



The People's Project

Bramley-Moore Dock
Planning Statement
December 2019

BRAMLEY-MOORE DOCK

Everton Stadium Development Limited

PLANNING STATEMENT

December 2019



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Reference:	Everton Stadium Development Limited		
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Executive Summary

This Planning Statement has been prepared by CBRE Limited, on behalf of Everton Stadium Development Limited (hereafter referred to as 'Everton' or 'the Club') in support of a full planning application for the proposed development of a new stadium, with associated facilities and infrastructure, at Bramley-Moore Dock (BMD).

Everton is proposing to relocate from its current stadium at Goodison Park where it has played football since 1892. The proposed new stadium at BMD is part of the Club's redevelopment plans which are referred to as 'The People's Project' and comprise:

1. The development of a new 52,888 seated capacity stadium predominantly for football use (with the ability to host other events) with associated facilities and infrastructure; and
2. Demolition of the existing Goodison Park stadium (post relocation) and redevelopment of the site for a mixed-use development, including housing, commercial space, community / leisure use and open space, referred to as the 'Goodison Park Legacy Project' (GPLP).

This Statement relates to part 1 of The People's Project only.

THE SITE

The application site extends to 8.67ha and comprises the water body and quaysides of BMD, located in north Liverpool.

The site is bound to the north by a boundary with the United Utilities Wastewater Treatment Works (WwTW) which is located on the now infilled Wellington Dock. Sandon Half-Tide Dock is situated to the north of the site, to the west of the WwTW, and connects to the BMD waterbody at the north-west corner of the site.

The eastern site boundary is delineated by the Grade II listed Regent Road wall which separates the site from Regent Road to the east.

The Grade II listed Nelson Dock retaining wall along the northern boundary of Nelson Dock and associated quayside form the southern site boundary. The BMD waterbody is hydrologically connected to the Nelson Dock waterbody at the south-west corner of the application site by a series of pipes through an isolation structure. The link between BMD and the wider dock network to the south is not navigable.

The western site boundary is formed by the River Mersey sea wall, which is an elevated section of wall which runs north to south along the western boundary, separating the application site from the River Mersey to the west.

The application site forms part of the UNESCO World Heritage Site (WHS) designation 'Liverpool – Maritime Mercantile City' (reference 1000104). The WHS was designated in 2004 and comprises six areas in the historic city centre and docklands of Liverpool; the application site is located within the Stanley Dock character area. The application site also lies within the Stanley Dock Conservation Area, which was designated in 2002. The application site contains several listed buildings / structures:

- Bramley-Moore Dock Retaining Walls, Grade II listed;
- Hydraulic Engine House at Bramley-Moore Dock, Grade II listed;
- Dock Wall from opposite Sandhills Lane to Collingwood Dock with Entrances, Grade II listed; and
- Nelson Dock Retaining Wall, Grade II listed.

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The application site is the northern most point of the Liverpool Waters development (application ref. 10O/2424 – latest non-material amendment being 19NM/1121), which is a 60 hectare regeneration scheme which encompasses the dockland between BMD in the north and Princes Dock in the south (BMD and Nelson Dock forming the Northern Docks neighbourhood area of the scheme). The Northern Docks neighbourhood is the last phase of Liverpool Waters, proposed for delivery between 2036 and 2041.

PROPOSED DEVELOPMENT

The description of the proposed development is as follows:

Application for Full Planning Permission in accordance with submitted drawings for the demolition of existing buildings/structures on site (listed in the schedule); remediation works; foundation/piling works; infill of the Bramley-Moore Dock, alteration to dock walls and dock isolation works with vehicular and pedestrian links above; and other associated engineering works to accommodate the development of a stadium (Use Class D2) predominantly for football use, with the ability to host other events, with ancillary offices (Use Class B1a); Club Shop and retail concessions (internal and external to the stadium) (Use Class A1); exhibition and conference facilities (Use Class D1); food and drink concessions (internal and external to the stadium) (Use Classes A3 / A4 / A5); betting shop concessions (Sui Generis); and associated infrastructure including: electric substation, creation of a water channel, outside broadcast compound, photo-voltaic canopy, storage areas/compound, security booth, external concourse / fan zone including performance stage, vehicular and pedestrian access and circulation areas, hard and soft landscaping (including canopies, lighting, wind mitigation structures, public art and boundary treatments), cycle parking structures and vehicle parking (external at grade and multi-storey parking) and change of use of the Hydraulic Tower structure to an exhibition / cultural centre (Use Class D1) with ancillary food and drink concession (Use Class A3).

The stadium has been designed as a stadium for the use of Everton Football Club. In addition to its primary function, the stadium may also host other events, such as non-football sporting events or concerts. In addition to these major events, the stadium is also proposed to host a range of smaller events e.g. conferences, exhibitions / conventions, weddings, stadium tours etc.

In addition, the Grade II listed Hydraulic Engine House is intended to function as an exhibition space, the start/end point for the River Walk, part of the stadium tour and as a small café / coffee shop.

On a non-match, non-event day, the site will remain open to the public. Crucially, therefore, as a result of the proposed development the BMD site will be accessible to all throughout the year, thus opening up a currently inaccessible part of the World Heritage Site and Stanley Dock Conservation Area.

The proposed development comprises the following aspects:

- A proposed stadium with 52,888 seated capacity;
- The change of use of the Hydraulic Engine House to an exhibition / cultural centre;
- Necessary circulatory space, including a large fan plaza which on a non-match / non-event day is an area of public realm;
- Hard and soft landscaping with associated street furniture and boundary treatments throughout all high quality and accessible external areas of the site;

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- A security building with vehicle barrier;
- A proposed water channel to visually maintain the dock connectivity between Nelson Dock and Sandon Half-Tide Dock;
- Northern isolation structure between Sandon Half-Tide Dock and the proposed water channel, with vehicle access above;
- Wind mitigation baffles/structures;
- Three new pedestrian entrances through the Regent Road dock wall;
- An Outside Broadcasting Compound area;
- An enclosed area of storage, predominantly for storage of grow lights for the pitch;
- A Distribution Network Operator Compound; and
- Surface car parking with overhead canopy (with Photo-Voltaic panels affixed).

Goodison Park Legacy Project

The second part of The People’s Project comprises the redevelopment of Goodison Park, once the Club relocates to the new stadium at BMD. Concurrently to designing the new stadium site to inform this full planning application, the Club has also developed initial plans for the redevelopment of its existing home, Goodison Park.

The outline planning application for Goodison Park seeks permission for up to 173 residential units, 102 residential care units and approximately 18,000 sq m of floorspace for commercial, retail, leisure or community use. Initial discussions have shown that this space could accommodate offices, a health centre, an education facility and small-scale retail and food & drink units. These uses are intended to help to support the existing community and also provide for a new community within the area.

Although not the subject of this planning application, the above proposals should be considered alongside the stadium development as the two collectively form ‘The People’s Project’.

CONSULTATION

Wide-ranging pre-application consultation has been undertaken by the applicant. In response to the heritage designations relating to the site, the applicant has extensively consulted with Historic England (HE) and Liverpool City Council (LCC). Detailed feedback was provided by both HE and LCC and this has been incorporated in the final scheme as submitted.

In addition, a two-stage public consultation has been held, which consulted the City Region about The People’s Project. Over 20,000 people responded during the first stage (November-December 2018), which focused on the principle of the Club moving to BMD. The headline findings are:

- 97% of respondents stated that it was important for Everton Football Club to remain in the City of Liverpool;
- 86% of respondents stated that Everton should remain in North Liverpool; and
- 94% of respondents stated that BMD was an appropriate location for a new football stadium.

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Over 43,000 people participated in the second stage consultation, which presented emerging designs for the new stadium and the illustrative masterplan for the GPLP. Key findings relating to BMD are:

- 98% of respondents supported / strongly supported the proposed stadium design;
- 96% of respondents supported / strongly supported the proposed reuse of historic features on the site; and
- 90% of respondents supported / strongly supported the proposed transport strategy.

Finally, respondents to the second stage public consultation were asked whether, in light of the information provided about The People's Project and its potential impacts and benefits, would they prefer to see the continuation of The People's Project or for the dock to be left in its current state. In response:

- 96% favoured the continuation of The People's Project;
- 2% had no preference;
- 1% preferred not to say; and
- 1% preferred to leave the dock in its current state.

Of note, a statistically significant number of responses came from people who are not Everton fans or who do not follow football at all, demonstrating significant and ongoing support for The People's Project as a whole.

PLANNING POLICY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town & Country Planning Act 1990 require planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.

The statutory development plan for Liverpool City Council currently comprises:

- Liverpool Unitary Development Plan (UDP) (adopted 2002); and
- Joint Merseyside & Halton Waste Local Plan (adopted 2013).

Other material considerations include:

- Local Guidance: including Supplementary Planning Documents / Supplementary Planning Guidance (SPGs);
- Emerging Policy;
- National Policy / Guidance: including the National Planning Policy Framework (NPPF, 2019);
- Economic Strategies; and
- Decisions regarding heritage assets.

Appendix 2 of the Planning Statement assesses the compliance of the proposed development against the statutory development plan. Generally, the proposed development is in compliance with the statutory development plan, with the exception of twelve policies of the UDP. In many of these cases, the proposed development complies with the majority of the policy but as one or two criteria are not satisfied a conclusion has been drawn that the

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proposed development is not fully compliant. Some of the other policies which the proposed development does not comply with are considered out-of-date.

As established in legislation, the application must be determined with regard to the statutory development plan unless material considerations indicate otherwise. A key material consideration in this case is the National Planning Policy Framework.

The NPPF (para. 11d) state that where there are no relevant development plan policies, or the policies most important for determining the application are out-of-date, permission should be granted, unless:

- i. the application of policies in the NPPF which protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against NPPF policies as a whole.

The most important policies to the determination of the proposed development relate to heritage assets, as the site is located within the Liverpool Maritime Mercantile City World Heritage Site (WHS), within the Stanley Dock Conservation Area, contains several Grade II listed assets and is within an area containing numerous listed buildings.

The heritage policies of the statutory development plan (UDP, 2002) can only be given limited weight and are considered out-of-date due to their lack of consistency with the NPPF and absence of policies regarding the WHS. Although the Council has published the World Heritage Site Supplementary Planning Document (2009), this is noted as being interim guidance (para. 1.5.7) which also predates the NPPF.

Therefore, paragraph 11d of the NPPF is engaged.

PLANNING ASSESSMENT

The following summarises the appraisal of the proposed development against NPPF policies which protect areas / assets of particular importance (para. 11d(i)).

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:

'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...'

Paragraph 196 of the NPPF is also relevant, which states that where less than substantial harm to the significance of a heritage asset is anticipated, the harm should be weighed against the public benefits, including securing the asset's optimum viable use where appropriate.

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Heritage Considerations

Mitigation Measures

The following are mitigation measures which are inherent in the proposed design and which have been included to reduce the impact upon heritage assets, following extensive pre-application consultation with HE and LCC:

- Reuse of the Hydraulic Engine House as an exhibition / cultural centre for public use throughout the year;
- Creation of a Water Channel to retain the visual connectivity of the dock system;
- Dock Infill Methodology which seeks to prevent damage to the listed dock walls, allowing for reversibility of infill in the future, if required;
- Stadium design:
 - *Scale*: reducing building height to the minimum possible;
 - *Massing*: particularly the stadium base, to reflect the warehouse typology seen in the Stanley Dock Conservation Area and WHS; and
 - *Materiality*: adopting a similar approach to other historic buildings in the Conservation Area to ensure the stadium base sits comfortably alongside listed buildings on site and in the surrounding area.
- Sensitive design of openings through the Grade II listed Regent Road wall; and
- Public realm design which exposes the listed BMD retaining wall within the public realm to the east and the west of the stadium and retains / repairs the majority of historical artefacts within the site.

Assessment of impact

The submitted Heritage Statement and ICOMOS Heritage Impact Assessment consider the impact of the proposed development upon the identified heritage assets, taking account of the various mitigation measures inherent in the design.

The assessments have identified that the proposed development will result in:

- *Substantial harm*: upon the Grade II listed BMD retaining walls and the Stanley Dock Conservation Area; and
- *Less than substantial harm*: to the UNESCO World Heritage Site, the Grade II listed Regent Road Dock Wall and the setting of the Grade II listed Hydraulic Engine House.

Public Benefits

The People's Project will generate benefits in terms of the environment, social value, the economy, heritage assets and equality / diversity, which can all be considered 'public benefits'.

The proposed development will result in a considerable public benefit associated with the renovation of the Hydraulic Engine House and proposals to bring this into public use as an exhibition / cultural centre.

This Planning Statement has demonstrated that the socio-economic benefits of The People's Project are anticipated to have a far-reaching geographical impact, going beyond the LCC administrative boundary to benefit the City Region and North West. The benefits are

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particularly transformational when considering the impact they will have upon priority regeneration areas, which include some of the most deprived parts of North Liverpool and the UK.

This Statement, and the reports which accompany this submission, have demonstrated that The People’s Project will have impacts which transcend the physical development of a stadium building and redevelopment of an existing stadium site. The catalytic impact associated with bringing forward development in the Ten Streets SRF area and accelerating the development of a part of Liverpool Waters which was initially proposed to be the last phase of development, together with The People’s Project itself, represents a generational opportunity to invest in, and transform, North Liverpool.

Therefore, it is concluded that the public benefits are substantial. The following summarises the social and economic benefits associated with the proposed development:



Source: CBRE

Alternative Sites

The requirement for Everton to develop a new stadium is long-standing and the search for an alternative site began over twenty years ago. The significant constraints of Goodison Park include its limited capacity, inadequate viewing experience, accessibility issues, insufficient facilities and commercial limitations in an increasingly competitive environment.

As detailed in Section 4.0 of this Statement and the submitted Alternative Sites Assessment, the redevelopment or expansion of Goodison Park is not considered an option.

Section 15.0 of this Planning Statement details that following an extensive site search and appraisal of potential sites, reported in the CBRE Alternative Sites Assessment, there are no alternative sites to BMD which could accommodate the requirements of Everton’s new stadium, either within the Extended North Liverpool catchment or the wider LCC authority area. For various reasons, none of the 50 sites assessed are considered to be feasible, practical or realistic options for a new stadium development.

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In accordance with paragraph 194 of the NPPF, substantial harm to the Grade II listed assets has been demonstrated to be exceptional. Paragraph 195 of the NPPF requires substantial harm to be necessary. It is considered that the Alternative Sites Assessment and Planning Statement have demonstrated that the proposed development meets both policy tests.

Weighing the harm and benefits

Based on the above, it is concluded that the significant public benefits outweigh the heritage harm (substantial and less than substantial) associated with the proposed development, in accordance with paragraphs 195 and 196 of the NPPF.

CONCLUSION

Although it is recognised that the proposed development will result in substantial and less than substantial harm to heritage assets, in accordance with paragraph 11d(i), the application of NPPF policies regarding the conservation and enhancement of the historic environment (specifically paragraphs 194 - 196), do not provide 'a clear reason for refusing the development'.

Paragraph 11d(ii) requires consideration of the adverse impacts of the development to understand whether such impacts demonstrably outweigh the benefits.

This application has fully assessed the environmental impacts of the proposed development alongside other planning considerations. Where an adverse impact has been identified, a series of mitigation measures have been proposed to reduce the impact.

It is concluded that there are no adverse impacts which would significantly and demonstrably outweigh the identified benefits.

Although Appendix 2 has demonstrated that generally the proposed development complies with the policies of the statutory development plan, there are some instances of non-compliance. However, the benefits of the proposed development are a material consideration in the planning balance, which outweigh the non-compliance of the proposed development to a small number of UDP policies.

Therefore, as directed by the NPPF presumption in favour of sustainable development (paragraph 11), the applicant invites Liverpool City Council's positive determination of this planning application.

Positive determination of this application is the first step in delivering transformational change in North Liverpool, as part of The People's Project.

1.0 Introduction

- 1.1 CBRE Limited, on behalf of Everton Stadium Development Limited (hereafter referred to as 'Everton' or 'the Club'), has prepared this Planning Statement in support of a full planning application for the proposed development of a new stadium with associated facilities and infrastructure at Bramley-Moore Dock (BMD), Liverpool.
- 1.2 Everton is proposing to relocate from its current stadium at Goodison Park where it has played football since 1892. The proposed new stadium at Bramley-Moore Dock is part of the Club's redevelopment plans which are referred to as 'The People's Project' and comprise:
 1. The development of a new 52,888 seated capacity stadium predominantly for football use (with the ability to host other events) with associated facilities and infrastructure; and
 2. Demolition of the existing Goodison Park stadium (post relocation) and redevelopment of the site for a mixed-use development, including housing, commercial space, community / leisure use and open space, referred to as the 'Goodison Park Legacy Project' (GPLP).
- 1.3 This Statement relates to part 1 of The People's Project only.

THE APPLICANT

- 1.4 Everton was founded in 1878 and was one of the founding members of the Football League in 1888. When football was transformed by the formation of the Premier League in 1992, Everton was again one of its founding members.
- 1.5 The Club's current stadium, Goodison Park, was the first major football stadium to be built in England and opened in 1892.
- 1.6 The Club is situated in Liverpool and competes in the top tier of English football, the English Premier League. The Club is one of the top five most successful English clubs and has won the FA Cup five times and the UEFA Cup Winners Cup once. The Club has been in the top division of English football for over 100 years.
- 1.7 The Club's most successful period was during the mid-1980s, when the Club secured two league titles – a FA Cup and European Cup Winners Cup – under the management of Howard Kendall.
- 1.8 Since it was founded, the Club has paved the way for many changes in English football, being the first club to have a four-sided stadium with two-tier stands, the first to issue a regular match day programme for home fixtures, the first to wear numbers on the back of shirts and the first to install key features such as dugouts, undersoil heating and scoreboards.
- 1.9 The Club is known as 'The People's Club', reflecting its commitment to its supporter base and local community through inclusiveness and accessibility. This is a philosophy that the Club feels that everyone connected to the Club can share. Community engagement is noted as a key part of the Club's operations and has been demonstrated through the work undertaken to date on The People's Project.
- 1.10 Although the Goodison Park stadium has been adapted significantly over the years, the inadequacies of Goodison Park, which are detailed in Section 4.0 of this Planning Statement, alongside the future aspirations of the Club, has necessitated the relocation to a new stadium site.

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- 1.11 The search for the new stadium started around 1998¹ and following several attempts to relocate, the Club is now progressing with a planning application for a new stadium at BMD.
- 1.12 However, the Club means more than just football and is important for both fans and non-fans. Everton in the Community (EitC) is the official charity of the Club and was founded in 1988. The charity is run by 120 full time staff and 160 volunteers, offering more than 40 programmes covering a range of social issues. EitC has invested significantly in the area surrounding Goodison Park. Further details are provided in Section 6.0 of this Statement.

THE BRIEF

- 1.13 The proposed development at BMD has been shaped by the 11 Principles of the Club. These principles were established by the Senior Executive Team of the Club and leading design team advisors and were signed off by the Club Board. The Club then consulted on these principles (see Statement of Community Engagement for further information). The principles were then used as a brief for the People’s Project, informing proposals for both BMD and the GPLP. These principles demonstrate that the People’s Project transcends beyond simply delivering a new football stadium, in terms of target beneficiaries, geographical reach and social, economic and environmental impact. The principles can be summarised as follows:
1. **Our Fortress:** To create a great place to play football, which facilitates and amplifies a compelling home advantage, inspiring the players. The stadium will promote sporting excellence and deliver one of the most atmospheric venues in world football;
 2. **A new home for Everton:** To replicate the best characteristics of Goodison while providing improved, modern facilities which meet and surpass the expectations of fans. This includes an iconic home end, a design which celebrates the Club’s history and an environment surrounding the stadium which will encourage people to congregate and socialise;
 3. **A platform for growth:** To address the demand for tickets and provide more variety in the hospitality provision. The new stadium will enable financial growth of the Club, including through securing a naming rights partner and improving broadcasting potential;
 4. **The People’s Club:** To listen to, and work with, fans and the local community throughout the process. The new stadium will provide dedicated facilities for families and young fans, as well as being exemplar in terms of the facilities and accessibility provision for those with disabilities;
 5. **An iconic landmark for Liverpool:** To develop an iconic, world-class stadium at BMD that challenges the conventions of stadium design;
 6. **Easy to get to, easy to get home:** To ensure that the stadium is accessible by public transport, through consultation with Liverpool City Council (LCC), the Combined Authority, Merseytravel and other service providers;
 7. **A legacy for Goodison Park:** To leave a lasting, positive legacy for the area. The Club intends to build upon the work of EitC and will demonstrate the Club’s continued commitment to the area;

¹ Summary Proof of Evidence of Robert Elstone, Everton Football Club Company Limited for appeal reference APP/V4305/V/08/1203375 (document reference TEV/S/8, para. 13.4).

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- 8. **Respecting Heritage:** To ensure that the development is sensitive to the history and significance of the site. The Club is committed to working with heritage groups to ensure that the developments considers the history of the site and preserve key structures at BMD, such as the Grade II listed Hydraulic Engine House. The development must encourage visits to the area, enabling the local community to benefit from the development;
 - 9. **Harnessing the environment:** To ensure that the stadium is environmentally efficient in design and construction and operationally efficient. The carbon footprint of the stadium will be minimised from construction onwards;
 - 10. **Embracing technology:** To create a unique entertainment experience which also uses technology to improve the pitch and players’ experiences before and after matches; and
 - 11. **The right deal for Liverpool:** To maximise the potential created by this regeneration opportunity in North Liverpool – both at BMD and the legacy project at Goodison Park. The new stadium will build upon development taking place elsewhere and act as a catalyst for future regeneration.
- 1.14 Further details of the Club’s Brief for a new stadium at BMD are provided in the Design & Access Statement (DAS), prepared by Meis Architects, which accompanies this planning application.

APPLICATION CONTENT

- 1.15 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town & Country Planning Act 1990, this Planning Statement assesses the acceptability of the proposed development with regard to the statutory development plan and other relevant material considerations.
- 1.16 The Applicant has voluntarily submitted a full Environmental Impact Assessment (EIA), under the 2011 Regulations, following submission of a Scoping Request to LCC on the 15th May 2017. A response was received on the 8th November 2017.
- 1.17 The application comprises the following documents:

Figure 1.1: Planning Application Documents

REPORT TITLE	PREPARED BY
Application form for planning permission and relevant demolition of an unlisted building in a conservation area	CBRE Limited
Application covering letter	CBRE Limited
Planning Statement	CBRE Limited
Alternative Sites Assessment	CBRE Limited
Full suite of planning application drawings	Meis Architects / Planit-IE / Pattern / Buro Happold / Murphy Surveys
Design & Access Statement	Meis Architects
Statement of Community Engagement	Influential
Section 106 Draft Heads of Terms	CBRE Limited
Desk Top Utilities Search	Buro Happold
Security Planning Report	Buro Happold
Sustainability Statement	Buro Happold
Energy Statement	Buro Happold
Hydraulic Engine House – Design Intent Report	Pattern Design

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Social and Heritage Value Report	Simetrica
Social Value Report	Real Worth
Bathymetric survey	Maltby Shoreline Surveys
Bramley-Moore Dock Condition Survey	Pebble Engineering
Utilities Status Report	Buro Happold
Interim Staff Travel Plan	Mott MacDonald
Match Day Transport Strategy Summary	Mott MacDonald
Framework Event Transport Strategy Summary	Mott MacDonald
Environmental Statement, including the following topics	
Transport	Mott MacDonald
Air Quality	WYG
Noise & Vibration	WYG
Ground Conditions	Buro Happold
Water Resources, Flood Risk & Drainage	Buro Happold
Terrestrial Ecology	WYG
Aquatic Ecology	Carcinus Limited
Wind Microclimate	Buro Happold
Daylight, Sunlight & Overshadowing	Anstey Horne
Lighting	WYG
Townscape & Visual Impact	WYG
Heritage	KM Heritage
Archaeology	Oxford Archaeology North
Socio-Economics	CBRE Limited

STRUCTURE OF DOCUMENT

- 1.18 The remainder of the Planning Statement is structured as follows:
- **Section 2.0 – Application Site Context:** describes the application site, including statutory and non-statutory designations, the wider location and planning history;
 - **Section 3.0 – Liverpool Waters:** provides details regarding the Liverpool Waters planning permission, including the approved development at the BMD site;
 - **Section 4.0 – The Need for a New Stadium:** provides the history of Goodison Park and details of its limitations and details the Club’s search for a new stadium site;
 - **Section 5.0 – Application Proposals:** details the proposed quantum of development, scheme layout and design in relation to both match day and non-match day modes as well as the construction methodology;
 - **Section 6.0 – The Future for Goodison Park:** describes the development proposed under the Goodison Park Legacy Project (GPLP);
 - **Section 7.0 – Pre-Application Consultation:** summarises the key aspects of the pre-application consultation undertaken by the applicant;
 - **Section 8.0 – Statutory Development Plan:** status of the statutory development plan, details of relevant policies and site allocation policies;

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- **Section 9.0 – Material Considerations – Local Guidance:** summarises Supplementary Planning Documents (SPDs), Supplementary Planning Guidance (SPGs) and Strategic Regeneration Frameworks (SRFs);
 - **Section 10.0 – Material Considerations - Emerging Policy:** details emerging Local Plan for Liverpool (2018) and Spatial Development Strategy (Liverpool City Region, 2019);
 - **Section 11.0 – Material Considerations - National Policy & Guidance:** National Planning Policy Framework (NPPF, 2019), Planning Practice Guidance (2014 and as amended), National Design Guide (2019);
 - **Section 12.0 –Material Considerations - Other:** details decisions relating to key heritage assets, relevant economic strategies and other material considerations;
 - **Section 13.0 – Heritage Impacts:** summarises the impacts of the proposed development upon designated and non-designated heritage assets and their setting;
 - **Section 14.0 – Public Benefits:** in accordance with paragraph 195 of the National Planning Policy Framework (NPPF), this section summarises the public benefits of the proposed development;
 - **Section 15.0 – Weighing the harm and benefits:** this section considers the heritage harm identified in Section 13.0 against the public benefits detailed in Section 14.0, in accordance with the balancing exercise required by paras. 194, 195 and 196 of the NPPF ('Conserving and enhancing the historic environment');
 - **Section 16.0 – Other Planning Considerations:** examines the other aspects of the proposed development which should be considered in the planning balance; and
 - **Section 17.0 – Conclusions:** draws together the various assessments to conclude on the overall acceptability of the proposal from a planning perspective.
- 1.19 A detailed description of the application site and surrounds is therefore provided in the next section.

