



PLANNING STATEMENT

LAND AT THE SITE OF THE BRIDGE INN, BELLE VALE, LIVERPOOL

ON BEHALF OF DJ McQUEEN

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1.0 Introduction

- 1.1 This Planning Statement supports an application for outline planning permission (all matters reserved) submitted by *DJ McQueen* promoting the demolition of the Bridge Inn and other structures / buildings and the erection of a 1,580 sqm (gross) Class A1 supermarket and a 120 sqm replacement bookmakers (*sui generis*) [or, in the event that William Hill opt not to proceed, falling within any of the following Use Classes A1, A2, A3, A4, A5 or B1(a)], with associated car parking (100 standard spaces plus 10 disabled bays), cycle parking, service yard, and hard and soft landscaping, all accessed via Childwall Valley Road, on land currently occupied by the Bridge Inn and William Hill bookmakers, Belle Vale, Liverpool.
- 1.2 The Bridge Inn is still operational, but does not realistically have a viable medium or longer term future. Our client has agreed heavily discounted terms to enable the pub to continue to operate in order to retain an active security presence at the site. The long term future of the pub is simply not sustainable, and as such a longer term viable end use for this prominent brownfield site needs to be secured.
- 1.3 The William Hill bookmakers is a popular local facility, and a lease is in place until 2018. That said, our client is keen to secure an alternative replacement facility, but in the event that William Hill choose not to occupy the replacement unit, this application seeks a flexible mix of end uses for that small (120 sqm) unit, to include Classes A1, A2, A3, A4, A5 or B1(a).
- 1.4 The proposed foodstore looks to cater for the demand identified from potential end users which has been highlighted in discussions with our client's agents. At this stage, no end user has committed to the scheme, but interest has been shown. At this stage, it seems most likely that the unit could be occupied by a discount retailer which is not currently active in the Belle Vale area.
- 1.5 Whilst the terms 'foodstore' and 'convenience store' (as well as 'supermarket') are applied to this project, it is a matter of fact that all successful operators in this field offer an element of non food goods. We anticipate that this will be the case here, so any references to 'food' or 'convenience' store in the supporting document should not be interpreted as suggesting that the store will offer foodstuffs only. If

approved, this will be a mid-sized supermarket offering predominantly food and drink items, but with an element of non-food products.

- 1.6 We understand that the site currently generates around 10 jobs in total (combination of full and part time, including the pub and the bookmakers).
- 1.7 We anticipate that, if approved, the development will generate around 100 jobs (based on data set out in '*Employment Densities Guide 2nd Edition 2010*' (Drivers Jonas Deloitte)). The overwhelming majority of those are likely to be entirely new jobs, with a degree of cross transfer of jobs from William Hill.
- 1.8 Reflecting the fact that no end user has yet committed in absolute terms to the project, the application is submitted in outline to establish the principle of development. All detailed matters (access, design, layout, external appearance, and landscaping) are reserved for future determination.
- 1.9 The proposal has been the subject of pre-application discussion with the LPA. Those discussions were *broadly* positive. It was rightly suggested by the LPA that, because of the site's 'out of centre' location, a sequential assessment exercise is required to accord with national policy advice, which should cover Belle Vale and Woolton District Centres. That exercise has been duly conducted and it is evident that there are no alternative in or edge-of-centre sites that that available, viable and suitable to cater for the proposition (refer to *Appendix 1* of this Planning Statement).
- 1.10 It was also acknowledged by the LPA that the proposal does not trigger the need to undertake retail impact assessment. That reflects national policy advice that such testing is only required if a proposal exceeds 2,500 sqm, *unless an authority has in place a lower threshold*. This proposal is considerably less than 2,500 sqm, and Liverpool does not have any such adopted threshold in place. As such, no impact testing has been undertaken, reflecting the advice set out in the National Planning Policy Framework (NPPF).
- 1.11 This Planning Statement (and no other part of the application) should be read in isolation. A comprehensive range of plans and documents have been submitted, and these should be considered alongside one another to provide a rounded and comprehensive assessment. The outline application comprises :

- Application forms and certificates
- Application fee of £2,695 (based on site area of 0.6775 ha);
- This Planning Statement (Roman Summer Associates Ltd);
- Sequential Assessment (forming *Appendix 1* of Planning Statement) (Roman Summer Associates Ltd);
- Noise Assessment (ADC Acoustics);
- Arboricultural Survey and Implication Assessment (We Know Trees);
- Arboricultural Method Statement (We Know Trees);
- Extended Phase 1 Ecological Survey (including Bat Potential Survey) (We Know Ecology Ltd);
- Transport Assessment (with MASA) (DTPC);
- Framework Travel Plan (DTPC);
- Phase 1 Desktop Study (Sutcliffe);
- Design & Access Statement (Condy Lofthouse Architects);
- The following drawings (Condy Lofthouse Architects) :
 - 14-123-101G Site Location Plan
 - 14-123-105 Site Survey
 - 14-123-103L Proposed Site Layout
 - 14-123-150A Existing Elevations The Bridge Inn
 - 14-123-151A Street Elevation
 - 14-123-160C Existing Site Sections
 - 14-123-A Sketch Images

1.12 The remainder of this Planning Statement is structured as below :

- Section 2.0 describes the site, surroundings, background and proposed development;

- Section 3.0 summarises national and local planning policies relevant to the application;
- Section 4.0 assesses the proposed development against planning policy and addresses other material considerations;
- Section 5.0 sets out our conclusions.

2.0 Description of the Site, Surroundings, Proposal & Planning History

The Site & Surroundings

- 2.1 The application site faces onto Childwall Valley Road (B5178) and is flanked by Kings Drive and Runton Road. It is 0.6775 ha in area.
- 2.2 The site is occupied by the Bridge Inn and its associated car park and historic bowling green (which has not been used for many years and is no longer usable), together with a small bookmakers occupied by William Hill.



