

11th February 2016

Chris Ridland
Liverpool City Council,
Planning,
Municipal Building,
Dale Street,
Liverpool
L2 2DH

Dear Chris,

APP NO 15F/2208

**FULL APPLICATION TO DEMOLISH EXISTING BUILDINGS, ERECT THREE (7, 9 AND 14 STOREY) APARTMENT BLOCKS CONTAINING 377 RESIDENTIAL UNITS (C3 USE) GROUND FLOOR COMMUNAL SPACE WITH ASSOCIATED ACCESS, SERVICING, CAR PARKING AND LANDSCAPING.
LAND ON THE CORNER OF BEVINGTON BUSH/GARDENERS ROW/EDGAR STREET, LIVERPOOL L3 6JH**

I write further to your meeting with Mike Ralph regarding the above application and your request for further information.

To keep things simple I have used your email that followed the meeting as a guide for our response.

Your email confirmed that the Local Planning Authority is supportive in principle of residential development with designated off-street car parking provision, however, there are still outstanding matters to address, both procedural and planning-related, before you would be in position to revalidate and re-advertise the application, and recommend it to Planning Committee for favourable determination. They include the following:

Procedural

Provide a summary of changes from the originally submitted application so as to inform a revised description of development, i.e. changes to residential unit types, changes to cycle parking, provision for a self-contained retail unit and basement car parking provision, etc.

I can confirm that the revised description is, 'Full detailed planning application for the demolition of existing buildings and the erection of three 7 - 15 storey blocks of apartments containing 381 units with ground floor communal space, an A1/A3 unit, associated access, servicing, parking and landscaping.'

The main changes from the original application are:

- An additional storey added to Block B (now 15 storeys)
- The inclusion of a basement car park (52 spaces);

- Provision of a self-contained commercial (A1/A3 use) unit;
- An increase to the number of proposed apartments – 381 now proposed;
- Amendments to the mix of units proposed – now 279 x studios, 80 x 1-beds and 22 x 2-beds.

Provide a breakdown of the residential unit types, including accessible accommodation.

This information is included within the revised D&AS.

Provide revised floor plans of Levels 8-13.

A full set of final plans are enclosed on the accompanying CD.

Provide an amended Design & Access Statement with 3D visualisations, which are coloured so as to be clearly distinct from the surrounding white sky.

An updated D&AS is enclosed on the accompanying CD. The updated D&AS submitted includes amended 3D visuals. As discussed 3 new CGI's will follow before Committee.

Provide an amended Design & Access Statement which includes details of landscaping proposals. This will need to include details of landscape concept, planting species, tree pit specification and provision for future maintenance; all informed by a detailed survey of statutory underground services. It will also need to clarify the status of landscaping proposals which lie outside of the red line application site boundary and on adopted highway land.

An updated D&AS including the landscaping details outlined above is enclosed on the accompanying CD. The status of landscaping proposals which lie outside of the red line application site boundary and on adopted highway land is dealt with under the section 'Public Realm and Landscaping'.

Provide a copy of Appendix 2 of the Planning statement, which refers to the previous marketing of the vacant industrial premises on site.

Appendix 2 is included on the enclosed CD.

Submit a revised Transport Statement that has regard to the provision for 55 no. off-street car parking spaces and revised cycle parking / cycle route arrangements, and clarify whether a financial contribution is still being offered up towards the expansion of the City Centre CPZ into this Pumpfields/Limekiln area. You previously indicated in your letter of the 10th December 2015 that a contribution of £20,000 would be made available.

An updated TS is included on the enclosed CD. The revised TS includes reference to the provision of 55 off-street car parking spaces and revised cycle parking/cycle route arrangements. I can also confirm that the applicant reiterates their commitment to the £20,000 contribution and this is also outlined within the revised TS.

Provide details of a designated vehicular servicing bay/lay-by for this development on Gardeners Row, along with details of the management responsibility for refuse disposal/collection.

I can confirm that Figure J542 Bevington Bush Fig 1 within the TS provides details of the vehicle service bay/lay-by and that the document also includes details of the refuse disposal/collection within a servicing strategy.