2.0 Application Site Context

THE APPLICATION SITE

- 2.1 The application site extends to 8.67ha and comprises the water body and quaysides of Bramley-Moore Dock (BMD) and existing buildings. The site is located at National Grid Reference SJ 33452 92491.
- 2.2 The site is located within the Kirkdale ward of North Liverpool, approximately 2.9km to the south-west of the Club's current home at Goodison Park.
- 2.3 The site is bound to the north by a boundary with the United Utilities Wastewater Treatment Works (WwTW) which is located on the now infilled Wellington Dock (developed in accordance with permission reference 11F/1581, approved 12/01/2012). Sandon Half-Tide Dock is situated to the north of the site, to the west of the WwTW, and connects to the BMD waterbody at the north-west corner of the site.
- 2.4 The eastern site boundary is delineated by the Grade II listed Regent Road wall (within the application site boundary), beyond which lies Regent Road which links Bootle in the north to Liverpool city centre in the south, running along the east edge of the docklands.
- 2.5 The Grade II listed Nelson Dock retaining wall along the northern boundary of Nelson Dock and associated quayside form the southern application site boundary. The BMD waterbody is hydrologically connected to the Nelson Dock waterbody at the south-west corner of the application site by a series of pipes through an isolation structure. However, the link between BMD and the wider dock network to the south is not navigable.
- 2.6 The BMD waterbody is connected via dock gates to Sandon Half-Tide Dock. The dock gates are currently open. The submitted Bramley-Moore Dock Wall Visual Condition Report (Pebble Engineering) considers the condition of the lock gates as being poor in places, with evidence of corrosion and decay in parts.
- 2.7 The water level within the dock system is isolated from the tidal River Mersey via a system of lock gates at Langdon Dock, which is approximately 1.8km to the north of the application site.
- 2.8 The western site boundary is formed by the River Mersey sea wall, which is an elevated section of wall which runs north to south along the western boundary, separating the application site from the River Mersey to the west.
- 2.9 The following buildings are present on the site:
 - Grade II listed Hydraulic Engine House at Bramley-Moore Dock (Historic England listing reference 1072981), constructed in 1883;
 - An unlisted two storey brick structure located at the western end of the north wharf;
 - An unlisted shed structure on the southern wharf (used for occasional music events);
 - A substation located adjacent to the eastern site boundary; and
 - Two small structures on the western quayside (north and south-west part of quayside).
- 2.10 The Hydraulic Engine House, which is one of the most visually prominent buildings on site when viewed from Regent Road, is derelict and in need of significant repair works following a long period of vacancy (further detail provided in Section 5.0).
- 2.11 The internal, 'wet' / retaining walls of the BMD and Nelson Dock waterbodies are Grade II listed structures (Bramley-Moore Dock Retaining Walls, Historic England listing reference 1072980 & Nelson Dock Retaining Walls, Historic England listing reference 1209519).

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- 2.12 The site is predominantly at low risk of flooding (Flood Risk Zone 1), with part of the site along the western boundary within Flood Zones 2 and 3. The River Mersey wall, which forms the western site boundary, is not classified as a formal flood defence to the site as it is not continuous but does provide local protection against wave overtopping. The River Mersey wall has a crest level of 8.12m AOD and therefore is approximately 1.5m higher than the ground level of the remainder of the site.

Access

- 2.13 The application site is currently accessed via two gated openings in the Grade II listed Regent Road wall (Historic England listing reference 1072979, name 'Dock wall from opposite Sandhills Lane to Collingwood Dock with entrances'). The top of the wall is 11.26m AOD.
- 2.14 There is one access point at the south-east of the site, which comprises both access and egress points from Regent Road flanked by a pair of round towers and separated by a large central tower. A similar arrangement provides access to the north-east corner of the site from Regent Road, with the application boundary encompassing the southern access point and central tower (northern access point is within the United Utilities site to the north).
- 2.15 Both the south-east and north-east access and egress points provide authorised vehicular and pedestrian access to the site. However, metal palisade fencing within the site prevents access around the dock quaysides. The site is not publicly accessible. Due to the presence of the Grade II listed Regent Road dock wall along the eastern site boundary, visibility into the site is also restricted with the north-east and south-east entrances providing the only openings for limited visibility into the application site from the commercial and residential areas to the east.

Use

- 2.16 The following provides a summary of the historic and current use of BMD. More information relating to the historic use of the site is provided within the Archaeological Desk Based Assessment and Heritage Statement, which accompany this planning application.
- 2.17 Historically, the application site formed part of dock engineer Jesse Hartley's dock system, which comprises Salisbury, Collingwood, Stanley, Nelson and Bramley-Moore docks. This group of interconnecting docks opened collectively in August 1848 and later joined by Wellington Dock (1850), Wellington Half-Tide Basin (1850), Sandon Dock (1851) and Huskisson Dock (1852) to the north and Wapping Dock (1855), Wapping Basin (1855) and Canada Dock (1858) to the south of the city.
- 2.18 BMD was originally designed to accommodate the largest steamships at the time, but as ships became larger the dock became unfit-for-purpose just three years after opening (1851) and was instead used for the storage and handling of coal. A high-level coal railway was built on the site to service Bramley-Moore and Wellington Docks to load coal onto exporting ships at the dock. The Liverpool Overhead Railway was constructed in the 1890s, which ran along the length of the Liverpool docks and was powered by an electricity generating station at Bramley-Moore Dock. This was initially constructed to alleviate congestion problems caused by heavy commercial traffic using the dock road. The railway lines were gradually dismantled, and fully removed in the 1970s and 1980s.
- 2.19 The submitted Heritage Statement details that in the second half of the 20th century recession hit heavy industry and the demise in coal mining meant the export market weakened significantly. In 1988 BMD stopped handling coal and in 2008 a concrete isolation structure

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- between Nelson Dock and BMD was installed, thus preventing navigation between the two docks.
- 2.20 The application site was, until recently, predominantly used for aggregate storage and distribution, operated by Mersey Sands until its lease expired in August 2019. Svitzer and Cataclean are currently operating at BMD, albeit their leases expire in May 2020.
- 2.21 The submitted Ground Conditions chapter of the ES (ES Volume II, Chapter 10) considers the history of the site and the legacy of this past industrial use, in terms of potential contamination and the requirement for site-wide remediation prior to any form of redevelopment.
- 2.22 The application site is owned by Peel Land & Property (Ports) Limited but 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.
- 2.23 The application site is the northern most point of the Liverpool Waters development (LPA ref. 10O/2424 – latest non-material amendment being 19NM/1121), which is a 60 hectare regeneration scheme which encompasses the dockland between BMD in the north and Princes Dock in the south (BMD and Nelson Dock forming the Northern Docks neighbourhood area of the scheme). Details of the Liverpool Waters permission are provided in the Planning History section below and Section 3.0 of this Planning Statement.

SURROUNDING AREA

- 2.24 The application site is within an industrial dockland environment. The dock system runs north to south adjacent to the River Mersey, ending in the north at the Royal Seaforth Dock in Sefton and in the south at Brunswick Dock in Liverpool.
- 2.25 The River Mersey is located to the west of the site, beyond which lies the Wirral.
- 2.26 The area to the east of the application site is known as the Ten Streets and Wellington Employment Area and predominantly comprises commercial and industrial properties and storage yards, including a timber retailer and tyre retailer. A small row of two and three-storey terraced properties front on to Regent Road at the north-east corner of the site (north of Blackstone Street), comprising both business and residential premises.
- 2.27 The Titanic Hotel and Stanley Dock warehouse, which is currently being converted into residential apartments, are located to the south-east of the site.
- 2.28 Atlantic Park, a rectangular area of green space, is situated to the north-east of the site.
- 2.29 This area is within the Ten Streets Strategic Regeneration Framework (SRF) area. More detail regarding this SRF is contained within Section 9.0 of this Planning Statement.
- 2.30 The predominantly commercial area surrounding the site extends eastwards and is separated from the residential area known as the Eldonian Village and Vauxhall area by the Merseyrail line. This is the Northern line which links Liverpool city centre and south Liverpool (ending at Hunts Cross station) with Southport, Ormskirk and Kirkby to the north and north-east. Sandhills station, located approximately 1km to the north-east of the application site, is situated on this line.

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Socio-Economic Context

- 2.31 The site is situated within the Kirkdale ward which forms part of the North Liverpool regeneration area², an area which is noted in the submitted Economic Impact Assessment as a community suffering from severe deprivation on almost all indicators. The North Liverpool area has a declining population, which is reflective of an area which remains in economic distress (Economic Impact Assessment, para. 3.39).
- 2.32 A summary of the key socio-economic indicators for the UK, Liverpool and Kirkdale ward is provided in Figure 2.1 below (taken from Table 6 of the Economic Impact Assessment):

Figure 2.1: Socio-Economic Indicators

SOCIO-ECONOMIC INDICATORS ³	KIRKDALE WARD	LIVERPOOL	UK
Average Household Income (index base = 100) (2017)	73	100	137
Unemployment rate ⁴	4.8%	4.5%	4.1%
Claimant Count	4.60%	3.50%	2.0%
Worklessness % (working age)	33.5%	21%	14.5%
Incapacity Benefit Claimants (2016)	16.50%	10.90%	6.30%
Workforce 16+ (no qualifications) (2011)	40.40%	28.70%	22.70%
Workforce 16+ (NVQ4 +) (2011)	14.50%	22.40%	27.20%
Percentage 5+ GCSEs A*- C (2011)	42.4%	54.8%	60.6%
Life expectancy (index) 2015-17	95	100	104
Child Poverty (2018)	38.9%	27.7%	16.8%
Crime per 1000 (2018)	141	114	n/a
IMD - % of area in most deprived 10% nationally	100%	49.6%	n/a
IMD score (highest = worse)	68.2	43.1	n/a
Business per capita ratio (bu: pop) (2016)	1:25	1:25	n/a
GVA per head (Index UK = 100) ⁵	57	88	100

Source: LCC / ONS / CBRE

DESIGNATIONS

- 2.33 The following designations are applicable to the application site and surrounding area. Further details of these designations can be found in the submitted Environmental Statement.

² North Liverpool comprises the Anfield, County, Everton and Kirkdale wards.

³ Data is 2019 unless otherwise stated.

⁴ Calculated by the difference between Liverpool Unemployment in 2016 and 2019 and applying this to Kirkdale

⁵ Calculated by the difference between Liverpool GVA in 2016 and 2019 and applying this to Kirkdale

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Application Site

World Heritage Site Status

- 2.34 The site forms part of the UNESCO World Heritage Site (WHS) designation ‘Liverpool – Maritime Mercantile City’ (reference 1000104). The WHS was designated in 2004 and comprises six areas in the historic city centre and docklands of Liverpool; the application site is located within the Stanley Dock character area.
- 2.35 The WHS extends to 136ha and the Buffer Zone associated with the site extends to 750.5ha. In total, the WHS and Buffer Zone cover approximately 886.5 ha / 8.9 km². The site extends from Bramley-Moore Dock in the north to Wapping Dock in the south but excludes some dockland and infilled dock within this stretch. The site also extends eastwards into the city centre.
- 2.36 The reasons for the designation against the UNESCO criteria for the assessment of Outstanding Universal Value (OUV)⁶ are as follows (as detailed in the UNESCO nomination file, 2004):
- **Criterion (ii):** Liverpool was a major centre generating innovative technologies and methods in dock construction and port management in the 18th, 19th and early 20th centuries. It thus contributed to the building up of the international mercantile systems throughout the British Commonwealth.
 - **Criterion (iii):** The city and the port of Liverpool are an exceptional testimony to the development of maritime mercantile culture in the 18th, 19th and early 20th centuries, contributing to the building up of the British Empire. It was a centre for the slave trade, until its abolition in 1807, and for emigration from northern Europe to America.
 - **Criterion (iv):** Liverpool is an outstanding example of a world mercantile port city, which represents the early development of global trading and cultural connections throughout the British Empire.
- 2.37 The dock structures within the WHS are identified by UNESCO as contributing to the authenticity of the Outstanding Universal Value (OUV) of the designation, in terms of their form, design, materials and use/function⁷.
- 2.38 The WHS was inscribed on UNESCO’s List of World Heritage in Danger in 2012 and has remained on this list every year since. The reason given for this decision was the indication that Liverpool City Council (LCC) was minded to grant the proposed Liverpool Waters development (LPA ref. 100/2424), which UNESCO noted as a potential danger to the World Heritage property. In 2012, UNESCO⁸ identified that should the Liverpool Waters project proceed as originally proposed, there was a possibility of deletion of the property from the World Heritage List. More information is provided in Section 12.0 of this Planning Statement.

⁶ As detailed in the UNESCO Operational Guidelines for the Implementation of the World Heritage Convention (2019).

⁷ UNESCO, <https://whc.unesco.org/en/list/1150/>

⁸ UNESCO Decisions adopted by the World Heritage Committee at its 36th session, 2012, document reference WHC-12/36.COM/19, pgs 132-133.

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Other Heritage Designations

- 2.39 The application site lies within the Stanley Dock Conservation Area, which was designated in 2002. The conservation area is one of the key 6 areas which make up the Liverpool Maritime Mercantile City WHS.
- 2.40 Although there is no Conservation Area Appraisal available for the Stanley Dock Conservation Area, the adopted World Heritage Site Supplementary Planning Document (SPD) (2009) provides details of the characteristics of the area (refer to Section 9.0 of this Planning Statement). Although the SPD was produced 11 years ago, and prior to the publication of the NPPF, it remains the most detailed local guidance relating to the World Heritage Site and Conservation Area.
- 2.41 The conservation area covers several docks, including Bramley-Moore Dock, the Regent Road boundary wall, part of the Leeds and Liverpool Canal and several historic dockyard structures and buildings. Many of the conservation area’s remaining structures are Grade II* or Grade II listed.
- 2.42 The application site contains several listed buildings / structures, as detailed above but for clarity are listed below:
 - Bramley-Moore Dock Retaining Walls, Grade II listed
 - Hydraulic Engine House at Bramley-Moore Dock, Grade II listed;
 - Dock Wall from opposite Sandhills Lane to Collingwood Dock with Entrances, Grade II listed; and
 - Nelson Dock Retaining Wall, Grade II (Ref. 1209519).

Surrounding Area

Heritage

- 2.43 The following are statutory heritage designations within a 1km radius surrounding the application site (excluding those located on the application site which are detailed above):

Figure 2.2: Statutory heritage designations within 1km of site

NAME	LISTING	LIST ENTRY NUMBER
Liverpool - Maritime Mercantile City	World Heritage Site	1000104
Sugar Silo	Grade: II*	1252955
Former Warehouse on North Side of Stanley Dock	Grade: II*	1359841
Collingwood Dock Retaining Walls	Grade: II	1209517
Gate to Clarence and Clarence Graving Docks	Grade: II	1360218
Entrance to Stanley Dock on Corner of Saltney Street	Grade: II	1072940
Stanley Locks, Leeds And Liverpool Canal	Grade: II	1084206
Sea Wall to North Island at Dock Entrance	Grade: II	1073438
Great Howard Street Bridge Over the Leeds And Liverpool Canal at Head of Stanley Dock	Grade: II	1218000
Dock Retaining Wall at Salisbury Dock	Grade: II	1361686
Sea Wall to South of Salisbury Dock Entrance	Grade: II	1073439
Bonded Tea Warehouse	Grade: II	1298760

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Gate to Victoria And Trafalgar Docks	Grade: II	1062578
Entrance to Stanley Dock at Saltney Street Corner	Grade: II	1187329
Sea Wall to Island at Dock Entrance	Grade: II	1361706
Dockmaster's House	Grade: II	1073479
Nelson Dock Retaining Wall (<i>N.B. the northern retaining wall is included within the application site boundary</i>)	Grade: II	1209519
Entrance to Leeds And Liverpool Canal at Head of Stanley Dock	Grade: II	1063329
Graving Docks	Grade: II	1206210
Stanley Warehouse to South of Tobacco Warehouse	Grade: II	1217978
Church of St Alban	Grade: II	1356259
Entrance to Stanley Dock at North End	Grade: II	1072939
Victoria Tower	Grade: II	1209989
Hydraulic Tower to West of Former North Warehouse, Stanley Dock	Grade: II	1217985
Warehouse	Grade: II	1392859
Boundary Bridge	Grade: II	1356315
Dock Master's Office	Grade: II	1073480
Entrance to Stanley Dock at North End	Grade: II	1356360
Tobacco Warehouse on South Side of Stanley Dock	Grade: II	1063328
Leigh Bridge	Grade: II	1280750
Gate to Clarence Dock	Grade: II	1218464

Source: Historic England website

Ecology

- 2.44 The following are ecological designations within a 2km area surrounding the application site:
- Mersey Narrows & North Wirral Foreshore Ramsar Site (Ref. UK11042);
 - Mersey Narrows & North Wirral Foreshore Special Protection Areas (SPA) (Ref. UK9020287);
 - Mersey Narrows Site of Special Scientific Interest (SSSI) (Ref. 1056551); and
 - Liverpool Bay / Bae Lerpwl SPA extension (SPA).
- 2.45 Further details of these designations are provided in ES Volume II, Chapters 12 and 13.

PLANNING HISTORY

- 2.46 The following table documents the planning history of the application site dating from the most recent approval back to 2000.

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Figure 2.3: Planning History

APPLICATION REFERENCE NUMBER	ADDRESS	APPLICANT	DESCRIPTION OF DEVELOPMENT	DECISION
19NM/1121	Liverpool Central & Northern Docks (Bramley-Moore, Nelson, Salisbury, Collingwood, Trafalgar, Clarence Graving, West Waterloo, Princes Half Tide & Princes Docks), L3	Peel Land & Property (Ports) Limited	Application for non-material amendment to 100/2424 - 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)	Approved 23/08/2019
18NM/2766	Liverpool Central & Northern Docks (Bramley-Moore, Nelson, Salisbury, Collingwood, Trafalgar, Clarence Graving, West Waterloo, Princes Half Tide & Princes Docks), L3	Peel Land & Property (Ports) Limited	Application for non-material amendment to 100/2424 - 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)	Approved 16/11/2018
12C/0173	Bramley-Moore Dock Liverpool L3	Peel Land & Property (Ports) Ltd	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)	Approved 28/06/2013

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100/2424	Liverpool Central & Northern Docks (Bramley-Moore, Nelson, Salisbury, Collingwood, Trafalgar, Clarence Graving, West Waterloo, Princes Half Tide & Princes Docks), L3	Peel Land & Property (Ports) Ltd	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)	Approved 19/06/2013
12L/0847	Bramley-Moore Dock Regent Road Liverpool L3 7DS	United Utilities Plc	To carry out works in connection with re-opening of existing entrance to Bramley-Moore Dock, demolish brickwork and replace with palisade fencing/gate.	Approved 17/05/2012
12F/0845	Bramley-Moore Dock Regent Road Liverpool L3 7DS	United Utilities Plc	To re-open existing entrance to Bramley-Moore Dock, demolish brickwork and replace with palisade fencing/gate.	Approved 17/05/2012
10C/2425	Liverpool Central & Northern Docks, Liverpool, L3	Peel Land & Property (Ports) Ltd	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	Pending determination 18/11/2010 (registered)
04L/0825	Nelson Dock, Liverpool, L5	British Waterways Board	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)	Approved 06/06/2006

Source: Liverpool City Council website

- 2.47 Of note, although not included in Figure 2.3 due to its age, the original planning application for the Liverpool WWtW (application reference L254561) to the north of the application site was approved in 1980 and extended to the Sandon, Wellington and Bramley-Moore Docks and would have involved their infilling, if works were carried out in accordance with the permission.
- 2.48 Wellington Dock was eventually filled in following approval of planning application reference 11F/1581, which was approved in January 2012. The method of infill (sand based) to minimise the impact on the dock walls and to enable reversibility in the future is also pertinent to this application.
- 2.49 In addition to the planning applications detailed in Figure 2.3, a licensing application which relates to the application site has recently been approved. The license (reference LA180042) is held by Cataclean Global Limited and is applicable from the 24th July 2018. The licence permits a range of activities, including the performance of a play, exhibition of a film,

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indoor sporting events, live music performances and the sale of alcohol. The licensing hours are Monday to Sunday from 08:00 to 00:00. This relates to the existing warehouse located on the southern quay of the application site.

3.0 Liverpool Waters Context

- 3.1 As detailed in the previous section, in June 2013 Peel Land & Property (Ports) Limited received outline planning permission for a mixed-use development, referred to as 'Liverpool Waters' (permission reference 10O/2424). BMD, along with Nelson Dock, form the Northern Docks Neighbourhood of the Liverpool Waters development.
- 3.2 The application was referred to the Secretary of State and was not Called-In. The then Secretary of State considered the application and concluded that the nature of the matters raised in the outline application did not persuade him to use his discretionary powers to call-in the application. As such, he was content to leave the decision to the LPA, considering the authority to be best placed to determine the application⁹.

PLANNING PERMISSION

- 3.3 The outline permission for Liverpool Waters approved the following development:
- '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).'*
- 3.4 The approved Development Plots Parameters Plan for Liverpool Waters is included at Appendix 1, for reference.
- 3.5 The permission encompasses five neighbourhood areas, which are listed below alongside their anticipated delivery period (as per the approved phasing plan):
- Princes Dock (Phase 1, 2019 – 2024);
 - Central Docks (Phase 2, 2020 – 2036);
 - King Edward Triangle (Phase 3, 2021 – 2029)
 - Clarence Docks (Phase 4, 2031 – 2036); and
 - Northern Docks (Phase 5, 2036 – 2041).
- 3.6 The application site, BMD, along with Nelson Dock, form the Northern Docks neighbourhood.
- 3.7 The outline permission includes a condition requiring all reserved matters applications for the entire development to be submitted to LCC within a 32 year period, starting from the date of the permission (19th June 2013).
- 3.8 The outline permission also dictates that prior to commencement of a phase of development delivered through the outline permission, a Neighbourhood Masterplan for the relevant neighbourhood is to be submitted to and approved by LCC via a discharge of condition

⁹ Letter from Sara Lewis, DCLG re. case reference NPCU/CONS/Z4310/69965, dated 4th March 2013.

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application. To date, there have been no Neighbourhood Masterplan submissions made in relation to the Northern Docks area, as this is the last phase in the Liverpool Waters development, as identified above, and will not be brought forwards until 2036 at the earliest.

- 3.9 Changes to the development approved under the Liverpool Waters permission (reference 10O/2424) have been made through two Non-Material Amendments (NMA) (permission reference 18NM/2766 approved 16th November 2018 and permission reference 19NM/1121 approved 23rd August 2019).
- 3.10 Peel Land & Property have also submitted two Reserved Matters applications (reference 18RM/1554 approved 14th June 2019 and reference 19RM/1817 approved 30th August 2019) since 2013, in accordance with Condition 8 of permission reference 10O/2424 and therefore the outline permission remains extant.
- 3.11 In addition, several planning applications have been submitted and approved for development within the Liverpool Waters boundary. These applications (both outline and detailed) are referred to throughout this submission as 'standalone' as they have not been made pursuant to the outline planning application. These applications are still considered as cumulative developments where they are not yet complete and occupied (i.e. not yet part of the baseline condition) and are identified within the Environmental Statement which accompanies this planning application (ES Volume II, Chapter 2). Although not an exhaustive list, such standalone applications include:
- Cruise Liner terminal, Princes Jetty, Princes Dock (application ref. 17O/3230 approved 11/04/2018 & 19RM/1037 approved 17/09/2019);
 - Isle of Man Ferry Terminal, West Waterloo Dock, Central Docks (application ref. 18F/3231, approved 23/04/2019);
 - Road links (including application references 17F/2628 approved 11/04/2018 & 18F/1419 which is pending determination); and
 - Residential developments, including:
 - Application reference 17F/1628, Plot C04 & C06, Central Docks: application for 237 apartments, approved 18/12/2017;
 - Application reference 17F/0913, Plot A05, Princes Dock: application for 105 apartments, approved 10/11/2017; and
 - Application reference 18F/3247, Plot C02, Central Docks: application for 538 apartments (revised from 646 apartments) currently pending determination.
- 3.12 Taking account of the proposed changes under the NMA permissions, the remainder of this section details the approved development for the Northern Docks area specifically.

Northern Docks

- 3.13 Figure 3.1 is an extract of the approved Parameter Plan 006, Liverpool Waters Building Heights (dated 25/04/2019) which was approved as part of NMA permission reference 19NM/1121.

Liverpool Waters Context

Figure 3.1: Approved Building Heights for Northern Docks



Source: Planit, extract from 1868-VW-009 Issue no. 09, approved under permission reference 19NM/1121)

- 3.14 The approved development at BMD comprises five blocks along the quaysides and a block within the BMD waterbody. Figure 3.1 shows that the approved maximum heights for development at BMD ranges from 8 metres (structure in centre of dock waterbody, plot reference E-17) to 38m (western quayside, plot reference E-13). The maximum extent of the blocks is also shown on Figure 3.1.
- 3.15 The application boundary also extends into the parameter blocks shown on Nelson Dock, including the northern part of the 38m maximum height block on Nelson’s western quayside (plot reference E-06) and the three development blocks (two of 33m maximum height and one of 31m maximum height, plot references E-09, E-10 and part of E-04) along the northern quayside.
- 3.16 The submitted Environmental Statement (Volume 2, Chapter 2) details the methodology for the technical assessments which inform this planning application, including the basis for assessing the interaction between the proposed development and Liverpool Waters, including the impact of the proposed development upon the approved parameters of Nelson Dock.
- 3.17 Schedule 1 of the Liverpool Waters outline planning permission (reference 10O/2424) establishes the proposed floorspace per Neighbourhood by land use (sq m). Condition 2 (Part A) of the permission establishes that the total floorspace provided within each neighbourhood shall not exceed the amount defined within this schedule. This information for the Northern Docks is replicated in Figure 3.2 below.

Liverpool Waters Context

Figure 3.2: Approved Floorspace by Use Class for Northern Docks

USE CLASS	NORTHERN DOCKS FLOORSPACE (GROSS INTERNAL AREA) (SQ M)
A1 Shops (comparison)	4,000
A1 Shops (convenience)	1,000
A2 Financial & Professional	300
A3 Restaurants & Cafes	2,200
A4 Drinking Establishments	1,200
B1 Business	1,800
C1 Hotels	0
C3 Dwelling Houses	219,500
D1 Non-Residential Institutions	6,600
D2 Assembly & Leisure	1,000
Servicing	5,800
Sui Generis (other)	1,000
Sui Generis (Parking)	103,100
Total	347,500

Source: Schedule 1 of Decision Notice for permission reference 100/2424

ENTERPRISE ZONE

- 3.18 Liverpool Waters, alongside a similar regeneration project in Wirral (termed ‘Wirral Waters’), form the Mersey Waters Enterprise Zone. Mersey Waters was amongst the first Enterprise Zones announced by HM Government in 2012¹⁰. Mersey Waters was launched by the Liverpool City Region Local Enterprise Partnership (LEP) together with Liverpool City Council and Wirral Council in 2012, with a 25 year lifespan to 2037.
- 3.19 Businesses within the 44ha Enterprise Zone can benefit from Business Rate discount / relief as a means of supporting businesses and enabling local economic growth. Mersey Waters is one of three Enterprise Zones across Liverpool City Region, identified due to their ‘unique potential to generate economic growth across the region’¹¹.

