG) that states “<i>the ability of the local economy to grow will need to be safeguarded and nurtured through the provision of a range of appropriate employment sites and associated infrastructure as identified in the SRF Land Use Framework. The majority of employment land is to be retained for new employment led development over the next 15 to 20 years.</i>”(page 3)</p>	

<i>Socio-Economic Profile</i>	<p>The site sits across two LSOAs, in 2019 the first LSOA has an IMD of 1,187 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain (EDD) of 915 out of 32,844 LSOAs in England (10% most deprived).</p> <p>In 2019 the second LSOA has an IMD of 7,096 out of 32,844 LSOAs in England (30% most deprived) and an EDD of 6,676 out of 32,844 LSOAs in England (30% most deprived).</p>	 <p>IMD Explorer, 2019</p>		
Planning and Development Context				
<i>Planning History</i>	The major applications which have been received the site has received are outlined below:			
	Application Number	Date	Decision	Details
	18F/2254	29-08-2018 (registered)	N/A	To erect 10 no. employment units (B1c/B2/B8) with associated parking and the creation of a 130 space car park for use by adjacent ambulance call centre.
	18F/3071	21-11-2019	Approved with Conditions	To erect distribution warehouse.
	180/1812	22-10-2018	Approve with Conditions	Outline Application for B1(b), B1(c), B2 & B8 with ancillary B1(a) office space up to 14,000m


	18RM/1615	24-08-2018	Approve with Conditions	Application for reserved matters following outline approval 15F/1251 - (OUTLINE PLANNING APPLICATION - To erect industrial/distribution centre B1(c), B2, B8 with all matters reserved apart from access.)
	18F/1145	28-06-2018	Approve with Conditions	To erect new training venue for Merseyside Police with associated car parking and landscaping
	17F/3421	29-01-2018	Approve with Conditions	To change of use of part of existing office to training facility; landscaping works; new 2m high boundary fence; install new generator; and 6 no. additional vehicle parking bays.
	17F/0013	16-02-2017	Approve with Conditions	To erect deck level car park (133 spaces) and motorcycle store (20 spaces) in connection with police command centre currently under construction
	15F/1822	05-11-2015	Approve with Conditions	To erect 3 storey building, single storey ancillary building, single storey dog kennels, substation, gate house with associated parking landscaping and boundary treatment incorporating 3 vehicular access to Leeward Drive
	15F/1251	24-09-2015	Approve with Conditions	<ul style="list-style-type: none"> i. OUTLINE PLANNING APPLICATION - To erect industrial/distribution centre B1(c), B2, B8 with all matters reserved apart from access. ii. FULL PLANNING APPLICATION - To erect industrial building/distribution centre B1(c), B2, B8 with associated access, service yards, car parking and landscaping
	13F/1940	13-11-2013	Approve with Conditions	Development of one 18,000 and one 22,000 sq. ft industrial workspace units (within use classes B2 and B8)
	12F/2028	09-10-2012	Approve with Conditions	To erect 15.3m high distribution warehouse (Use B8) with ancillary offices and associated gatehouse, lorry wash, refuelling facilities, sub-station, sprinkler tank, pump house, cycle/motor cycle storage, car and lorry parking, access services yards, enclosure and landscaping.
	10F/2640	03-02-2011	Approve with Conditions	To erect 4 no. two storey commercial units (Use Classes B1, B2, B8) and lay out associated parking
	09F/1431	28-05-2010	Approve with Conditions	To erect 4 storey office development with associated car parking and landscaping
	08RM/2451	24-11-2008	Approve with Conditions	To erect 4 storey office block and layout associated car parking and landscaping
	01Q/1843	19-05-2004	Approve with Conditions	To redevelop former airfield site as Phase 2 of the Estuary Commerce Park, and use as a mixed class B1, B2, B8 development (offices/industrial/storage/distribution) with associated infrastructure and landscaping

<i>Development Status</i>	The major developments which have occurred in the surrounding area include Speke Unit Trust’s development at New Mersey Shopping Park to demolish existing retail units, erect a new cinema, restaurants and shopping units, and the reconfiguration of the B&Q unit and car park. Other notable developments include 268 new houses developed by Barratt Homes at Imagine Park and the proposed 169 houses at Blackburne Street by Backhouse Developments Limited (‘170/3256’ submitted January 2018).	
<i>Landowner / Developer Aspirations</i>	The site is in a number landownerships and in use for a range of uses. Recent planning applications and development activity demonstrate the “live” development status of the site and commitment to the ongoing operational use of the site as a key employment location.	
Accessibility		
<i>Access to National Network</i>	Speke Road (A561) borders the site and gives the site access to Liverpool within 12 km, Widnes within 11 km and J6 of the M62 and J1 of the M57 within 11 km.	
<i>Access to Public Transport Nodes</i>	Several bus stops sit on Speke Road which sits adjacent to the site and provides regular services to Speke, Barrows Green, Belle Vale and Liverpool. 900m north of the site sits Liverpool South Parkway which is connected to the Merseyrail network and National Rail networks connecting the site to Chester, Liverpool Lime Street, Norwich, Manchester Oxford Road and Manchester Airport. Hunt’s Cross is also within the vicinity of the site.	
<i>Pedestrian and Cycle Accessibility</i>	Off-road cycle routes within the site, via Speke Road and to the south of the site along the River Mersey and on-road signed cycle routes are also provided to the west of the site.	
Mersey Travel, Liverpool Cycle Maps, 2017		


Highways Capacity and Access	Speke Road (A561) is a 2x2 lane road which has some capacity to accommodate additional trips and provides good access to the site via the roundabout. This is one of the primary routes into the City from Cheshire and Knowsley.	
Fit with Everton's Requirements		
Connection to North Liverpool	The site does not possess any cultural ties with Everton and is located approximately 11km away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.	
Iconic Location	The site is surrounded by commercial and industrial development and would not provide an iconic location.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The site is allocated for employment uses in the adopted UDP and emerging Local Plan. If assessed against adopted or emerging policy, a stadium development would need to address key employment polices (adopted policy E1 and emerging policy EC2) as well as the NPPF with regard to employment (pp's 80-82).Liverpool Employment Land Study (2017) identifies that the site is located within the Speke and Garston South Employment Area. The majority of the site is identified as the Former Northern Airfield, the study identifies that the site has successfully been developed in stages for employment uses and recommend <i>"The site is a key employment site and any remaining capacity of approximately 12 ha should be reserved for employment (B1, B2, and B8) uses. Changes of use to non-B Class should be resisted."</i>The site accommodates a range of industrial and utilities uses which would require relocation or re-provision.
Is site acquisition a realistic proposition?	No	<ul style="list-style-type: none">The site is owned and occupied by a number of retailers, logistics companies and other business users (and includes over 500 leaseholds). As demonstrated by the recent "live" planning and development history of the site, it has been recently developed for a range of new operational employment uses and is fundamentally no longer available for development. LCC has confirmed that the site is now considered fully developed.Located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.


<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> It not considered that there are any unaffordable development costs that would prevent the development of the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is reasonably well connected, including to Liverpool South Parkway and the rail network, and served by a number of bus stations in the vicinity.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There are not considered to be any unacceptable environmental or visual impacts that would prevent the redevelopment of the site, subject to mitigation around the wildlife site to the south of the site.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned and occupied by a number of retailers, logistics companies and other business users (and includes over 500 leaseholds). As demonstrated by the recent “live” planning and development history of the site, it has been recently developed for a range of new operational employment uses and is fundamentally no longer available for development. LCC has confirmed that the site is now considered fully developed. Planning policy constraints — the site is allocated for employment uses in the existing and emerging development plan. The Liverpool Employment Land Study (2017) identifies that the site is located within the Speke and Garston South Employment Area. The majority of the site is identified as the Former Northern Airfield, the study identifies that the site has successfully been developed in stages for employment uses and recommend “<i>The site is a key employment site and any remaining capacity of approximately 12 ha should be reserved for employment (B1, B2, and B8) uses. Changes of use to non-B Class should be resisted.</i>” Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location which is wholly divorced from the Club’s traditional catchment, in a location at the southern extent of LCC where the Club would not consider relocation in a “real world” scenario.</p>	

Site 40: Wavertree Playground



ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 43.6 hectares.
<i>Existing Site Uses</i>	The site contains Liverpool Harriers and Athletic Club alongside associated running track, Wavertree Bowling Green, Kiddy Academy Wavertree, the Harthill Youth Centre, Liverpool Tennis Club, Grange Court Sheltered Housing Scheme, Liverpool Aquatics Centre and Open Space.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies Wavertree Church of England School, retail units along High Street, Our Lady Good Help Catholic Primary School, St Mary's Church Wavertree and detached, semi-detached and terraced residential units. • To the west lies a railway line, Frontline Church Liverpool and predominantly terraced residential units.


	<ul style="list-style-type: none">• To the south lies a railway line, terraced residential units, Tesco Express, Greenbank Primary School, Cornerstone Church Liverpool, Liverpool Mosque and Islamic Institute, Penny Lane retail park.• To the east lies the Liverpool Blue Coat School, Wavertree Green, The Parish Church of Holy Trinity Wavertree, Royal School for the Blind and Wavertree Congregational Church.
Site Ownership	<p>The sites freeholder is Liverpool City Council.</p> <p>Several leaseholders sit on the site which include:</p> <ul style="list-style-type: none">• Merseyside Youth Association Limited;• Plus Dane Housing Limited;• SP Manweb PLC; and• Two unknown leaseholds (MS338539 & MS459428)
Planning Policy	
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policies OE11 & OE12 - Green Space,• Policy C8 - Existing Sports / Recreation Centre, and• Policies HD7 - HD13 - an area Proposed for Deletion from Wavertree Village Conservation Area.