Provide microclimate modelling of the development relative to potential sunlight/daylight and wind downdraft impacts.

I can confirm that Buro Happold have been instructed to provide desk top assessments on both wind and sun light/day light and that these reports should be available by the middle of next week (17th February).

Planning Merits

Principle

The residential proposal still almost entirely comprises of studios and one bedroom apartments with the exception of 2 no. two bedroom apartments, and this will fail to realise a diverse residential offer that contributes towards a balanced, harmonious and sustainable development. Therefore this proposal cannot genuinely be described as making a positive contribution to the comprehensive regeneration and wider place-making of this Pumpfields/Limekiln area. I would urge you again to reconsider the residential offer and make provision for a greater proportion of 2 and 3 bedroom apartments to ensure a more balanced and sustainable residential community. An overall reduction in residential units would also assist in achieving a higher and more acceptable car parking ratio.

I can confirm that the mix of the proposed development is now 279 x studios, 80 x 1-beds, and 22 x 2-beds (381 total).

We would re-iterate our previous comments in relation to PRS and highlight that, the proposed scheme is a flagship regeneration project that will help to transform Pumpfields and the wider area, generating footfall and additional spending power and helping to support businesses in the city centre. The proposed development has the capacity to potentially attracting circa 400 additional residents to the city centre, thereby contributing to the longstanding policy ambition of repopulating the urban core.

The applicant is seeking to retain the units in long-term ownership for rent. A 'Private Rented' offer works alongside the provision of other tenures in order to attract and retain households and higher earning residents over the long term as well as promoting mixed communities. It is a 'stepping stone' to save and purchase.

The Private Rented Sector (PRS) is increasingly recognised as a distinct asset class within the residential sector. The Government has recently vocalised its support for PRS as a response to the national housing crisis. As demand has outstripped supply, the UK has experienced phenomenal growth in house prices and even higher entrance barriers to owner occupation. PRS is therefore

a marriage of opportunity and need. Combined with significant support from Central Government and its dedicated Taskforce, it is a product with the potential to form a 'release valve' – bridging the affordability gap between traditional forms of 'affordable housing', shared ownership and open market sale.

Although a relatively new concept, PRS could play an important role in meeting Local Authority housing targets. It also promises to provide the market with products that are in high demand and on which many households are increasingly reliant. PRS is therefore extremely helpful in unlocking brownfield sites, expediting regeneration, meeting housing targets and delivering a product for which there is a growing demand and need.

The proposed development of 381 apartments for private rent will help to regenerate an underused site within the City centre and contribute to meeting the City's housing requirement. The proposed development will deliver all the benefits of building high quality long-term homes for rent, rather than development for a quick sale. Quality, community and longevity will be the priority.

I would also add that in terms of investment the scheme has already secured financial backing from a London Fund. The benefits of the scheme are reflected in the fact that the project has secured funding, which is most unusual for a scheme that hasn't yet secured planning consent. The Fund behind the scheme have picked this development within Liverpool ahead of many others in more 'traditional' areas like London and the South East, a sign that they have confidence in the development and its location. As funding has been secured the developer has the ability to get on site quickly following a successful grant of planning permission.

The scope to amalgamate one bedroom units to create two and three bedroom apartments, should future demand dictate, should be an integral component of the proposal that dictates the building layout and design.

The revised D&AS includes information on the scope to amalgamate units. The scheme is to be held by an owner in the long term and it is therefore aimed at longer term renters. Flexibility is key to the success of the product and it is in the owners interest to look after the scheme and make changes if the rental profile changes.

Design

Consider providing a glazed roof enclosure to the eighth floor walkway between Blocks B & C. This element has been deleted from the scheme along with some amenity space.

Provide details of a transparent enclosure at the entrance to the basement car park and consider incorporating a greater translucent design of gated enclosure to the central courtyard.

The landscaping information enclosed on the CD includes a preferred option for the gate. The gate option is also highlighted in the DAS. We consider that the option we have presented a well-designed enclosure, however, if the Council wish to see something else we are happy to have this element of the design conditioned.

Provide a material sample panel board up front with your application detailing all facing, roofing and surfacing materials to be used in the development.