- 2.3 The site is prominently located, but in poor and arguably dilapidated condition. As noted in Section 1.0, the pub cannot remain operational beyond the very short term. Trade has been declining for many years, and is only open today due to our client offering highly favourable rental terms in order to maintain a security presence on the site.
- 2.4 Although the LPA has described the site as '*a distinctive local landmark*', we tend to disagree that the pub presents anything particularly unique, special or that warrants preservation. It is a fairly typical, bland, nondescript structure of a type that can be found anywhere throughout the UK. We suggest that it is no more of a distinctive local landmark than the adjacent Police Station, petrol filling station or indeed McDonald's restaurant. In any case, the LPA has not suggested that its removal will be resisted.

- 2.5 The grounds of the pub are decrepit and unusable. Although an element of thinning out has recently been undertaken to the rear of the pub, the former bowling green and 'pond' have not operated as such for many years. The former 'pond' is no longer a pond, and has been filled with all manner of rubbish for many years. The former bowling green has similarly not been used as such for many years, and is now totally overgrown and could not sensibly be resurrected, even if demand and funds were in place for its restoration (which they are clearly not).
- 2.6 In short, the site is an underused, deteriorating, unsustainable eyesore on a principal road / junction, which – via appropriate redevelopment – represents an important regeneration opportunity, capable of replacing the handful of jobs currently on site by at least tenfold, and at the same time replacing poor quality, nondescript buildings with a fine contemporary building, tree planting and other soft landscaping.
- 2.7 The site is just 400 metres away from the boundary of Belle Vale District Centre (photograph below). While 300 metres is used as the benchmark for defining an 'edge of centre' location, we suggest that this site could reasonably be considered as 'edge of centre', given the flat, direct walking distance to the District Centre, and the array of commercial / community uses that flank the main pedestrian route (such as Belle Vale Police Station, the Fire Station and McDonald's restaurant).



- 2.8 The site is not in a conservation area and contains no listed buildings. There are no heritage assets in close proximity.
- 2.9 The site contains a number of trees to the rear. Some of these are fine specimens, and our client is committed to retaining as many trees as can sensibly be achieved.

All of the trees have been surveyed, and it is evident that many are in poor condition and ought to be removed (for good arboricultural reasons / management), even in the event that this development does not proceed. Furthermore, some of the trees are not ideal specimens for an urban site such as this. The full details of the tree survey and assessment are set out in the separate report by We Know Trees (which is part of Knowsley MBC).

The Proposal

- 2.10 The proposal seeks outline planning permission to demolish all buildings and erect a 1,580 sqm (gross) Class A1 supermarket and 120 sqm replacement bookmakers (*sui generis*) [or, in the event that William Hill opt not to occupy the unit, a use falling within those under paragraph 2.14 below], with associated car parking (100 standard spaces plus 10 disabled bays), 16 cycle parking spaces, a service yard, hard and soft landscaping, all accessed via Childwall Valley Road, on land currently occupied by the Bridge Inn and William Hill bookmakers, Belle Vale, Liverpool.
- 2.11 Reflecting the fact that no end user has yet committed in absolute terms to the project, the application is submitted entirely in outline to establish the *principle* of development. All detailed matters (access, design, layout, external appearance, and landscaping) are therefore reserved for future determination.
- 2.12 The proposed foodstore looks to cater for the demand identified from potential end users in discussions with out client's agents. At this stage, no end user has committed to the scheme, but firm interest has been shown. At this stage, it seems most likely that the unit could be occupied by a discount retailer which is not currently active in the Belle Vale area.
- 2.13 If approved, this will be a mid-sized supermarket offering predominantly food and drink items, but with an element of non-food products.
- 2.14 The application also proposes the erection of a replacement facility (of the same size) for the existing William Hill bookmakers. However, in the event that William Hill choose not to occupy the replacement unit, this application seeks a flexible mix of end uses for that small (120 sqm) unit, to include Classes A1, A2, A3, A4, A5 or B1(a).

- 2.15 As noted above, the site contains a number of trees, particularly to the rear. The trees have been surveyed, and it is evident that some are in poor condition and ought to be removed (for good arboricultural reasons / management), even in the event that this development does not proceed. Beyond those, a total of 20 trees are likely to be removed via the development proposed as a direct consequence of the development. While the proposal is in outline and landscaping details are reserved for future determination, our client is committed to replacing all removed trees on an *at least* 2 for 1 basis, as well as providing additional trees in line with the Council's standards. There is plentiful space within the site to accommodate this (and other planting), so we are confident that the number of new trees will exceed the usual policy demands, creating an attractive landscape public space close to the road junction as a green 'gateway' feature on the approach towards the District Centre.

3.0 Overview of Planning Policy

- 3.1 This section summarises the planning policy context against which the application falls to be considered. These policy strands will then be considered further in Section 4.0 of this Statement.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 3.2 The NPPF was published on 27 March 2012.
- 3.3 Paragraph 12 makes it clear that the NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an *up-to-date* Local Plan should be approved, whilst development that conflicts should be refused, unless other material considerations indicate otherwise. Paragraph 2 confirms that the NPPF is a material consideration in planning decisions.
- 3.4 Paragraph 187 states that:
- ‘Local planning authorities should **look for solutions rather than problems**, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should **work proactively with applicants** to secure developments that improve the economic, social and environmental conditions of the area.’*
- 3.5 From the outset, the NPPF asserts that development that is sustainable should go ahead **“without delay”**, and that a presumption in favour of sustainable development should be the basis for every planning decision.
- 3.6 Paragraph 6 states that the purpose of the planning system is to contribute to the achievement of sustainable development. This is elaborated in paragraph 7, which suggests that there are three dimensions to sustainable development: **economic, social and environmental**. These dimensions give rise to the need for the planning system to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

3.7 Paragraph 14 reinforces the message about 'sustainable development'. It states that the presumption in favour of sustainable development lies at the heart of the NPPF, and describes this as *"a golden thread running through both plan-making and decision-taking"*. For **decision-taking** this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are **out-of-date**, granting permission unless any adverse impacts of doing so would **significantly and demonstrably outweigh the benefits**, when assessed against the policies in this Framework taken as a whole.