<i>Emerging Policy</i>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policies GI 1 & GI 3 - Open Space.	
<i>National Policy and Other Material Considerations</i>	<p>NPPF (2019)</p> <p><u>Community</u></p> <p>Paragraph 92 (c) seeks to safeguard social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none">a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; orb) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; orc) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none">a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;	

	<p>b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and</p> <p>c) the desirability of new development making a positive contribution to local character and distinctiveness.</p> <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> • grade II listed buildings, or grade II registered parks or gardens, should be exceptional; • assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
	<p>Sports England</p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.
	<p>Liverpool's Open Space Assessment (2017)</p> <p>The Open Space Assessment recognises Wavertree Playground as a Park and Garden which has both a high-quality score and a high value score with a secondary function as a green corridor. Wavertree Playground also helps to serve the gap in the provision of amenity greenspace and natural/semi-natural space.</p>

Statutory Designations		
<i>Heritage</i>	No listed buildings or monuments sit on the site; however, approximately 40 listed buildings or monuments sit within close proximity to the site.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site is located within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology issues identified that would prevent the development of the site.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	

Strategic and Regeneration Context	
<i>Strategic and Regeneration Policy</i>	n/a
<i>Socio-Economic Profile</i>	<p>The site sits across four LSOAs (pictured), In 2019:</p> <ul style="list-style-type: none"> • The first LSOA has an IMD ranking of 644 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 905 out of 32,844 LSOAs in England (10% most deprived). • The second LSOA has an IMD ranking of 13,760 out of 32,844 LSOAs in England (50% least deprived) and an Employment Deprivation Domain of 24,148 out of 32,844 LSOAs in England (30% least deprived). • The third LSOA has an IMD ranking of 12,199 out of 32,844 LSOAs in England (40% most deprived) and an Employment Deprivation Domain of 15,979 out of 32,844 LSOAs in England (50% most deprived). • The fourth LSOA has an IMD ranking of 6,206 out of 32,844 LSOAs in England (20% most deprived) and an Employment Deprivation Domain of 9,004 out of 32,844 LSOAs in England (30% most deprived).
	 <p>Indices of Deprivation 2015 explorer</p>
Planning and Development Context	
<i>Planning History</i>	<ul style="list-style-type: none"> ▪ No relevant planning history
<i>Development Status</i>	There is limited surrounding development context beyond the 26 new dwellings by Lacy Roofing Company Ltd at Wellington Road.
<i>Landowner / Developer Aspirations</i>	The site is owned LCC and is an important community resource which would not be considered for redevelopment. The site contains a range of community uses including Liverpool Harriers and Athletic Club alongside associated running track, Wavertree Bowling Green, Kiddy Academy Wavertree, the Harthill Youth Centre, Liverpool Tennis Club, Grange Court Sheltered Housing Scheme, Liverpool Aquatics Centre and Open Space.

Accessibility	
<i>Access to National Network</i>	The site borders High Street which gives the site access to Liverpool City Centre within 6 km and J5 of the M62 within 4 km.
<i>Access to Public Transport Nodes</i>	<p>The site borders Smithdown Road which provides regular bus services to Liverpool, Halewood, Speke, Garston and Childwall. Additionally, the site borders High Street which provides regular services to Liverpool, Windmill Hill, Halewood, Woodlands, Palace Fields and Widnes.</p> <p>Wavertree Technology Park sits 750m north of the site and gives the site access Northern Rail services to Liverpool Lime Street, Wigan North Western, Warrington Bank Quay and Crewe.</p>
<i>Pedestrian and Cycle Accessibility</i>	<p>Two off-road cycle routes travel through the site which are linked to on-road signed cycle routes and on-road cycle lanes which connect the site to Liverpool city centre and to the east along cycle route 56 and the Trans Pennine Trail.</p>  <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	The site is surrounded on all sides by residential development which would make access / egress to any major development difficult.
Fit with Everton's Requirements	
<i>Connection to North Liverpool</i>	The site does not possess any cultural ties with Everton and is located approximately 5km away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.
<i>Iconic Location</i>	The site is surrounded by residential area of Wavertree and would not provide an iconic location.

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy GI1 and GI3), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities). In terms of its use and quality, the site is considered as High Value Green Space as the Liverpool City Council Open Space Assessment Report and Standards April 2017 identifies the site as high quality and high value Park and Garden that serves a secondary function as a green corridor and also helps to serve the gap in the provision of amenity greenspace and natural/semi-natural space. The site contains a range of community uses including Liverpool Harriers and Athletic Club alongside associated running track, Wavertree Bowling Green, Kiddy Academy Wavertree, the Harthill Youth Centre, Liverpool Tennis Club, Grange Court Sheltered Housing Scheme and Liverpool Aquatics Centre. LCC has stated that it would not favourably consider a planning application for a stadium development on a high value community open space and recreational asset. A stadium development could generate a significant impact on the amenity of the surrounding community – the site is bounded on all sides by residential development. There is the potential to generate a significant impact on the amenity of the surrounding community in terms of traffic, noise, visual impact and event day disruption.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned LCC and is an important community resource which would not be considered for redevelopment. The site contains a range of community uses including Liverpool Harriers and Athletic Club alongside associated running track, Wavertree Bowling Green, Kiddy Academy Wavertree, the Harthill Youth Centre, Liverpool Tennis Club, Grange Court Sheltered Housing Scheme and Liverpool Aquatics Centre. LCC wish to retain the site therefore, the site is not available to the developer because the City Council will not sell it. Suitable access to the site would require the acquisition of residential and community properties in order to deliver access/egress that would meet the needs of a stadium use – this would not be reasonable and there is no reasonable prospect of planning permission being granted to support this. The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.

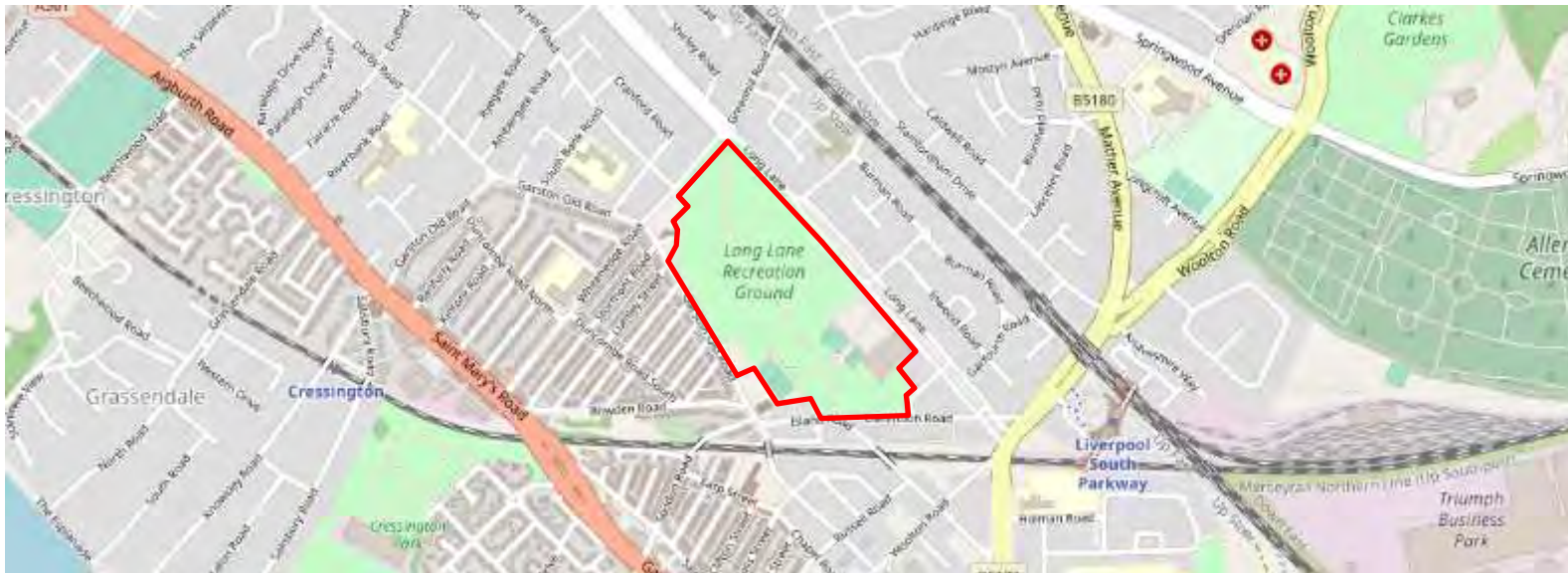
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> As the site is a greenfield site with no history of contamination, it is anticipated that there would not be unaffordable development costs on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is connected to the public transport network, including regular bus services to Liverpool, Halewood, Speke, Garston and Childwall from Smithdown Road, and additional services to Liverpool, Windmill Hill, Halewood, Woodlands, Palace Fields and Widnes from the High Street. Wavertree Technology Park sits 750m north of the site and gives the site access Northern Rail services to Liverpool Lime Street, Wigan North Western, Warrington Bank Quay and Crewe.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> Subject to mitigation and investigation. There are not considered to be any unacceptable environmental or visual impacts that would prevent the redevelopment of the site, subject to an appropriate design solution to mitigate any impact on the setting of the Wavertree Village Conservation Area or listed buildings in the vicinity.
Summary and Conclusions <i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i>	Summary Assessment In summary, the key considerations when assessing the site include: <ul style="list-style-type: none"> Availability – the site is owned by Liverpool City Council who is committed to retaining the site as an important community recreation asset, including the provision of active playing fields. LCC will not consider the sale of the site to Everton and therefore the site is not available. Planning policy constraints – the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality – there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. Liverpool’s Open Space Assessment (2017) recognises that Wavertree Playground as a Park and Garden which has both a high-quality score and a high value score with a secondary function as a green corridor. Wavertree Playground also helps to serve the gap in the provision of amenity greenspace and natural/semi-natural space. In addition, the site contains a range of community uses including Liverpool Harriers and Athletic Club alongside associated running track, Wavertree Bowling Green, Kiddy Academy Wavertree, the Harthill Youth Centre, Liverpool Tennis Club, Grange Court Sheltered Housing Scheme and Liverpool Aquatics Centre. LCC has stated that it would not favourably consider a planning application for a stadium development on a high value community open space and recreational asset. 	