¹⁰ <http://enterprisezones.communities.gov.uk/>

¹¹ <http://liverpoollep.org/major-projects/enterprise-zones/>

4.0 The Need for a New Stadium

- 4.1 The case for a new stadium is comprehensively set out in the Alternative Sites Assessment submitted with this planning application. This section of the Planning Statement therefore does not seek to replicate this but instead summarises the pertinent points to the planning case.
- 4.2 Goodison Park is considered to be the first major purpose-built stadium in England, opening in 1892 with a capacity of 11,000. The stadium has been significantly altered since this time and now accommodates 39,572 spectators.
- 4.3 The stadium grew throughout the 1900s, with double-decker stands being designed to increase capacity. Key to this expansion was Archibald Leitch, a renowned stadium architect at the time. The last major stand redevelopment was the replacement of the Henry Hartley Park End Stand (a double tiered stand) with the single tier Park End Stand in 1994, which has a capacity of 6,000 seats. Since the mid-1990s, Goodison 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 has sought to make Goodison Park compliant with disability access guidelines.
- 4.4 The Club invests significant amounts on an annual basis for the general upkeep of Goodison Park. Between 2015/16 and 2019/20, this amounted to £19m on major maintenance works and capital expenditure, to ensure that the stadium continues to meet the modern regulations and standards.
- 4.5 In February 2019, the Secretary of State for Digital, Culture, Media and Sport (DCMS) issued a Certificate of Immunity from Listing for Goodison Park. Despite the Club's extensive history at Goodison Park, the Secretary of State and Historic England considered that the building did not fulfil the national criteria for listing, in part due to the extensive alteration which has occurred since the building's initial construction.
- 4.6 Due to the age of the building there are several limitations to Goodison Park which mean that it is falling far short of its competitors' stadia in the English Premier League (EPL). These issues are summarised in the following section.

LIMITATIONS OF GOODISON PARK

- 4.7 Goodison Park has fallen significantly behind its rivals during a period of unprecedented and intensive infrastructure development in the English Premier League. It is 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.
- 4.8 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 that¹² [CBRE **emphasis** added]:

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

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“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 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 Elstone’s evidence that **had it been feasible to stay at or near the current site, EFC would have done so**”.

4.9 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. The following summarises the information provided in the submitted Alternative Sites Assessment, which explains the operational weaknesses of Goodison Park in further detail:

- **Insufficient capacity:** Based on its analysis of current demand, the Club requires more than 50,000 seats to address its significant waiting list for season tickets, which as of November 2019 amounted to requests for more than 11,000 tickets.
- **Spectator Viewing Experience:** Over the last 15 years in the Premier League Matchday Fan Experience Survey, Club has consistently ranked at the bottom of the EPL in terms of sightlines to the pitch. Goodison Park has almost 21,000 seats which have an obstructed view of the pitch, due to the position of columns and stands, which equates to 53% of the stadium capacity. Furthermore, seating terrace widths are narrow and there are issues with the widths/quality of seats, the quality of accommodation and comfort in the majority of the stands. These are major issues that could not be rectified without the comprehensive redevelopment of the stadium.
- **Accessibility and Facilities:** the constrained nature and age of the stadium restricts the accessibility of Goodison Park does not provide the level of integrated facilities or accessibility required by a top tier football club. Key issues include:
 - *Disabled access and seating:* The Accessible Stadia Guide (ASG) requires Goodison Park to provide 207 wheelchair positions, of which 75% should be located in elevated positions within proximity to accessible toilet facilities. The Club has made significant investments in recent years to increase provision and in 2017 Goodison Park provided only 121 seats that met ASG guidance. Since 2007, further works have been 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. Whilst the Club is legally compliant, the stadium does not provide appropriate proximity to accessible toilet facilities; sufficient numbers of elevated positions; or accessible positions in all stands around the ground (no elevated positions in the Bullens Road or main section of the Gwladys Street stands).
 - *Dedicated Facilities:* The current stadium does not contain changing places facilities, breastfeeding rooms, prayer rooms or quiet rooms, instead using existing office space for these purposes, which is not necessarily suitable.
 - *Quality and Access to Facilities:* The existing concourses are narrow, which has an adverse impact on the spectator experience. As well as creating significant movement issues for large crowds, the access to toilets and retail facilities is impeded. This has

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a particularly detrimental impact on the ability of families with small children and disabled supporters to circulate around the stadium. Commercially, the lack of concourse space restricts the ability for the Club to sell programmes and food & drink to fans. 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'.

- *Information Communications Technology (ICT)*: Due to the age of the building and lack of space, the Club is unable to offer a low power network to provide mobile phone coverage throughout the stadium. The wireless network infrastructure is also restrictive. This contributes to a negative fan experience of the ground, which is evidenced in the EPL matchday fan experience surveys.
- *Outside the Stadium*: The stadium is tightly constrained by the surrounding network of residential streets. This has significant amenity impacts on a match day for local residents. As there is no dedicated exterior concourse for marshalling and managing crowds, the surrounding roads are used for this, which requires significant stewarding and policing, with the Club responsible for staffing increased Counter Terrorism measures, including Hostile Vehicle Mitigation, in a tight and significantly constrained urban setting.
- *Team and Players*: 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 which does not provide the quality of provision that is expected at a top tier Club.
- **Commercial limitations**: the limitations of Goodison Park not only have major implications in terms of ongoing maintenance costs but are also a major financial constraint in terms of its ability to generate revenue. These include:
 - *Corporate Hospitality*: 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. 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.
 - *Retail*: The Club's shop is approximately 100m away from the stadium across a busy arterial road into/from the city centre. Due to a lack of space within the stadium the Club is unable to accommodate this floorspace within the main building. The shop is also smaller than that of most EPL clubs. Typically, stadium tours of a Premier League Club would start / end at the Club Shop, but this is not currently possible at Everton, thus further limiting commercial opportunities.
 - *Food and Beverage Offer*: The lack of space for kitchen equipment, coolers and cellar space means that the Club can only offer spectators a limited range of food and drink in certain 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

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overall spectator experience at Goodison Park, as well as having an adverse financial impact on the Club.

- *Attractiveness to the Media:* Media facilities are limited and camera positions small and inadequate. This limits the ability of the Club to accommodate national and international broadcasters and is not of the standard expected by EPL and UEFA. Although able to meet the EPL rules, this results in the creation of additional obstructed seats and necessitates media outlets sharing space and facilities with General Admission spectators. This is an ongoing constraint of the stadium which affects the Club commercially as broadcasting revenue is a major source of income for EPL clubs.

- **Other operational issues:** Other issues that impact on the operation at Goodison Park include a lack of office space for administration staff, the existing ticket collection point is in close proximity to the visiting supporters collection point creating safety and security issues; and the poor visual and architectural quality of Goodison Park that does not reflect the status of Everton as one of the top division's oldest and most respected Clubs.

4.10 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 ongoing costs on the Club and losing the Club significant revenues as a result of the practical and operational limitations of Goodison Park.

GROWING COMPETITIVENESS DURING THE PREMIER LEAGUE ERA

4.11 Since the inception of the English Premier League (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.

4.12 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 period. 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% increase.

4.13 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 generate revenue, attract talent and to compete with rival top tier clubs. These clubs all benefit from improved and modern facilities, with capacities that all 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). These new stadiums also benefit from a significant hospitality executive offer, unimpeded views from all seats, high quality facilities for staff and fans, and compliance with all modern regulations.

4.14 It is therefore clear that for Everton to remain competitive in a rapidly developing and commercially changing league, it must deliver the facilities, stadium and experience that

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matches the expectations of supporters, staff, investors and broadcasters – in order to compete alongside its peer EPL and European peers and to ensure the Club does not fall into further decline.

REDEVELOPMENT / EXPANSION

- 4.15 As previously detailed, the current stadium sits within a tight urban setting, occupying just 3.25ha of land; this is considerably smaller than what would be required for the comprehensive development of a new stadium and associated facilities. The Alternative Sites Assessment details why the threshold of a minimum site size of 8ha has been used in the assessment to allow the development of a modern stadium with the required ancillary facilities.
- 4.16 The expansion of Goodison Park would require the purchase of residential properties and possibly a school, shops and businesses. This would involve significant site assembly issues (in terms of both cost and programme) and could have a significant impact on the very community which Everton strives to support through the charity work of EitC. Even if such acquisition were possible, with the support of the local authority and local community, it would not resolve the fundamental issues at Goodison relating to the stadium being surrounded by residential properties and the amenity impacts this creates.
- 4.17 Another option considered was to increase the capacity of the existing stands, for example through the use of additional tiers. This would also require an extended stadium footprint which would encroach onto surrounding highways and residential properties.
- 4.18 Fundamentally though, expanding/redeveloping the existing stands would not address the critical limitations of the building, including poor sightlines, lack of accessibility, the ageing nature of the existing stands and insufficient front and back of house facilities.
- 4.19 Operationally, the redevelopment of the existing site would cause significant issues either in requiring the Club to relocate or reduce seating capacity during the redevelopment. Neither are considered practical or realistic for the Club.
- 4.20 The Alternative Sites Assessment concludes that Goodison Park does not provide a feasible, practical, realistic or deliverable opportunity to provide a football stadium which meets the modern needs of a top tier football club.

THE SEARCH FOR AN ALTERNATIVE SITE

- 4.21 The Club's search for a new stadium site began before 2000. Over the last 20 years, the Club has continued to regularly review the availability and suitability of alternative sites. Previous Everton stadium proposals include:
- **King's Dock, Liverpool (1999 - 2003):** Plans for a waterfront stadium were pursued in the early 2000s but were halted due to issues with funding. The site is now home, in part, to Liverpool's M&S Arena.
 - **Kirkby, Knowsley (2006 – 2009)¹³:** The Club, in partnership with Tesco Stores Limited, submitted a hybrid planning application for a 50,000 capacity football stadium, along with required enabling development (retail led) in early 2008. Although a resolution to approve the application was received from Knowsley Metropolitan Borough Council, the

¹³ Appeal reference: APP/V4305/V/08/1203375, application reference: 08/00001/HYB

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scheme was then called-in by the Secretary of State and ultimately dismissed in 2009, primarily relating to retail planning matters.

The scheme received significant opposition from LCC and a large section of the Club’s fan base, as shown by the formation of a fan group called ‘Keep Everton In Our City’. Since this time, the Club has focused its search for a new stadium on sites which have a tangible connection to its spiritual home in North Liverpool. The physical, historic and cultural ties of the Club to the North Liverpool area are detailed further in the submitted Alternative Sites Assessment.

- **Walton Hall Park (2014 – 2016):** The Club carried out initial feasibility work to explore Walton Hall Park as a potential location for a new stadium. However, due to the site’s status as an important City Park (designated in the statutory development plan as protected green space) and its role in providing high quality open space for North Liverpool, together with the quantum of retail development required to cross-subsidise the development, meant that proposals were not progressed.

At the time, the initial proposals generated significant opposition and at a consultation event in September 2014 there were a number of demonstrations against the proposals by the local community and local groups, including Friends of Walton Hall Park.

LCC has since made clear that it would not consider important City Parks or protected open space as being suitable for a stadium development.

- 4.22 There is a clear, long-standing need for a new stadium. This was accepted at the Kirkby inquiry and no material change has occurred in the period since. As such it is concluded that the Club must move location.
- 4.23 Section 15.0 of this Statement summarises the recent work that has been undertaken to conclude that BMD is the only feasible, practical and realistic opportunity to provide a football stadium which meets the modern needs of a top tier football club.

5.0 Application Proposals

- 5.1 This section describes the development proposed in this application, specifically the proposed use, layout, scale and quantum of development. Details regarding the proposed parking, servicing, access and phasing of the proposed development are also provided. More information regarding the proposed development can be found in the following documents:
- Design & Access Statement, Meis Architects;
 - Hydraulic Engine House – Design Intent Report, Pattern Design;
 - ES Volume 2, Chapter 4 – Construction Methodology, CBRE;
 - ES Volume 3, Document 4.1 - Construction Management Plan, Laing O’Rourke; and
 - ES Volume 3, Document 4.2 - Dock Infill Methodology Statement, Buro Happold.

DESCRIPTION OF DEVELOPMENT

- 5.2 The description of the proposed development is as follows:

Application for Full Planning Permission in accordance with submitted drawings for the demolition of existing buildings/structures on site (listed in the schedule); remediation works; foundation/piling works; infill of the Bramley-Moore Dock, alteration to dock walls and dock isolation works with vehicular and pedestrian links above; and other associated engineering works to accommodate the development of a stadium (Use Class D2) predominantly for football use, with the ability to host other events, with ancillary offices (Use Class B1a); Club Shop and retail concessions (internal and external to the stadium) (Use Class A1); exhibition and conference facilities (Use Class D1); food and drink concessions (internal and external to the stadium) (Use Classes A3 / A4 / A5); betting shop concessions (Sui Generis); and associated infrastructure including: electric substation, creation of a water channel, outside broadcast compound, photo-voltaic canopy, storage areas/compound, security booth, external concourse / fan zone including performance stage, vehicular and pedestrian access and circulation areas, hard and soft landscaping (including canopies, lighting, wind mitigation structures, public art and boundary treatments), cycle parking structures and vehicle parking (external at grade and multi-storey parking) and change of use of the Hydraulic Tower structure to an exhibition / cultural centre (Use Class D1) with ancillary food and drink concession (Use Class A3).

- 5.3 In addition to the full planning application, separate listed building consent (LBC) submissions are to be made for openings to the Grade II Regent Road Dock Wall; works affecting the Grade II listed BMD retaining walls; and works in relation to the Grade II listed Hydraulic Engine House (to secure the building during the construction phase, make good the structure and convert the building to its future use).

USE

- 5.4 The stadium has been designed as a stadium for the use of Everton Football Club. In addition to its primary function, the stadium may also host other events, such as non-football sporting events or concerts (details below). The operation of the stadium for such events will be subject to appropriate controls as will the use of the stadium for football matches e.g. maximum capacity, levels of amplified sound, lighting. These controls will predominantly be enforced through the licensing process.
- 5.5 This planning application seeks permission for four major, non-football events at full capacity being held at the proposed stadium per year (e.g. concerts, other sporting events).

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- 5.6 In addition to these major events, the following smaller events may also take place throughout the year:
- **Meetings/Conferences** - potential for up to 261 days per year;
 - **Exhibitions/Conventions** - potential for up to 339 days per year;
 - **Weddings** - potential for up to 79 days per year;
 - **Funerals** - potential for up to 261 days per year;
 - **Banqueting** - potential for up to 339 days per year;
 - **Christmas Parties** - potential for up to 27 days per year; and
 - **Stadium Tours** - potential for up to 339 days per year.
- 5.7 The assessments provided as part of the planning application have been based on the above event type and frequency.
- 5.8 In addition, the Grade II listed Hydraulic Engine House is intended to function as an exhibition space, the start/end point for the River Walk, part of the stadium tour and as a small café / coffee shop. Further details regarding the reuse of this structure are provided later in this section.
- 5.9 On a non-match, non-event day, the site will remain open to the public. The club shop, restaurants and box office within the stadium will be open during business hours. The exhibition space within the Hydraulic Engine House will also be open on non-match / non-event days.
- 5.10 The public realm will be accessible to all on a non-match / non-event day. This will allow people to walk, meet and rest throughout the site.
- 5.11 Crucially, therefore, as a result of the proposed development the BMD site will be accessible to all throughout the year, thus opening up a currently inaccessible part of the World Heritage Site and Stanley Dock Conservation Area.

SITE LAYOUT

- 5.12 The proposed development comprises the following aspects:
- A proposed stadium with 52,888 seated capacity (orientated north-south) with associated facilities, including a Multi-Storey Car Park (MSCP) integral to the West Stand;
 - The change of use of the Hydraulic Engine House to an exhibition / cultural centre;
 - Necessary circulatory space, including a large fan plaza which on a non-match / non-event day is an area of public realm;
 - Hard and soft landscaping with associated street furniture and boundary treatments throughout all high quality and accessible external areas of the site;
 - A security building with vehicle barrier;
 - A proposed water channel to visually maintain the dock connectivity between Nelson Dock and Sandon Half-Tide Dock;
 - Northern isolation structure between Sandon Half-Tide Dock and the proposed water channel, with vehicle access above;
 - Wind mitigation baffles/structures;

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- Three new pedestrian entrances through the Regent Road dock wall;
 - An Outside Broadcasting Compound area;
 - An enclosed area of storage, predominantly for storage of grow lights for the pitch;
 - A Distribution Network Operator Compound; and
 - Surface car parking with overhead canopy (with Photo-Voltaic panels affixed).
- 5.13 The proposed stadium is located mostly within the proposed infilled section of the waterbody of BMD. The foundations of the stadium and all other proposed structures have been designed to ensure that they do not conflict with the listed retaining walls of BMD with the building effectively spanning the listed walls.
- 5.14 A large area of public space is proposed to the east, which is to be used as a fan zone plaza on match days, when it will be occupied by temporary structures associated with fan entertainment and the match day experience e.g. stage, canopies, food and beverage outlets and other activities.
- 5.15 The north-east corner of the site is occupied by the Grade II listed Hydraulic Engine House. A Security building and barrier are located close to the Hydraulic Engine House, near to the north-east vehicular entrance to the site.
- 5.16 To the west of the stadium will be a new water channel which is proposed to maintain a visual connection between the interlinked docks. The channel is to be created after the existing dock waterbody has been infilled (through excavation). A stepped area of public realm is located on the eastern side of the channel to allow people greater access to the water's edge and enhanced experience and appreciation of the listed BMD retaining walls.
- 5.17 On the western plaza, to the west of the water channel are areas of public realm located up to the River Mersey sea wall (the inland face constituting the application site boundary). Built structures in this area include an enclosed area of storage, predominantly for the pitch grow lights, and a Distribution Network Operator Compound are proposed. Adjacent to this to the north is an area of surface car parking, with an overhead canopy containing a roof mounted Photo-Voltaic (PV) panel system. To the south of the structures is an area of public realm which will be used on match days by Outside Broadcast vehicles in televising matches.
- 5.18 The existing isolation structure to the south between BMD and Nelson Dock forms part of the site circulation with a new isolation structure proposed to the north of the new water channel to provide pedestrian and vehicular access to the new surface compound.

THE STADIUM

Layout

- 5.19 The proposed stadium building is orientated in a North-South position. It comprises four stands (north, east, south and west) and will have a seated capacity of 52,888 people.
- 5.20 Elements of the stadium have been designed to be adaptable to increase the capacity in the future, if safe standing were to be introduced in England (subject to relevant legislation) and if the ratio of seated to standing were larger than 1:1. Adaptations to accommodate this additional capacity would likely require additional planning and licensing applications.
- 5.21 There are 3 levels of stadium accommodation, which includes space for Back of House, General Admission (GA), Hospitality, Catering, Media, Medical, Parking, Plant & Risers,

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- Players, Retail, Security and other Stadium Facilities. The fourth level contains mechanical equipment and plant, enclosed by a screen.
- 5.22 The West Stand incorporates an integral Multi-Storey Car Park (MSCP), with parking available at level 00 (mezzanine) above pedestrian circulation space at ground floor level (including turnstiles), level 01, level 01 (mezzanine) and level 2. The MSCP is accessed from the north-west corner of the stadium via a ramp.
 - 5.23 Of the 52,888 seats, 239 are proposed to be wheelchair accessible viewing positions.
 - 5.24 Additional proposed facilities include faith rooms, incorporating separate-sex prayer facilities, a sensory room with a view of the pitch and two additional quiet rooms. Details of this provision are included within the Design & Access Statement.
 - 5.25 The Hospitality and GA concourse areas include toilets, food & beverage sales points and other retail areas.
 - 5.26 Hospitality areas are located within both the East and West stands. Of the 52,888 seats, around 5,000 are hospitality seats. Within the West stand a publicly accessible riverside restaurant is proposed, with a café facility available in the East stand, both of which are proposed to be open on non-match / non-event days.
 - 5.27 The Away fans section is located at the north-east corner of the stadium. The extent of this section can be changed if a higher allocation is required – such as in domestic cup competitions – but generally 15% of total stadium capacity is required for FA Cup fixtures (7,933 seats). The main (iconic) Home end is the southern stand, with the East and West stands also accommodating Home fans.

Scale & Appearance

- 5.28 The stadium building is 46.86m high. In order to mitigate the risk of flooding, accounting for future climate change, it is proposed that the Level 00 Finished Floor Level (FFL) is raised to 7.3m AOD. Taking this into account, the proposed maximum height of the stadium (at the highest point) is therefore 54.16m AOD. To the top of the bowl, the proposed height is 38.04 m AOD.
- 5.29 As a comparison, the approved maximum height for building plots within BMD as part of the Liverpool Waters permission (application reference 19NM/1121) was 38m; therefore at 46.86m high the stadium represents an exceedance to the maximum approved height by 8.86m, which as the views submitted as part of the Townscape & Visual Impact Assessment (TVIA) demonstrate is relatively imperceptible at longer distances.
- 5.30 The stadium façade comprises two distinct sections: a barrel roof formed of metal panels (with varying degrees of perforation density) and a solid base made of brick and metal.
- 5.31 As detailed in the submitted Design and Access Statement, the stadium base has been designed as a structure which ‘grows from the dock’, displaying the robustness and solid appearance typical of warehouses within the Stanley Dock Conservation Area.
- 5.32 The base is predominantly of brick, to replicate the rectangular massing of the warehouse examples in the area.
- 5.33 The base of the stadium comprises alternating columns of perforated metal panels and brick pilaster with a textured waterstruck style brick blend of various red tones. The bricks will be laid in Flemish bond using natural mortar.

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- 5.34 The proposed design includes a pattern to represent the criss-cross steelwork used by original Goodison Park architect Archibald Leitch. This will be included across the base of the stadium using different levels of perforation and brick / mortar tones to create a continuous pattern across both materials. This proposed detailing breaks up the façade of the stadium base to a more pedestrian scale.
- 5.35 At both the north and south elevations a large window features across the length of each elevation.
- 5.36 Further information regarding the proposed materiality and design rationale, which has led to the proposed design, is provided in the Design & Access Statement.

PUBLIC REALM

Landscaping

- 5.37 As detailed in the submitted Design & Access Statement, the public realm proposals include both hard and soft landscaping.
- 5.38 The proposed hardscape comprises a mix of existing, old materials – such as reclaimed granite setts, railway tracks – and new materials, including granite setts / flags and brushed concrete with steel edge.
- 5.39 A crucial part of the landscape strategy is the retention of the top of the Grade II listed coping stones of the Bramley-Moore Dock retaining wall, which is to be visible where exposed in the public realm, outside of the stadium footprint.
- 5.40 The area of infill (i.e. the former water body) will be finished with a new concrete surface material with hints of blue tones and linework pattern to represent the water that used to fill this space.
- 5.41 This design will provide a level transition between the historic quaysides, across the listed retaining wall and into the new concrete surface representing the water.
- 5.42 Furthermore, existing artefacts along the quaysides have been assessed and their future use within the proposals considered. As detailed in Section 13.0, an Artefact Appraisal and Heritage Asset Survey have been completed to identify and categorise the dock infrastructure present on the site, such as capstans, bollards and ladders associated with the listed retaining walls. Where possible, the identified heritage assets which can be retained will be removed and renovated during construction and then reinstated as part of the proposed landscaping strategy, thus allowing the public to access and appreciate features connected to the historic maritime use of the application site.

Boundary Treatments

- 5.43 Although the intention is for the site to remain publicly accessible throughout the year, the proposed development includes a series of gates and fences to provide the Club with the ability to close off parts of the site for matches and events or if a security situation dictates.
- 5.44 The northern site boundary will be a secure steel mesh fence, as no movement is possible between the stadium site and the operational WWtW to the north.
- 5.45 As detailed earlier in this Statement, the western site boundary is the elevated River Mersey wall, which the Club does not have ownership of. As such, fences are required at points of access to the wall (steps to the upper surface of the wall) in order to prevent access.

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- 5.46 A new balustrade is proposed along the southern site boundary where it meets the Nelson Dock waterbody. Where the southern site boundary meets the east and west quaysides of Nelson Dock a 2.4m high secure fence with controlled access gate is required. Until Nelson Dock is developed as part of the Liverpool Waters scheme the gates will remain closed; however, once Nelson Dock is developed the gates will be opened as part of the wider dockland River Walk (see below).
- 5.47 The eastern site boundary will remain defined by the Grade II listed Regent Road Dock Wall. Details of the proposed access points through this wall are provided later in this section.

Fan Plaza

- 5.48 On a matchday, the primary space for fans to gather will be the fan plaza which is located to the east of the stadium, between the stadium and the Regent Road dock wall.
- 5.49 The Club propose to provide a number of temporary structures within the public realm to enliven the match day experience. The submitted *Plans & Section – Eastern Concourse* (ref. BMD01-PLA-L1-00-DR-L-5003 Rev. 03) shows the indicative locations for these temporary structures. The structures include:
- Performance Stage – This structure will include an elevated platform, screen and an overhead canopy. An unobstructed space to the south of the stage will allow supporters to gather and watch the entertainment on the stage.
 - Bag drop area – for larger bags which cannot be taken into the stadium, in accordance with the proposed Security Strategy.
 - Canopies – offering shade and shelter to groups of supporters. There will be additional temporary seating and tables under these canopies.
 - TV screens located within the fan zone.
 - Temporary concession stands – vendors that will be driven/moved into the fan plaza on match days. This includes the sale of food, drink and programmes.
 - Games venues – Flexible family interactive game facilities such as ‘Beat the Goalie’ and five-a-side football penalty kicks.
 - Gaming Tents – similar to the canopies, these covered structures will offer opportunities for fans to interact and socialise, playing computer games and other multimedia platforms.
 - Temporary wheelchair accessible toilets on a match day located adjacent to standard toilets.
 - Dog spending areas for assistance dogs, designed according to guidance.

Water Channel

- 5.50 A new water channel is proposed to the west of the stadium (beyond public realm / circulatory space immediately adjacent to the stadium). The new channel is proposed to ensure the visual continuity of the interlinked dock system remains following the infill of BMD to facilitate the stadium development. The channel is to be located between two isolation structures; an existing structure between BMD and Nelson Dock (hydrologically linked via open sluice pipes) and a new structure which is to be proposed between BMD and Sandon Half-Tide Dock to the north. The channel will therefore be non-navigable but

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is an interpretive feature proposed in recognition of the maritime heritage of the site as part of the interconnected dock system as noted in the OUV of the WHS and the WHS SPD.