3.8 Paragraph 17 states that, within the overarching roles that the planning system ought to play, 12 core land-use planning principles should underpin both plan-making and decision-taking. These include (with our emphasis) :

- Planning should not simply be about scrutiny, but instead be **a creative exercise** in finding ways to **enhance and improve** the places in which people live their lives

- Planning should **proactively drive and support sustainable economic development** to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.
- Planning should always seek to secure **high quality design** and a good standard of amenity
- Planning should support the transition to a **low carbon future** in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources
- Planning should encourage the effective use of land by **reusing land** that has been previously developed (**brownfield land**)
- Planning should actively **manage patterns of growth** to make the **fullest possible use of public transport, walking and cycling**

3.9 Paragraph 19 confirms that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. **Planning should operate to encourage and not act as an impediment to sustainable growth.** Therefore significant weight should be placed on the need to support economic growth through the planning system.

3.10 Paragraph 22 suggests that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, **applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.**

3.11 Paragraph 23 confirms that the principal objective that **planning policies should be positive and promote competitive town centre environments.**

3.12 Paragraph 24 carries forward the **sequential test** to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. Local authorities should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. **When**

considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

- 3.13 Paragraph 26 confirms that, when assessing applications for retail, leisure and office development outside of town centres, *which are not in accordance with an up-to-date Local Plan*, local planning authorities should require an *impact assessment*, but only if the development is over a proportionate, locally set floorspace threshold. It makes it clear that, if there is no locally set threshold, the default threshold is 2,500 sqm. Liverpool City Council does not have in place an adopted locally set threshold, and as such an impact assessment is not required in this case (as confirmed in pre-application advice by the LPA).
- 3.14 Paragraph 26 makes it clear that, where an application fails to satisfy the sequential test or is likely to have significant adverse impact, it should be refused.
- 3.15 Paragraph 56 carries forward the sentiment of previous policy statements that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Planning policies and decisions should aim to ensure that developments:
- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
 - respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

- are visually attractive as a result of good architecture and appropriate landscaping.
- 3.18 Paragraph 60 confirms that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.
- 3.19 Paragraph 65 carries forward support for sustainable development and states that local authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.
- 3.20 Paragraph 111 makes it clear that planning policies and decisions should encourage the effective use of land by *re-using land that has been previously developed* (brownfield land), provided that it is not of high environmental value.

National Planning Practice Guidance (NPPG)

- 3.21 On 6 March 2014 the Department for Communities and Local Government launched its new Planning Practice Guidance web-based resource. This was accompanied by a Written Ministerial Statement which included a list of the previous planning practice guidance documents cancelled when this site was launched.
- 3.22 The PPG echoes the NPPF in stating that good quality design is an integral part of sustainable development and is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. In particular, the Guidance states that the following key issues should be considered in development:
- local character (including landscape setting)
 - safe, connected and efficient streets
 - a network of greenspaces (including parks) and public places
 - crime prevention
 - security measures

- access and inclusion
- efficient use of natural resources
- cohesive & vibrant neighbourhoods

3.23 Not only this, but well-designed developments should also look to:

- be functional;
- support mixed uses and tenures;
- include successful public spaces;
- be adaptable and resilient;
- have a distinctive character;
- be attractive; and
- encourage ease of movement.

3.24 The PPG goes on to state that plans, policies and decisions can effectively manage physical form at a variety of scales and that where appropriate:

- layout – the way in which buildings and spaces relate to each other
- form – the shape of buildings
- scale – the size of buildings
- detailing – the important smaller elements of building and spaces
- materials – what a building is made from.

LIVERPOOL UNITARY DEVELOPMENT PLAN

3.25 The Liverpool UDP was published in November 2002, with many of its policies ‘saved’ in 2007 in preparation of the publication of the Council’s LDF (now referred to as the Local Plan). Only progress has been made towards the Local Plan, and there is clearly some way to go. As such, the UDP remains in force. However, it must be said that the UDP is now approaching 13 years old and much has changed (both locally and nationally) during that time.

3.26 Paragraphs 214 and 215 of the NPPF explain that, for 12 months from the day of publication of the NPPF (March 2012), decision-takers could continue to give full weight to relevant policies adopted since 2004, even if there was a limited degree of conflict with the Framework. That 12 month period expired over 2 years ago, and NPPF paragraph 215 explains that - following that 12 month period – “*due weight*”

should be given to relevant policies in existing plans “*according to their degree of consistency with this Framework*”. In other words, the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given. We note that the UDP has not been formally assessed against the provisions of the NPPF to establish its degree of consistency, but it is self evident that, since its adoption 13 years ago, a good deal has changed in Liverpool and nationally, which again raises questions about the weight that can now be attached to many of the UDP’s policies.

3.27 Notwithstanding that, we consider the relevant UDP policies below.

Policy GEN1 (Economic Regeneration)

3.28 The Policy aims to reverse the decline in economic activity, investment and employment that Liverpool has experienced in recent years. The Policy states various ways in which this can be achieved including:

- the provision and servicing of sites for economic development and investment;
- promoting regeneration within the City’s most deprived communities; and
- encouraging small scale economic development in appropriate locations throughout the City.

Policy GEN3 (Heritage and Design in the Built Environment)

3.29 Policy GEN3 states that the UDP aims to protect and enhance the built environment of the City by encouraging a high standard of design and landscaping in developments and creating an attractive environment which is safe and secure both day and night.

Policy GEN5 (Shopping)

3.30 The Policy aims to secure the provision of shopping facilities for all members of the community at locations which are accessible to all City residents through

concentrating retail investment in the City Centre Main Retail Area and Local District centres.

- 3.31 The justification text for the policy states that shopping provision should be accessible to all in the local community and should contribute to meeting the local needs of the area.

Policy H4 (Primarily Residential Areas)

- 3.32 The site is located outside of the Belle Vale District Centre and as located within a 'Primarily Residential Area' as defined by the UDP Proposals Map. The Policy states that planning permission will be granted for:

- new housing development that satisfies other Plan policies;
- new industrial and **business development**, subject to policy E5 and where there will be no detrimental effect on the amenities and character of the residential area;
- new and improved community facilities, providing there is no adverse impact on residential amenity, traffic generation and car parking; and
- **other forms of development, redevelopment or changes of use, provided there is no adverse impact on residential amenity or the character of the area** and subject to other policies of the Plan.