- Location and access — the site is surrounded on all sides by residential and community uses with no suitable access — development of the site would require the acquisition of residential and community properties in order to deliver access/egress that would meet the needs of a stadium use. The site is also in a location that could generate significant amenity issues with surrounding residential areas.
- Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario.

Conclusion & Comparison with BMD



The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available**. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.


Site 41: Long Lane Recreation Ground


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
Site Outline	
Site Details	
Site Area	The site is approximately 13.9 hectares.
Existing Site Uses	The site contains Open Space, Garston Park, a play area, two bowling greens, 11 aside and 5 aside football playing fields, public footpath, and a leisure centre with associated swimming pool and sports hall.
Surrounding Uses	<ul style="list-style-type: none"> To the north lies semidetached residential units and Gilmour Southbank Infant School To the west lies Gilmour Junior School, terraced residential units and Garston Park Church. To the south lies a railway line, St Francis of Assisi Church, detached and semidetached residential units.

	<ul style="list-style-type: none"> To the east lies detached and semidetached residential units and a railway line. 	
<i>Site Ownership</i>	The sites freeholder is Liverpool City Council and two leaseholders exist on the site – Cadent Gas Limited and SP Manweb PLC.	
Planning Policy		
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> Policies OE11 & OE12 - Green Space, and Policy C8 - Existing Sports/Recreation Centre. 	
<i>Emerging Policy</i>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> Policies GI 1 & GI 3 - Open Space. 	

<i>National Policy and Other Material Considerations</i>	<p>NPPF (2019)</p> <p><u>Community</u></p> <p>Paragraph 92 (c) seeks to safeguard social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p>
	<p>Sports England</p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • and which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.
	<p>Liverpool Open Space Assessment (2017)</p> <p>The Open Space Assessment recognises Long Lane Recreation Ground as the largest Amenity Green Space in the city which is considered to have both a high quality and a high value score. Long Lane Recreation Ground has the highest scoring site for quality and one of the highest scoring in terms of value in all of the amenity greenspaces in Liverpool.</p>

Statutory Designations		
<i>Heritage</i>	No listed buildings or monuments sit on the site or in close proximity to the site.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site sits within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	It is not considered that there are any ecology designations that would prevent the development of the site.	
<i>Landscape</i>	It is not considered that there are any landscape designations that would prevent the development of the site.	

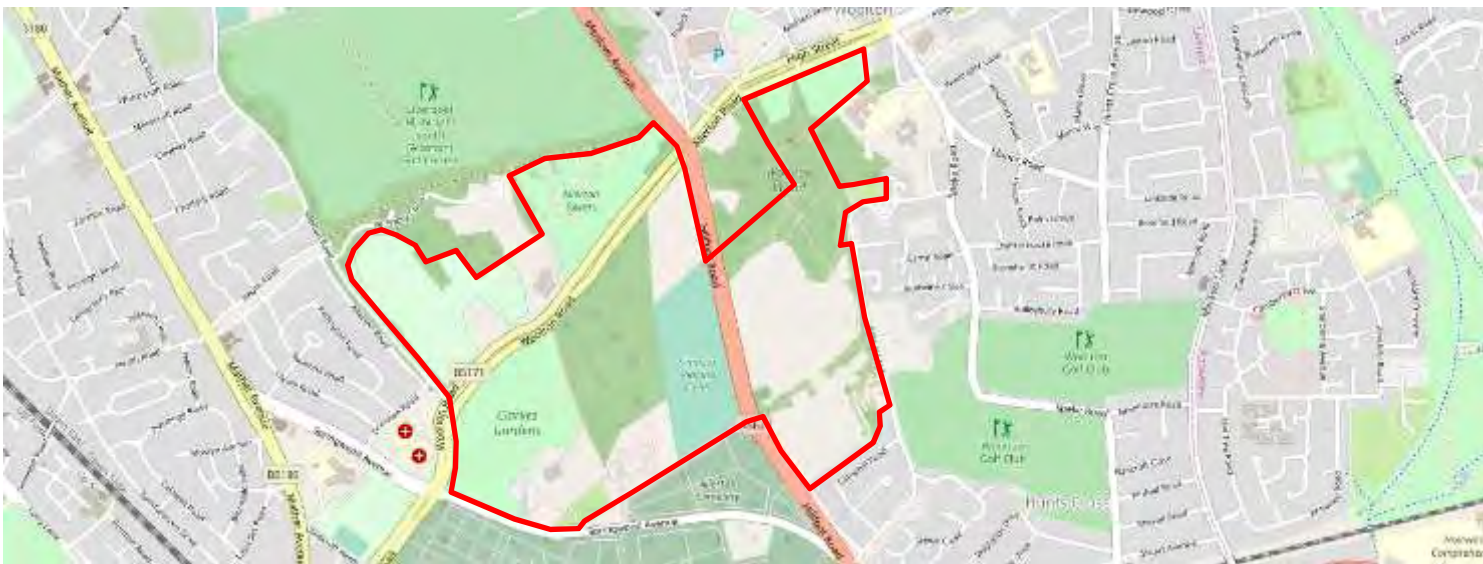
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	n/a	
<i>Socio-Economic Profile</i>	<p>The site sits across two LSOAs (pictured), in 2019:</p> <ul style="list-style-type: none"> • The first LSOA has an IMD ranking of 3,553 out of 32,844 LSOAs in England (20% most deprived) and an Employment Deprivation Domain of 4,924 out of 32,844 LSOAs in England (20% most deprived). • The second LSOA has an IMD ranking of 2,874 out of 32,844 LSOAs in England (10% most deprived) and an Employment Deprivation Domain of 3,917 out of 32,844 LSOAs in England (20% most deprived). 	 <p>IMD Explorer, 2019</p>
Planning and Development Context		
<i>Planning History</i>	<ul style="list-style-type: none"> ▪ There are no relevant recent planning applications 	
<i>Development Status</i>	<p>Major developments within the surrounding area include Morris Homes Limited development of 83 homes at Ollerton Grange and Liverpool Mutual Homes proposed development of 27 apartments at Ivy Mews.</p>	
<i>Landowner / Developer Aspirations</i>	<ul style="list-style-type: none"> ▪ LCC consider the site as a high value community open space and recreational asset which the Council wish to retain. 	


Accessibility	
<i>Access to National Network</i>	The site borders Long Lane which provides access to Liverpool within 11km and J6 of the M62 and J1 of the M57 within 10km.
<i>Access to Public Transport Nodes</i>	Several bus stops sit along Long Lane which provides regular services to Liverpool, Belle Vale and Speke. Liverpool South Parkway is located approximately 400m to the east of the site which is connected to the Merseyrail network and National Rail networks connecting the site to Chester, Liverpool Lime Street, Norwich, Manchester Oxford Road and Manchester Airport.
<i>Pedestrian and Cycle Accessibility</i>	<p>The site borders Garston Old Road where an On-road signed cycle route is provided.</p>  <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	The site is accessed via Long Lane, which is a local road only. Any major events in this location would have a significant adverse impact on the local highways network in terms of access and egress. In addition, the site is surrounded on all sides by residential uses.
Fit with Everton's Requirements	
<i>Connection to North Liverpool</i>	The site does not possess any cultural ties with Everton and is located approximately 10km away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.
<i>Iconic Location</i>	The site is surrounded by residential area of Garston and would not provide an iconic location.


Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of a sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and as Green Infrastructure and Open Space in the emerging Local Plan (Policy GI1 and GI3), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities). In terms of its use and quality, the site is considered as High Value Green Space as the Liverpool City Council Open Space Assessment Report and Standards April 2017 identifies the site as having both a high quality and a high value. Long Lane Recreation Ground has one of the highest scoring site for quality and one of the highest scoring in terms of value in all of the amenity greenspaces in Liverpool. A stadium development could generate a significant impact on the amenity of the surrounding community – the site is bounded on all sides by residential development. There is the potential to generate a significant impact on the amenity of the surrounding community in terms of traffic, noise, visual impact and event day disruption.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned by LCC and is an important community resource which would not be considered for redevelopment. The site contains a range of community uses and recreation uses including a swimming pool, sports hall, football pitches and a play area, which the Council wish to retain. The site is therefore, not available to the developer because LCC will not consider its sale. The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> As the site is a greenfield site with no known history of contamination, it is anticipated that there would not be unaffordable development costs on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is well connected to the public transport network, including regular bus services to Liverpool, Belle Vale and Speke Liverpool South Parkway is located approximately 400m to the east of the site which is connected to the Merseyrail network and National Rail networks connecting the site to Chester, Liverpool Lime Street, Norwich, Manchester Oxford Road and Manchester Airport.

<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> There are not considered to be any unacceptable environmental or visual impacts that would prevent the redevelopment of the site.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as an important community recreation asset, including the provision of active playing fields. LCC will not consider the sale of the site to Everton and therefore the site is not available. In addition, the site is inaccessible, and it would be likely properties would need to be acquired to allow suitable access to the site — requiring land assembly and potentially CPO. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. Liverpool’s Open Space Assessment (2017) recognises Long Lane Recreation Ground a large Amenity Green Space in the city which is considered to have both a high quality and a high value score. Location and access — the site is surrounded on all sides by residential and community uses with no suitable access. The development of the site would require the acquisition of residential or community properties in order to deliver access/egress that would meet the needs of a stadium use. The site is also in a location that could generate significant amenity issues with surrounding residential areas. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club’s historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.</p>	

Site 42: Allerton Park

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 98.5 hectares.
<i>Existing Site Uses</i>	The site contains Open Space, Woodlands, Hillfort Road (A562), Woolton Road, Leonard Cheshire Disability (residential care company), Woolton Manor Care Home, Allerton Hall Farm Dining & Carvery, Deadman's Valley, Woolton Woods/Camphill, Woolton woods Botanical Gardens, Allerton Tower Park, Merseyside Youth Challenge Trust, Springwood Crematorium and the Simpson Ground which contains an artificial and 11-a-side grass football pitches.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies Allerton Golf Course, Tesco Superstore, terraced residential units, St. James Church and several retail units along Allerton Road. To the west lies Allerton Priory Estate, Springwood Heath Primary School, St Michaels Nursing Home and semidetached residential units. To the south lies Allerton Cemetery and semidetached residential units. To the east lies Woolton Golf Club, St. Julie's Catholic High School and semidetached residential units.