- 5.51 The existing Grade II listed BMD retaining wall will form the western edge of the channel and therefore will be exposed. The eastern edge will be formed by a row of secant piles that will also act as a retaining wall, with concrete capping beam on top. The proposed retaining wall will support the terraced steps that form the public realm area to the west of the stadium, referred to as the Western Concourse. This is a terraced seating area, which is accessible to all through the use of ramps, which is proposed to provide opportunities for people to get close to the water's edge and the listed retaining walls of BMD and the associated dock structures (e.g. bollards, dock gates, ladders) which are to be removed during construction phase, renovated (where possible / practical) and re-installed in the final hard landscaping scheme.
- 5.52 The water channel allows the exposure of the western wall of the BMD waterbody, to ensure that this part of the listed retaining walls can still be viewed and appreciated.

River Walk

- 5.53 As part of the Liverpool Waters outline permission (reference 10O/2424), Peel L&P were required to provide three walkways through the proposed development. One walkway is referred to as the Merseyview Esplanade in the approved Parameter Plans and runs north-south through Liverpool Waters along the western boundary, adjacent to the River Mersey.
- 5.54 The proposed development at BMD has taken account of the intention for a Liverpool Waters wide route by creating a River Walk along the western boundary of the application site adjacent to the River Mersey Wall upstand, thereby sheltering people from the prevailing winds. Pedestrian access to the top of River Wall, which is outside Everton's ownership, will be restricted through interpretation fencing panels.
- 5.55 This proposed route leads from the southern boundary of the west quayside (boundary with Nelson Dock) to the north-west corner of the site and then travels eastwards, along the northern edge of the proposed stadium, to the Hydraulic Engine House, as the intended start or end point of the route. An alternative, and more attractive route, would be to cross the southern isolation structure over the water channel and proceed along by the southern elevation of the stadium (overlooking the Nelson Dock waterbody), through the fan plaza and ending at the Hydraulic Engine House.
- 5.56 Fences and gates will define the site boundaries and although the intention is for the site to remain open throughout the year (24/7 access), the gates provide the ability for the Club to restrict access to certain parts of the site during an event or if required for security or anti-social behaviour reasons.
- 5.57 The proposed pedestrian routes across the site therefore allow for future connectivity with Nelson Dock and for this part of the pedestrian access to be linked to the wider Merseyview Esplanade, when the Liverpool Waters scheme, particularly Nelson Dock, has been developed further in accordance with the current approved phasing strategy.

HYDRAULIC ENGINE HOUSE

- 5.58 The Hydraulic Engine House, a Grade II listed structure, is a key part of the proposed development.
- 5.59 The Historic England listing for the building states:

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Engine house, accumulator tower and truncated octagonal chimney. 1883. Common brick with red brick dressings, slate roof. Round-headed windows and entrances; pyramidal roof to accumulator tower; chimney cap missing¹⁴.

- 5.60 This planning application seeks to change the use of the tower, to allow it to be used as an exhibition space with ancillary café area. The required listed building consents associated with the detailed design of this space are not proposed at present, as the design cannot be further developed until internal surveys of the building are complete. Currently, the structure is unsafe to enter and therefore the building must be made safe first for the purposes of surveys being carried out. These surveys cannot be conducted by the Applicant until the Club have control of the site, which will occur on receipt of planning permission for the proposed stadium development.
- 5.61 The proposed approach is that two separate listed building consent submissions will be made in the future – one for temporary works (scaffolding etc.) to consolidate and protect the structure during the stadium construction and to allow safe internal surveys to be undertaken and the second for the permanent works to make good the structure for its intended reuse.
- 5.62 However, an external visual survey (photographic and drone survey) has been carried out to inform the planning application and has identified the following:
- The brickwork and pointing are exhibiting extensive weathering;
 - The elaborate original chimney stack has been shortened and capped off;
 - The roof of the office structure is showing movement;
 - Ground level openings are blocked off and windows have been damaged with significant pigeon infestation;
 - Although the building is mostly stable, roof coverings are missing and there is progressive water penetration and degradation; and
 - A former internal wall is showing signs of extensive weathering, nearly a full brick deep in places.
- 5.63 The Club plans to make a significant investment in order to bring the Engine House back into a condition where it can be accessed, allowing public appreciation of this currently deteriorating asset.
- 5.64 The structure has deteriorated and has been derelict for a significant period and without The People’s Project is at risk of further deterioration, particularly as the Northern Docks Neighbourhood of the Liverpool Waters proposals, in which BMD is located, is not proposed for development for another 16 years (2036 – 2041), if it were to be developed in accordance with the outline permission.
- 5.65 The Hydraulic Engine House is an anchor element of the proposals at BMD and will remain publicly accessible on non-event days and contribute to the proposed year-round usage of Bramley-Moore Dock, as part of the World Heritage Site.
- 5.66 As detailed in the submitted Hydraulic Engine House Design Intent Report, prepared by Pattern Design Architects, the intention is for the Hydraulic Engine House to house a permanent exhibition, which could be based around the history of the Club, BMD or the

¹⁴ Historic England listing, accessed via: <https://historicengland.org.uk/listing/the-list/list-entry/1072981>

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- World Heritage Site; become the start / end point of the River Walk (once Liverpool Waters is complete); be the start / end point of stadium tours; and act as a meeting point on matchdays.
- 5.67 The Hydraulic Engine House is an iconic feature of the site which will generate significant public benefits through increased use and interpretation of the cultural and physical history of the docks. Further details regarding the reuse of the Hydraulic Engine House and its associated benefits are provided in Section 14.0.
- 5.68 Out of deference to the Hydraulic Engine House, the stadium is orientated and positioned to allow considerable space to be provided between the stadium building and the Hydraulic Engine House. This ensures that its special interest, including architectural interest, can still be appreciated. The submitted Heritage Statement compares this to the Liverpool Waters scenario, which proposes buildings of 27m and 28m to be built directly adjacent to the Hydraulic Engine House to the west and south, which would ‘...fundamentally change the immediate setting of the listed building from its existing setting’ (para. 8.56). As such, the proposed stadium offers greater benefit to the listed building and its setting.
- 5.69 In addition, the proposed brick tone of the stadium base / façade has been chosen to be complementary to the Hydraulic Engine House, whilst also ensuring that the two are not seen as one and therefore ensuring the Hydraulic Engine House remains as a prominent feature on the site.

ACCESS & SERVICING

Inclusive Access

- 5.70 The Design & Access Statement provides a detailed description of the approach to inclusive design; relevant policy and guidance; the extensive consultation which has been undertaken; and measures adopted to ensure that the proposed development is inclusive.
- 5.71 The following summarises some of the inclusive design features which have been proposed:
- Provision of accessible entrances as well as turnstiles;
 - Provision of passenger lifts and escalators for those unable to use stairs;
 - Inclusion of sensory rooms, quiet rooms and faith rooms within the stadium;
 - Provision of 239 wheelchair accessible viewing positions (with additional companion seat) dispersed throughout the stadium and within approximately 40m of unisex wheelchair accessible toilets;
 - The public realm has been designed to ensure that level changes are addressed in an inclusive manner, with all circulation routes being step-free. For every 500mm change in level, resting places or level landings have been proposed;
 - Provision of accessible seating in the public realm; and
 - Use of visually contrasting surfaces / materials to indicate level differences and unavoidable free-standing post / columns.

Site Access & Circulation

- 5.72 A vehicular access route is marked around the site through the use of varying types of hardstanding in the public realm, guiding vehicles around the periphery of the site, predominantly in an anti-clockwise direction from the north-east corner of the site at the

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existing vehicular entrance at the northern extent of the Regent Road dock wall, through the site (north of proposed stadium) to the west quayside and on to the existing south-east entrance through the Regent Road dock wall.

- 5.73 Exceptions to this strategy will be managed by on site Club staff and include:
- Emergency vehicles will be able to use both north-east and south-east entrances as entry / exit points;
 - On match days both ramps to the MSCP within the West Stand will be managed to use both lanes for exit or entry, depending on whether it is pre- or post- match, rather than using one lane for exit and one for entry. This is also the strategy for exiting the site, with vehicles able to exit via the north-east entrance at Regent Road post-match;
 - On a match day, team coaches will be escorted through the site and will be able to enter and exit the site through either Regent Road gate; and
 - Refuse Collection vehicles will use the north-eastern gate to exit the site.
- 5.74 Service vehicles will use this route and enter the stadium building at either the north-east corner of the North Stand (in Away section) or the north-west corner of the North Stand through the loading dock. A separate refuse collection point is located to the west of the loading dock, within the North Stand.
- 5.75 Pedestrian access will be through two existing entrances and three new pedestrian access points proposed through the Regent Road dock wall. The number, width and positions of these proposed entrances has been determined by crowd modelling and the width of the surrounding highway network. The positions of the openings have been further informed by a constraints and opportunities analysis of the Regent Road dock wall, in order to avoid openings being located in area which could be susceptible to hostile vehicle attack (reflecting pre-application advice from Merseyside Police & counter-terrorism officers) and to avoid the positions of the 'Bramley-Moore Dock' signs which are embedded in the Grade II listed wall (refer to constraints plan provided in the Design & Access Statement).

PARKING

- 5.76 There are three car parks incorporated into the proposed development. A small parking area (with potential to accommodate 27 spaces) will be located in the south-east part of the site within the eastern fan zone plaza, which will be in operation on non-match days only. This (shared surface) car park will accommodate visitors to the club shop, exhibition/cultural centre, restaurants and box/ticket office. It will also be used for taxi drop off/pick up. It does not contain marked bays but instead its use will be controlled by on-site security personnel and Club staff.
- 5.77 On match and major event days the small plaza parking area at the south-east will not be used as this space will be required for pedestrian circulation.
- 5.78 The proposed MSCP located within the structure of the West Stand of the stadium (starting at mezzanine level with ramp access from the northern access road) has capacity for 345 cars. In addition, a surface car park is proposed to the western side of the water channel with space for 136 cars, which will be covered by a freestanding canopy upon which will be PV panels. The surface car park will be accessed from the northern access road and will bridge over the proposed new water channel via the new isolation structure proposed between BMD and Sandon Half-Tide Dock.

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- 5.79 Of these 481 parking spaces (MSCP and surface car parking on western quayside), 70 will be designated as accessible spaces. This equates to 14.5% of the parking provision in the MSCP and surface car park.
- 5.80 Of the 481 parking spaces, 24 spaces will be electric vehicle charging point bays. This equates to 5% of the total parking provision. Four accessible spaces will have electric charging stations, which also equates to 5% of the accessible spaces.
- 5.81 On match / major event days the MSCP and western surface car park will be for the use of spectators, club directors and guests. These spaces will require pre-booking in advance of the match / event.
- 5.82 On non-match / non-major event days the use of the MSCP and western surface car park will be for staff working at the stadium and visitors to any smaller events or conferences located within the stadium. It is envisaged that the MSCP will accommodate the bulk of demand on non-match days, with the western car park available as an overspill if necessary.
- 5.83 This strategy allows the surface car park to be used for events or activities more frequently when not used for parking.
- 5.84 Parking for 152 bicycles will be provided within the stadium site initially. There is opportunity to increase this provision in the future, subject to demand.
- 5.85 The majority of cycle storage is proposed on the inside (western side) of the Regent Road dock wall, as it is closest to the main cycling route along Regent Road.
- 5.86 Staff will use a covered two-tier cycle store (capacity for 30 bicycles), whereas individual cycle stands are provided throughout the landscaped area (to the west and east of the stadium) for use by visitors.

OFF-SITE WORKS

- 5.87 Several changes will be required to the surrounding highways in order to accommodate the volume of pedestrians travelling to/from the site for a match or major event. This predominantly relates to Regent Road and includes lower existing kerbs to allow coaches / HGVs to turn into the site, as well as provision of a ramp from the existing cycle lane (recently installed) up to the new pavement at top-of-kerb level, to remove the additional levels change. A plan showing the extent of these proposed off-site works is included in the submitted Design & Access Statement.
- 5.88 As detailed in the submitted Transport Assessment, due to the demand for rail travel potentially exceeding the capacity of Sandhills station, a corralling facility is required on land owned by Merseytravel, adjacent to the station. This facility is proposed to be used during the post-match period to control and manage the number of people entering the station.
- 5.89 The area to be used for corralling is approximately 1,150 sq m. The area will comprise hard standing and it is proposed that passengers will use the area to form four queues, which will be separated by temporary barriers. The four queues are for:
1. Passengers for stations on the Southport line;
 2. Passengers for stations on the Ormskirk line;
 3. Passengers for stations on the Kirkby line; and
 4. All southbound passengers.

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- 5.90 A plan showing this corralling area is included in the submitted Transport Assessment.
- 5.91 Each queue will be called to the platform via the subway in the interval between trains arriving at the station, ensuring that the queue for the next arriving train will be waiting to access the platform as soon as the previous train leaves the station.
- 5.92 Consultation with Mersytravel, Merseyrail Electrics and the LCR Combined Authority has confirmed that the proposed approach is acceptable.
- 5.93 It is proposed that these works are secured via a Section 106 Agreement.

CONSTRUCTION & PHASING

- 5.94 The following provides a summary of the construction programme. Further details are provided in the submitted Construction Management Plan and Chapter 4 of the ES.
- 5.95 For the purposes of the ES, it has been assumed that the opening year for the development is 2023, with construction anticipated to commence in Q3 2020. In total, the expected duration of demolition, construction and fit-out works is 37 months, carried out as a single phase.
- 5.96 As detailed in the Construction Management Plan (CMP) prepared by Laing O'Rourke, the construction process can be split into twelve stages:
 1. Site preparation & dock filling – including demolition of existing unlisted buildings, protecting listed structures and repairing dock walls (details of dock infill methodology provided later in this section);
 2. Substructure including piling;
 3. Superstructure concrete works for East and West stands;
 4. Steelwork and precast terracing;
 5. Roof steelwork;
 6. Roofing including mesh cladding to the barrel;
 7. Façade;
 8. Mechanical, Electrical & Plumbing (MEP) and fit-out;
 9. Pitch works;
 10. Western Water Channel (excavation of infilled material to create channel);
 11. External works (landscaping etc.); and
 12. Testing, commissioning and move to fully operational.
- 5.97 Stage 1 of the works includes the protection of listed structures from damage during demolition and construction. Where appropriate, hoardings will be attached to prevent any damage. The contractor will also seek to agree with HE and LCC which heritage assets should be removed for safe storage on the West Quay during the construction period.
- 5.98 The site preparation, dock filling and substructure phases (Stages 1 & 2) include numerous activities relating to the remediation at the site, linked to its past industrial use. This includes an asbestos survey prior to the soft strip of buildings identified for demolition. Following the dock infill (details provided below), Stage 2 of the construction works involves addressing ground contamination, possibly through the excavation and treatment of existing ground which is then backfilled to support the working platform. Further mitigation includes the

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installation of gas proof membranes and vapour barriers in the ground slab, as well as potential groundwater treatment to address known contamination.

Dock Infill

- 5.99 The proposed methodology for infilling BMD is detailed in the submitted Dock Infill Method Statement (prepared by Buro Happold) and ES Chapter 4. This methodology has been based on knowledge and understanding of other dock infill projects, including the adjacent Wellington Dock, which was infilled to accommodate the existing United Utilities Wastewater Treatment Works (WwTW). This has involved consultation with Boskalis, the company that carried out the dock infill works at Wellington Dock. In summary, the methodology has been developed to minimise harm to the listed BMD retaining walls. The stages of infill work include:
- Agreeing the extent of repairs needed to the retaining walls with LCC through appropriate Listed Building Consents (as required);
 - Fish removal and installation of a bubble curtain to deter fish from re-entering the dock;
 - Dock bed raking and debris removal;
 - Dock closure through a temporary isolation structure (between Sandon Half-Tide Dock and BMD), comprising 1 tonne ballast bags;
 - Final fish removal and transfer;
 - Installation of a geotextile membrane;
 - Ongoing vibration and displacement monitoring of the BMD retaining walls;
 - Dock reclamation (infill);
 - Material compaction; and
 - Installation of a permanent northern isolation structure (between Sandon Half-Tide Dock and BMD).
- 5.100 The proposed infill material is sand, which has been chosen as it reduces the potential for damage to the listed BMD retaining walls and means that the proposed development is technically reversible. If the stadium were to be removed in the future the infilled material could be excavated, thus allowing the exposure of the retained dock retaining walls.

Regent Road Dock Wall

- 5.101 The physical works to the wall will be subject to separate Listed Building Consent (LBC) submissions (one for the initial demolition works; one for the construction of the new insertion structures).
- 5.102 The proposed design is for three openings, with four archways in each, with the facing part of the arch finished with black aluminium metal panels. This design, with archways and lintels, has less of an impact on the visual continuity of the dock wall compared with complete openings.
- 5.103 The archways will contain bollards and gates, allowing the Club to restrict access if required for security purposes.
- 5.104 The Stage 1 site preparatory works will require a single new opening in the Grade II listed Regent Road wall to create the necessary pedestrian access into the works compound with the remaining two proposed access points to be created later in the construction

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programme. The existing turreted entrances at the north and south of the Regent Road boundary will be used for vehicles and protected from vehicle damage during the stadium construction.

- 5.105 Once the site reaches a completed condition, the lintel and interim walls will be rebuilt across the top of the openings to return the wall to a near-continuous form.
- 5.106 Any excess stonework arising from the creation of these openings will be reused on site where possible, potentially within the public realm.

6.0 The Future for Goodison Park

- 6.1 As detailed in the Introduction section to this Planning Statement, the second part of The People’s Project comprises the redevelopment of Goodison Park, once the Club relocates to the new stadium at BMD.
- 6.2 This section of the Planning Statement provides background information regarding the Goodison Park Legacy Project.
- 6.3 Concurrently to designing the new stadium site to inform this full planning application, the Club has also developed initial plans for the redevelopment of its existing home, Goodison Park.
- 6.4 An outline planning application is to be submitted to LCC and is proposed to be determined at the same time as the full planning application for BMD. Although the two applications are different in nature, relate to separate sites and have separate programmes for delivery, they are intrinsically linked through The People’s Project. The public consultation carried out in November-December 2018 and July-August 2019 provided information on both applications as it was important for stakeholders and the public to understand the connections between the two.
- 6.5 The assessments of economic and social value impact, submitted as part of this planning application, consider the impacts of both strands of The People’s Project. This is because the impacts are inherently linked: without the move to BMD, the opportunity to redevelop Goodison Park could not arise and so the benefits associated with the GPLP could not be realised.

THE ROLE OF EVERTON

- 6.6 The move of Everton from its existing home of Goodison Park creates a development opportunity within a ward which contains pockets of the worst deprivation in the country. The submitted Economic Impact Assessment (ES Volume 3, Document 20.1) reports that the declining population of the County ward, in which Goodison Park is located, combined with other indicators of severe deprivation across multiple indices, point to an area in economic distress. This assessment concludes that Everton’s current role in the community cannot be overstated, and that without a meaningful legacy project the Club’s plans to move away from the area could have very serious consequences for the community.
- 6.7 The Club has several key principles relating to Goodison Park:
 - Non-abandonment of Goodison Park and the L4¹⁵ community;
 - Long-term sustainability and financial viability of the project;
 - Support for the growth of EiTC; and
 - An open and inclusive development.
- 6.8 The non-abandonment of the Club within the L4 area is a fundamental principle which has underpinned the proposals at Goodison Park. Instead of selling the site to a developer, the Club is looking at several different delivery options to ensure that Everton retains a role in the future development of the Goodison Park site. Current proposals for ensuring Club interest in the future development of the site are to retain ownership and establishing a wholly owned subsidiary of Everton Football Club group, to be known as Goodison Legacy Limited. A working group, to be known as the Everton Civic Inheritance Management Trust (ECIMT) will be established below Goodison Legacy Ltd and will oversee the management

¹⁵ Postcode district in which Goodison Park is located

The Future for Goodison Park

and long-term sustainability of the Legacy Project. Surplus income will be reinvested into the local area, for example through the work of Everton in the Community.

Everton in the Community (EitC)

- 6.9 A legacy project at Goodison Park will build on the award-winning work of Everton in the Community (EitC). EitC has won numerous awards at national, regional and local levels, most recently including: Sports Business Awards, Best Club or CSR or Community Scheme (2019); Football Business Awards, Best Football Community Scheme – Premier League (2018); and Northwest Football Awards, Best Community Initiative (2018).
- 6.10 Achievements of EitC in North Liverpool include a 100% success rate in all education programmes; contribution to a 72-85% reduction in anti-social behaviour and 79% reduction in crime in challenging areas across Merseyside; and the establishment / involvement with nine disability teams in the area.
- 6.11 EitC has made significant investment in the L4 area, including the following developments:
- **The Everton Free School & Sixth Form College:** school for alternative education for people aged 14-16 years who are at risk of exclusion or who have been permanently excluded from school;
 - **The People's Hub:** Community building for EitC programmes;
 - **The Blue Base:** Function Centre and place for use by disabled fans on matchdays; and
 - **The People's Place:** a proposed new drop-in mental health facility (planning application reference 19F/3055 submitted November 2019, pending determination).
- 6.12 The charity will help with the delivery of programmes from the community facilities proposed at the GPLP, building on the £10m already invested in community buildings on Spellow Lane. The legacy project will also provide a platform for EitC to expand and grow, potentially occupying some of the office space proposed as part of the GPLP. This will allow the charity and Club to build on its current reach and magnitude of impact within its cultural home of North Liverpool.

GPLP – PROPOSED DEVELOPMENT

- 6.13 The outline planning application for Goodison Park reserves all matters for future development. The description of development is as follows:
- Application for Outline Planning Permission for the demolition of existing buildings and redevelopment of the site for a mix of uses, comprising residential units (Use Class C3); residential institution (Use Class C2); shops (Use Class A1); financial & professional services (Use Class A2); food and drink use (Use Class A3); drinking establishments (Use Class A4); hot food takeaways (Use Class A5); business use (Use Class B1); non-residential institutions (Use Class D1); and open space, with associated access, servicing, parking and landscaping. All matters (Access, Appearance, Landscaping, Layout and Scale) are reserved for future determination.*
- 6.14 The application seeks outline permission for up to 173 residential units, 102 residential care units and approximately 18,000 sq m of floorspace for commercial, retail, leisure or community use. Initial discussions have shown that this space could accommodate offices, a health centre, an education facility and small-scale retail and food & drink units. These uses are intended to help to support the existing community and also provide for a new community within the area.

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- 6.15 The residential units could be a mix of apartments and houses, providing choice to the local housing market in terms of the size, house type and tenure of new properties.
- 6.16 The illustrative masterplan which accompanies the outline application identifies that a central area of open space could be created within the site, representing the current pitch. The development blocks are shown around the perimeter of the site, which represents the stands of Goodison Park. The proposed provision of publicly accessible green space within the masterplan ensures that football will continue to be played at Goodison Park after the move to BMD.

PROGRAMME

- 6.17 The proposed redevelopment of Goodison Park cannot begin until the existing stadium has been demolished, which will follow the completion of the proposed new stadium at BMD. Once the new stadium is operational, the Club can turn its attention once again to Goodison Park. At the earliest this would begin in late 2023.
- 6.18 To reflect this timescale, the Club will seek a longer implementation period for planning permission at Goodison Park, relating to both the timescales for submission of Reserved Matters and subsequent start on site. This would be secured as part of a planning condition(s) attached to the outline planning permission at Goodison Park.
- 6.19 The proposed development at Goodison Park is likely to be phased, with Reserved Matters submissions being made separately for individual blocks as they are progressed.
- 6.20 More information regarding the proposals at Goodison Park are included within the separate outline planning application for the GPLP development.

7.0 Pre-Application Consultation

- 7.1 In accordance with recommended best practice (NPPF para. 39 - 43) the applicant has undertaken extensive consultation with statutory and non-statutory consultees, including a far-reaching two stage public consultation, engagement with key stakeholders and consultation with statutory consultees regarding technical assessments.

STATUTORY & NON-STATUTORY CONSULTEES

- 7.2 The submitted Environmental Statement (ES Volume II) details the consultation undertaken in relation to each technical discipline. The EIA scoping exercise undertaken is also summarised in Chapter 2 of the ES.

- 7.3 In summary, consultation has been undertaken with numerous consultees, including:

- Liverpool City Council (LCC): Officers from Highways, Planning Policy & Development Control, Conservation, Access and Building Control departments;
- Historic England (HE);
- Sports Ground Safety Authority (SGSA);
- Marine Management Organisation (MMO);
- Environment Agency (EA);
- Natural England;
- Merseyside Environmental Advisory Service (MEAS);
- United Utilities (UU);
- Merseyside Police;
- Civil Aviation Authority;
- National Counter Terrorism Security Office;
- LCC Corporate Access Forum;
- Highways England;
- Merseytravel;
- Merseyrail;
- Places Matter Design Review Panel; and
- Network Rail.

- 7.4 This consultation related to the baseline conditions at the site, methodology for assessments to inform the planning application, the proposed development and potential mitigation measures. Further details are included within the relevant chapter of Volume II of the ES.

- 7.5 The submitted Design & Access Statement provides details of consultation which has informed the design of the proposed development; this predominantly relates to engagement with LCC (Building Control & Planning), SGSA and HE.

- 7.6 In response to the heritage designations relating to the site, the applicant consulted extensively with HE and LCC from an early stage in the development process. From May 2017 to December 2019 the applicant has met and presented detail on the following topics:

- Methodology for the Alternative Sites Assessment;

Pre-Application Consultation

- Methodology for the Townscape & Visual Impact Assessment;
 - Scheme design, including:
 - Orientation
 - Initial scheme options
 - Design rationale
 - Inclusive design
 - Massing / Scale
 - Materiality / Façade
 - Public Realm
 - Car Parking
 - Wind Mitigation
 - Openings to the Regent Road Dock Wall
 - Sustainable energy strategy
 - Requirement for a water channel;
 - Lighting strategy;
 - Proposed reuse of the Hydraulic Tower;
 - Archaeological impact; and
 - Artefacts Appraisal.
- 7.7 Detailed feedback was provided by both HE and LCC and this has been incorporated in the final scheme as submitted. Details of the meetings held are provided in the Design & Access Statement and the written feedback received from HE is contained within the submitted Heritage Statement.