Policy E5 (Economic Development Outside the Regeneration Areas)

- 3.33 Outside the Economic Regeneration Areas, the City Council seeks to encourage the development of a range of employment generating activities, such developments should be subjected to the following criteria:

- Safeguard the amenity of residential and neighbouring uses;
- standards of design, materials and maintenance proposed, including landscaping details, boundary treatments and security measures; and
- the accessibility of the proposed use to the public transport network.

UDP Policy HD18 (General Design Requirements)

- 3.34 Policy HD18 identifies several design-related criteria, with which all applications will be required to comply:
- a. The scale, density and massing of the proposed development relate well to its locality
 - b. The development includes characteristics of local distinctiveness in terms of design, layout and materials.
 - c. The building lines and layout of the development relate to those of the locality
 - d. External boundary and surface treatment is included as part of the development and is of a design and material which relates to its surroundings
 - e. All plant machinery and equipment are provided within the building envelope or at roof level, as an integral part of the design
 - f. The development pays special attention to views into and out of any adjoining greenspace
 - g. The development has regard to and does not detract from the city's skyline, roofscape and local views within the city
 - h. The satisfactory development or redevelopment of adjoining land is not prejudiced
 - i. There is no severe loss of amenity or privacy to adjacent residents
 - j. Adequate arrangements are made for the storage and collection or refuse within the curtilage of the site, and provision of litter bins where appropriate
 - k. The exterior of the development incorporates materials to discourage graffiti
 - l. Adequate arrangements are made for pedestrian and vehicular access and for parking.

Policy HD19 (Access for All)

- 3.35 Policy HD19 states that the City Council will ensure that consideration is given to the need to ensure ease of access and movement for disabled people between and within public areas by the careful provision, siting and design of parking areas, paths, dropped kerbs, pedestrian crossings, street furniture and open space. It states that access to and from buildings and their surroundings will be improved.

Policy T12 (Car Parking Provision in New Developments)

- 3.36 Policy T12 outlines that any new development which generates a demand for car parking will be required to make provision for car parking on site, to meet the minimum operational needs of the development.
- 3.37 **Policy C9** confirms that the City Council will seek to retain all existing tennis, bowls and other multi purpose facilities, unless those facilities are to be satisfactorily replaced by a facility of equivalent or better quality in an appropriate location.
- 3.38 Chapter 10 sets out policies on shopping development. **Policy S4 (District Centres)** states that the District Centres (including Belle Vale) will be the primary focus for retail development and investment outside the City Centre.
- 3.39 However, that does clearly not rule out retail development in other locations. Policy S6 allows for edge of centre development – such as the Morrisons development on the edge of Belle Vale District Centre.
- 3.40 **Policy S12** governs out of centre retailing, and sets out the following ‘tests’ to be satisfied :
- whether the applicant has adopted a sequential approach to site selection, and the availability of suitable alternative sites;
 - the likely economic impacts on the City Centre and other centres in the City and adjoining local authority areas as appropriate, including the cumulative effects of recently completed developments and outstanding planning permissions;
 - the impact on the Council's strategy for securing a major retail and mixed use redevelopment and renewal scheme on the PSDA;
 - the site's accessibility by a choice of means of transport;
 - likely changes in travel patterns over the catchment area; and
 - significant environmental impacts.

The Emerging Local Plan

- 3.41 The **Submission Draft Core Strategy** is the most up to date version of the Liverpool Core Strategy, and was subjected to consultation from 22 March 2012 to 10 May 2012. The Council has since declared that the Core Strategy will not be submitted as a separate DPD, but will instead form the framework for the new **Local Plan** for Liverpool (not yet published).
- 3.42 The Plan has undergone a further public consultation round which took place between December 2013 to 30 April 2014. The purpose of that consultation was to notify key stakeholders and interested parties of the Council's intention to prepare a Local Plan and to encourage representations on what it should contain. A post consultation survey was made available as of the 31st January 2015.
- 3.43 Notwithstanding the fact that it currently possesses no weight, we summarise below the most relevant policies of the Submission Draft Core Strategy (SDCS).
- 3.44 The SDCS contains eight 'strategic objectives' which aim to ensure that, by 2028, Liverpool will have :
- A strong economy
 - Residential neighbourhoods that meet housing needs
 - An attractive and safe city with a strong local identity
 - High quality green infrastructure
 - Efficiently used resources
 - More sustainable accessibility
 - Improved social inclusion and equal opportunities.
- 3.45 The central approach of the SDCS is to capitalise on Liverpool's assets and resources to achieve urban and economic growth, prioritising those areas of the City with the greatest development potential. It aims to stimulate, support and deliver economic growth and address regeneration needs.
- 3.46 The Strategy builds on the Core Strategy 'vision', and takes account of the key issues within Liverpool. A number of strategic objectives have been identified for the City.

- 3.47 **Strategic Objective 1 (Strengthen the City's Economy)** states that ensuring sustainable economic growth is advantageous for the City and will lead to reductions in economic disparities. The Core Strategy should provide sufficient quantity and quality of employment land to meet existing and future employment needs.
- 3.48 **Strategic Objective Three** seeks to deliver **Vital and Viable Shopping Centres**. Paragraph 6.193 explains that sustainable communities have at their heart good local services and facilities. Liverpool City Centre, supported by a network of district, local and neighbourhood centres, provide a range of shops, services and community facilities.
- 3.49 **Strategic Objective Four (Attractive and Safe City with a Strong Local Identity)** notes that the Core Strategy seeks to protect and enhance the City's unique historic and architectural environment, including the World Heritage Site, Conservation Areas and Listed Buildings. The Core Strategy should also ensure that all new development achieves high quality and inclusive design to ensure an attractive, distinctive, healthy and sustainable City for those who live in, work in and visit Liverpool.
- 3.50 **Strategic Objective Seven (Maximising Sustainable Accessibility)** states that there should be maximum accessibility to employment, shops, services, education and training. New developments should be highly accessible by sustainable modes of transport.
- 3.51 **Strategic Policy 1 (Sustainable Development Principles)** states that, to ensure the sustainable growth of the City new development, should be located and designed so that resources are used prudently. New development should:
- As a first priority, be located on previously-developed land and buildings ahead of greenfield sites
 - Improve accessibility, reduce the need to travel by motorised transport and where travel is necessary, enable convenient and safe access by sustainable transport modes
 - Deliver high quality design
 - Protect and enhance environmental and heritage assets