<i>Site Ownership</i>	<p>The sites freeholders include:</p> <ul style="list-style-type: none"> • Liverpool City Council; • SP Manweb PLC; • Leonard Cheshire Disability; • Redrow Homes Limited; and • Three unknown freeholders (MS340371, MS342284, MS360254, MS586781 and MS648850) <p>Three leasehold titles also exist on the site which include:</p> <ul style="list-style-type: none"> • SO Manweb PLC, • Spirit Pub Company (Managed Limited) • Unknown (MS618362)
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy OE3 - Green Wedge, • Policy OE 5 & OE 6 - a site of Nature Conservation Value, • Policy OE7 - a Potential Local Nature Reserve, • Policy OE11 & OE12 - Green Space, and • Policies HD7 to HD14 - Woolton Village Conservation Area. 

<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy GI 1 & GI 2 - Green Wedge, • Policy GI 1 & GI 5 - Local Nature Reserve, • Policies GI 1 & GI 5 - Local Wildlife Site, • Policies GI 1 & GI 3 - Open Space, and • Policy HD1 - Woolton Village Conservation Area. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p><u>NPPF</u></p> <p><u>Community</u></p> <p>Paragraph 92 (c) seeks to safeguard social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ol style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Belt</u></p> <p>Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, paragraph 144 requires that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p>	

	<p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> • grade II listed buildings, or grade II registered parks or gardens, should be exceptional; • assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p>Sports England</p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions. <p>Liverpool's Open Space Assessment (2017)</p> <p>The Open Space Assessment identifies the site as two Parks and Gardens, Woolton Woods / Camphill and Allerton Tower. Both Parks and Gardens are identified as having a high quality and a high value. Woolton Woods also has a noticeable secondary function as a green corridor.</p>
--	--

Liverpool's Strategic Green and Open Spaces Review (2016)


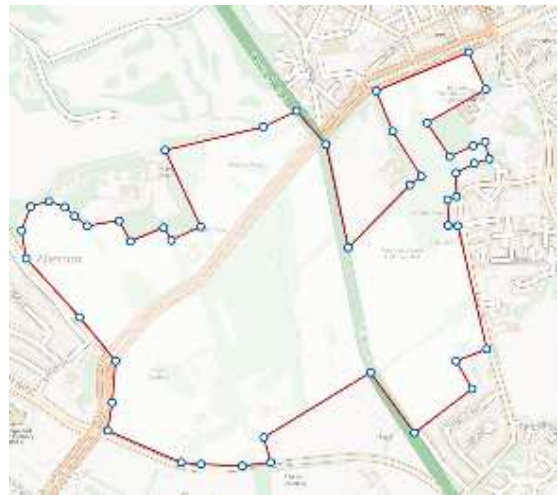
The Strategic Green and Open Space Review states that through the FA's Investment Programme, Liverpool's Playing Pitch Strategy aims to:



- Determine the future requirements of sites/pitches where there is currently no recorded football play and/or spare capacity at education sites to address overplay on senior, youth and mini pitches;
- Identify strategic grass pitch sites and improve football pitch quality in order to increase capacity to accommodate unmet and future demand for youth 11 vs 11 and adult 11 vs 11 football;
- Meet a current shortfall of one full size 3G (third generation) Artificial Grass Pitches (AGPs) to service unmet demand for football in the north of the city; and
- Deliver a phased implementation of new 3G Artificial Grass Pitches (AGPs) and changing facilities on strategic hub sites to meet the FA Chairman's England Commission priorities and be the catalyst to address shortfalls in provision in the city e.g. shortfall of adult pitches in the south of the city.

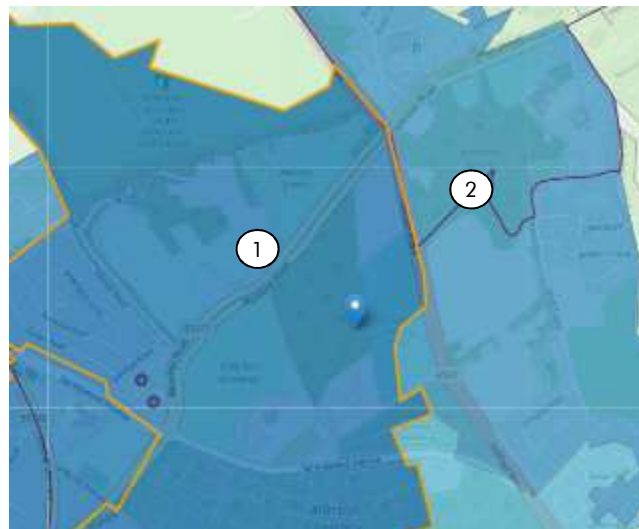
To achieve this the City Council have entered in an investment partnership with the Football Association, the Premier League and Sport England. The external parties committed a funding contribution of £12.6 million and the City Council committed a capital contribution of £4.4 million, totalling £17 million. The funds from the investment partnership are committed to the development and construction of the new third generation (3G) pitches and ancillary facilities.


The FA model is based around all grass roots football delivery in an area being focused on floodlit 3G pitches and a small number of high-quality grass pitch hub sites. The ownership of the improved sites after the investment has been undertaken would be transferred from council ownership to a new city-wide local delivery vehicle (Football Trust) responsible for maintenance and management of football in the city.

The proposal in Liverpool is to invest in up to 4 hub sites across the city; each consisting of three floodlit artificial grass pitches, three grass pitches, associated changing provision and extensive car parking. The sites that have been identified are Jeffrey Humble Playing Fields, Heron Eccles Playing Fields, Jericho Lane Playing Fields and the Simpson Ground which sits on the site.

Statutory Designations		
<i>Heritage</i>	Six Grade II listed buildings and monuments sit on the site and the Grade II* listed Allerton Hall.	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	The site is located within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>

<p><i>Ecology</i></p>	<p>Habitats located on site include Priority Habitat Inventory - Deciduous Woodland and National Forest Inventory – Broadleaved.</p>	 <p>Magic Maps, 2019</p>
<p><i>Landscape</i></p>	<p>Statutory land-based designations which affect the site include Allerton Local Nature Reserve.</p>	 <p>Magic Maps, 2019</p>

Strategic and Regeneration Context				
Strategic and Regeneration Policy	n/a			
Socio-Economic Profile	<p>The site sits across two LSOAs (pictured), in 2019 the first LSOA has an IMD ranking of 5,200 out of 32,844 LSOAs in England (20% most deprived) and an Employment Deprivation Domain of 5,454 out of 32,844 LSOAs in England (20% most deprived).</p> <p>The second LSOA in 2019 has an IMD ranking of 9,749 out of 32,844 LSOAs in England (30% most deprived) and an Employment Deprivation Domain of 7,851 out of 32,844 LSOAs in England (30% most deprived).</p>			 <p>IMD Explorer</p>
Planning and Development Context				
Planning History	Recent planning applications are outlined below:			
	Application Number	Date	Decision	Details
	160/1191	21-02-2018	Refused (10-01-2017) - appealed – appealed allowed	Outline application for up to 160 dwellings and open space with all matters reserved except for access.
	17L/1378	01-08-2017	Approve with Conditions	To carry out internal alterations

	17F/1654	01-08-2017	Approve with Conditions	To install new scissor lift, extend patio/paved areas, erect play equipment and paint boundary treatments
	16F/1049	31-10-2016	Approve with Conditions	To install 3no. 3G artificial grass pitches with associated flood lighting, fencing, car parking, boundary treatments and changing room building following demolition of existing changing pavilion
Development Status	There are no major recent developments in the vicinity of the site.			
Landowner / Developer Aspirations	Although a small part of the site is within Redrow’s ownership and their aspirations are to develop this site it for residential, the remainder of the site is within the ownership of Liverpool City Council which is committed to retaining the site in its current use as publicly accessible open space and Green Wedge.			
Accessibility				
Access to National Network	Hillfoot Road runs through the site and gives the site access to Liverpool within 13km and J5 of the M62 within 6km.			
Access to Public Transport Nodes	Two bus stops sit along Allerton Road which lies north east of the site and provides regular services to Liverpool, Speke, Halewood and Belle Vale. 700m to the south west of the site sits Liverpool South Parkway train station and 800m to the south east sits Hunts Cross train station. Liverpool South Parkway is connected to the Merseyrail network and National Rail networks connecting the site to Chester, Liverpool Lime Street, Norwich, Manchester Oxford Road and Manchester Airport. Hunts Cross provides Mersey Rail Services and National Rail Services which connect the site to Liverpool Lime Street and Manchester Oxford Road.			
Pedestrian and Cycle Accessibility	Off-road cycle routes border the site to the north west and connect the site to footpaths through Allerton Manor Golf Club.			
Mersey Travel Cycle Maps, 2017				

Highways Capacity and Access	<ul style="list-style-type: none">Access to the site would be achievable via the A562.	
Fit with Everton's Requirements		
Connection to North Liverpool	The site does not possess any cultural ties with Everton and is located approximately 6.2 miles away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.	
Iconic Location	The site would not provide an iconic location.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment — to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The Site is allocated as Green Wedge, Green Space, a Site of Nature Conservation Value and a Potential Local Nature Reserve (Policies OE3, OE5, OE6, OE7, OE11 & OE12) in the adopted UDP and Open Space, Green Wedge, Local Nature Reserve and a Local Wildlife Site (Policy GI1, GI2, GI3 and GI5) in the emerging Local Plan, which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101).The site is allocated within a Conservations area (Policies HD7 to HD14) in the adopted policy and Clarke's Gardens form a major part of the site which is a public park, with the Grade II* listed Allerton Hall at its heart. There would be major implications for the design/massing/siting of a stadium in this location due to the impact on the listed building and its setting.In terms of its use and quality, Liverpool City Council's Open Space Assessment Report and Standards (2017) identifies both Woolton Woods / Camphill and Allerton Tower as a 'high-quality' park and garden with a 'high value' attached to it from the community.In terms of its use and quality, site is identified as Green Space and is an important community recreation asset. A new state of the sports facility has opened at Jericho Lane Football Ground as part of a £17m investment partnership to improve grassroots football in Liverpool (Parklife Project).