PUBLIC CONSULTATION

- 7.8 Details of the public consultation and fan engagement undertaken by the Club are included within the submitted Statement of Community Engagement. Due to the relationship between the proposed stadium at BMD and the redevelopment of Goodison Park, the consultation covered both and was therefore a consultation regarding The People’s Project, rather than just the stadium development.
- 7.9 The public consultation was divided into two stages:
- **Stage 1, November – December 2018:** focused on the principle of the Club relocating from Goodison Park to BMD and the initial ideas for the redevelopment of Goodison Park; and
 - **Stage 2, July - August 2019:** presented emerging designs for the new stadium, including details of the proposed transport strategy and information regarding the heritage assets at BMD. The consultation also presented the emerging illustrative masterplan for the GPLP.
- 7.10 Both consultations involved a roadshow which travelled around the City Region across a number of days, providing the opportunity for people to read the consultation material, ask

Pre-Application Consultation

- questions and complete a questionnaire. Other methods of responding included via the project website or via post. The consultations were advertised via post, social media, newspapers (local and national) and the project specific website.
- 7.11 Over 20,000 people responded during the first stage public consultation. This included people from all six authorities of the Liverpool City Region and beyond. Of the respondents, 10 per cent (1,919) identified themselves as being either non-football fans or followers of clubs other than Everton. The headline findings are as follows:
- 97% of respondents stated that it was important for Everton Football Club to remain in the City of Liverpool;
 - 86% of respondents stated that Everton should remain in North Liverpool; and
 - 94% of respondents stated that BMD was an appropriate location for a new football stadium.
- 7.12 Over 43,000 people participated in the second stage consultation. This included people from across the City Region and beyond. Of the respondents, 7 per cent (2,726) identified themselves as being either non-football fans or followers of clubs other than Everton.
- 7.13 Key findings relating to BMD were as follows:
- 98% of respondents supported / strongly supported the proposed stadium design;
 - 96% of respondents supported / strongly supported the proposed reuse of historic features on the site; and
 - 90% of respondents supported / strongly supported the proposed transport strategy.
- 7.14 Finally, respondents to the second stage public consultation were asked whether, in light of the information provided about The People's Project and its potential impacts and benefits, would they prefer to see the continuation of The People's Project or for the dock to be left in its current state. In response:
- 96% favoured the continuation of The People's Project;
 - 2% had no preference;
 - 1% preferred not to say; and
 - 1% preferred to leave the dock in its current state.
- 7.15 The public consultation was far reaching and produced an overwhelming response. In recognition of this, The People's Project consultation was named winner in the Best Property and Construction Campaign category at the 2019 Northern Marketing Awards in November 2019.
- 7.16 Of note, a statistically significant number of responses came from people who are not Everton fans or who do not follow football at all, demonstrating that the interest in The People's Project goes beyond the activity on the pitch.
- 7.17 The results of the consultation demonstrated the significant and ongoing support for The People's Project as a whole. The thousands of comments received were reviewed and analysed and the findings are presented in the Statement of Community Engagement submitted with the application.

8.0 Statutory Development Plan

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town & Country Planning Act 1990 require planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.
- 8.2 The statutory development plan for Liverpool City Council currently comprises:
- Liverpool Unitary Development Plan (UDP) (adopted 2002); and
 - Joint Merseyside & Halton Waste Local Plan (adopted 2013).
- 8.3 This section addresses the statutory development plan, whilst the following sections (Sections 9.0 – 12.0) summarise the following non-statutory planning policies and strategies which could be termed ‘other material considerations’ to the statutory development plan:
- **Section 9.0, Material Considerations - Local Guidance:** Supplementary Planning Documents (SPDs), Supplementary Planning Guidance (SPGs) and Strategic Regeneration Frameworks (SRFs);
 - **Section 10.0, Material Considerations – Emerging Policy:** emerging Local Plan for Liverpool (2018) and Spatial Development Strategy (Liverpool City Region, 2019);
 - **Section 11.0, Material Considerations - National Policy & Guidance:** National Planning Policy Framework (NPPF, 2019), Planning Practice Guidance (2014 and as amended), National Design Guide (2019); and
 - **Section 12.0 – Other Material Considerations:**
 - **Heritage Assets - Decisions:** UNESCO decisions on the Liverpool Maritime Mercantile City WHS and update on the status of the Stanley Dock Conservation Area;
 - **Economic strategies:** A summary of relevant economic strategy documents from the Liverpool City Region (LCR) Combined Authority, Liverpool Local Enterprise Partnership (LEP) and Liverpool City Council; and
 - **Other:** Other strategies and policies of relevance to the proposed development.
- 8.4 A detailed overview of the statutory development plan is therefore provided below. Appendix 2 of the Planning Statement assesses the compliance of the proposed development against the statutory development plan.

UNITARY DEVELOPMENT PLAN

Site Allocation

- 8.5 The site is covered by the following allocations on the UDP adopted Proposals Map:
- Port (Policy E3);
 - Developed Coastal Zone (Policy OE4); and
 - Conservation Area (Policies HD7 to HD14).
- 8.6 **Policy E3 Port Development** supports the continued growth and development of the ports in Liverpool. Developments within Port areas will be considered in light of the following:
- protection of the amenity of existing residential and business users in adjoining areas;
 - impact on potential development sites in adjoining areas;
 - impact on nature conservation and other environmental concerns;

Statutory Development Plan

- design criteria (including standards of materials, site layout, landscaping, pollution control and waste storage) appropriate to the riverside location; and
 - impact on the capacity of the highway network.
- 8.7 **Policy OE4 *The Mersey Coastal Zone*** establishes that the City Council will support the restructure and regeneration of the Developed Coastal Zone, in which the application site is located. The Council will support proposals which enhance the area’s environmental quality, tourism potential and recreational facilities. In particular, the Council will support schemes which lead to improvements in accessing the coast.
- 8.8 Part of the southern side of the application site (bridge link between Nelson Dock and BMD) is identified on the UDP Proposals Map as being located within a Conservation Area. However, following its designation in 2002, the Stanley Dock Conservation Area now covers the whole of the application site.
- 8.9 **Policy HD8 *Preservation and Enhancement of Conservation Areas*** seeks support and funding for building and environmental improvements. The Council will use its powers to prepare Action Plans for priority areas and investigate the removal of features which detract from the character of the area.
- 8.10 **Policy HD9 *Demolition of Buildings in Conservation Areas*** establishes that buildings/structures which make a positive contribution to the character or appearance of a conservation area will be treated with a presumption in favour of preservation. The demolition of such buildings will be considered against the following criteria:
- The importance of the building, its architectural and historic interest and contribution to the character or appearance of the conservation area;
 - The condition of the building and cost of repairing / maintaining it;
 - The adequacy of the efforts made to retain the building in use; and
 - The contribution of a new proposal to the character and appearance of a conservation area.
- 8.11 In relation to buildings which make little or no contribution to a conservation area’s character, proposals for demolition will be considered in light of alternative proposals for the site and the contribution made to the character of the conservation area.
- 8.12 In accordance with **Policy HD11 *New Development in Conservation Areas*** the Council will prevent planning permission for development in a conservation area which fails to preserve or enhance its character. Proposals for new development will be permitted providing it is of a high standard of design and materials which are appropriate to the setting and context and respect the character and appearance of the conservation area. In addition, the development must conserve the essential elements that give the area its special character; protect important views and vistas within, into and out of the conservation area; do not generate levels of traffic, parking, noise or environmental problems; and have satisfactory means of access and car parking which is sympathetic to the appearance of the area.
- 8.13 Under **Policy HD14 *Street works in Conservation Areas*** the quality and appearance of streets, footpaths and other public spaces within conservation areas will be protected. This may include relaxing highways standards, retaining existing natural materials, using traditional materials and minimising street furniture.

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Other Relevant Policies

8.14 Other relevant policies of the statutory development plan have been grouped as follows:

- Principle of development / Proposed use
- Design
- Heritage
- Environment
- Transport

Principle of development / Proposed use

- 8.15 **Policy C7 *The Football Clubs*** states that the City Council will assist both clubs (Liverpool and Everton) in progressing their development proposals, provided that these do not adversely affect residential amenity and are in accordance with other policies in the Plan.
- 8.16 The supporting text for this policy acknowledges that the success of both football clubs has 'elevated Liverpool to its position as a premier football City, renowned throughout Europe and the World' (para. 12.56, p. 315).
- 8.17 Furthermore, the UDP states that both stadia represent major tourist and visitor centres and therefore football plays an 'increasingly important role in the economy of the City' (para. 12.67, p.315). The City Council is noted as being keen to maintain this position by accommodating the development of both clubs.
- 8.18 **Policy GEN7 *Community Facilities*** aims to promote the satisfactory provision and distribution of community facilities, including leisure facilities, for the City's residents.
- 8.19 In accordance with **Policy E8, *Tourist Attractions and Facilities*** the Council will promote and encourage the development of tourism, ensuring that key visitor attractions are signed and links are clear for visitors.
- 8.20 **Policy E9 *Leisure Development*** states that planning permission will be granted for leisure development in the City Centre and other locations provided that there is a need for the proposal and a sequential approach to site selection has been adopted; the design and scale of the development is appropriate to the location and surrounding area; residential amenity is not adversely affected; highways matters are addressed; the vitality and viability of the evening economy of nearby centres is not undermined; the site is highly accessible via non-car modes and the proposed development would not prejudice or undermine other Plan policies or objectives.
- 8.21 **Policy GEN1 *Economic Regeneration*** aims to reverse the decline in economic activity, investment and employment in the City. Means of achieving this include concentrating available resource in Regeneration Areas, including the waterfront and docks; promoting the principle of mixed use development in appropriate locations; promoting the role of Liverpool as a regional retail, cultural and tourism centre; strengthening the commercial role of the City Centre; encouraging leisure development in areas which are highly accessible with no detrimental impact on existing centres; and promoting regeneration within the City's most deprived communities.
- 8.22 Under **Policy S12, *Out-of-Centre Retailing***, retail development outside the main retail area of the city centre, district and local centres will only be permitted when several policy requirements are met, including compliance with the sequential test and meeting the requirements of impact and need assessments.

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- 8.23 **Policy S14 *Use of Shops and Other Premises for Class A3 (Food and Drink) use*** states that in the city centre main retail area and district and local centres, planning permission for A3 use will be granted subject to compliance with several criteria. Elsewhere, A3 uses will be permitted providing that the development will not increase the level of disturbance or nuisance to the detriment of residential amenity and would not increase traffic movement or create a demand for parking which would be detrimental to the area.

Design

- 8.24 **Policy HD18 *General Design Requirements*** states that the scale, density and massing of proposed development should relate well to its locality. Developments should include characteristics of local distinctiveness e.g. design, layout, materials. Building lines and layout of new development should relate to those of the locality. New development should not detract from the city's skyline, roofscape and local views within the city. There should be no severe loss of amenity or privacy to adjacent residents. External boundary and surface treatment should be included as part of the development and should be designed to relate well to its surroundings. Adequate arrangements should be made for the storage and collection of refuse within a site, including provision of litter bins. The exterior of a building should incorporate materials to discourage graffiti. Adequate arrangements should be made for pedestrian and vehicular access and car parking.
- 8.25 **Policy HD19 *Access for All*** establishes that developments should include suitable provision for disabled people, giving consideration to ensuring ease of access and movement through public areas. This includes careful provision and design of parking areas, paths, dropped kerbs, pedestrian crossings and street furniture.
- 8.26 **Policy HD20 *Crime Prevention*** encourages the incorporation of measures to provide for personal safety and crime prevention, including increasing overlooking, discouraging provision of hiding places, ensuring well designed public spaces (e.g. car parking, entrances) and making a clear distinction between public and private space. The Council will encourage the creation of lively and varied environments, to increase activity and passive surveillance.
- 8.27 In accordance with **Policy HD21 *Energy Conservation*** developers are expected to minimise the energy demand of new buildings by taking account of the most efficient siting, orientation and layout of new developments.
- 8.28 **Policy HD23 *New Trees and Landscaping*** establishes that new development proposals should make proper provision for planting of new trees and landscaping. High quality landscaping and boundary treatment should be incorporated and nature conservation should be promoted through the use of native species and new wildlife habitats, where appropriate.
- 8.29 The provision of appropriate new works of public art, including visual, crafts and landscape design, is encouraged by **Policy HD24 *Public Art***.
- 8.30 The design of lighting must take into account the need to minimise light spillage and ensure that it is the minimum level required for security and working purposes (**Policy HD28 *Light Spillage***).

Heritage

- 8.31 In addition to the policies relating to Conservation Areas which are detailed above, the following policies relate to other heritage assets:

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- **Policy GEN3 *Heritage and Design in the Built Environment*** aims to protect and enhance the built environment of the City, including by preserving and enhancing historically and architecturally important buildings, and where possible improving them; encouraging a high standard of design and landscaping in developments; improving accessibility; and creating an attractive environment which is safe and secure.
- **Policy HD1 *Listed Buildings*** seeks to secure the retention, repair, maintenance and continued use of listed buildings. Planning policies may be relaxed, where possible, to achieve this.
- **Policy HD4, *Alterations to Listed Buildings*** establishes that consent will not be granted for works that would adversely affect a listed building's architectural or historic character. Any works which are not of a high standard of design in terms of form, scale, detailing and materials will be refused. If a building is to be reused by members of the public, the needs of disabled people should be provided for in a manner which preserves the architectural and historic interest of the building.
- **Policy HD5, *Development affecting the setting of a listed building*** states that planning permission will only be granted for such development if it preserves the setting and important views of the building. Where appropriate, this includes control over design and siting of development, the use of adjacent land and the preservation of landscape features.
- **Policy HD17 *Protection of Archaeological Remains*** states that the Council will seek to protect sites of archaeological importance. Where development is proposed on sites of known or suspected archaeological importance, the City Council will require developments to assess the archaeological implications of their proposals and permanently preserve archaeological remains and their settings in situ. Where in situ preservation is not justified and disturbance by development is acceptable in principle, applicants must agree a programme of mitigation, including excavation and recording.

Environment

- 8.32 **Policy EP15 *Environmental Impact Assessments*** require planning applications to provide sufficient information to enable the Council and consultees to assess potential environmental impacts accurately. This may necessitate provision of an Environmental Impact Assessment depending on the scale, location or type of development proposed.
- 8.33 **Policy GEN2 *Open Environment*** states that the Council will protect and enhance a network of open space throughout the City. Of relevance to the proposed development, this includes protecting ecologically important sites and protecting and enhancing the landscape, heritage and wildlife value of the water courses in the City.
- 8.34 Under **Policy GEN8 *Environmental Protection*** Liverpool's environment will be protected and enhanced, for example through the recycling of land for productive use; ensuring efficient disposal of waste and encouraging recycling; preventing flooding; promoting renewable energy; and ensuring that developments are carried out with due consideration of public health.
- 8.35 **Policy OE5 *Protection of Nature Conservation Sites and Features*** seeks to protect nature conservation of open land and the water environment. In order to achieve this, development will not be permitted which directly or indirectly adversely affects a Special Protection Area, Ramsar site or Site of Special Scientific Interest (SSSI), unless there is no alternative solution and there are reasons of overriding public interest which support the development. Proposals which adversely affect a Site of Nature Conservation Value or Regionally

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- Important Geological/Geomorphological site (RIGS) have similar policy protection, stating that the benefits of the proposed development must outweigh the need to safeguard the environmental value of the site. Developments which have an adverse effect on legally protected species or the conservation value of a neighbouring authority will not be permitted.
- 8.36 In accordance with **Policy OE6 *Development and Nature Conservation*** potential damage to designated ecological sites will be minimised. Developers are required to identify the nature conservation interest of the site, propose means of protecting and managing this value – possibly through the use of planning obligations or conditions – and provide compensatory measures for any nature conservation interest which is damaged or destroyed during the development.
- 8.37 The enhancement of nature conservation interest for both open land and watercourses is sought through **Policy OE7 *Habitat Creation and Enhancement***. This includes supporting habitat creation, enhancing wildlife corridors and undertaking landscaping in a sensitive manner.
- 8.38 Under **Policy OE17 *The Recreational Route Network***, the Council will develop, safeguard and enhance a network of recreational routes for both cyclists and pedestrians throughout the city.
- 8.39 **Policy EP1 *Vacant, Derelict and Neglected Land*** encourages the reclamation of derelict land and the restoration of neglected land and encourages redevelopment for alternative uses. The contribution such a scheme would make to urban regeneration and the need to facilitate inward investment and create jobs are key considerations, as well as the degree of contamination, dereliction or danger posed by the site.
- 8.40 **Policy EP2 *Contaminated Land*** states that before approving development on suspected contaminated land, developers will need to submit a site survey regarding contamination and remedial measures required to address the hazard, including timescales for implementation of the mitigation. Planning permission may be granted subject to planning conditions regarding site investigations and remediation.
- 8.41 Developments which generate commercial waste will only be permitted where there is adequate provision for storage of waste on site and adequate access to enable waste to be transferred to a licensed waste disposal contractor (**Policy EP9 *Waste Storage***).
- 8.42 In accordance with **Policy EP11 *Pollution*** developments which have potential to generate unacceptable air, water, noise or other forms of pollution will be resisted. Planning permission will not be granted for development next to existing premises authorised/licensed under pollution control legislation unless the Council is satisfied that sufficient measures can and will be taken to protect amenity and environmental health.
- 8.43 **Policy EP12 *Protection of Water Resources*** states that planning permission will not be granted for development that can adversely affect the quality or supply of surface water or groundwater, including through unsatisfactory arrangements for the disposal of foul sewage or surface water, or the disturbance of contaminated land.
- 8.44 **Policy EP13 *Flood Prevention*** states that unless appropriate alleviation or mitigation is conducted, planning permission will not be granted for development at unacceptable risk from flooding, development which is likely to increase the risk of flooding elsewhere or that which will result in an adverse impact on the water environment due to additional surface water run off.

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Transport

- 8.45 Overarching policy **GEN6 Transportation** establishes the Council's aim to provide a balanced provision of transport infrastructure which is inclusive, safe and accessible. This includes improving facilities for cyclists and pedestrians and discouraging car use e.g. reducing the availability of car parking facilities. Access should be provided to leisure and other facilities for all of the City's residents.
- 8.46 Under **Policy C7 The Football Clubs** the City Council will seek effective solutions to remedy car parking and other amenity problems experienced by residents on a match day and to maintain and enhance residential amenity in the area.
- 8.47 Development which is likely to be used by the public should incorporate provision for taxi and Hackney Carriage facilities, where there are no existing facilities in close proximity to the site (**Policy T4 Taxis**).
- 8.48 **Policy T6 Cycling** promotes initiatives to maximise cycling as a transport mode, including improving the condition of designated routes; catering for cyclists' needs; considering the provision of safe cycling routes through all major development sites; improving road signage; introducing traffic calming and requiring new developments to provide secure cycle parking facilities.
- 8.49 **Policy T7 Walking and Pedestrians** supports measures to encourage walking and improving the pedestrian environment through better signing, lighting, surfaces and visibility. All major development should cater for pedestrians' needs in the design and provide safe and convenient walking routes.
- 8.50 **Policy T8 Traffic Management** states that the priority for investment in roads will be given to the maintenance and enhancement of the Primary and Strategy Route Network. This includes schemes to improve road safety, conditions for cyclists and pedestrians and public transport facilities and services.
- 8.51 **Policy T9 Road Safety** seeks to implement road safety measures to reduce the number of road accident casualties and minimise the risk of accidents on new roads. This includes reducing the risk of accident and injury to more vulnerable road users in particular, including cyclists.
- 8.52 **Policy T11 Major Road Corridors** includes Regent Road as an identified road corridor for improvement measures. Resources will be targeted towards the design and implementation of measures to improve the image of the city, facilitate efficient operation of public transport and relieve sensitive locations of heavy traffic.
- 8.53 In accordance with **Policy T12 Car Parking Provision in New Developments** any development which generates a demand for car parking will be required to make provision on site to meet the minimum operational needs of the development. The need will be determined by several factors, including highway and pedestrian safety, residential amenity, accessibility by public transport and proximity to existing public car parks.
- 8.54 A minimum of 6% of the first hundred parking spaces in a development should be reserved for Blue Badge holders¹⁶ and thereafter the number of accessible spaces will be negotiable (**Policy T13 Car Parking for the Disabled**). This policy also establishes requirements relating to the width of bays, bay markings and proximity to the point of access of the development served. For multi-storey car parks disabled bays should be provided adjacent to lifts.

¹⁶ Policy T13 refers to Orange badge holders but these have since been replaced with Blue Badges.

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- 8.55 **Policy T15 *Traffic Impact Assessment*** states that for developments which are likely to result in a material change to the character or volume of traffic on the surrounding highway network, a full Traffic Impact Assessment will be required. Conditions may be imposed on developments which require off-site works to take place before development can be made acceptable, in order to secure these works prior to operation of the development.

JOINT WASTE LOCAL PLAN (2013)

- 8.56 The proposed development does not relate to a waste development. However, the complex construction process and large volumes of visitors anticipated to completed development mean that relevant policies in the Joint Waste Local Plan should be considered.
- 8.57 The Merseyside and Halton Joint Waste Local Plan (adopted July 2013) sets out development management polices to address a range of waste management related development issues, including waste prevention and resource management. The most relevant policies are as follows:
- **Policy WM8 (*Waste Prevention and Resource Management*)** requires development involving demolition and/or construction to implement measures to achieve the efficient use of resources taking particular account of: methods that minimise waste production and encourage re-use and recycling materials as far as practicable on-site; designing out waste by using design principles and construction methods that prevent and minimise the use of resources; make provision for the use of high-quality building materials made from recycled and secondary sources; and use waste audits or site waste management plans, where applicable, to monitor waste minimisation, recycling, management and disposal. Evidence demonstrating how this will be achieved must be submitted with development proposals of this type.
 - **Policy WM9 (*Sustainable Waste Management Design and Layout for New Development*)** states that the design and layout of new built developments must, where relevant, provide measures as part of their design strategy to facilitate the collection and storage of waste, including separated recyclable materials, and provide sufficient access to enable waste and recyclable materials to be easily collected and transported for treatment.

9.0 Material Considerations – Local Guidance

- 9.1 This section summarises relevant Supplementary Planning Documents (SPDs), Supplementary Planning Guidance (SPG) and Strategic Regeneration Frameworks (SRFs).

WORLD HERITAGE SITE SPD (2009)

- 9.2 The World Heritage Site SPD provides guidance for protecting and enhancing the Outstanding Universal Value (OUV) of Liverpool Maritime Mercantile City World Heritage Site (WHS), 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 (para 1.1.1, p.1).
- 9.3 Liverpool is recognised within the SPD as having the longest and most recognisable waterfront in the UK and has ‘the largest and most complete system of historic docks anywhere in the world’ (para. 1.1.2, p.1). However, the SPD recognises that as the city seeks economic growth, it will try to find alternative sustainable uses for its redundant dockland (para. 1.1.5, p.1).
- 9.4 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 (para. 1.2.5, p.2).
- 9.5 The SPD recognises that different parts of the WHS are undergoing different types of development pressure. Within the Central Docks / Liverpool Waters area, the SPD notes that the regeneration of this part of the WHS requires significant amounts of private investment, without which the tangible cultural heritage in this area will continue to deteriorate (para. 1.3.2, p.3).

Character Area

- 9.6 The WHS site is divided into six character areas, which have distinct townscape characters (para. 1.3.1, p.3).
- 9.7 The application site sits within Area 3, ‘Stanley Dock Conservation Area’, an area which encompasses the northern part of the docks, including Princes Half-Tide Dock, Stanley Dock and the surviving Dock wall which runs along Regent Road. The SPD acknowledges that this character area is mostly derelict and disused and has massive potential for heritage-based regeneration (para. 3.1.1, p.25).
- 9.8 The Northern Docks area is recognised as having potential to extend waterfront access and attractions further north of the city centre and create links east-west to include Northern Liverpool (para. 3.1.14, p.35).
- 9.9 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.
- 9.10 Page 96 of the SPD identifies a key node adjacent to Bramley-Moore Dock, at the corner with Boundary Street.
- 9.11 Development opportunities in the Liverpool Waters part of the Character Area should consider (para. 6.4.27, p.103):
- Being part of a long-term phased masterplan to regenerate derelict docks;
 - Being part of an overall waterfront regeneration strategy;

Material Considerations – Local Guidance

- Provide significant additional employment opportunities;
- Capitalise on the dockland heritage of the site;
- Ensure there is no significantly detrimental impact on key views or the setting of historic buildings; and
- Protect and enhance the integrity of the dock water spaces.

Dock Water Spaces

- 9.12 The SPD identifies that a crucial aspect of the city’s historic landscape and its cultural heritage is the complex of interlinking docks (para. 4.7.1, p.63). The SPD states that any development which would compromise the status as the most complete historic dock system in the world would need ‘exceptional justification’ (para. 4.7.2, p.63). As such, the SPD notes that it is fundamental that the integrity of the docks as open water spaces is retained.
- 9.13 The role of the docks is both in relation to heritage conservation and urban design. The need to retain the docks extends to their quaysides, artefacts and water spaces (para. 4.7.6, p.64).
- 9.14 The importance of the docks extends beyond the WHS and also applies to the Conservation Areas in this part of the city.
- 9.15 Although dock infill in the WHS is resisted, the SPD acknowledges that proposals to build permanent structures in the water spaces may be acceptable subject to a range of criteria; one of which is that the community benefit of a new structure is proven to substantially outweigh any disbenefits to cultural heritage (para. 4.7.11, p.64).
- 9.16 In the assessment of Character Area 3, the SPD again reiterates that the infill of dock water spaces in the character area will not generally be permitted (para. 6.4.12, p.100). The SPD also notes that development on quaysides should retain, conserve and enhance the historic dock structures, walls and ancillary surviving elements.

Design

- 9.17 The SPD requires applicants to undertake analysis and assessment to demonstrate a clear understanding of the characteristics of their site and its surroundings, in order to show that the proposed design has responded to the characteristics and OUV of the area, in terms of materials, layout, massing, details and height (para. 4.2.3, p.40). In addition, applicants must assess the impact of proposals on the OUV of the WHS.
- 9.18 The SPD aims to:
- Ensure that new developments in the WHS reflect the inherited patterns of local architectural diversity and unique townscape of each character area (para. 1.6.3, p.8);
 - Ensure that the setting of the WHS is protected and that new development respects the visual and historic context in which it is located (para. 1.6.3, p.8);
 - Encourage economic regeneration through high quality new buildings (para. 1.6.3, p.8);
 - Contemporary design is also encouraged, providing that it meets best practice for urban design (para. 1.6.3, p.8), which includes respecting, responding to and enhancing the highly sensitive and important historic context (para. 4.2.12, p.42);
 - Ensure that new developments achieve high standards in terms of design, materials, architectural quality and innovation (para. 4.2.11, p.42); and

Material Considerations – Local Guidance

- Emphasise the need for quality architecture, which is grounded in an understanding and design concepts, which are informed by the context to the site (para. 4.2.12, p.42).
- 9.19 Pages 43-44 of the SPD provide a checklist of ‘Urban Design Considerations’ relating to a development’s character, its continuity and enclosure, the ease of movement, the quality of the public realm, ability to address diversity, its legibility and sustainability.