- Be adequately supported by infrastructure and, where necessary, be phased to enable essential infrastructure to be brought forward

- 3.52 The Core Strategy's *Executive Summary* notes that, in overall terms, it expects Liverpool's Suburban Areas to see increased growth and development. While the City Centre and the Urban Core will be the main focus of development, growth in residential development will be nearly doubled in order to sustain population levels and increase housing choice, and the long-standing emphasis on sustainable economic growth and neighbourhoods will be continued.
- 3.53 **Strategic Policy 18 'The Hierarchy of Centres for Liverpool'** looks to achieve more sustainable shopping patterns across the City and provide a sustainable distribution of shops and services within Liverpool to support local communities. It explains that the City's centre hierarchy will comprise the following types of centre:
1. **Liverpool City Centre** - as the Regional Centre will be the primary comparison shopping destination for Liverpool and the City Region and the focus for appropriate investment in major comparison retailing, leisure, cultural and tourist facilities, and other main town centre uses including complementary evening and night time uses which support its role.
 2. **District Centres** - will be the primary focus for development and investment in shops, services, leisure and community uses outside the City Centre. A mix of uses (with retail as the principle use) will be supported to ensure vibrant and vital centres which meet the needs (primarily for convenience shopping) of the local communities that they serve. *A key consideration when assessing proposals for town centre uses in other locations will be the impact on the vitality and viability of Liverpool's District Centres.*
- 3.54 **Strategic Policy 21 (Suburban Areas District Centre Hierarchy)** states that the vitality and viability of Allerton Road, **Belle Vale**, Old Swan, Smithdown Road South, Speke, **Woolton** and Walton Vale will be protected to ensure that they continue to act as a focus for the local community and provide a range of shops and services.

- 3.55 The explanatory text indicates that (at that time) the boundary of Belle Vale DC was to be extended to include the edge of centre Morrisons store. Paragraph 6.218 explains that :

‘Belle Vale District Centre comprises an indoor shopping centre and Morrisons supermarket. It has a large catchment which includes Gateacre, Netherley and Childwall and regeneration fringe housing estates which are a key priority for housing renewal. An extension to the centre has recently been delivered which presents a more attractive and modern facade and it is important to support continued investment in the centre.’

- 3.56 Para 6.221 explains that :

‘Woolton District Centre is an attractive and vibrant centre which needs to be protected. Investment should contribute to public realm and environmental improvements and it would be appropriate though a further development plan document to consider managing the mix of uses, including A3/A4/A5 uses, to protect its shopping function.’

- 3.57 **Strategic Policy 22 ‘Out-of-Centre and Edge-of-Centre Retail and Leisure Facilities’** suggests that there is no quantitative retail and leisure capacity case to support any additional out-of-centre retail and leisure floorspace across the City. Proposals for new retail or leisure floorspace - including extensions and proposals to vary or remove conditions in respect of the range of goods sold outside the defined network of centres - must therefore demonstrate:

- a. Compliance with the sequential approach;
- b. That there would be no significant adverse impact on any centre within the City or adjacent authority. An impact assessment will be required for retail and leisure proposals according to the following floorspace thresholds:
 - Edge of Local Centre – over 200sqm gross
 - Edge of District Centre – over 500sqm gross
 - Out-of-Centre – over 500sqm gross

3.58 The same DRAFT policy suggests that such proposals should be assessed against their impact on:

- Existing, committed and planned public and private investment in a centre or centres within the catchment area
- Vitality and viability of centres, including local consumer choice, and the range and quality of the convenience and comparison retail offer
- In-centre trade / turnover taking account of current and future consumer expenditure capacity
- For local convenience stores the impact assessment should demonstrate no adverse impact on existing convenience stores in centres within the catchment area.

Other Policy Considerations

Design for Access for All (Supplementary Planning Document)

3.59 This SPD was adopted in 2011. It seeks to ensure that inclusive design principles are integrated into development proposals, promoting a high quality and inclusive environment for all, irrespective of age, gender, mobility or impairment.

3.60 Somewhat confusingly, the SPD cross refers to the LDF, which - as explained above - does not in fact exist.

Ensuring a Choice of Travel (SPD)

3.61 This SPD was adopted December 2008 and provides guidance to developers on the access and transport requirements for new development across Merseyside. It was developed in partnership with the various Merseyside local authorities and Merseytravel.

3.62 It was created to provide a framework for developers providing consistent guidance regarding access and transport requirements for new developments thus creating balanced transport infrastructure allowing efficient access to employment, leisure, retail and other facilities.

Policy 1 (RSS Policy RT2 - Managing Travel Demand)

- 3.63 The Policy states that plans for new developments should be located where good access to public transport already exists, backed by effective provision for pedestrians and cyclists to minimise the need to travel by private car.

Policy 4 (Policy T3 – Car parking for the Disabled)

- 3.64 The Policy gives guidance on minimum parking standards for the disabled. It states that as a minimum 6% of the first 100 parking spaces should be allocated for the disabled.

4.0 Planning Assessment

4.1 The key planning policy issues arising in this case are summarised in Section 3.0. The purpose of this section is to consider these further and to present the benefits likely to accrue from the development. Each of the key issues will be addressed in turn, namely:

- Compliance with the NPPF;
- Compliance with UDP;
- Design Quality and Townscape Considerations
- Sustainability Considerations;
- Section 106 Issues;
- Noise;
- Trees;
- Ecology;
- Ground Conditions; and
- Transportation Issues.