I can confirm that we will provide a material sample panel board prior to Committee.

Public Realm and Landscaping

It is acknowledged that the proposed development makes provision for a central courtyard as a private amenity space for future residents, and the indicative proposals for landscaped open space that are intended to directly benefit this development and the immediate area are welcomed in principle. However, I am unclear how these landscaping proposals, which lie outside of the red line application site boundary and on adopted highway land, would be delivered and maintained in future. Further information is required in this respect, and the Local Highways Authority and Street Scene team would need to agree to these works. Furthermore, any such proposals must meet the recreation needs of future users of this development, whilst delivering an appropriately high-quality local environment. If this could not be guaranteed, the default position would be to require full commuted sum contributions towards off-site provision of open space, street trees and public art.

Since submission of the original application we made changes to the proposed landscape scheme to ensure that it was more user friendly and that a better quality of amenity space was provided. It has been clear from day one that a high quality landscape component is an important element of the scheme. As discussed, there are 2 options re the landscaping.

Option 1 (our preferred option), to provide and implement the landscape scheme via a S.278 Agreement. The applicant would then be responsible for maintenance under a landscape contract on a site wide basis. If we go down this route then the cost of the works should be deducted from any S.106 contribution – details to be agreed post Committee.

Option 2, in the event that Highways and the Street Scene team don't agree to the former approach then we would make a S.106 contribution and the Council would undertake the works and maintenance of the landscaping for the scheme. A condition of this would be that we would require a form of obligation on the Council to undertake the landscape works alongside the development construction.

For your information we have included costs for the proposed landscape scheme and also Dwg. No. PL1488.GA.003 [Softworks]_1.1 provides details of the existing retained and proposed services to ensure that the proposed landscape scheme is implementable in terms of underground services.

Parking, Servicing & Access

Your revised proposals which now make provision for 55 no. off-street car parking spaces are welcomed, however, this figure still falls well below the Council's parking standards for this peripheral part of the City Centre at only 15% of total residential units. Indeed, it is also below the car usage figures of 26% quoted in the Transport Statement supporting this application. I would therefore enquire as to whether there is scope to provide additional off-street car parking,

potentially through another level of basement car parking. When combined with the suggested reconfiguration and reduction in residential units this would help arrive at a more acceptable ratio of off-street car parking for residents.

Given the cost associated with provision of a basement car park there is no prospect of a further basement level. The scheme just simply cannot carry it in terms of cost. The applicant is already spending circa £1.4m on the first basement level. Our approach to the issue of parking is covered in some detail in the TS.

In addition to off-street car parking provision the financial contribution of £20,000 previously offered up towards the expansion of the City Centre CPZ in to this Pumpfields/Limekiln area will need to be committed, otherwise the associated demand for on-street car parking in an area which is already at capacity from demand generated by existing businesses and commuter parking, will serve to exacerbate problems of road congestion and highway safety. In turn, this could undermine local business operation and amenity in an area between Vauxhall Road and Scotland Road which may only be physically capable of accommodating circa 300-350 no. on-street parking bays for business, residents and visitors.

As stated previously the TS confirms the financial contribution figure of £20,000 as does this letter. The TS confirms the full details of the mitigation offer in relation to highways. In summary it includes:

- Provide a city bike station of either 6 or 12 units location to be agreed as shown on page 43 of the TS.
- Additional cycle parking as demand increases as part of the travel plan initiative.
- Based on the mode split and the parking offer the site considered that membership of the city cycle club for the 5 years of the travel plan for a max of 25% of the residents was considered a good basis for the support of cycle use, the highway feedback has indicated that full cost year 1 and 2 for all units, half cost year 3 and 4 and 25% of costs year 5 and 6. At £60/year this for 381 units equates to **£80,040** over the 6 years if fully taken up, a significant increase from the £18703 initially offered. This will be managed by the on site team and TPC through the FTP..
- Support to the annual metro card for area C £631/year, for first year only for 25% of the residents equates to **£59,314**.
- Promotion through the TRO of a city car club space at the site frontage for car users not allocated a space.
- In addition a similar member ship of the car club based on demand based on £60/year as the cycles for **£18,360** capped. This will be managed by the on site team and TPC through the FTP.
- Provide a contribution to the wider are study/management of movement and parking capped at **£20,000**. (If the displacement of the commuters is considered an overriding concern then the TRO on Gardner's Row could be amended to allow parking in section thus reducing the potential for displaced parking. The road is sufficiently wide enough to allow this without detriment to local movements).
- Loading bays as part of the s278 locations to be finally agreed.
- Connect a new path and cycle lane to the Bevington Bush cul de sac on the north of the scheme thus improving connectivity for the wider users.