Building Height

- 9.20 The SPD notes that the relationship between the River Mersey and the WHS is a ‘fundamental aspect’ of the OUV of Liverpool’s WHS (para. 4.5.1, p.54). Due to its impact on views, development on the riverfront has potential to affect the setting and character of the WHS as well as the city’s skyline.
- 9.21 The SPD notes that high quality development could contribute in a positive manner to the waterfront.
- 9.22 New development must be incorporated into the existing key features of the city’s skyline, including the Stanley Dock Complex, Pier Head Group and Victoria Clock Tower. Development between these buildings must ensure that new buildings do not dominate existing landmarks or significantly obstruct key views associated with the WHS. This is of particular importance to Character Area 3 of the WHS (para. 4.5.4-4.5.5, p.54).
- 9.23 The Council defines tall buildings which are ‘high-rise’ as those which are significantly taller than surrounding buildings, typically of 15 storeys or 45m or higher (para. 4.6.3, p.55).
- 9.24 Regarding tall buildings, the SPD notes that such development can contribute positively to a city’s landscape, often through the provision of legibility (para. 4.6.5, p.56). Future tall buildings must be appropriately sited and designed in a manner which ensures minimal impact on the WHS and other heritage assets in the city (para. 4.6.5, p.56).
- 9.25 Overall, the SPD concludes that there is a presumption against high-rise developments within the WHS boundary, due to its potential over-dominance effects and being out of context with the prevailing character of the area. However, the SPD notes that there is an exception to this in the area to the north of Collingwood Dock and Salisbury Dock, where there is a lack of development and where ‘medium rise’ development may be considered suitable (para. 4.6.13, p.57). Figure 4.3 of the SPD identifies the quaysides of BMD as being an opportunity for a mid-rise building.
- 9.26 The SPD establishes a set of criteria for high-rise buildings (para. 4.6.19, p.61):
- High rise buildings should be mixed use schemes to maximise economic and social regeneration; proposals which deliver sustainable employment and tourism will be preferred.
 - The location of high-rise buildings should take account of the grain of the city, including whether situated at a node or gateway.
 - Public realm treatment should take account of local context.
 - Public access should be provided at higher levels so that the public are not excluded from tall buildings and can share the viewpoints.
 - Design solutions should be bespoke to the individual sites and the philosophy needs to be articulated in the Design & Access Statement supporting the application.
 - The visual impact of high-rise buildings on the setting of designated heritage assets should be considered, including ways to mitigate the impact through design.

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- Consider the vertical proportions and articulation of the tall building and how it can impact the city's skyline and waterfront.
 - Buildings should not seek to replicate existing structures.
 - The base of tall buildings should have a human scale and should not dominate the streetscape.
 - New tall buildings should not have a negative impact on microclimate, particularly key pedestrian routes and public spaces.
 - All proposals should be highly sustainable.
 - Key views to, from and across the WHS should not be adversely compromised.
 - New development should contribute to the city's skyline and not obscure, detract from, overshadow it or result in a lack of legibility.
 - New developments in the WHS should not generally exceed the height of the tallest building in the immediate vicinity, with the exception of the area north of Salisbury and Collingwood Docks, where there is little existing development in the WHS to determine the height (para. 5.2.6, p.70).
 - Where new development is proposed near to listed buildings, special attention will be paid to the potential impact of the new development in terms of its height and design on the setting of the listed buildings (para. 5.2.8, p.72).
- 9.27 The Design Guidance for Character Area 3 of the WHS identifies the quaysides in this area as having the potential to accommodate some substantial medium-rise buildings which would help to define and enclose the historic docks, subject to the criteria set out above (para. 6.4.5, p.97).

Materials

- 9.28 The brick warehouses within the WHS are recognised in the SPD as being of a highly distinctive style and being 'monumental' in terms of scale (para. 3.1.10, p.33). The warehouses use materials in a consistent manner and are considered to be fairly homogenous, which reflects that many were developed in a short period and influenced by Jesse Hartley.
- 9.29 The SPD notes that the materials which define Character Area 3 of the WHS include hard surface, edges, stock brick, stone and iron (para. 6.4.3, p.94).
- 9.30 Within the public realm, historic paving materials, fixtures, street furniture and railway track should be preserved in situ and conserved (para. 6.4.16, p.100).

Public Realm

- 9.31 The SPD seeks to support the delivery of public realm schemes to enhance the character of the WHS and Buffer Zones as a means of attracting inward investment and tourism (para. 1.6.3, p.8).
- 9.32 The SPD notes that a key objective of the Council is to provide walking and cycling routes for the public along the whole of the riverfront (para. 4.3.9, p.47).
- 9.33 The SPD notes that historically the Stanley Dock Conservation Area would have been a bustling area. The regeneration of this area presents '...an important opportunity to create a stimulating area with a strong and animated sense of place' (para. 6.4.10, p.99). As

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such, the SPD encourages active street frontages which provide enclosure and animation at street level.

- 9.34 Within Character Area 3, the SPD requires a network of high quality public rights of way, along the riverside and around all quaysides, to promote pedestrian and cycle access (para. 6.4.13, p.100). The SPD includes mention of a riverside walk between Princes Dock and Salisbury Dock, as part of the Liverpool Waters development. The SPD notes that ‘Without a good network of primary and secondary routes, the Liverpool Waters Sites and this part of the WHS will not be able to fulfil its massive potential’ (para. 6.4.15, p.100).

Regent Road Dock Wall

- 9.35 The dock wall along Regent Road is identified in the SPD as defining the relationship between the docks and the city, which is a significant aspect of the character of the area. The dockyard wall often ‘underscores’ views towards the city from the docks (para. 6.4.3, p.94).
- 9.36 The SPD notes that the dock wall is an integral part of the WHS with much architectural interest. The dock wall and its setting are required to be retained, repaired and preserved in its entirety, including gate piers, timber gates, adjacent setts and railway lines (para. 6.4.6, p.98).
- 9.37 Developments should initially look to utilise existing openings through the wall as the main east-west access points. If adequate access cannot be achieved through the existing openings, the case for the creation of new openings will need to be supported by a strong justification, demonstrating that this is essential to the delivery of major regeneration opportunities or to create essential permeability and connectivity to the surrounding area (para. 6.4.7, p.98).
- 9.38 Development to the west of the dock wall should respect its integrity and setting. Opportunities must be taken to conserve the wall and its features. Any new development to the west of the wall should be set back by at least 9m from the wall to provide adequate setting and to enable historic surfaces to be retained, as well as creating a usable corridor for cycling and walking (para. 6.4.8, p.98). Exceptions may be considered e.g. the creation of large public spaces, subject to satisfactory detailed design.

Reuse of historic buildings

- 9.39 Paragraph 1.6.3 of the SPD states that the conversion of historic buildings will be encouraged where it will stimulate the city centre economy and enhance the city’s profile (p.8). The historic fabric of the WHS’s historic buildings will be safeguarded to ensure it continues in appropriate use. Building owners are encouraged to maintain and conserve the stock of historic buildings within the WHS. Buildings considered to be ‘at risk’ due to their poor condition or which are under-used, will be brought into beneficial and sustainable use (para. 1.6.3, p.8).
- 9.40 The stock of listed buildings in the WHS is noted as being fundamental to its OUV and to Liverpool’s unique sense of place (para. 5.4.1, p.73). Maintaining a viable and appropriate use for historic buildings is considered an important factor in ensuring their survival, particularly as otherwise such buildings can be at an increased risk of decay. The SPD notes that ‘...delivering viable and sympathetic uses for these properties is a key issue for the long-term management of the Site’ (para. 5.4.3, p.73).
- 9.41 Proposals for the viable and long-term reuse of historic buildings will be generally supported where they are in broad accordance with allocations and policies within the

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statutory development plan; maintain an appropriate mix of uses; will not result in the loss of significant elements of historic fabric and will not result in the degradation of the character of the street (para. 5.4.5, p.75). The SPD also notes that all proposals seeking to reuse buildings should take account of the need to protect the habitats of birds and bats.

LIVERPOOL MARITIME MERCANTILE CITY WORLD HERITAGE SITE MANAGEMENT PLAN (2017-2024)

- 9.42 The purpose of the Liverpool World Heritage Site (WHS) Management Plan is to ensure effective protection of the WHS for current and future generations.
- 9.43 The Plan includes five aims: Protect; Conserve and Develop; Understand; Connect; Capitalise; and Govern. These aims support the overall Vision (p.54):
‘Reconciliation of the enduring ambitions for growth and prosperity established by the City’s mercantile founders with the need to protect, develop and enhance the Outstanding Universal Value of Liverpool’s world-class heritage’
- 9.44 BMD is located within Area 3 of the WHS, the Stanley Dock Conservation Area. This area is described as a ‘dramatic component of Liverpool’s historic dockland...’ (p.11). The area is characterised by ‘massive warehouses, walls and docks’ (p.11) but the Management Plan also recognises the importance of smaller structures, including bollards and capstans. The Management Plan acknowledges that the large water-filled docks are in private ownership and not currently accessible to the public.
- 9.45 The Management Plan acknowledges several issue and challenges to the WHS, including socio-economic pressure, the need for high-quality sustainable development, lack of understanding in relation to the WHS, lack of awareness and accessibility, the requirement to achieve an integrated approach, Climate Change and disaster risk management and Governance issues.
- 9.46 A series of Actions are identified under the five aims of the Management Plan. These include: requiring a Heritage Impact Assessment for all major developments within the WHS and buffer, encouraging higher levels of pre-application discussions for developments within the WHS, establishing a WHS Design Review Panel and stimulating the location of key attractions and developments within more remote parts of the WHS, helping to draw footfall and interest to underused parts of the site.

TEN STREETS SPATIAL REGENERATION FRAMEWORK SPD (2018)

- 9.47 The area covered by the Ten Streets Strategic Regeneration Framework (SRF) extends from the northern fringe of the City Centre to the Port of Liverpool on the northern docks. The SRF presents a vision, illustrative masterplan and set of design and development principles to guide the future development of the Ten Streets SRF area over the next 15 – 20 years.
- 9.48 The SRF fully recognises the potential of Bramley-Moore Dock to support a new football stadium and consequently the long-term potential of the Ten Streets 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’ (p.54).

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- 9.49 Page 135 of the SRF states ‘The potential for a new stadium has the potential to facilitate rapid change, creating a catalyst that will accelerate the redevelopment of the wider framework area’.
- 9.50 The ‘Northern Gateway’ is an area to the north of the Stanley Dock Complex which links further north to the Port of Liverpool. The area is characterised by a number of industrial uses. Although the application site at Bramley-Moore Dock is outside the SRF area, the SRF notes that BMD, the proposed location for the new football stadium, is adjacent to the Northern Docks (p.6).
- 9.51 The Northern Docks is envisaged as an area that will support 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’ (p.105). Ancillary uses which may be required to support the development of a new stadium are also identified as having potential to locate in the Northern Gateway area. The SRF provides a number of character area development principles for the Northern Gateway, 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.
- 9.52 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’ (p.106).
- 9.53 In terms of supporting connectivity and public realm, the SRF supports improved connections between Sandhills Station and BMD. Due to the proposed new stadium, connectivity, permeability, movement and public realm are noted as being paramount to the redevelopment of the Northern Gateway. The Illustrative Masterplan (Figure 1xiii, p.124) identifies a Public Square / Fan Zone, referred to as the stadium plaza, opposite BMD, to the east of Regent Road.

CAR AND CYCLE PARKING STANDARDS (1996)

- 9.54 When assessing the requirements of a particular scheme, the Council will consider the nature and type of development; whether off-site parking could cause danger to highway and pedestrian safety; whether the area is served by public transport; and whether off-site parking would be detrimental to residential amenity.
- 9.55 In terms of parking design, pedestrian access should be separated from vehicular access. The internal layout should be user friendly, including good lighting and signage. Car parking spaces should be a minimum of 2.4m x 4.8m.
- 9.56 Where possible, parking for disabled people should be provided under cover to give protection during wet weather. Parking bays for the disabled should be 4.8m x 3.6m, or 2.4m wide if a common transfer zone between two bays is provided. Accessible parking bays should be within 50m of a building entrance if uncovered, or 100m if covered.

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- 9.57 This document also establishes maximum and minimum car parking requirements and minimum cycle parking requirements for new development. However, more recent standards have been adopted in the *Ensuring a Choice of Travel SPD (2008)*.

ENSURING A CHOICE OF TRAVEL SPD (2008)

- 9.58 The document provides guidance on the access and transport requirements for new development, including establishing car and cycle parking standards for different types of development.
- 9.59 For Use Class D2 (Leisure) development, the following standards should apply:
- **Cycle spaces:** 1 secure space and locker per 5 members of staff, plus either 1 cycle stand per 50 sq m of floor space open to the public or 1 per 80 seats (minimum of 2 spaces) (whichever is most appropriate to use);
 - **Motorcycles:** 1 space per 200 seats (minimum of 2 spaces);
 - **People with disabilities:** For development providing over 200 bays, 4 spaces must be provided plus 4% of the total number of spaces provided;
 - **Service vehicles:** No minimum requirements; on-site provision should be on the basis of early negotiation with LCC, supported by a Transport Assessment;
 - **Taxis:** Pick-up/set-down bay adequate for one taxi is required above 1,000 sq m, with additional space if justified by a Transport Assessment;
 - **Other Staff and Operational Parking:** 1 space per 6 seats or 1 space per 23 sq m (for General Leisure facilities) in out-of-centre locations; and
 - **Coach parking and coach pick-up/drop-off:** will also be required and will be assessed on a case-by-case basis.
- 9.60 Transport Assessments will need to address sustainable access; the impact on the existing transport network; and the need to mitigate impacts. Stadia development will also be expected to submit a Travel Plan which will, as a minimum: control car parking; nominate a Travel Plan Co-ordinator; provide improved public transport, cycle and pedestrian services and facilities both inside and outside the site; and promote public transport, walking and cycling.

DESIGN FOR ACCESS FOR ALL SPD (UNDATED)

- 9.61 The SPD provides guidance on providing positive and inclusive developments. The document advises developers on how to integrate inclusive design principles into their planning proposals, promoting a high quality and inclusive environment for all, irrespective of age, gender, mobility or impairment. The purpose of the document is to:
- Set out the Local Planning Authority's requirements in respect of provision for disabled people in new development;
 - Enable the needs of disabled people to be taken into account at the earliest stages of planning a development (e.g. from concept; prior to planning application stage);
 - Indicate likely requirements arising from Building Regulations and Highways legislation which may influence the design and layout of proposed developments in respect of their provision for disabled people; and

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- Draw attention to best practice in the design of the internal and external environment in terms of making buildings and external spaces accessible to, and useable by disabled people
- 9.62 The SPD requires an Access Statement to be produced as part of a planning application to demonstrate what has been done to ensure buildings, services and facilities are accessible to all. The document also focuses on improving accessibility in the public realm as well as improving access to historic buildings and sites. Wherever possible, historic buildings and sites should be as easily accessed with use of the primary entrance by disabled people as by others.
- 9.63 New buildings will be required to be designed, positioned and orientated within a site to achieve an accessible approach from highways and the nearest public transport stations. The position of a proposed building will affect where the vehicle and pedestrian entrance to the site will be and therefore it should be carefully considered. Consideration should also be given to providing suitable drop off points immediately adjacent to a safe pedestrian route and as close as possible to the main entrance.

PLANNING ADVICE NOTE FOR DEVELOPERS ON DEVELOPING CONTAMINATED LAND (UNDATED)

- 9.64 The guide, produced by the LCC Environmental Protection Unit (EPU), comprises general advice to developers and requirements for planning application submissions on potentially contaminated land. Sufficient investigatory works should be undertaken for the purposes of assessing all ‘site-specific’ risks posed at / from a proposed development site.
- 9.65 The Planning Advice Note sets out the four phases of a typical contaminated land planning condition. The first three phases (desk base study, intrusive investigations and remediation strategies) are to be carried out prior to commencement of the development, with the remaining phase (completion and validation) to be carried out prior to occupation of the development.
- 9.66 Details of the content required for each phase of the condition are provided within the Planning Advice Note.

PLANNING ADVICE NOTE ON REFUSE STORAGE AND RECYCLING FACILITIES IN NEW DEVELOPMENTS (2005)

- 9.67 The Note provides advice on the Council’s recommended standards for refuse storage and recycling in all new developments. The guidance will ensure that the right number and size of refuse containers are provided for particular developments, and are located externally, where possible. Larger schemes which are open to the public will be required to provide a storage area for the recycling of materials too.
- 9.68 Businesses must provide storage facilities within their curtilage for the effective containment of all waste. Adequate access must also be provided to enable waste disposal contractors to transfer waste away from the commercial premises.

10.0 Material Considerations – Emerging Policy

- 10.1 The following section summarises relevant emerging (as yet not examined or adopted) policies related to the LCC authority area and LCR.

EMERGING LIVERPOOL LOCAL PLAN (SUBMISSION VERSION, 2018)

- 10.2 The Liverpool Local Plan was submitted to the Secretary of State for examination in May 2018. The next stage is the commencement of examination hearings. The submission version of the plan is dated January 2018. In September 2019, Liverpool City Council published a draft of proposed changes to the Local Plan following the Inspector’s Initial Questions and Issues.
- 10.3 In accordance with paragraph 48 of the NPPF, LPAs may give weight to relevant policies in emerging plans according to the stage of preparation (the more advanced its preparation, the greater the weight that can be applied); the extent to which there are unresolved objections to the relevant policies; and the degree of consistency of the policies to the NPPF.
- 10.4 The approach to the emerging Local Plan has therefore been to give the policies substantive weight where consistent with the NPPF. However, full weight cannot be given to the emerging Local Plan until the plan has been examined and adopted, with all outstanding objections resolved.

Vision

- 10.5 The Vision in the Local Plan is to create a sustainable, vibrant and distinctive city, which maximises development opportunities to create economic prosperity alongside sustainable communities and an outstanding and high quality natural and built environment (p.29). The Vision recognises the need for sustainable development and redevelopment of unique and important assets, including the City’s football stadia. The Vision also recognises the role of the waterfront as the focus for leisure and tourism activity (p.29).
- 10.6 The emerging Local Plan proposes several Strategic Priorities, including:
- Strengthening the city’s economy;
 - Creating a high-quality historic environment;
 - Creating an attractive and safe city with a strong local identity;
 - Using resources efficiently;
 - Maximising sustainable accessibility; and
 - Maximising social inclusion and equal opportunities.
- 10.7 The Local Plan includes a chapter on the City Centre, which identifies the ‘Waterfront and its Fringes’ sub-area as a major asset of significant architectural and historic importance (p.26). The Vision for the City Centre identifies the Waterfront as a world-class leisure and visitor destination, with the aim being to maximise the use of waterspaces and take full advantage of development opportunities. The Council will seek to prioritise the following over the plan period (p.54-55):
- Support investment and regeneration within the City’s Waterfront and its fringes;
 - Support further growth of leisure, tourist and cultural facilities, including at the Waterfront;
 - Build upon the city’s positive reputation as a vibrant and world class designation for night time entertainment;

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- Protect and enhance the centre’s heritage assets and secure a high standard of design that integrates well within the existing urban fabric;
- Improve connectivity, walking and cycling routes, the pedestrian environment and public realm; and
- Open public access to the Waterfront by creating a linked cycle and pedestrian route along the River Mersey.

10.8 The following are priorities which are specific to the Waterfront & its Fringes area:

- To create a world-class, high-quality, mixed-use Waterfront which focuses on the tourism offer and leisure economy by supporting and enhancing existing attractions and supporting the regeneration of historic docklands;
- Enhance walking and cycling routes along the Waterfront, creating a continual route along the river edge;
- Protect and enhance the heritage assets of the Waterfront, including the WHS and ensure that new development integrates well with these assets; and
- Improve connectivity between the Waterfront and the rest of the city centre.

Site Allocation & Principle of Development

10.9 The site is allocated as being within the Liverpool Waters area (**Policy CC12**), within a Conservation Area (**Policy HD1**), within a World Heritage Site (**Policy HD2**) and is also within a Mixed Use Area (**Policy EC6**). The site is within the ‘Waterfront & its Fringes’ area of the city centre (**Policy CC10 & CC11**).

- **Policy CC10 *Waterfront Design Requirements*** establishes that development on the waterfront must be of a high quality design which respects its historic surroundings, whilst making adequate provision for access, parking and servicing. This includes protecting the character, setting, distinctiveness and Outstanding Universal Value (OUV) of the World Heritage Site (WHS). New development must ensure the protection of European and Nationally designated habitat sites; not undermine local residential amenity and business operations; ensure high-quality design; ensure usable and inclusive public realm; provide enhanced pedestrian / cycle movements; make provision for the repair and conservation of heritage assets; incorporate appropriate street furniture and lighting; and ensure greater access to dock water spaces and their quaysides.
- **Policy CC11 *Recreational Use of Dock Water Spaces, Quaysides and the Waterfront*** supports proposals which facilitate greater access and recreational / leisure use of dock water spaces and their quaysides, including through the installation of stepped dockside structures to gain access to water level, use of feature lighting that assists in animating dock water spaces and adjacent quaysides and proposals which enhance the interpretation of the cultural heritage and archaeology of the historic dockland environment.
- **Policy CC12 *Liverpool Waters*** states that the Council will support planning applications to deliver the vision for Liverpool Waters, which is to regenerate a 60ha historic dockland to create a mixed-use waterfront quarter in the city centre.
- **Policy HD1 *Heritage Assets: Listed buildings; Conservation Areas; Registered Parks and Gardens; Scheduled Ancient Monuments*** seeks to conserve and where appropriate enhance the historic environment. The docks and other maritime structures associated with the City’s role as one of the world’s major ports from the 18th century to the early

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20th century are identified as an element which contributes most to the city’s identity and sense of place. Proposals affecting a designated heritage asset and its setting should seek to conserve the significance of the heritage asset. Substantial harm to or total loss to of the significance of a designated heritage asset (or an archaeological site of national importance) and its setting will be permitted only in exceptional circumstances, where it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss. Where less than substantial harm is anticipated, it 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 where it can be demonstrated that, either, there are substantial public benefits which outweigh the harm or there are other convincing circumstances to justify granting permission.

Proposals affecting archaeological sites of less than national importance are required to conserve elements which contribute to their significance in line with the importance of the remains. Preservation of the remains in situ is the preferred solution to mitigate damage.

Proposals affecting a Conservation Area are required to preserve or enhance those elements which contribute to its character and appearance, especially any elements identified in any adopted Conservation Area Appraisal as making a positive contribution to the significance of that area.

Proposals which will help to safeguard the significance of a heritage asset, and secure a sustainable future, especially for those assets identified as being at greatest risk of loss or decay, will be supported.

- **Policy HD2 *Liverpool Maritime Mercantile City World Heritage Site*** states that the Council will support proposals which conserve or enhance the Outstanding Universal Value (OUV) of the World Heritage Site (WHS). The policy states:
 - ‘a. Permission will not be granted for proposals which would have an adverse impact upon the views of the Waterfront from the River Mersey, or of the key Landmark Buildings and vistas having regard to those identified in the Liverpool Maritime Mercantile City World Heritage Site SPD.
 - b. Proposals for the redevelopment or remodelling of buildings or sites which have a negative or neutral impact on the character of the World Heritage Site will be supported where it can be demonstrated that this will enhance or better reveal the Outstanding Universal Value of the World Heritage Site.
 - c. Proposals which would help to facilitate the reuse of vacant or under-used floorspace in buildings which make a positive contribution to the character of the area and the Outstanding Universal Value of the World Heritage Site will be supported.
 - d. Proposals for tall buildings in the World Heritage Site or its Buffer Zone will be assessed against Policy UD6.’

Applications for development which is likely to impact on the OUV will not be granted unless accompanied by an appropriate Heritage Impact Assessment which evaluates the likely effects of the proposals upon the OUV of the WHS.

Proposals for development within the World Heritage Site or its Buffer Zone will be expected to have regard to the advice set out in the Liverpool Maritime Mercantile City World Heritage Site Management Plan and the guidance in the Liverpool Maritime Mercantile City World Heritage Site SPD.

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- **Policy EC6 *Mixed Use Areas and Sites for Various Types of Development*** states that planning permission will be granted for those uses specified in the relevant Mixed-Use Area profile, subject to other planning policies. For the Waterfront area in which the application site is located, this is addressed in Policy CC10.

Other relevant policies

10.10 The following policies of the emerging Local Plan are also relevant to the principle of the proposed development.

- **Policy EC3 *Delivering Economic Growth*** establishes that the development of the tourism and visitor economy, including the football club of Everton, will be supported and where appropriate, protected and enhanced.
- **Policy EC4 *Culture, Tourism and Sport*** details that the Council will support proposals which reinforce and promote Liverpool as a centre for tourism, culture and major events. This includes proposals for new / expanded provision which contributes to the city's continued success as a destination for visitors and venue for major events, including sports. Within this, the sustainable development or redevelopment of Everton football club is specifically mentioned, providing the proposals are of an appropriate scale and subject to other relevant planning policies.

Proposals should be of a high quality design, be highly accessible, not adversely impact residential amenity or business operations and be designed to be flexible, adaptable and capable of multi-use.

- **Policy CC13 *Ten Streets*** establishes that the Council will support uses which maximise the economic potential of the area, focusing on creative businesses and light employment uses. Within the Northern Gateway (adjacent to the application site), a mix of uses will be supported, including leisure and potential tourism related uses, ancillary retail and significant new public realm.

10.11 The following briefly summarises other relevant policies of the Local Plan:

- **Policy STP1 *Spatial Priorities for the Sustainable Growth of Liverpool*** aims to create a robust and regionally significant, competitive economy. To achieve this economic development will be focused in the City's key employment areas, including North Liverpool and the Enterprise Zone at Mersey Waters.
- **Policy STP2 *Sustainable Growth Principles and Managing Environmental Impacts*** states that the Council will support development proposals which address, as appropriate, strategic economic, social and environmental principles, including: contributing to delivering economic growth and ensuring a strong, responsive and competitive economy; making efficient use of land; making use of suitable brownfield land and support opportunities to remediate land (especially derelict, contaminated or unstable land); locating development in areas which are accessible by sustainable transport, minimising environmental impact; delivering high quality contextual design; conserving the City's heritage assets; adapting to the effects of climate change and minimising adverse impacts; and including measures to improve air quality.
- **Policy STP3 *Protecting Environmentally Sensitive Areas*** seeks to avoid and/or mitigate negative impacts on European habitats sites. Development which may have an adverse impact will be subject to a Habitat Regulations Assessment.
- **Policy STP4 *Presumption in Favour of Sustainable Development*** states that planning applications which accord with the Local Plan will be approved unless material

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considerations dictate otherwise. Where the Local Plan is silent on an issue or the policies are out of date, the protocol as established in the NPPF is to be adopted.