		<ul style="list-style-type: none"> Part of the site to the north and west owned by Redrow Homes NW and Allerton Priors LLP (Land off Woolton Road, Allerton, Liverpool) has recently been granted planning permission at appeal for the development of up to 160 residential units. The Inspector found that although the site is located in the Green Wedge, and the proposal would reduce the physical separation between existing built up areas, there would be little or no harm in respect of many of the requirements of the policy. It notes that the site is not used for recreational purpose, is privately owned and views into the site area limited (which is in contrast to other more valuable areas of the park). The Council's intentions for this site were clear in its refusal of the initial planning application, which generated significant local opposition.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The majority of the site is owned by the Council, who view the remainder of Allerton Park as an important community resource that should be protected from development. LCC wish to retain the current use of the site and will not consider the sale of the site (in its ownership) to Everton and therefore the site is not available. The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> As the site is a greenfield site with no known history of contamination, it is anticipated that there would not be unaffordable development costs on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is connected to the public transport network with regular bus services to Liverpool, Speke, Halewood and Belle Vale via Allerton Road and regular train services via Liverpool South Parkway train station and Hunts Cross train station. Liverpool South Parkway is connected to the Merseyrail network and National Rail networks connecting the site to Chester, Liverpool Lime Street, Norwich, Manchester Oxford Road and Manchester Airport. Hunts Cross provides Mersey Rail Services and National Rail Services which connect the site to Liverpool Lime Street and Manchester Oxford Road.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> Subject to mitigation and investigation. There are likely to be significant environmental impacts relating to the loss of a Wildlife Site/Nature Reserve and visual impacts relating to the openness of the Green Wedge and the impact on the Grade II* listed building (Allerton House) that would prevent the redevelopment of the site.

Summary and Conclusions

Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?

Summary Assessment


In summary, the key considerations when assessing the site include:



- Availability — the high-quality areas of the site are publicly accessible, and are owned by the Council, and are not available for sale. Part of the site to the north and west is owned by Redrow Homes NW and Allerton Priory LLP (Land off Woolton Road, Allerton, Liverpool) and has recently been granted planning permission at appeal for the development of up to 160 residential units. The Inspector found that although the site is located in the Green Wedge, and the proposal would reduce the physical separation between existing built up areas, there would be little or no harm in respect of many of the requirements of the policy. It notes that the site is not used for recreational purpose, is privately owned and views into the site area limited (which is in contrast to other more valuable areas of the park). The Council's intentions for this site were clear in its refusal of the initial planning application, which generated significant local opposition. LCC will not consider the sale of the site (in its ownership) to Everton and therefore the site is not available.
- Planning policy constraints — the site is allocated as Green Wedge, open space (including playing pitches), as a Local nature /wildlife site and partially within a conservation area (containing a number of listed buildings) — in both then adopted and emerging development plans. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere.
- Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a "real world" scenario.

Conclusion & Comparison with BMD

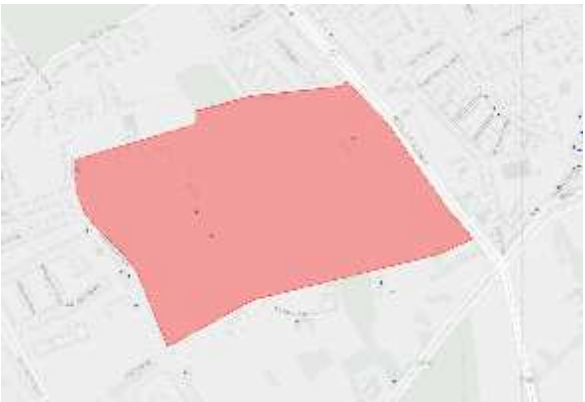

- The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however **the key consideration is that the site is not available**. The site is also in a location where the Club would not consider relocation in a "real world" scenario and does not represent a better or more realistic option than BMD.



Site 43: Allerton Golf Course

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 51.9 hectares
<i>Existing Site Uses</i>	The site contains Allerton Golf Course with associated buildings, woodlands and open space, The Old Stables Restaurant and Fletcher's Sports Bar.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> • To the north lies Carmelite Monastery, pond open space, woodlands, detached and semidetached residential units. • To the west lies allotments and semidetached residential units. • To the south lies Allerton Priory Estate, Merseyside Youth Challenge Trust, Allerton Tower Park, woodlands and open space. • To the east lies allotments, Tesco Superstore, Reynolds Court retirement living, a 13 storey apartment block and woodlands.


Site Ownership	<p>The sites predominant freeholder is Liverpool City Council however, an unknown freehold title exists on the site - MS350633.</p> <p>The site is predominantly leased to Allerton Golf Trading Limited however, several leasehold titles exist on the site including:</p> <ul style="list-style-type: none">• Arqiva Services Limited,• Fletchers Barn Management Company,• SP Manweb PLC, and• Several unknown leasehold titles (MS353975, MS375570, MS392904 & MS394359).	
Planning Policy		
Adopted Policy	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none">• Policy OE3 - Green Wedge, and• Policies OE11 & OE12 - Green Space.	
Emerging Policy	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none">• Policies GI 1 & GI 3 - Open Space, and• Policies GI 1 & GI 2 - Green Wedge and Local Wildlife Site (Policy GI 1 & GI 5).	

<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Green Belt</u></p> <p>Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, paragraph 144 requires that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> • grade II listed buildings, or grade II registered parks or gardens, should be exceptional; • assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional . <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p>
---	---

Statutory Designations		
<i>Heritage</i>	<p>Four Grade II listed buildings sit on the site named:</p> <ul style="list-style-type: none"> • Lodge to Allerton Park Golf Course, • Obelisk on Lawn to South East of Allerton Golf Club House, • Fletchers Farm House, and • Allerton Golf Club House. <p>Additionally, 9 listed buildings or monuments lie within close proximity to the site including Allerton Priory a Grade II* listed building to the south of the site.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The site is located within Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>

<i>Ecology</i>	Habitats located on the site include Priority Habitat Inventory - Deciduous Woodland and National Forest Inventory - broadleaved woodland.	 <p>Magic Maps, 2019</p>
<i>Landscape</i>	No statutory land-based designations affect the site.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	N/A	
<i>Socio-Economic Profile</i>	<p>The site sits across two LSOAs (pictured), in 2019 the first LSOA has an IMD ranking of 23,114 out of 32,844 LSOAs in England (30% least deprived) and an Employment Deprivation Domain of 21,908 out of 32,844 LSOAs in England (30% least deprived).</p> <p>The second LSOA has an IMD ranking of 5,200 out of 32,844 LSOAs in England (20% most deprived) and an Employment Deprivation Domain of 5,454 out of 32,844 LSOAs in England (20% most deprived).</p>	 <p>IMD 2015 explorer</p>


Planning and Development Context				
<i>Planning History</i>	Application Number	Date	Decision	Details
	19F/1818	25-09-2019 (registered)	-	To refurbish and extend the Listed facade of the Manor House in connection with the creation of a 31 bed hotel incorporating spa and conference facilities and widening of existing access to Allerton Road; To undertake works to, and within golf course comprising:- - erection of single storey detached hotel lodge - erection of part subterranean pavilion incorporating shop and golf related facilities - layout adventure golf course - relocate putting green - layout driving range and erect associated building and 4m high ball catch fencing - reconfigure golf course to form a single 18 hole golf course - creation and retention of new tees and greens with associated irrigation system - create new temporary site accesses - retain security fencing and gates - layout new footpath in connection with diversion of public right of way - layout greenkeepers yard with associated buildings and storage containers - reconfigure and expand car parking across the site
	18L/1721	17-08-2018	Approve with Conditions	To demolish outbuilding
	17F/2259	17-11-2017	Approve with Conditions	To change use to drinking establishment (class A4) and carry out associated external alterations including replacement doors and windows and to install disabled access ramp
	17L/2086	17-11-2017	Approve with Conditions	To carry out refurbishment and repair works and install replacement windows and doors, along with disabled access ramp
	15F/1790	15-03-2016	Approve with Conditions	To erect extension external terrace, raised timber walkway and associated external alterations to clubhouse in connection with creation of new cafe, widen existing vehicular access, create additional 56 parking spaces and lay out associated hard and soft landscaping
<i>Development Status</i>	Limited development activity in the surrounding area other than Redrow Homes development of 160 dwellings at Allerton Priory LLP.			
<i>Landowner/ Developer Aspirations</i>	Until recently (late 2014), it is understood that the course was operated by Liverpool City Council (as owner). Due in part to the City Council's considerable budget cuts from central government, the course has suffered from many years of lack of investment. The Council subsequently sought an experienced and reputable golf operator to take control and assume management of the facility. In November 2014, the Council opted to lease the course to Allerton Golf Trading Ltd. This arrangement secured much private sector funding to improve the facilities (as evidenced by this application and our client's previous applications, all of which have been implemented). It is clear that there is significant current investment into the enhancement of Allerton Golf Club, which is operational and in use.			



Accessibility		
Access to National Network	The site borders Menlove Avenue (A562) which connects the site to Liverpool within 12 km and J5 of the M62 within 6 km.	
Access to Public Transport Nodes	Two bus stops sit on the adjacent to the site on Menlove Avenue and provide regular services to Liverpool and Halewood. West Allerton station is located approximately 1 mile to the west of the site providing services to Liverpool Lime Street and Manchester Oxford Road.	
Pedestrian and Cycle Accessibility	Footpaths are provided through the site; off-road cycle tracks are provided to the south of the site and on-road signed cycle routes are provided to the north via Yew Tree Road.	 <p>Mersey Travel Cycle Maps, 2017</p>
Highways Capacity and Access	Access to the site would be achievable via the A562.	
Fit with Everton's Requirements		
Connection to North Liverpool	The site does not possess any cultural ties with Everton and is located approximately 6 miles away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.	
Iconic Location	The site would not provide an iconic location.	

Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none"> The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> The Site is allocated as Green Wedge and Green Space (Policies OE3, OE11 & OE12) in the adopted UDP and Open Space and Green Wedge (Policy GI1, GI2 and GI3) in the emerging Local Plan, which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and Sport England tests. The site contains four Grade II listed building where any impacts would require clear and convincing justification.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> The site is owned by Liverpool City Council, with the Golf Club being a long leaseholder. It is anticipated that the Council will retain the golf club and continue to allow Allerton Gold Club to make upgrades and invest in the site in the coming years – which is demonstrated by the proposed investment into A 31-bed hotel incorporating spa and conference facilities. Fundamentally, the site is not considered to be available. The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> As the site is a greenfield site with no known history of contamination, it is anticipated that there would not be unaffordable development costs on the site.


<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> This site is reasonably well connected to the public transport network with regular bus services to Liverpool and Halewood and Belle Vale via Menlove Avenue. West Allerton station is located approximately 1 mile to the west of the site providing services to Liverpool Lime Street and Manchester Oxford Road.
<i>Would there be any unacceptable environmental or visual impacts?</i>	No	<ul style="list-style-type: none"> Subject to investigation and mitigation. There are likely to be unacceptable impacts relating to the impact on the Grade II listed building (Manor House) that could generate significant issues with the redevelopment of the site for a stadium, as well as an impact on the openness and integrity of the Green Wedge.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council, with the Golf Club being a long leaseholder. The golf club is currently investing in Allerton Golf Club — which is demonstrated by the proposed investment into A 31 bed hotel incorporating spa and conference facilities. LCC will not consider the sale of the site (in its ownership) to Everton and therefore the site is not available. Planning policy constraints — the site is allocated as Open Space and Green Wedge, open space in both then adopted and emerging development plans. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. The site is also centred around a Grade II listed building where any impacts would require clear and convincing justification. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.</p>	



Site 44: Heron Eccles Playing Field

ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 14.2 hectares.
<i>Existing Site Uses</i>	The site contains Merseyside Youth Association, sports playing fields, changing pavilion, open space and new 3G pitches.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies semidetached residential units, allotments and Geoffrey Hughes Memorial Ground. To the west lies a railway line and semidetached residential units. To the south lies West Allerton train station, Booker Avenue Infant School, Robin Hood's Stone (a scheduled monument) and beyond this, semidetached residential units. To the east lies Calderstones School Playing Fields and semidetached residential units.
<i>Site Ownership</i>	The sites freeholder is Liverpool City Council.


Planning Policy		
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policies OE11 & OE12 - Green Space. 	
<i>Emerging Policy</i>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policies GI 1 & GI 3 - Open Space. 	
<i>National Policy and Other Material Considerations</i>	<p>NPPF (2019)</p> <p><u>Community</u></p> <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Open Space</u></p>	

	<p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> A. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or B. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or C. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p> <p><u>Residential Amenity</u></p> <p>Paragraph 180 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.</p> <p>Sports England</p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions. <p>Liverpool's Strategic Green and Open Spaces Review (2016)</p> <p>The Strategic Green and Open Space Review states that through the FA's Investment Programme, Liverpool's Playing Pitch Strategy aims to:</p> <ul style="list-style-type: none"> • Determine the future requirements of sites/pitches where there is currently no recorded football play and/or spare capacity at education sites to address overplay on senior, youth and mini pitches; • Identify strategic grass pitch sites and improve football pitch quality in order to increase capacity to accommodate unmet and future demand for youth 11 vs 11 and adult 11 vs 11 football; • Meet a current shortfall of one full size 3G (third generation) Artificial Grass Pitches (AGPs) to service unmet demand for football in the north of the city; and • Deliver a phased implementation of new 3G Artificial Grass Pitches (AGPs) and changing facilities on strategic hub sites to meet the FA Chairman's England Commission priorities and be the catalyst to address shortfalls in provision in the city e.g. shortfall of adult pitches in the south of the city.
--	---

	<p>To achieve this the City Council have entered in an investment partnership with the Football Association, the Premier League and Sport England. The external parties committed a funding contribution of £12.6 million and the City Council committed a capital contribution of £4.4 million, totalling £17 million. The funds from the investment partnership are committed to the development and construction of the new third generation (3G) pitches and ancillary facilities.</p> <p>The FA model is based around all grass roots football delivery in an area being focused on floodlit 3G pitches and a small number of high-quality grass pitch hub sites. The ownership of the improved sites after the investment has been undertaken would be transferred from council ownership to a new city-wide local delivery vehicle (Football Trust) responsible for maintenance and management of football in the city.</p> <p>The proposal in Liverpool is to invest in up to 4 hub sites across the city; each consisting of three floodlit artificial grass pitches, three grass pitches, associated changing provision and extensive car parking. The sites that have been identified are Jeffrey Humble Playing Fields, Heron Eccles Playing Fields, Jericho Lane Playing Fields and the Simpson Ground.</p>	
Statutory Designations		
Heritage	<p>No listed buildings or monuments sit on the site or in the immediate vicinity of the site however, Robin Hood's Stone, a scheduled monument, sits in close proximity to the south of the site.</p>	 <p>Historic England Map Search, 2019</p>

<i>Flood Risk</i>	The site falls within Flood Zone 1.	 <p>Flood Map for Planning, 2019</p>
<i>Ecology</i>	There are not considered to be any ecological designations that would prevent the development of the site.	
<i>Landscape</i>	No statutory land-based designations affect the site.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	n/a	
<i>Socio-Economic Profile</i>	The site sits across one LSOA which has an IMD ranking of 23,378 out of 32,844 LSOAs in England (30% least deprived) and an Employment Deprivation Domain of 20,813 out of 32,844 LSOAs in England (40% least deprived).	 <p>IMD 2019 explorer</p>

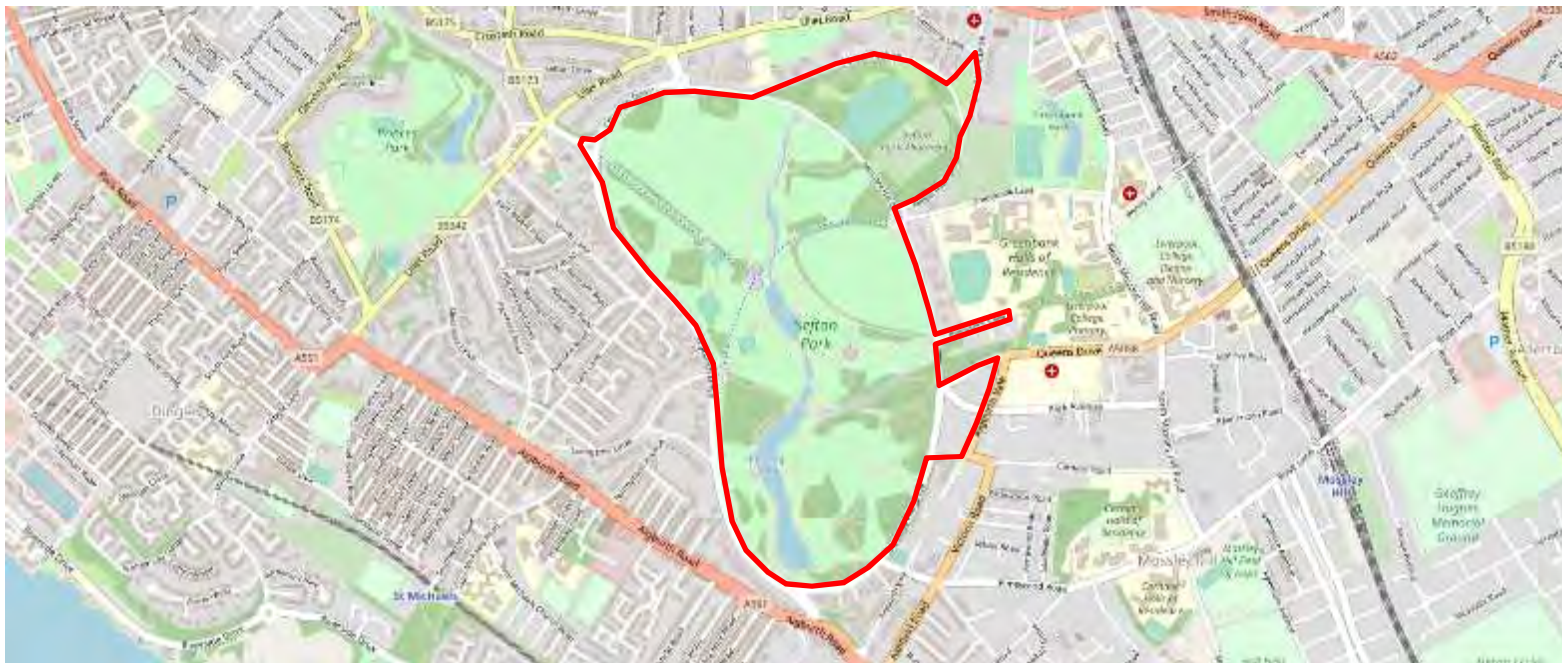
Planning and Development Context				
Planning History	Recent planning applications are outlined below:			
	Application Number	Date	Decision	Details
	17F/2335			To vary condition 2(i) attached to 16F/1903 (To extend existing changing pavilion incorporating clubroom install 3, 3G artificial pitches together with 15m high floodlighting, perimeter fencing, hardstanding, extend car park to provide additional parking and create mounding to the rear of properties in Greenhill Road and Greenhill Close) so as to retain excavation material on site through the creation of low mounding **Revised mounding details including removal of previously proposed mound adjacent to railway**
	16F/1903	23-11-2016	Approve with Conditions	To extend existing changing pavilion incorporating clubroom install 3, 3G artificial pitches together with 15m high floodlighting, perimeter fencing, hardstanding, extend car park to provide additional parking and create mounding to the rear of properties in Greenhill Road and Greenhill Close.
Development Status	There are no recent major developments in the surroundings area of the site.			
Landowner / Developer Aspirations	The site is within the ownership of Liverpool City Council which is committed to retaining the site in its current use as playing fields. There has been significant investment in this site in recent years through the upgrading of the facilities provided – including the development of new 3G pitches.			
Accessibility				
Access to National Network	The site is accessed via Abbottsley Avenue located in a predominantly residential area which connects the site to Booker Avenue via Greenhill Road linking the site to Liverpool within 11km and J4 of the M62 within 5 km.			
Access to Public Transport Nodes	Mather Avenue sits 175m to the east of the site and provides two bus stops which provide services to Liverpool, Garston and Speke. West Allerton Train Station sits 140m south of the site and gives the site access to Liverpool Lime Street and Manchester Oxford Road.			