COMPLIANCE WITH THE NPPF

- 4.2 We suggest that the application is consistent with the NPPF, and that there are no considerations that should prevent approval.
- 4.3 The proposal will deliver good quality, well designed and an efficient form of development on a highly accessible, underused, unattractive, prominent brownfield site.
- 4.4 The proposal reflects the NPPF's encouragement to respond to market signals and the relative need for different land uses which leads to sustainable communities.
- 4.5 The proposal will create around 100 new jobs, most of which will be recruited from within Liverpool. This will help to deliver the sustainable economic development promoted via the NPPF.

- 4.6 The NPPF promotes good quality design, and suggests that this is fundamental to the creation of sustainable economic development. Developments should function well and add to the overall quality of an area over the long term helping to create a strong sense of place and comfortable places to live and work. Although the application is in outline (based on illustrative materials), it is anticipated that bold, contemporary design will create a new entrance gateway into Belle Vale District Centre, replacing the currently tired and somewhat barren site on this main road frontage.
- 4.7 This application also addresses other key policy aims and objectives: making efficient use of existing infrastructure; and helping building the community in a sustainable, balanced fashion by providing a modern convenience facility and therein extending the quantitative and qualitative retail offer in the Belle Vale are.
- 4.8 In all of the above terms, the proposal constitutes sustainable economic development. The NPPF tells local authorities that development that is sustainable should go ahead **“without delay”**; that a presumption in favour of sustainable development should be the basis for every planning decision; and that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 14 states that, for **decision-taking** this means:
- approving development proposals that accord with the development plan without delay; and
 - where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 4.9 As such, the scheme complies with the NPPF and should be approved accordingly.

COMPLIANCE WITH UDP

- 4.10 The starting point in considering the UDP is that the application is contrary to the provisions of UDP Policy H4, which designates the site as part of a larger ‘*Primarily Residential Area*’.

- 4.11 Policy H4 recognises the role vital and important of business in residential areas. Paragraph 9.65 states that the Council is **aware** of the role of business in residential areas as it provides ***“important locally based job opportunities and shopping facilities”***. The Council will encourage business to locate or expand providing such operations do not cause nuisance to local residents or harm the residential character of an area.
- 4.12 Crucially, Policy H4 makes it clear that non-residential uses are appropriate in these areas are acceptable *‘provided there is no adverse impact on residential amenity or the character of the area and subject to other policies of the Plan.’*
- 4.13 In this case, we have presented evidence which demonstrates that there will be no such adverse impacts, and as such there is no tension with Policy H4.
- 4.14 As noted in section 3.0, new business development (such as that proposed) will be subject to Policy E5 (Economic Development Outside the Regeneration Areas). That policy states that new development will be permitted so long as it does not constitute to the detriment of the area. In this case, the proposed development will deliver a new retail facility that will provide complement the existing local amenities for the community of Belle Vale and immediately beyond. Through high quality design and landscaping, it will enhance and ‘green up’ the character of the area and create a new gateway into the District Centre at a prominent main road junction.
- 4.15 Section 3.0 considers other UDP policies. For example, Policies GEN1 and GEN5 (Economic Regeneration and Shopping) promote the local economy. This proposal will deliver economic stimulation, creating around 100 new jobs and a high quality, accessible local shopping facility.
- 4.16 This application addresses all of these key policy aims and objectives: good quality, sensitive design; making efficient use of land; and building the community in a sustainable, balanced fashion.
- 4.17 UDP Policy Policy S12 governs out of centre retailing, and sets out the following ‘tests’ to be satisfied :

- whether the applicant has adopted a sequential approach to site selection, and the availability of suitable alternative sites;
- the likely economic impacts on the City Centre and other centres in the City and adjoining local authority areas as appropriate, including the cumulative effects of recently completed developments and outstanding planning permissions;
- the impact on the Council's strategy for securing a major retail and mixed use redevelopment and renewal scheme on the PSDA;
- the site's accessibility by a choice of means of transport;
- likely changes in travel patterns over the catchment area; and
- significant environmental impacts.

4.18 In its pre-application advice letter, the LPA confirmed the following :

'Should a planning permission be forthcoming it should be accompanied by a full sequential assessment in accordance with NPPF paragraph 24. This should consider sequentially preferable sites/ vacant units with Belle Vale and Woolton District Centres.

Given it is below the NPPF threshold of 2500sqm for an impact assessment one is not technically required and therefore the City Council cannot insist that one is undertaken.'

4.19 We concur with this advice. Because of the site's 'out of centre' location, a sequential assessment exercise has required to accord with national policy advice, to extend to Belle Vale and Woolton District Centres. That exercise – as presented in *Appendix 1* of this Statement - demonstrates that there are no alternative in or edge-of-centre sites that that available, viable and suitable to cater for the proposition. As such, the sequential test is satisfied.

4.20 Considering impact testing, the LPA has confirmed (as above) that the proposal does not trigger the need for retail impact assessment. That reflects national policy advice that such testing is only required if a proposal exceeds 2,500 sqm, unless an authority has in place a lower threshold. Liverpool does not have any such adopted threshold in place, and as such no impact testing has been undertaking, again reflecting the advice set out in the National Planning Policy Framework (NPPF). The

draft threshold in the draft Core Strategy carries no weight. It is subject to object; has not been carried forward as adopted policy. Nor has not been subjected to independent scrutiny. We therefore agree with the LPA that impact testing is not required and cannot be requested in this case, and we note that precisely the same stance was adopted by the LPA in the following cases (both of which were recently approved).

- 4.21 *Application ref: 14F/1802* – Grey Chaser PH, Longmoor Lane – very similar to this application, that proposal sought to redevelopment of a pub site, in an out of centre location, within a Primarily Residential area, for a food retail unit of 1,453 sqm. In commenting on the need for impact testing, the Planning Manager advised Committee as below :

The NPPF (paragraph 26) states when assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, LPAs should require an impact assessment if there is no locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2500sqm). The foodstore is 1453sqm gross internal area and as such is below the NPPF threshold of 2500sqm. Therefore, it is accepted that a retail impact assessment would not be required.