- **Policy STP5 *Infrastructure Provision*** states that new developments should make use of existing infrastructure capacity where possible. Measures to address capacity issues will be required to be in place in a timely and phased manner.
- **Policy STP6 *Developer Contributions*** states that new developments need to meet the reasonable costs of providing on and off-site infrastructure requirements and to meet the needs for additional, or improvements to existing, infrastructure and services which would mitigate the impacts generated by new development. Developers are expected to fund the future maintenance of facilities provided as a result of development. If viability is an issue, site specific independent financial evaluation will be required.
- **Policy CC21 *The Night Time Economy*** establishes that planning permission for night time economy uses will be granted if there is no adverse impact on residential amenity or the operation of nearby businesses or the character and function of an area and that identified noise level requirements have been met. The hours of operation of late night uses will be managed through planning conditions.
- **Policy CC22 *Food and Drink uses and Hot Food take-aways within the City Centre*** states that proposals for such uses will need to demonstrate that there is no adverse impact on residential amenity or the character of an area.
- **Policy SP4 *Food and Drink uses and Hot Food take-aways*** establishes a set of criteria for such uses, including requirements for appropriate hours of operation; no adverse impact on residential amenity; satisfactory approach to traffic and parking implications; appropriate locations for trade waste; appropriate fume extraction system and noise insulation; and no increase in potential for crime and anti-social behaviour.
- **Policy CC26 *Protection and Enhancement of Green Infrastructure*** requires new development to include an element of green infrastructure where possible. This includes green roofs/walls, trees, water features and use of native species in landscaping.
- **Policy SP1 *The Hierarchy of Centres for Liverpool*** aims to protect and enhance the vitality and viability of centres within the City's network. Liverpool City Centre is identified as the Regional Centre, and therefore the focus for leisure, cultural and tourist uses.
- **Policy UD1 *Local Character and Distinctiveness*** establishes that development proposals should demonstrate that several aspects of local design have been taken into account, including local grain and pattern of development; means and pattern of enclosure; patterns of movement and street character; materials, colours, tones and textures; relationship to topography; the need to preserve and improve views into and across development; heritage assets; and focal buildings and landmarks.
- **Policy UD2 *Development Layout and Form*** states that development proposals should demonstrate that the following are taken into account: the hierarchy of streets and spaces; form, height, scale and massing; the need to reduce opportunities for crime; the need to promote physical activity; the creation of active frontages; and the establishment of sufficient sunlight and daylight.
- **Policy UD3 *Public Realm*** requires public realm design to reinforce and complement local distinctiveness; be based on a clear rationale of the function of an area; establish a primacy of pedestrians and cyclists over vehicles; incorporate historically important features; incorporate strong inclusive design principles; minimise physical barriers and

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visual clutter; minimise risk of criminal activity and perception of insecurity; incorporate appropriate street lighting and signage; and encourage physical activity.

- **Policy UD4 *Inclusive Design*** states that development proposals should meet the highest standards of accessibility, safety and inclusion to ensure development can be used safely and easily. The principles of inclusive design, including the specific needs of disabled people, should be integrated into the development.
- **Policy UD5 *New Buildings*** lists a series of criteria for new development proposals, including that buildings are robust and adaptable; orientation and micro-climate issues have been considered; materiality, tone and texture of an area are reflected in the design; the building aids legibility; adequate sound attenuation is provided; building design is resource and energy efficient; and it provides appropriate levels of car and cycle parking and servicing provision.
- **Policy UD6 *Tall Buildings*** establishes that proposals for Tall Buildings must make a positive contribution to the streetscape and skyline of Liverpool by being of the highest quality of design. Proposals must be supported by a comprehensive Townscape and Visual Impact Assessment and be considered under the EIA process, considering cumulative impacts too. Tall buildings are expected to contribute to the way-finding and legibility of the city as well as contribute to the economic, social and environmental sustainability of Liverpool.
- **Policy UD8 *Public Art*** states that the City Council will encourage applicants for all major developments to consider the opportunity to integrate artists' ideas and visions into the development process.
- **Policy GI1 *Green Infrastructure Resources*** affords protection to the Mersey Estuary SSSI/SPA/Ramsar Site, Biodiversity assets (including Local Wildlife Sites and Local Nature Reserves), water spaces and public rights of ways.
- **Policy GI4 *Water Spaces*** states that the Council will support proposals which increase access along the coast and allow opportunities for greater interaction with water spaces in the city. Development adjacent to a water space should demonstrate that the design, detailing and massing takes account of its location; the site layout takes account of the relationship between buildings, parking, landscaping and the water space; public access is maintained or enhanced; opportunities are created to enhance green infrastructure provision; and any historical or industrial archaeological features relating to the water space are retained and restored. Opportunities should be taken to provide active frontages. In addition, there should be no negative consequences for nature conservation value.

For proposals involving dock spaces, development will not be permitted to infill dock water spaces or reduce the depth of the dock to an extent which would limit the range of vessels which could use the dock water space. Development should avoid dominating water spaces and maintain their importance as open water which provides spacing between dockland buildings.

Development should demonstrate there is no adverse impact on residential amenity or business continuity and should make appropriate provision for the future management and maintenance of the public realm, movement routes, water spaces and adjacent quaysides. Navigational routes should be protected.

- **Policy GI5 *Protection of Biodiversity and Geodiversity*** requires development which may have a significant effect on an internationally important site to be accompanied by

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sufficient evidence to allow the Council to conduct a Habitats Regulation Assessment. Adverse effects should be avoided and/or mitigated. Where significant harm cannot be avoided, adequately mitigated, or as a last resort, compensated, then planning permission will be refused. Applications should be supported by an Ecological Appraisal and include details of avoidance, mitigation and/or compensation where appropriate.

Development which may cause direct or indirect significant harm to other designated sites of nature or geological conservation importance, Priority Habitats, legally protected species and / or Priority Species will only be permitted on:

- *National sites (Mersey Estuary Ramsar site/Mersey Estuary Site of Special Scientific Interest (SSSI))*: where there are no alternatives and where the reasons for and the benefits of development clearly outweigh the impact on the nature conservation value of features of the site that make it of special scientific interest, and its broader contribution to the national network
 - *Local Sites (Local Nature Reserves (LNRs), Local Wildlife Site (LWS) and Regionally Important Geological/Geomorphological Sites (RIGS))*: where the reasons for and the benefits of development clearly outweigh the impact on the nature conservation value of the site and its broader contribution to the Liverpool City Region (LCR) Ecological Network.
- **Policy GI6 *Liverpool City Region Nature Improvement Areas*** identifies the Mersey Estuary as a Nature Improvement Area (NIA). Under this policy, development within the NIA should enable the function of the NIA, contribute to opportunities for habitat creation / management and deliver biodiversity enhancement measures where a potential impact on the NIA is anticipated.
 - **Policy GI7 *New Planting and Design*** states that where appropriate, depending on the character of the site and locality, new development should make provision on site for the planting and successful growth of new trees and landscaping, including any replacement planting provided as compensation for loss due to development. New planting schemes must consider sustainability, locational challenges, opportunities for the creation of new habitats, stock size and suitable plant selection.
 - **Policy GI9 *Green Infrastructure Enhancement*** states that developments should be designed to incorporate new and/or enhanced green infrastructure, which should be appropriate in terms of type, standard and size. Green infrastructure should be provided at key gateways and along key corridors. Green infrastructure should also integrate and enhance biodiversity features, as well as improve green routes where possible. All development proposals, where possible, should contribute to ensuring a net gain in biodiversity. Where fairly and reasonably related to the development proposal, financial contributions through an appropriate legal agreement will be sought towards the creation of new off-site green infrastructure provision, or to enhance and improve existing provision off-site where it is clearly demonstrated that on-site provision is not possible, beneficial or appropriate.
 - **Policy R1 *Air, Light and Noise Pollution*** requires development that is likely to have a pollution impact to demonstrate that appropriate measures are incorporated, that the impacts will not be significant and that the development will not lead to a significant decline in air quality. Major developments should incorporate measures to reduce air pollution.
 - **Policy R3 *Flood Risk and Water Management*** states that development should protect and enhance water quality, reduce flood risk and include water efficiency measures. Proposals

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must follow the sequential approach to determining the suitability of land for development, directing development to the area at lowest risk of flooding. Developments must demonstrate that there is no increase in flood risk anticipated at the site or elsewhere and should seek to reduce flood risk. Developments should comply with the Water Framework Directive. Where reasonably practical, developments should incorporate Sustainable Drainage Systems (SuDS) to manage surface water run-off.

- **Policy R4 *Coastal Protection*** requires development to not increase the risk of tidal flooding or coastal erosion or adversely impact the integrity of designated sites of European and/or International nature conservation importance and to mitigate the impacts of climate change.
- **Policy R7 *Renewable and Low Carbon Energy*** states that future development will be required to connect to a decentralised energy network where one has been constructed or is programmed to be constructed, unless it can be demonstrated that this is not viable. All major developments will be required to integrate low carbon energy and decentralised energy networks into the proposal.
- **Policy R9 *Solar Panels*** states that both building and ground mounted installations will be supported, providing heritage assets are conserved (including views important to their setting and elements which contribute to the OUV of the WHS); impact on visual amenity and neighbouring uses is minimised; there is no adverse impact on aircraft safety; the proposal has been subject to community engagement; and the design incorporates the ability to remove the structure and restore the site.
- **Policy R10 *Non-Fossil Fuel Energy Sources*** the adoption of non-fossil fuel technologies to generate locally sourced energy will be supported as part of the transition to a low carbon economy. Proposals for non-fossil fuel energy development must demonstrate that the proposed development is: appropriately sited; any cultural and heritage landscape issues are addressed including conserving heritage assets; there will be no unacceptable impact on biodiversity or harm to the area / living conditions; and the proposal has been subject to community engagement.
- **Policy TP1 *Improving Accessibility and Managing Demand for Travel*** states that development proposals should make the best of existing infrastructure. The use of Travel Plans will be required to positively manage travel demand and improve accessibility of development. All developments should address the accessibility of pedestrians and cyclists, as well as public transport users.
- **Policy TP2 *Transport Assessments*** establishes that a Transport Statement or Assessment will be required to accompany a planning application for development proposals that generate significant amounts of movement. Developments must ensure new road layouts are safe and can operate efficiently; the development would not individually or cumulatively with other projects have a severe impact on the functioning of the network; there is no detrimental impact to the safety of users of the transport network; there is provision for walking, cycling and the use of public transport; and vehicle and cycle parking and servicing are appropriate to the scale and nature of development proposed.
- **Policy TP5 *Cycling*** requires new developments to demonstrate they will have a positive impact on the cycling network, be designed to encourage cycling, provide appropriate cycle access and sufficient secure cycle parking facilities; demonstrate best practice in design for cyclists; and ensure that the layout is fully accessible for cyclists, and encourages and facilitates cycle usage.

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- **Policy TP6 *Walking and Pedestrians*** states that developments must be designed to encourage walking, provide appropriate pedestrian access, demonstrate a positive impact on the pedestrian network, ensure layouts are fully accessible and demonstrate best practice in design for pedestrians.
- **Policy TP7 *Taxis*** reiterates UDP Policy T4 regarding taxi rank provision.
- **Policy TP8 *Car Parking and Servicing*** requires demand for car parking to be met on site, in accordance with the Council’s standards. 5% of spaces should have charging points available. Parked cars should be unobtrusive, using discreet and innovative solutions to avoid car parking dominating the street-scene. Adequate provision should be made for parking, servicing and loading, including access by emergency and refuse vehicles. All new development should have regard to road safety considerations.
- **Policy TP9 *Public Transport*** requires transport assessments to consider how opportunities could be taken to provide good access to the bus and rail network, including (where appropriate) providing and improving the infrastructure necessary to support such greater accessibility. Applications should demonstrate how proposed development relates to walking & cycling distances and routes to stations, convenience of bus access to stations and details of service frequencies.

SPATIAL DEVELOPMENT STRATEGY (SDS) – ABOUT LIVERPOOL CITY REGION: OUR PLACES (2019)

- 10.12 The Liverpool City Region (LCR) Combined Authority is in the process of preparing its first Spatial Development Strategy (SDS). An initial consultation period is ongoing, which ends on the 14th January 2020. After receiving the responses, the Combined Authority will review and, along with any evidence needed, take comments into account when drafting policies. A draft of the SDS will then be presented to the Combined Authority.
- 10.13 Central to setting the SDS’s policy direction will be the Local Industrial Strategy, which is due to be published in March 2020. Its vision is to deliver a prosperous and inclusive economy founded on five priorities, ensuring that:
- People with the right opportunities are able to turn passion into prosperity;
 - There is a dynamic business base that creates opportunity;
 - We are a City Region of collaboration that transforms research into reality;
 - We are a City Region that connects all our communities to opportunity; and
 - Create revitalised and distinctive places.
- 10.14 As part of this round of SDS public consultation on ‘Our Places’, six policy themes have been defined:
- **Environment and Climate Change** – The Combined Authority declared a Climate Emergency in May 2019 and aims to make the city region net carbon neutral by 2040. The SDS will play a central role in supporting and monitoring efforts to act on climate change; ensuring that new development is resilient to predicted impacts and contributes towards reducing greenhouse emissions. The consultation asks about the main challenges in planning for a changing climate and how to tackle these challenges.
 - **Healthier, Safer and Resilient Homes and Communities** – The Combined Authority has identified the quality of housing as a key determinant of our health and wellbeing. A Design Champion and an Air Quality Task Force have been appointed to tackle these

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two key matters. The Combined Authority has also adopted a social value approach to preparing policies in the SDS. The Combined Authority states that it is vital that future development in the LCR communities offers wider opportunities and benefits to people. A 'Social Value Evaluation' of the SDS will be carried out to highlight where 'social value gain' can be secured through the planning process.

- **A thriving and Vibrant City Region** - The Combined Authority consider that the role of spatial planning is key in supporting the diversification and adaptation of town centres. The Metro Mayor and Combined Authority also recognise the importance of culture and creativity as valuable assets; defining the city region as a vibrant and unique place and contributing significantly towards the prosperity of the local economy. The SDS will need to consider how strategic planning policy supports our cultural well-being and plans positively for our cultural facilities. It will also need to take account of the wider social, cultural, economic and environmental benefits offered by our historic buildings.
- **A Connected City Region** – This theme focuses on the strategic vision for digital and transport connectivity. The SDS should be proactive in promoting sustainable forms of transport such as walking and cycling, low and ultra-low emission vehicles and public transport. The LCR Combined Authority Transport Plan provides direction for SDS policy as part of an integrated approach. Its key transport priorities are:
 - Better public transport accessibility and choice;
 - Moving away from car dependency;
 - Working with Government and Transport for the North (TfN) to deliver a direct HS2 and Northern Powerhouse Rail link to the LCR;
 - Increasing rail capacity to enable more sustainable movement of freight; and
 - Improving access to Liverpool John Lennon Airport by public transport.
- **An Inclusive Economy** - The Combined Authority aims to create a fairer, more prosperous city region for everyone. Informed by the Local Industrial Strategy, the SDS policies will encourage sustainable economic growth. The Metro Mayor promotes a 'brownfield first' approach to development, whereby brownfield sites are prioritised to ensure the re-use of sustainable, previously developed land is maximised.
- **The Infrastructure we need** – Necessary infrastructure will be identified in an Infrastructure Plan, which will sit alongside the SDS. This will identify the key pieces of strategic infrastructure needed to support the delivery of the SDS, helping ensure that future development in the City Region is co-ordinated and sustainable.

11.0 Material Considerations – National Policy & Guidance

- 11.1 This section summarises relevant aspects of the National Planning Policy Framework (NPPF, 2019), Planning Practice Guidance (PPG, 2014 and as amended) and National Design Guide (2019).

NATIONAL PLANNING POLICY FRAMEWORK (NPPF, 2019)

- 11.2 The National Planning Policy Framework (NPPF) was published in February 2019.

Chapter 2: Achieving Sustainable Development

- 11.3 Sustainable development is at the core of the Framework. Paragraph 8 of the NPPF establishes that there are three dimensions of sustainable development: economic, social and environmental. These dimensions are defined as:

- an **economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a **social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- an **environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.

- 11.4 These objectives are interdependent and need to be pursued in a manner which is mutually supportive. Decision-making should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (para. 9).

- 11.5 Paragraph 10 details that at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 sets this out for decision taking as follows:

‘For decision-taking this means:

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 1. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 2. 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.’

- 11.6 With regard to ‘assets of particular importance’, as mentioned in paragraph 11, footnote 6 of the NPPF confirms that this definition includes designated heritage assets.

- 11.7 Paragraph 12 of the NPPF establishes that the presumption in favour of sustainable development does not change the statutory status of the development plan, which is the starting point for making decisions on planning applications.

Material Considerations – National Policy & Guidance

Chapter 4: Decision Making

- 11.8 This chapter states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community (para. 39).
- 11.9 Regarding planning obligations, paragraph 56 of the NPPF states that these may only be sought when meeting all of the three tests:
1. 'Necessary to make the development acceptable in planning terms;
 2. Directly related to the development; and
 3. Fairly and reasonably related in scale and kind to the development.'

Chapter 6: Building a strong, competitive economy

- 11.10 Paragraph 80 of the NPPF states that significant weight should be attached to the need to support economic growth and productivity through the planning system. Paragraph 80 sets out how planning policies and decisions should '*help create the conditions in which businesses can invest, expand and adapt*' whilst paragraph 82 states that LPAs should recognise and address the specific locational requirements of different sectors.

Chapter 7: Ensuring the vitality of town centres

- 11.11 In accordance with paragraph 85, planning decisions should support the role of town centres as the heart of local communities, adopting a positive approach to their growth, management and adaptation.

Chapter 8: Promoting healthy and safe communities

- 11.12 Planning decisions are required to achieve healthy, inclusive and safe places that promote social interaction; are safe and accessible; and enable and support health lifestyles, for example, through the provision of sports facilities and layouts that encourage walking and cycling (para. 91). Paragraph 92 of the NPPF states that decisions should:
- a. 'plan positively for the provision and use of shared spaces, community facilities (such as sports venues, open space,) and other local services to enhance the sustainability of communities and residential environments;
 - b. take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
 - c. guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
 - d. ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
 - e. ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.'
- 11.13 In accordance with paragraph 95, planning decisions should promote public safety and take account of wider security and defence requirements. This includes anticipating and addressing potential malicious threats, particularly in areas where large numbers of people are expected to congregate. Footnote no. 41 confirms that this includes stadia development.

Material Considerations – National Policy & Guidance

Chapter 9: Promoting sustainable transport

- 11.14 Paragraph 103 states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
- 11.15 In assessing proposals, it should be ensured that: appropriate opportunities to promote sustainable transport modes are taken up; safe and suitable access to the site can be achieved for all users; and any 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 (para. 108).
- 11.16 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 (para. 109). In accordance with paragraph 110, applications should:
- a. 'give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - b. address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c. create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - d. allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e. be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'
- 11.17 At paragraph 111, it states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement / assessment so that the likely impacts of the proposal can be assessed.

Chapter 11: Making effective use of land

- 11.18 Planning decisions are required to give substantial weight to the value of using suitable brownfield sites within settlements and to support appropriate opportunities to remediate derelict, contaminated or unstable land (para. 118).
- 11.19 The NPPF supports the promotion and development of under-utilised land and buildings.

Chapter 12: Achieving well-designed places

- 11.20 Paragraph 124 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development. Effective engagement between applicants and the local community and LPA can be essential to this.

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- 11.21 Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot (para. 128). LPAs are encouraged to ensure they make appropriate use of tools and processes for assessing and improving the design of developments. This includes review arrangements, and LPAs should have regard to these processes, including any recommendations made by design review panels (para. 129).
- 11.22 In accordance with paragraph 127, planning decisions should ensure that developments:
- a. '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;
 - b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'
- 11.23 Planning permission is to be refused for development of poor design, that fails to take account of the opportunity to improve an area's character, quality and function (para. 130).
- 11.24 Paragraph 131 states that: *'In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'*

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

- 11.25 Paragraph 149 details that local plans should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply / demand considerations. Paragraph 150 specifies that in supporting the move to a low carbon future, new development should be planned to reduce greenhouse gas emissions (e.g. through location, orientation and design) and avoid increased vulnerability to the range of impacts arising from climate change.
- 11.26 In accordance with paragraph 151, plans should identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems.
- 11.27 In determining planning applications, LPAs are directed to expect new development to (paragraph 153):

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- Comply with adopted Local Plan policies on local requirements for decentralised energy supply, unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
 - Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 11.28 In terms of flood risk, inappropriate development in areas at risk of flooding should be avoided by directing development elsewhere. Where such development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere (para. 155).
- 11.29 Paragraph 163 states that LPAs should ensure that flood risk is not increased elsewhere as a result of proposed developments. Development should only be permitted in areas at risk of flooding where, in light of a site-specific flood risk assessment, it can be demonstrated that the most vulnerable development is located in areas of lowest flood risk; the development is appropriately flood resistant and resilient; sustainable drainage is incorporated where appropriate; residual risk can be safely managed; and safe access and escape routes are included.
- 11.30 Paragraph 165 of the NPPF requires major developments to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
- a. 'take account of advice from the lead local flood authority;
 - b. have appropriate proposed minimum operational standards;
 - c. have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d. where possible, provide multifunctional benefits.'

Chapter 15: Conserving and enhancing the natural environment

- 11.31 Planning decisions are required to minimise impacts on biodiversity and provide net gains. New and existing development must not be put at risk from, or contribute towards, unacceptable levels of soil, air, water or noise pollution or land instability (paragraph 170). This section of the NPPF also requires degraded, derelict, contaminated and unstable land to be remediated where appropriate.
- 11.32 In accordance with paragraph 175, LPAs should consider that if significant harm to biodiversity as a result of development cannot be avoided, adequately mitigated or (as a last resort) compensated for, then planning permission should be refused. Furthermore, opportunities to enhance biodiversity should be supported, including incorporating biodiversity improvements in and around developments, particularly where this can secure measurable net gains for biodiversity.
- 11.33 Paragraph 177 states that the presumption in favour of sustainable development does not apply in instances where a development is likely to have a significant effect on a habitats site, unless an appropriate assessment has concluded that the project will not adversely affect the integrity of the habitats site.
- 11.34 Under paragraph 178, planning decisions should ensure that a site is suitable for development in terms of risks arising from land instability and contamination. Paragraph 179 of the NPPF establishes that the responsibility for securing a safe development rests with the developer and/or landowner.

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- 11.35 Planning decisions should mitigate and reduce the potential adverse impacts associated with noise and light pollution (paragraph 180). Planning decisions should sustain and contribute towards compliance with objectives for pollutants, taking into account the presence of Air Quality Management Areas (paragraph 181).

Chapter 16: Conserving and enhancing the historic environment

- 11.36 The Chapter attaches great importance to the conservation of heritage assets. Paragraph 184 defines World Heritage Sites as being internationally recognised to be of Outstanding Universal Value and therefore are a heritage asset of the highest significance. Regarding heritage assets, the NPPF states: ‘These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (para. 184).
- 11.37 The significance of heritage assets, including any contribution made by their setting should be clearly set out by the applicant (para. 189). Developers should submit an appropriate desk-based assessment and, where necessary, a field evaluation where sites have the potential to be of archaeological interest.
- 11.38 In determining applications, paragraph 192 sets out what 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.’
- 11.39 Under paragraph 193, when considering the impact of a proposal on the significance of a designated heritage asset, 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.
- 11.40 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:
- 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.’
- 11.41 Paragraph 195 states that: ‘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:
- a. the nature of the heritage asset prevents all reasonable uses of the site; and

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- 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
 - c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d. the harm or loss is outweighed by the benefit of bringing the site back into use.’
- 11.42 In accordance with paragraph 196: ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’.
- 11.43 The effect of a development on the significance of non-designated heritage assets will be taken into account when determining applications. A balanced judgement is required, having regard to the scale of harm or loss to the significance of the heritage asset (para. 197).
- 11.44 Paragraph 200 states that: ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably’. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole (paragraph 201).

PLANNING PRACTICE GUIDANCE (PPG, 2014 AND AS AMENDED)

- 11.45 The PPG provides guidance on a range of topics which are relevant to the assessments which inform this planning application. These are listed below, as well as a short summary of the type of information included within the PPG for each topic:
 - **Air Quality** – requirements for Air Quality Assessments, guidance as to how impacts on air quality can be mitigated;
 - **Appropriate Assessment** – scope for a Habitats Regulation Assessment and potential mitigation measures;
 - **Climate Change** – guidance on how adaptation and mitigation measures can be integrated and how developments can be adapted;
 - **Design: process & tools** – tools for assessing and improving design quality and details of effective community engagement on design;
 - **Effective use of land** – supporting more effective use of land and planning for higher density development;
 - **Environmental Impact Assessment** – overview of relevant legislation and the process, guidance for producing an Environmental Statement and the procedure for determining applications subject to an EIA;
 - **Flood risk and coastal change** – guidance regarding the Sequential Test and Exception Test and how to address flood risk in individual planning applications;

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- **Historic Environment** – details of designated and non-designated heritage assets and the heritage consent process;
 - **Land affected by contamination** – guidance relating to how to determine whether land could be contaminated, identification of contamination risks and the use of planning conditions and obligations;
 - **Light pollution** –summary of the light pollution considerations that the planning system needs to address;
 - **Natural Environment** – provides information relating to green infrastructure, biodiversity, geodiversity, ecosystems and landscape;
 - **Noise** – summary of how noise impacts can be determined, the use of noise standards and how to mitigate the impact of noise on residential development;
 - **Planning Obligations** – defines planning obligations and advises when they can be sought, including information regarding the pooling of contributions;
 - **Renewable and low carbon energy** – includes specific planning considerations for active solar technology, as well as a strategy for renewable and low carbon energy;
 - **Travel Plans, Transport Assessments and Statements** – details the type of information required in Transport Assessments and Travel Plans;
 - **Use of planning conditions** – guidance regarding the circumstances in which conditions can be imposed, including the use of pre-commencement conditions;
 - **Waste** – guidance relating to the waste hierarchy and waste in the context of determining planning applications; and
 - **Water supply, wastewater and water quality** – details of water quality, the water environment and considerations for planning applications.
- 11.46 PPG establishes that applicants proposing development that might affect the Outstanding Universal Value, integrity and authenticity of a World Heritage Site through development within the Site need to submit sufficient information with their applications to enable assessment of the potential impact on Outstanding Universal Value¹⁷.
- 11.47 The following guidance relating to the Historic Environment is relevant to Section 15.0 of the Planning Statement, which weighs the heritage harm against the public benefits of the proposed development. PPG defines public benefits as anything that delivers economic, social or environmental objectives and should flow from the proposed development. Benefits are required to be of a nature and scale to be beneficial to the public at large i.e. not a private benefit¹⁸. Examples given within this section of PPG include:
- Sustaining / enhancing a heritage asset’s significance;
 - Reducing / removing risks to a heritage asset; and
 - Securing an optimum viable use for a heritage asset, to support its long-term conservation.

¹⁷ PPG, 035 Reference ID: 18a-035-20190723, REVISED 23/07/2019.

¹⁸ PPG, 020 Reference ID: 18a-020-20190723, revised 23/07/2019.