<i>Pedestrian and Cycle Accessibility</i>	Booker Avenue is located to the south of the site and provides an on-road signed cycle route.	 <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	The site is in a residential area with local level access only. It is surrounded on all sides by residential and community uses with no suitable access — development of the site would require the acquisition of residential or community properties in order to deliver access/egress that would meet the needs of a stadium use.	
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>	The site does not possess any cultural ties with Everton and is located approximately 6 miles away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.	
<i>Iconic Location</i>	The site would not provide an iconic location.	
Site Assessment Summary		
<i>Is the site large enough for the proposed stadium and parking?</i>	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking — however, there is no suitable access and further acquisition would likely be required.


<i>Are there any overriding site-specific planning issues?</i>	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none"> ▪ The Site is allocated as Green Space and for Recreational Uses (Policy OE11 and OE12) in the adopted UDP and Green Infrastructure and Open Space in the emerging Local Plan (Policy G11 and G13), which seeks to protect the City's green spaces for recreational and community uses. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies; as well as the NPPF with regard to the loss of open space (pp's 96-101) and the tests of Sport England (for playing pitches and sports facilities). ▪ In terms of its use and quality, site is identified as Green Space and is an important community recreation asset. A new state of the sports facility has opened part of a £17m investment partnership to improve grassroots football in Liverpool (Parklife Project). ▪ A stadium development could generate a significant impact on the amenity of the surrounding community – the site is bounded on all sides by residential development. There is the potential to generate a significant impact on the amenity of the surrounding community in terms of traffic, noise, visual impact and event day disruption.
<i>Is site acquisition a realistic proposition?</i>	No	<ul style="list-style-type: none"> ▪ The site is within the ownership of Liverpool City Council which is committed to retaining the site in its current use as playing fields. There has been significant investment in this site in recent years through the upgrading of the facilities provided – including the development of new 3G pitches. Heron Eccles Playing Fields are identified within the Open Space Strategy 2016 as one of four key hubs around Liverpool which will receive investment from the Council and be transferred to a local delivery vehicle (Football Trust) responsible for maintenance and management of such facilities. The upgrades include installation of both artificial and natural grass pitches, changing provision and car parking. The recent planning applications on the site demonstrate this investment. The playing fields are a key asset for LCC therefore, they are not available to the developer because the City Council will not sell it. ▪ The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
<i>Can the stadium be built without incurring unaffordable development costs on the site?</i>	Yes	<ul style="list-style-type: none"> ▪ As the site is a greenfield site with no known history of contamination, it is anticipated that there would not be unaffordable development costs on the site.
<i>Is the site accessible by sustainable modes of transport?</i>	Yes	<ul style="list-style-type: none"> ▪ This site is connected to the public transport network with regular bus services via Mather Avenue 175m to the east of the site which provides services to Liverpool, Garston and Speke. ▪ West Allerton Train Station sits 140m south of the site and gives the site access to Liverpool Lime Street and Manchester Oxford Road. ▪ However, there is no suitable access to the site.

<p><i>Would there be any unacceptable environmental or visual impacts?</i></p>	<p>No</p>	<ul style="list-style-type: none"> There are not likely to be any unacceptable environmental or visual impacts relating to the redevelopment of the site for a stadium development.
<p>Summary and Conclusions</p> <p><i>Is the site considered feasible, practical and realistic proposition and does it have reasonable prospects of obtaining planning permission?</i></p>	<p>Summary Assessment</p> <p>In summary, the key considerations when assessing the site include:</p> <ul style="list-style-type: none"> Availability — the site is owned by Liverpool City Council who is committed to retaining the site as an important community recreation asset, including the provision of active playing fields. LCC will not consider the sale of the site to Everton and therefore the site is not available. In addition, the site is inaccessible, and it would be likely properties would need to be acquired to allow suitable access to the site — requiring land assembly and potentially CPO. Planning policy constraints — the site is allocated as an open space and recreation asset in the adopted and emerging Local Plan. Whilst planning policy and guidance, including the NPPF and Sport England policy, does not strictly preclude development within an important City Park or on existing sports facilities, any development would require convincing justification and mitigation. It would need to be demonstrated that the current use is not required, the loss of the provision would be outweighed by significant benefits or that alternative provision could be provided elsewhere. Usage and quality — there is evidence to suggest that the site is a high quality recreational space that well used and is afforded high value by its community. There has been significant investment in this site in recent years through the upgrading of the facilities provided — including the development of new 3G pitches. Heron Eccles Playing Fields are identified within the Open Space Strategy 2016 as one of four key hubs around Liverpool which will receive investment from the Council and be transferred to a local delivery vehicle (Football Trust) responsible for maintenance and management of such facilities. The upgrades include installation of both artificial and natural grass pitches, changing provision and car parking. Recent planning applications demonstrate the commitment to this investment and the future recreational use of the site. Location and access — the site is surrounded three sides by residential uses and to the west by a rail line - with no suitable access. The development of the site would require the acquisition of residential or community properties in order to deliver access/egress that would meet the needs of a stadium use. The site is also in a location that could generate significant amenity issues with surrounding residential areas. It is also in a location where the development of a stadium would be inappropriate - the development of the site would generate significant issues in what is a suburban residential area of the City. Preference of the Club and its supporters — the site is located outside of the Extended North Liverpool catchment (including Areas 1a and 1b) and is wholly divorced from the Club's historic home and existing community. It is in a location where the Club would not consider relocation in a “real world” scenario. <p>Conclusion & Comparison with BMD</p> <p>The applicant contends that in comparison to BMD, both sites have planning and policy constraints which would need to be addressed to be suitable for a stadium use, however the key consideration is that the site is not available. The site is also in a location where the Club would not consider relocation in a “real world” scenario and does not represent a better or more realistic option than BMD.</p>	

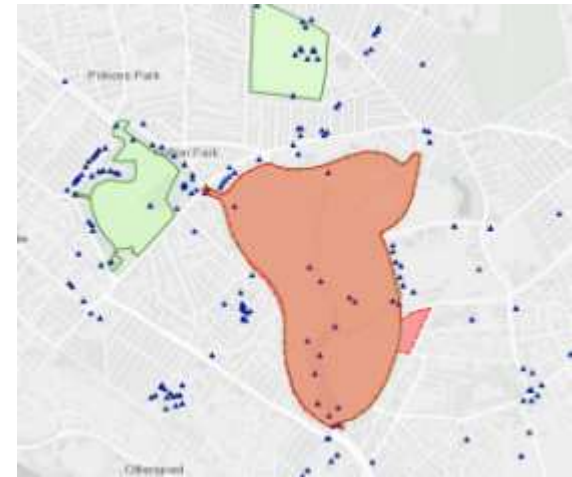

Site 45: Sefton Park


ASSESSMENT CRITERIA	COMMENTS/SUMMARY
<i>Site Outline</i>	
Site Details	
<i>Site Area</i>	The site is approximately 108.8 hectares.
<i>Existing Site Uses</i>	The site contains Open Space, woodlands, a café (Oasis in the Park), Mersey Bowmen Lawn Tennis Club, Sefton Park Obelisk, Sefton Park Cricket Club, Sefton Park Allotments, Sefton Park Palm House, Sefton Park Bowling Club and Sefton Park Lake.
<i>Surrounding Uses</i>	<ul style="list-style-type: none"> To the north lies St Hilda's CE High School, Archdiocese of Liverpool, Jubilee Church Liverpool, Sefton Community Association, St Agnes Field, The Conference Centre at LACE, Liverpool Jewish Housing Association and semidetached and terraced residential units. To the west lies Lark Lane retail units, Christ Church Toxteth Park, detached and semidetached residential units, Sefton Park Library and Tesco Metro.

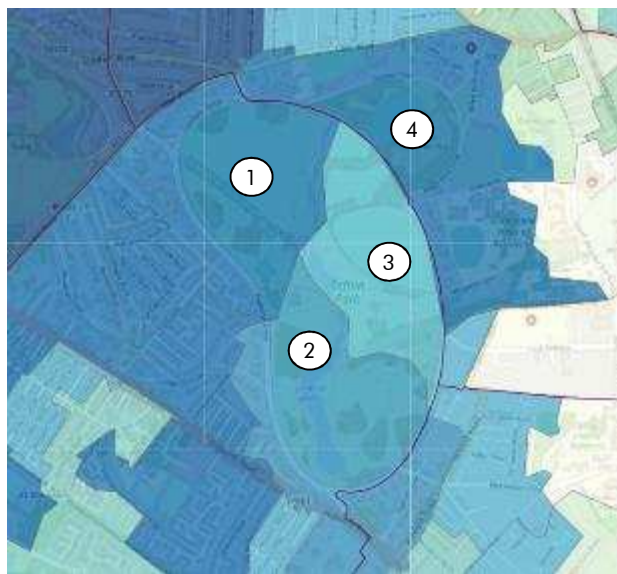
	<ul style="list-style-type: none"> • To the south lies Fulwood Park, Otterspool Park Promenade, Gorselands Court and detached, semidetached and terraced residential units. • To the east lies Greenbank Sports Academy with associated Hall of Residence, Greenbank Allotments, Greenbank Playground Area, Aigburth Vale Playground, Aigburth Peoples Hall, Greenbank Park, Mossley Hill Hospital and terraced residential units.
<i>Site Ownership</i>	<p>The site's freeholder is Liverpool City Council.</p> <p>Five leasehold titles exist on the site with unknown owners (MS433863, MS579823, MS581849, MS631191 & MS682).</p>
Planning Policy	
<i>Adopted Policy</i>	<p>In the Liverpool UDP (2002), the site is allocated as:</p> <ul style="list-style-type: none"> • Policy HD15 - a Historic Park, • Policies OE11 & OE12 - Green Space, • Policy OE5 - a Regionally Important Geological / Geomorphological Site (RIGS), and • Policies HD7 to HD14 - Sefton Park Conservation Area.
	