- 4.22 More recently (on 10 March 2015), *application ref: 14F/1140* was resolved to be approved. That promoted a smaller foodstore (admittedly smaller than that proposed here, but the principle remains the same), which was assessed as below in the Committee Report :

At the pre-application stage the applicant submitted information that demonstrated that the catchment of the proposed retail store would be localised given its retail floor space and 'convenience' nature. It was established that a sequential test (to demonstrate that the use could not be located in an existing local or district centre) was not required in this instance and it is accepted by the Head of Planning that the scale of the proposed retail unit would not detract from the viability or vitality of nearby designated centres. Paragraph 26 of the NPPF advises that a retail impact assessment would only be required for sites that provide more than 2,500m² therefore this was not required.

A number of objections have been received on the grounds that another convenience store is not needed and that it would unduly impact on other nearby operators. As stated above, the store will be small scale and is well beneath the 2,500sqm threshold where impact is considered to be significant. Notwithstanding this, any potential impacts can only be applied to operators within District and Local Centres, and not to out of centre locations (such as Neighbourhood parades). As such, if the principle of a retail unit is considered acceptable having regard to other plan policies, then any impacts on out of centre operators is a matter of competition and such impacts cannot be offered any significant weight.

- 4.23 We entirely disagree with the suggestion that sequential testing was not required in the above case, as that runs contrary to the clear advice in the NPPF. But, crucially in this case, there is further acknowledgment in the above report that Liverpool does not have in place a locally set threshold for impact testing that can be relied upon or applied. This reflects the advice our client has been presented with by the LPA at pre-application stage, and hence no impact testing has been conducted.
- 4.24 Finally (in respect of the UDP), whilst Policy C9 seeks to protect bowling (and other) sports facilities, it is very evident that the grounds of the pub are decrepit and unusable. Although an element of thinning out has recently been undertaken to the rear of the pub, the former bowling green and 'pond' have not operated as such for many years. The former 'pond' is in fact no longer a pond, and has been filled with all manner of rubbish for many years. The former bowling green has similarly not been used as such for many years. It is totally overgrown and could not sensibly be resurrected, even if demand and funds were in place for its restoration (which they are clearly not).
- 4.25 For the above reasons, we contend that the proposal accords with adopted development plan policies. The Sequential Assessment at *Appendix 1* clearly demonstrates that there are no in centre or edge of centre sites that are available, suitable and viable to accommodate the proposal.

DESIGN QUALITY & TOWNSCAPE CONSIDERATIONS

- 4.26 Whilst the scheme is presented in outline, the formulation of the (indicative / illustrative) design and layout has had regard to UDP Policy HD18 (General Design Requirements), with its emphasis on the need to deliver high quality urban design and architecture.
- 4.27 Such issues, together with an explanation of the background and rationale to the design, are contained in the separate Design & Access Statement.
- 4.28 It is anticipated that the new buildings will contribute positively towards local character, utilising a contemporary, yet contextual design solution. They will replace the currently underused, unkempt and (at best) mediocre buildings / structures with

buildings of visual interest and distinctiveness, and provide animation to these prominent streets and this gateway location approaching Belle Vale District Centre.

- 4.29 The proposal will be accessible by road, public transport, bicycle and foot. Provisions will be put in place for the disabled and infirm.
- 4.30 We therefore suggest that the proposal – in its *outline* format – can and will be formulated to accord with the design and heritage principles of UDP policy HD18, HD19 and T12.

SUSTAINABLE ECONOMIC GROWTH

- 4.31 In simple terms, a viable, deliverable, high quality development scheme is being promoted in ongoing difficult economic times. Not only will the proposal bring back into use a prominent under-utilised area, but it will also create a high quality retail facility that will sit alongside the wider regeneration that being experienced in Liverpool. We contend that this scheme represents sustainable economic growth through its accessibility and its service to the community of Belle Vale, allowing local people to travel to and from the development by means other than private car.
- 4.32 The likely physical impacts of the proposal are self-evident. The site is currently in an under utilised and poor state. Its redevelopment as proposed will bring economic stimulation and job creation (around 100 new jobs).
- 4.33 In the above terms, this project represents sustainable economic development, particularly bearing in mind the fragile economic climate that continues to affect the UK economy. In this regard, it is worth drawing attention to the following statements in the NPPF:

‘Development that is sustainable should go ahead without delay’

‘A presumption in favour of sustainable development should be the basis for every planning decision’

‘For decision-taking, this means, where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts

of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

'Planning should not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives.'

'Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.'

- 4.34 We therefore anticipate that this application will be welcomed by the Council in respect of its deliverance of sustainable economic growth and associated regeneration.

SECTION 106 ISSUES

- 4.35 The City Council's 'policy' would ordinarily anticipate Section 106 contributions as below:

- the provision of 1 tree per 1,000 sqm of floorspace for non residential elements), or – if that level of tree planting is not realistic – payment of the cost of providing street trees (including their maintenance) at £4,000 per tree. In view of the floorspace involved (1,700 sqm), this suggests the need for just 2 trees. Far more than that minimum requirement will be provided via this scheme, and as such **we do not anticipate any S106 demands in this regard.**
- 15% of the value of the planning application fee to part fund the Council's costs in relation to the implementation of a strategy/programme for the provision of Public Art = $15\% \times £2,695 = \text{£}404.25$ *[however, we note that the statement in the new NPPG that Council's should not be seeking S106 demands in respect of public art. We understand that the LPA will be reviewing its policy in this regard, and as such the applicant is minded not to offer any public art contribution]*
- To fund the post of a Section 106 Monitoring Officer, an additional charge of 15% of the value of the planning application fee contributions for the Liverpool Construction Initiative = $15\% \times £2,695 = \text{£}404.25$ *[however, we note that the Council does not employ a S106 Monitoring Officer]*

NOISE

4.36 The application is supported by a Noise Assessment produced by ADC Acoustics. This is based on indicative details at this outline stage, but at the same time it is apparent that a store (and servicing area) of the size proposed can only be located / configured in broadly the location(s) shown on the submitted plans. ADC have drawn the following conclusions :

- The predicted noise from typical external mechanical plant should be acceptable, day or night by any conceivably reasonable standard with no particular mitigation.
- There should be no significant risk of noise from mechanical plant.
- Daytime deliveries of all types should be acceptable during daytime hours with any realistic number of delivery vehicles. Vans and large rigid trucks should also be acceptable during the night but articulated HGVs may be more difficult on the current design.