Provide a plan detailing a designated vehicular servicing bay for this development on Gardeners Row, which could also be used for disabled drop off / pick up.

As outlined previously Figure J542 Bevington Bush Fig 1 within the TS provides details of the designated vehicle servicing bay.

Provide details of the likely types and numbers of servicing movements associated with the residential accommodation and ground floor retail unit, along with details of the management responsibility for refuse disposal/collection.

The revised TS provides the details of the servicing movements requested.

Consider relocating the 6/12 proposed City Bike facilities further to the north at the end of Bevington Bush so that they could serve both this development and any future redevelopment of land to the north.

We are satisfied with the current shown location of the City Bikes facility, however, we are happy to relocate them under S.278 Agreement if the Council considers they should be moved as a result of other developments in the local area. This approach is confirmed within the TS.

Make provision for an expanded cycle network enhancement so as to continue further north along Bevington Bush and further south along Scotland Road to crossing facilities on Leeds Street.

The provision for an expanded cycle network enhancement is referenced within the TS. The site will link to the existing cycle network along Gardeners Row which is on street, the link to Leeds St and the route to the city centre and onto the Scotland Road route at the nearby signals. The landscape design takes this on board, with signage to be agreed as part of the s278 works.

Make provision for 'City Car' facilities within on-street parking bays on Gardeners Row, as part of the wider CPZ expansion.

The mitigation outlined within the TS (and above) outlines the promotion through the TRO of a city car club space at the site frontage for car users not allocated a space.

Make provision for all future residential occupiers to have fully paid up memberships to City Bike and City Car facilities, as well Merseytravel passes, for the first five years (not just partial funding for 25% of occupants).

Based on the mode split and the parking offer the site considered that membership of the city cycle club for the 5 years of the travel plan for a max of 25% of the residents was considered a good basis for the support of cycle use, the highway feedback has indicated that full cost year 1 and 2 for all units, half cost year 3 and 4 and 25% of costs year 5 and 6. At £60/year this for 381 units equates to £80,040 over the 6 years if fully taken up, a significant increase from the £18,703 initially offered. This will be managed by the on site team and TPC through the FTP.

Amend the Design & Access Statement to explain how inclusive access has been incorporated into the detailed building layout and design, including: building approaches and entrances; public realm treatment; 5% disabled car parking; disabled drop off/pick up; internal manoeuvring space; accessible WCs to all communal residential areas and commercial uses; fire evacuation strategy and lift specification.

The D&AS has been amended to include information on inclusive access as detailed above.

Amenity

Confirm that all residential habitable rooms have main lighting accessing windows.

The D&AS provides information on habitable rooms and main lighting accessing windows.

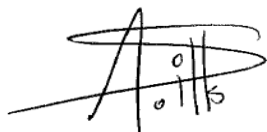
Provide microclimate modelling of sunlight/daylight impacts within the development and to neighbouring land and properties, as well as potential wind downdrafts relative to Block B, to demonstrate no undue adverse impact. As above, I am trying to get some info on wind.

As above, I can confirm that Buro Happold have been instructed to provide desk top assessments on both wind and sun light/day light and that these reports should be available by the middle of next week (17th February).

Hopefully we have now responded to all the comments you have raised in connection with the application. However, should you wish to discuss the contents of this letter or its enclosures please do not hesitate to contact me. We believe we have now resolved all outstanding issues relating to the application and we look forward to receiving confirmation that the application will be reported to the Planning Committee on the 8th March.

Kind regards

Yours sincerely,



Nikki Sills
Associate Director

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