<p><i>Emerging Policy</i></p>	<p>The Submission Draft of the Liverpool Local Plan (May 2018) proposes to allocate the site as:</p> <ul style="list-style-type: none"> • Policy HD1 - a Historic Park, • Policies GI 1 & GI 5 - Local Wildlife Sites, • Policies GI 1 & GI 5 - Regionally Important Geological/Geomorphological Sites (RIGS), and • Policy HD1 - within Sefton Park Conservation Area. 	
<p><i>National Policy and Other Material Considerations</i></p>	<p>NPPF (2019)</p> <p><u>Open Space</u></p> <p>Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ol style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p>Paragraph 92 (c) seeks to safeguards social, recreational and cultural facilities and services the community needs. Part C guards against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Part (d) goes on to ensure that facilities are retained for the benefit of the community.</p> <p><u>Green Space</u></p> <p>Paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.</p>	

	<p><u>Historic Environment</u></p> <p>Paragraph 192 states that in determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>In considering the impact of a proposal on the significance of a designated heritage asset, paragraph 193 states that great weight should be placed on the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of the level of harm anticipated upon the asset and its significance.</p> <p>Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (should require clear and convincing justification. Substantial harm to or loss of</p> <ul style="list-style-type: none"> • grade II listed buildings, or grade II registered parks or gardens, should be exceptional; • assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. <p>Under paragraph 195, harm has to be outweighed substantial benefits. Where there is less than substantial harm then there is a requirement for that harm to be clearly outweighed by public benefits (paragraph 196 of NPPF).</p> <p><u>Natural Environment</u></p> <p>Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).</p> <p><u>Sport England</u></p> <p>Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> a) all or any part of a playing field, or b) land which has been used as a playing field and remains undeveloped, or c) land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions. <p>Liverpool's City Council Open Space Assessment (2017)</p> <p>The Open Space Assessment identifies Sefton Park as a Park and Garden with provision for children and young people and allotments which also provides natural greenspace functions. Sefton Park is identified as being the second highest ranking Park and Garden in Liverpool and one of three sites which have achieved a Green Flag Award Status. The site also has a high value.</p>
--	---

Statutory Designations		
<i>Heritage</i>	<p>The site is a Grade I listed Park and Garden and contains one Grade II* listed building — Sefton Park Palm House - and 17 further Grade II listed buildings and monuments.</p> <p>Two further Historic Parks and Gardens, Princes Park (Grade II* listed) and Toxteth Park Cemetery (Grade II listed), sit to the north and north west of the site.</p> <p>There is also an abundance of listed buildings and monuments within the immediate vicinity of the site as shown on the adjacent plan.</p>	 <p>Historic England Map Search, 2019</p>
<i>Flood Risk</i>	<p>The pond areas of the site sit within Flood Zone 2, the remainder of the site sits within Flood Zone 1.</p>	 <p>Flood Map for Planning, 2019</p>

<i>Ecology</i>	Key habitats located on the site include Wood pasture and Parkland BAP Priority Habitat, Priority Habitat Inventory - Deciduous Woodland and National Forest Inventory – Broadleaved.	 <p>Magic Maps, 2019</p>
<i>Landscape</i>	There are no statutory land base designations affect the site.	
Strategic and Regeneration Context		
<i>Strategic and Regeneration Policy</i>	N/A	

<i>Socio-Economic Profile</i>	<p>The site sits across four LSOAs (pictured), in 2019 the first LSOA has an IMD ranking of 3,648 out of 32,844 LSOAs in England (20% most deprived) and an Employment Deprivation Domain of 3,879 out of 32,844 LSOAs in England (20% most deprived).</p> <p>The second LSOA in 2019 has an IMD ranking of 9,780 out of 32,844 LSOAs in England (30% most deprived) and an Employment Deprivation Domain of 7,632 out of 32,844 LSOAs in England (30% most deprived).</p> <p>The third LSOA in 2019 has an IMD ranking of 11,662 out of 32,844 LSOAs in England (40% most deprived) and an Employment Deprivation Domain of 12,842 out of 32,844 LSOAs in England (40% most deprived).</p> <p>The fourth LSOA in 2019 has an IMD ranking of 3,714 out of 32,844 LSOAs in England (20% most deprived) and an Employment Deprivation Domain of 4,397 out of 32,844 LSOAs in England (20% most deprived).</p>	 <p>Indices of Deprivation 2015 explorer</p>		
Planning and Development Context				
<i>Planning History</i>	Recent planning applications are outlined below:			
	Application Number	Date	Decision	Details
	17F/0812	28-07-2017	Approve with Conditions	To erect permanent cricket practice nets
	13F/0352	03-04-2013	Approve with Conditions	To carry out external alterations including repairs to roof, replacement windows, new door and rebuild wall of Mersey Bowmen Tennis Club.
<i>Development Status</i>	The recent major developments in the surrounding area include Green Drive Liverpool Limited’s conversion of a synagogue into 58 apartments at Greenbank Synagogue and Redrow Homes development of 34 houses at the Land off Park Avenue.			

<i>Landowner / Developer Aspirations</i>	The site is within the ownership of Liverpool City Council who is committed to retaining the park as a key community asset and one of the most iconic parks in the City.	
Accessibility		
<i>Access to National Network</i>	Aigburth Road lies to the south of the site and connects the site to Liverpool within 6 km and J4 of the M62 within 6 km.	
<i>Access to Public Transport Nodes</i>	<p>Ullet Road to the north of the site provides regular services to Liverpool, Aigburth Vale, Speke, Halewood and Bootle. Additionally, Aigburth Road to the south of the site provides regular services to Liverpool, Bootle, Speke, Garston and Aigburth Vale.</p> <p>800m to the west of the site sits St Michaels train station which provides Merseyrail services which connect the site to Liverpool City Centre and National Rail services.</p> <p>900m to the east sits Mossley Hill train station which provides regular National Rail services to Liverpool Lime Street and Manchester Oxford Road.</p>	
<i>Pedestrian and Cycle Accessibility</i>	Several footpaths are located on the site as well as off-road cycle tracks which includes cycle route 56 and the Trans Pennine Trail which connects the site to central Liverpool and to the east via on-road signed cycle routes and off-road cycle tracks.	 <p>Mersey Travel Cycle Maps, 2017</p>
<i>Highways Capacity and Access</i>	There are multiple potential access points to Sefton Park which link into the strategic highways network	
Fit with Everton's Requirements		
<i>Connection to North Liverpool</i>	The site does not possess any cultural ties with Everton and is located approximately 6km away from Goodison Park. As such, it does not provide a suitable location for Everton in terms of its requirements to stay physically, socially and culturally connected to its home in the North of Liverpool.	

Iconic Location	The site would not provide an iconic location.	
Site Assessment Summary		
Is the site large enough for the proposed stadium and parking?	Yes	<ul style="list-style-type: none">The site is of sufficient size to accommodate a stadium in an east-west or north-south orientation, including the required circulation space and car parking.
Are there any overriding site-specific planning issues?	Subject to further investigation and assessment – to address the relevant national and local policy tests and site specific issues	<ul style="list-style-type: none">The Site is allocated as a Grade I Listed Historic Park (HD15 and HD1) in the adopted and emerging Local Plan, which seeks to protect and enhance Historic Parks and prevent built development on part or all of any green space unless the proposed development can be accommodated without material harm. However, planning policy and the NPPF does not preclude development within a Historic Park. Any substantial harm to the park and its heritage assets would require ‘clear and convincing’ justification whilst any substantial harm would need to be exceptional and weighed against the substantial public benefits.The site is also allocated as greenspace (OE11 and OE12) and open space (GI3) in the adopted and emerging plan respectively. If assessed against adopted or emerging policy, a stadium development would need to address key open space policies as well as the NPPF with regard to the loss of open space (pp’s 96-101).The Liverpool City Council Open Space Assessment Report (2017) identifies Sefton Park as “being of particularly excellent quality” this is recognised by the park having a Green Flag Award status; a national mark for open spaces and is only awarded if they are managed and maintained to a high standard. The loss of Sefton Park would cause Liverpool to lose Liverpool’s second highest quality park (behind Calderstones Park), one of its two Green Flag open spaces, a high value park for the local community.A stadium development could generate a significant impact on the amenity of the surrounding community – the site is bounded on all sides by residential development. There is the potential to generate a significant impact on the amenity of the surrounding community in terms of traffic, noise, visual impact and event day disruption.
Is site acquisition a realistic proposition?	No	<ul style="list-style-type: none">The site is owned by LCC and is considered a key open space asset and an important City Park that serves a large catchment in the south of the City. LCC will not consider the sale of the site to Everton and therefore the site is not available.The site is located outside of Everton's traditional and preferred catchment, with no tangible ties to its historic home and existing community, and is in a location where the Club would not consider relocation in a "real world" scenario. As such, the site is not considered a realistic or reasonable proposition over what is currently proposed.
Can the stadium be built without incurring unaffordable development costs on the site?	Yes	<ul style="list-style-type: none">As the site is a greenfield site with no known history of contamination, it is anticipated that there would not be unaffordable development costs on the site.