4.37 It is therefore considered that the proposal – when designed in detail (as opposed to be illustrative) and subject to reasonable servicing / delivery restrictions – will not result in any unacceptable noise impact issues.

TREES

4.38 The site contains a number of trees, particularly to the rear. The trees have been surveyed, and it is evident that some are in poor condition and ought to be removed for good arboricultural reasons / management, even in the event that this development does not proceed.

4.39 To accommodate the proposal, 20 trees will be removed as a direct result of development. Importantly, none of these trees are designated as falling within Category A (trees of high quality and value). Three sycamore trees (G4) are to be removed, which are of low quality and value. The remaining 17 trees are classified as trees of moderate quality and value, two of which are dead with others having epicormic growth.

- 4.40 While the proposal is in outline and landscaping details are reserved for future determination, our client is committed to replacing all removed trees on an at least 2 for 1 basis, as well as providing additional trees in line with the Council's standards. There is plentiful space within the site to accommodate this (and other planting), so we are confident that the number of new trees will exceed the usual policy demands, creating an attractive landscape public space close to the road junction as a green 'gateway' feature on the approach towards the District Centre.
- 4.41 The application is supported by a Trees Survey / Assessment produced by We Know Trees (which forms part of Knowsley Council). This concludes that, regardless of the proposed development, a number of trees require removal for good arboricultural reasons.
- 4.42 In conclusion, trees will be replaced /provided in full accordance with the Council's policies, and it will be noted that there is ample space on the site to create substantial planted areas and the 'green up' what is currently a somewhat hard and barren street scene.

ECOLOGY

- 4.43 The application is supported by an Extended Phase 1 Ecological Survey (including Bat Potential Survey) produced by We Know Ecology Ltd (again, part of Knowsley Council). This concludes that:
- Building 3 had high potential to support roosting bats and bat use was confirmed in building 4.
 - Any tree loss due to re-development will be minimal and it is considered that any impact to foraging habitat for bats will be negligible. Foraging habitat is likely to be enhanced with the implementation of a future landscaping scheme.
 - No invasive plant species or other protected species were found on site.
- 4.44 The table on the following page highlights that no reptiles or birds are present on site.

Species or Group		Highlighted in data search?	Key habitat	Likely to be impacted?	Level of impact	Notable consideration on site?
Amphibian		Yes	None present on site	No	Negligible	No
Bird		No	Dense scrub, and scattered trees	Yes	High	Yes
Flowering plant		Yes	None present on site	No	Negligible	No
Reptile		No	None present on site	No	Negligible	No
Terrestrial mammals	Bats	Yes	Building 3 & 4 and scattered tree	Yes	High	Yes
	Water Vole	Yes	None present on site	No	Negligible	No

- 4.45 The main findings of the ecology report relate to the high potential for the presence of bats on site. As such, during the course of this application, further bat surveys will be submitted.

GROUND CONDITIONS

- 4.46 The application is supported by a Phase 1 Desktop Report produced by Sutcliffe. The report concludes that:
- The site is deemed to be at low risk in terms of potential contamination.
 - There are no significant environmental issues on site, although the site is affected by coal mining.

- 4.47 Therefore no unduly problematic issues have been raised at this outline stage.

TRANSPORTATION CONSIDERATIONS

- 4.48 The site is located in a highly accessible location within the built up area of Liverpool. It is served by frequent bus services, pedestrian facilities, and connections are good.
- 4.49 Transport considerations are reported in more detail in the Transport Statement (by DTPC). This concludes that the scheme accords with local and national policy to site development adjacent to good transport linkages and other attractions to minimise trips and share trip movements. It confirms that the site occupies a sustainable

location and that the site layout is designed to accord with good practice. It further confirms that there are no operational transport issues that would arise if the development was to proceed, and that the scheme will have little or no impact on the local highway network. Fundamentally, DTPC conclude that there are no reasons why the scheme should not be approved from a transportation point of view.

- 4.50 DTPC have also produced a Travel Plan Framework which is submitted with the application. The intention of this is to demonstrate a commitment to sustainable travel initiatives. It provides an indication of how the scheme will be designed and managed to discourage reliance on the private car and promote alternative modes of travel for both the residential and limited commercial elements of the scheme.
- 4.51 We therefore contend that the development is in line with UDP Policy T12 and Policy 1 and 4 of the Ensuring a Choice of Travel SPD.

5.0 Conclusions

- 5.1 The proposed development will deliver a high quality retail-focused scheme that will transform a currently underused and unkempt accessible brownfield site at the gateway to Belle Vale District Centre.
- 5.2 The scheme will create around 100 new jobs for local people (compared to the 10 that currently occupy the site).
- 5.3 The scheme constitutes sustainable economic development that is encouraged in both national and local planning policies.
- 5.4 Sequential assessment has been undertaken in line with the LPA's pre-application advice, and no in-centre or edge-of-centre sites are available, suitable and viable to accommodate the proposal.
- 5.5 We agree with the LPA that impact testing is not required, and as such none has been undertaken.
- 5.6 Approval of the application will reflect the advice of central Government in the NPPF that planning should not simply be about scrutiny, but instead **a creative exercise** in finding ways to **enhance and improve** the places in which people live their lives :
- 'Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.'***
- 5.7 For the above reasons, we contend that the application proposal is compliant with relevant policies and will deliver a range of much needed regeneration benefits. This will constitute towards sustainable development and will drive economic growth. We accordingly commend it to the Council and urge its positive determination.