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NATIONAL DESIGN GUIDE (2019)

- 11.48 The National Design Guide provides details of the ten characteristics of well-designed places, which work together to create a physical Character, sustain a sense of Community and address environmental issues affected by Climate. The ten characteristics are:
- **Context** – enhancing the surroundings;
 - **Identity** – attractive and distinctive;
 - **Built Form** – a coherent pattern of development;
 - **Movement** – accessible and easy to move around;
 - **Nature** – enhanced and optimised;
 - **Public spaces** – safe, social and inclusive;
 - **Uses** – mixed and integrated;
 - **Homes and Buildings** – functional, healthy and sustainable;
 - **Resources** – efficient and resilient; and
 - **Lifespan** – made to last.
- 11.49 More details regarding the National Design Guide, including how the proposed development meets the ten characteristics, is provided in the submitted Design & Access Statement.
- 11.50 The Government has also issued an interim report on its **Building Better, Building Beautiful Commission**. The interim report, **Creating space for beauty**, was published in July 2019. The purpose of the Commission is to address the challenge of poor quality design and build of places across the country. Beauty should be seen in Buildings (windows, height, space and materials); Places (nature of streets, squares and parks) and being Beautifully Placed (sustainable settlement patterns and siting). There are 30 proposed policy directions with more engagement due before the Commission reports further.

12.0 Material Considerations - Other

- 12.1 This section summarises other relevant material considerations, including decisions made regarding heritage assets, economic policies / strategies and other relevant guidance.

HERITAGE ASSETS – DECISIONS

UNESCO World Heritage Site (WHS) Decisions

- 12.2 In 2004, at the 28th Session of the World Heritage Committee, the Liverpool – Maritime Mercantile City was inscribed on the World Heritage List, on the basis of the cultural criteria (ii), (iii) and (iv). These are detailed as follows:
- **Criterion (ii):** Liverpool was a major centre generating innovative technologies and methods in dock construction and port management in the 18th and 19th centuries. It thus contributed to the building up of the international mercantile systems throughout the British Commonwealth.
 - **Criterion (iii):** The city and the port of Liverpool are an exceptional testimony to the development of maritime mercantile culture in the 18th and 19th centuries, contributing to the building up of the British Empire. It was a centre for the slave trade, until its abolition in 1807, and for emigration from northern Europe to America.
 - **Criterion (iv):** Liverpool is an outstanding example of a world mercantile port city, which represents the early development of global trading and cultural connections throughout the British Empire.'
- 12.3 On its inscription, UNESCO recommended that authorities pay particular attention to monitoring the processes of change in the WHS in order to not adversely impact the property. This includes both changes of use and new construction. The State Party is requested to assure that the height of any new construction does not exceed that of the structures in the immediate surroundings; the character of any new construction respects the qualities of the historic area; and new construction at the Pier Head should not dominate but complement the historic Pier Head buildings.
- 12.4 In 2012, at the 36th session of the World Heritage Committee, the decision was made to inscribe the Liverpool – Maritime Mercantile City WHS on the List of World Heritage in Danger.
- 12.5 The decision report identified the following factors as affecting the property (WHC-12/36.COM/7B.Add p.182):
- Lack of overall management of new developments;
 - Lack of analysis and description of the townscape characteristics relevant to the Outstanding Universal Value of the property and important views related to the property and its buffer zone;
 - Lack of clearly established maximum heights for new developments, for the backdrops of the World Heritage areas as well as along the waterfront; and
 - Lack of awareness of developers, building professionals and the wider public about the World Heritage property, its Outstanding Universal Value and requirements under the World Heritage Convention.
- 12.6 The World Heritage Centre and Advisory Bodies recommended to the World Heritage Committee that there were serious concerns about the proposed development of Liverpool Waters and that LCC was inclined to grant consent to the proposals. The report concluded: 'The proposed development has the potential to irreversible damage the attributes that

Material Considerations - Other

- sustain the OUV of the property and threaten its authenticity and integrity' (WHS-12/36.COM/7B.Add p.184). The report concluded that the impact of Liverpool Waters on the WHS '...meets the criteria of potential danger and recommend to the World Heritage Committee might wish to consider deletion of the property from the World Heritage List, should the current project be approved and implemented' (p.185).
- 12.7 Following this decision, the Liverpool Waters outline planning application was granted in June 2013.
- 12.8 In subsequent years the State Party has issued Desired State of Conservation Reports on the WHS to UNESCO. Every year since 2012 its position has been reassessed by the World Heritage Committee and has remained on the World Heritage in Danger register. The following bullet points summarise the annual decisions made:
- **2012:** Inscribe the property on the List of World Heritage in Danger;
 - **2013:** Committee urge the State Party to reconsider the Liverpool Waters decision and retain the property on the List of World Heritage in Danger;
 - **2014:** Committee reiterates serious concern regarding the implications of Liverpool Waters for the OUV of the WHS. Property is retained on the List of World Heritage in Danger;
 - **2015:** Committee invites the State Party to amend the Desired State of Conservation Report (DSoCR) in relation to reducing urban density and building heights. Property retained on the List of World Heritage in Danger;
 - **2016:** Committee proposes a moratorium of development until the DSoCR is finalised and adopted. Property retained on the List of World Heritage in Danger with possibility of deletion in the absence of timely implementation of recommended measures;
 - **2017:** Committee requests State Party ceases granting of planning permission for developments with a negative impact on OUV. Property retained on the List of World Heritage in Danger;
 - **2018:** Committee recognise that Peel are reviewing the LW scheme and that a DSoCR has been submitted but cannot be considered complete as it relies upon documents yet to be provided e.g. Local Plan, Sky Line Policy. Property retained on the List of World Heritage in Danger; and
 - **2019:** Acknowledges the increasing engagement of civil society in the care of the property. Committee expresses concern that the moratorium on development has not been adhered to. Property retained on the List of World Heritage in Danger with possibility of deletion in 2020 if the Committee decisions relating to the adoption of the DSoCR and the moratorium for new buildings are not met.
- 12.9 UNESCO has requested a moratorium for new buildings within the WHS and its buffer zone until the Local Plan, the revised Supplementary Planning Document, Neighbourhood Masterplans and the Tall Building (skyline) Policy are reviewed and endorsed by the World Heritage Committee. The 2019 report expressed the extreme concern of the World Heritage Committee that the requested moratorium had not to date been adopted. The Committee requests the commitment of the State Party that the approved outline planning permission for Liverpool Waters will not be implemented and a revised version would not propose intervention which would adversely affect the OUV of the WHS. In terms of work undertaken to progress Liverpool Waters, the Committee '...regrets that the submission of Princes Dock Masterplan and changes to the Liverpool Water scheme to the World Heritage Centre took

Material Considerations - Other

place after their adoption by the LCC, and expresses its utmost concern that these documents are putting forward plans, which does not ensure the adequate mitigation of the potential threats for which the property was inscribed on the List of World Heritage in Danger' (p. 71).

- 12.10 The State Party has a deadline of the 1st February 2020 to provide an updated report on the State of Conservation of the property and the implementation of correction measures, before a decision is made regarding the future of the WHS in July 2020.

Heritage at Risk – North West Register (Historic England, 2019)

- 12.11 The Stanley Dock Conservation Area is noted on the Heritage at Risk register as being in Very Bad condition and of Medium Vulnerability. However, the noted trend is that the Conservation Area is improving significantly.

ECONOMIC STRATEGIES

- 12.12 The following section summarises economic strategies at the City Region and local authority level which are relevant to the application site and proposed development.

Building Our Future – Liverpool City Region Growth Strategy, LCR Combined Authority (2016)

- 12.13 This document outlines the City Region's Strategy for Growth and acknowledges the unique strengths and assets of each local authority area within the LCR Combined Authority. The Strategy recognises the importance of football as a key cultural asset for the Region (p.10), as well as the importance of entertainment and visitor attractions (p.10) and the waterfront as a key asset in which to deliver future development (p.44).
- 12.14 The Strategy proposes to deliver economic growth and improve the quality of life for residents by focusing on the following three growth pillars:
- **Productivity** - Sustain economic growth to maximise the potential of the Region's sector strengths and related assets and focus on starting and growing more successful businesses by promoting innovations and entrepreneurial activity.
 - **People** - Improve and increase skills, developing existing talent and attracting new talent for sustainable growth.
 - **Place** - Improve the Region's transport, energy and digital infrastructures, and protect and enhance our cultural and environmental assets. This will improve quality of life for residents and attract and retain investors, skilled workers and visitors who will contribute to growth.
- 12.15 The document states that the City Regions will maximise the impact of investment and opportunities by strategically focusing on those sectors with the greatest potential. Of particular relevance is the 'Visitor Economy' sector which is identified in the Strategy as a significant strength to deliver productivity, but also a huge potential for the growth of the City Region. The Strategy aims to continue to establish the City Region as an 'internationally renowned thriving and vibrant destination for business and leisure visitors, with global connectivity and enhancing the attractiveness of the area as a place to study, live, work and invest'. In this context, the Strategy supports the following areas:
- Developing key assets, amenities and attractions on the Waterfront;
 - Promoting effective use of the City Region's key 'brands' for place marketing; and

Material Considerations - Other

- Providing bespoke support to growth businesses in the Visitor Economy.
- 12.16 The Strategy identifies ‘Place-Making’ as an area of relevance to delivering the ‘Place’ pillar. In this regard, the ambition of the strategy is to protect and enhance the distinctive quality of place, to improve quality of life for residents and attract and retain those investors, skilled workers and visitors who will contribute to future economic growth.
- 12.17 The Strategy identifies an array of cultural and sporting institutions and heritage and visitor attractions which have already made the Liverpool City Region a globally renowned destination. However, the Strategy considers that there are further opportunities to enhance Liverpool City Region’s distinctive quality of place as a means to attract and retain those investors, visitors, works who will contribute to future economic growth and the quality of life of residents.
- 12.18 The Strategy also identifies Mersey Waters as a key component of the Atlantic Gateway vision, which aims to maximise the economic potential of the ‘Mersey Corridor’. The Strategy aims to capitalise on the City Region’s unique geography by developing the Mersey Waters Enterprise Zones (including Liverpool and Wirral Waters). The Strategy recognises that there is great potential to align the Enterprise Zone with the City Region’s key growth sectors, including Maritime and Logistics and Low Carbon Energy and their supply-chain investment opportunities. One of the key delivery mechanisms is a ‘more joined up approach to development and inward investment’.

Strategic Investment Fund (SIF) Strategy, LCR Combined Authority (2018)

- 12.19 The document builds upon the Growth Strategy to set out the investment priorities of the Combined Authority.

Productivity priorities

- 12.20 The Investment Strategy generally states that the SIF will support projects that facilitate ‘...the expansion of existing enterprise through physical and intellectual capital, typically...development/refurbishment of suitable premises’ (para 3.11).
- 12.21 At page 17, the document reiterates that the Visitor Economy sector is to be prioritised for growth and indicates that support will be available towards interventions that would ‘expand leisure and business markets’, deliver key physical infrastructure supporting the sector and promote productivity gain in the sector by encouraging businesses to ‘scale up ...through use of renewable energy and application of digital capabilities and technologies’.

People priorities

- 12.22 The SIF Strategy reiterates that improving the local skills base is key to ensuring that any growth can be inclusive across the City Region.
- 12.23 It states that the Fund will support ‘projects which support the creation of facilities to support skills development’ and ‘projects which provide training opportunities’.
- 12.24 Building upon the Growth Strategy’s Place Pillar, the SIF Strategy sets out how funds will be allocated to support the City Region’s Place-making ambitions.
- 12.25 At para 3.16 it notably indicates that the SIF will:
 - Support ‘Place renewal projects’ that champion improving quality of place by promoting a holistic approach to bringing place and people together around a unique proposition;

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- Help ensure that the supply of developable land responds to demand, including by supporting site remediation where it is needed and encouraging the provision of the ‘the right supporting physical and social infrastructure’;
- Support projects that maximise the visibility of the City Region’s major place-based assets to the global marketplace;
- Support projects which include investment in green energy, to improve air quality and increase the self-sufficiency of businesses;
- Support ‘Projects which ensure that the City Region has the housing stock needed to attract skilled people and provide the quality of life we want for existing communities’, for example those seeking to ‘upgrade the housing offer in the most deprived areas’;
- Support ‘projects which support the creation of good quality jobs (including paying the real living wage, permanent contracts and workplace progression)’;
- Support projects which provide training opportunities;
- Support Projects which prioritise and deliver the use of local labour / local supply chains; and
- Support projects which address specific challenges of people who face complex and multiple barriers to work or are furthest away from employment.

SIF Skills Capital Funding Prospectus, LCR Combined Authority (2019)

- 12.26 The SIF Skills Capital Funding Prospectus echoes the objectives identified in the City Region Growth Strategy under the ‘People Pillar’.
- 12.27 It recognises that a significant skills gap is currently a strong barrier to growth across the area and seeks to allocate funding towards ‘capital investment that encourages learning and training in the identified City Region growth sectors’ (Section 2.2, first bullet).

LCR Construction Action Plan, LCR Combined Authority (2018)

- 12.28 The City Region’s Construction Action Plan seeks to enhance the contribution of the construction sector to ‘fair and inclusive growth’ outcomes in the area (at Page 3).
- 12.29 It highlights the need to build capabilities and skills and the sector to address significant supply and demand issues (for example, Pages 4, 6 and 24) to meet this goal.
- 12.30 From pages 39 to 43, it highlights how major development projects can make a significant contribution to sustainable economic growth whilst driving large-scale opportunities in the construction sector.

Visitor Economy Investment Plan for Growth 2016-2025, LCR Visitor Economic Board (2016)

- 12.31 The City Region’s Visitor Economy Strategy (2016 – 2025) focuses on developing the distinctive features of Liverpool City Region as the basis for delivering competitive advantage when compared to other rival destinations. Liverpool generates 32 million visitors annually and over the last 10 years has established itself as a successful leisure and business tourism destination being ranked 6th in the UK for international visitors (p.4). The economic case for continued investment in the Visitor Economy is affirmed through the sector’s inclusion within the City Region’s new single Economic Growth Strategy. Similarly, the sense of place and infrastructure that the sector supports (accommodation,

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conference/meetings infrastructure, retail and amenities etc) are identified as integral features of the region's wider investment proposition.

- 12.32 The Plan recognises that growth will be achieved by leading with Liverpool in terms of aligning product investment with the rich cultural and heritage proposition that has spearheaded the City's regeneration and international positioning over the last 10 years. To realise these opportunities, four investment priorities have been identified in the Plan:
- Core funding - sustaining funding streams for destination marketing, conference bidding and events;
 - Product Development – identifying opportunities and establishing pipeline projects that will increase national and international visitors to the Liverpool City Region;
 - Identifying other sources of investment - capable of supporting LCR Visitor Economy Strategy priorities for transport and connectivity; and
 - People – identifying investment required for developing the quality of welcome across the Liverpool City Region.
- 12.33 The core proposition for the City Region therefore is those areas that make it distinctive: including its people, its waterfront/coastline, and the assets, attractions and landmarks that it comprises. Consequently, the approach to investment is thematic and focussed on the key themes of culture and heritage, and conference tourism.
- 12.34 The Plan recognises the need to capitalise on the big/ iconic sporting brands and infrastructure of the LCR to enhance profile with emerging markets (tourism and investment), encourage repeat visits and increase length of stay. Importantly, this plan is focussed on justifying investment through job creation and economic growth.

Inclusive Growth Plan: A strong and growing city built on fairness, Liverpool City Council (2018)

- 12.35 The City's Inclusive Growth Plan has several priorities:
- Investing in our children and young people;
 - People who live well and age well;
 - Quality homes in thriving neighbourhoods;
 - A strong and inclusive economy;
 - A connected and accessible city with quality infrastructure; and
 - Liverpool – the most exciting city in the UK.
- 12.36 The last aim is included in order to grow the city's reputation as a cultural and sporting capital and the most exciting city in which to live, visit, work, study and invest.
- 12.37 Priority no. 5.3 of the Growth Plan (p.76) references the dualling of the A565 from the city centre to Sefton as being required to support several projects, including the proposed football stadium at Bramley-Moore Dock.
- 12.38 In accordance with Priority no. 4.4, the Council will look to develop key economic sites such as the waterfront, by strengthening the waterfront offer with new developments including the proposed new stadium at Bramley-Moore Dock (p.68).

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Atlantic Corridor Development Framework, Liverpool City Council (2016)

- 12.39 The Atlantic Corridor Development Framework (ACDF) provides the overarching context for regeneration and establishes principles for development within the ACDF, which is located on the north edge of the City Centre. The Atlantic Corridor area is predominately industrial and perceived as a series of dislocated locations with poor connections between the waterfront to the west and the residential areas to the east. In recent years, the area has been subject to major regeneration investments such as Liverpool Waters, the Port of Liverpool and Project Jennifer. The area is included within the Liverpool City Enterprise Zone, Liverpool Waters Enterprise Zone, forms part of the North Liverpool Enterprise Zone and links committed development projects and emerging opportunities.
- 12.40 The Framework aims to better connect these emerging destinations to each other, improve connections with the City Centre, identify further opportunities for coordinated investment, create improved investment conditions, and improve access to new jobs and opportunities for local residents and workers. The Framework identifies five-character zones. The application site sits in the northern most area of Zone A (Liverpool Waters).
- 12.41 The Framework recognises the importance of development along the waterfront to act as a catalyst for tourism and leisure activity in this area, including the role of Bramley-Moore Dock in hosting music events (e.g. Creamfields Launch Night and South City Festival).
- 12.42 The Framework identifies the following five principles to guide proposals for investment and development within the Atlantic Corridor:
 - Movement and connectivity – Supporting Regent Road as a link between the Waterfront development and City Centre, improving connectivity across the Atlantic Corridor and supporting cycleways and infrastructure;
 - Support economic growth – supporting businesses and appropriate employment uses;
 - Sense of Place – Encouraging increased activity along frontages, contemporary approaches to building and streetscape design and encouraging a more diverse mix of uses, principally employment generating uses;
 - Heritage and historic environment - Encourage the retention and conversion of historic warehouse and dockland, encourage building scale, form and massing to respond to the scale and encourage high quality building and landscape design structures; and
 - Delivery – supporting partnership working arrangements and appropriate funding to assemble sites, or fund strategic acquisitions.

Metro Mayor 'Our Future Together' Manifesto (2017)

- 12.43 The following summarises the Metro-Mayor’s manifesto vision for an ambitious, fair, green and connected City Region.

Ambitious

- 12.44 The manifesto’s pledge for Ambition (pages 6 to 11) highlights that the City Region should seek to increase the visibility of its heritage and cultural (including sports-related) assets to promote the City Region’s brand and encourage inward investment in the area.
- 12.45 Under this objective, the Mayor’s stated goal for the area was for it to become a ‘high-skill, high-value economy’. In order to deliver this, the manifesto highlights that the area must address its productivity gap through steps including:

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- Focusing on its strengths and sectors where it has a competitive edge;
- Supporting the growth of local businesses, including by 'help[ing] established companies to expand'; and
- Developing the capabilities of its workforce.

Fair

- 12.46 In his manifesto, the Metro Mayor fully recognised that a high-quality physical environment and good public infrastructure are key to supporting a fairer society (page 12, page 14). It highlights that a better use of brownfield land, good design and concerted action to improve the quality and attractiveness of neighbourhoods will be essential to support increased quality of life for all across the City Region. It also encourages development to use 'community-led neighbourhood design' to deliver housing and services that meet people's aspirations.

Green

- 12.47 Pages 16 to 19 of his Manifesto emphasised the Metro Mayor's intention to deliver a zero-carbon City Region by 2040.
- 12.48 The document identifies that promoting green and renewable energy, low carbon transport and sustainable land use will be key to delivering this ambition.

Connected

- 12.49 The manifesto highlighted that promoting greater connectivity across the City Region would be a key pillar of the Metro Mayor's strategy to unlocking prosperity. At page 21, it acknowledges that physical connectivity issues have become an economic obstacle and that interventions which seek to address this challenge will be supported.

Mayoral Development Zone / Enterprise Zone

Liverpool's Mayoral Development Zones: Review of achievements 2012-2017, Regenerating Liverpool (2018)

- 12.50 Liverpool has established an Enterprise Zone (EZ) for North Liverpool, offering incentives for companies to set up business in Liverpool and encourages existing city-based business to grow. The EZ focuses on encouraging investment and capturing the economic benefit.
- 12.51 The North Liverpool Mayoral Development Zone (MDZ) is the largest of the MDZs. 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. North Liverpool is also home to both of the city's football clubs. The MDZ recognises Everton FC's redevelopment plans are at an early stage.

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Mersey Waters Enterprise Zone, HM Government website^{19,20}

- 12.52 Liverpool City Region includes three Enterprise Zones (Mersey Waters, Liverpool City and Sci-Tech Daresbury). The zones were established in 2012 and run for 25 years until 2027.
- 12.53 The Mersey Waters EZ straddles the River Mersey and covers the Liverpool Waters and Wirral Waters schemes. Extending across a combined area of 125 hectares, the zone is one of the largest nationally and was identified due to its potential to generate economic growth for the region.

Northern Powerhouse Strategy (2016)

- 12.54 Liverpool is one of the core cities at the heart of the Northern Powerhouse vision, a Government initiative which seeks to 'unleash the full economic potential' of the North.
- 12.55 In 2016, the Government published its strategy for the Northern Powerhouse, setting out the key steps through which this objective will be reached.

Connectivity objectives

- 12.56 The Strategy identifies connectivity challenges as a key barrier to productivity across the area (para 1.6).
- 12.57 Paragraph 2.2 highlights how delivering physical connectivity improvements will be key to supporting 'cohesive economies' within the Northern Powerhouse, and paragraph 2.8 states that it is the Government's ambition to encourage 'local areas to invest in local infrastructure'.

Enterprise and investment objectives

- 12.58 The Strategy seeks to support business growth and productivity across the Northern Powerhouse through its 'enterprise and innovation' goal.
- 12.59 At para 1.6, the document identifies that challenges relating to enterprise and innovation and trade and investment are core barriers to productivity in the area. In order to address those issues, the strategy sets out that the Government intends to 'continue to invest to support Northern businesses' (para 4.4), encourage mayoral combined authorities to 'invest in economically productive infrastructure' (para 4.7) and promote initiatives which help to showcase the 'northern offer' and create stronger branding for the region.
- 12.60 The 'enterprise and innovation' and 'trade and investment' objectives of the Strategy (para 1.6) also point to strong strategic support for place-making interventions across the Northern Powerhouse.
- 12.61 At paragraph 4.7, the document highlights that Government recognises that local infrastructure investment plays a key role in creating 'attractive places for businesses' and encourages mayoral combined authorities to support this type of intervention.
- 12.62 At paragraphs 5.2 to 5.5, the Strategy sets out an objective to develop a 'single internationally competitive offer to the world' across the Northern Powerhouse and increase

¹⁹ <https://enterprisezones.communities.gov.uk/boost-business-government-backs-enterprise-zones/> (accessed October 2019)

²⁰ <https://enterprisezones.communities.gov.uk/enterprise-zone-finder/mersey-waters-enterprise-zone/> (accessed October 2019)

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its visibility on foreign investment markets. ‘Infrastructure and regeneration’ are highlighted as key channels for place-marketing.

- 12.63 Through its ambitions to create iconic new destinations supported by local infrastructure improvements around Bramley-Moore Dock and Goodison Park, the People’s Project therefore meets the enterprise and investment goals of the Northern Powerhouse Strategy.

Skills objectives

- 12.64 Paragraph 1.6 of the Strategy also identifies a strong skills gap as another key barrier to sustained growth in the Northern Powerhouse.
- 12.65 Paragraphs 3.15 to 3.19 of the Northern Powerhouse Strategy indicate that the skills gap experienced in the area is driven in part by the challenges it experiences in attracting and retaining skilled workers.
- 12.66 The introduction to Section 3 of the document (at Page 17) indicates that the Government is committed to intervening to ‘improve educational standards and skills levels across the region’.
- 12.67 They identify that delivering improvements in the quality of the local living and working environment will be essential to create a ‘great place’ capable of meeting and exceeding the aspirations of this category of the population.
- 12.68 The Strategy advocates an innovative approach to delivering those outcomes. Notably, it recommends that three elements should form a key part of the Northern Powerhouse’s place-making strategy:
- Capitalising on the area’s key strengths, including the strong attraction of its ‘world-renowned sports teams’ (para 3.15);
 - Promoting the ‘right housing offer’ across the area, supporting the aspirations of skilled workers for good quality and affordable mix of housing and opportunities (para 3.17); and
 - The use of the area’s cultural assets to forge a strong regional identity (para 3.19).

UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (2015)

- 12.69 The United Nations Development goals seek to act as a ‘plan of action for people, planet and prosperity’ to 2030, at a global scale. The Sustainable Development Goals strongly emphasise that social and economic issues must be tackled jointly to deliver the United Nation’s vision for a better world by 2030.
- 12.70 They seek to promote sustainable development globally by inspiring UN member countries – including the UK - to take action to support long-term human, environmental and economic wellbeing at a global scale.
- 12.71 There are 17 Sustainable Development Goals:
1. No Poverty
 2. Zero Hunger
 3. Good Health and Well-Being
 4. Quality Education
 5. Gender Equality

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6. Clean Water and Sanitation
 7. Affordable and Clean Energy
 8. Decent Work and Economic Growth
 9. Industry, Innovation and Infrastructure
 10. Reduced Inequalities
 11. Sustainable Cities and Communities
 12. Responsible Consumption and Production
 13. Climate Action
 14. Life Below Water
 15. Life on Land
 16. Peace, Justice and Strong Institutions
 17. Partnerships
- 12.72 The following goals of particular relevance to the proposed development are grouped thematically:
- Goal 8 (to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all) clearly identifies economic growth as an essential pillar of sustainable development, whilst Goal 9 (to build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation) points out that capital investment in economic infrastructure is essential to support growth.
 - One of the Sustainable Development Goals, ‘Sustainable Cities and Communities’ (Goal 11), indicates that a high quality of built environment is essential to deliver a liveable city environment and overcome ‘urbanisation challenges’, such as poor accessibility and air quality.

This is complemented in its intent by Goal 15, ‘Life on land’, which emphasises that preserving the environment from degradation should be a key priority for the global population.
 - Goals such as ‘No poverty’ (Goal 1), ‘Good health and well-being’ (Goal 3), ‘Quality Education’ (Goal 4) and ‘Reduced inequalities’ (Goal 10), emphasise that significant human development efforts are required to allow economic growth to truly benefit the majority of global population.

13.0 Heritage Considerations

- 13.1 As detailed in Section 2.0, the application site is located within the Liverpool Maritime Mercantile City WHS, is situated within the Stanley Dock Conservation Area and also contains several Grade II listed buildings / structures.
- 13.2 This planning application is accompanied by a Heritage Statement and an International Council on Monuments and Sites (ICOMOS) Heritage Impact Assessment, prepared by KM Heritage. In addition, an Artefact Appraisal has been carried out, from which a Heritage Asset Survey and plans of the assets, including those identified for removal and those for renovation / retention in the proposed landscape scheme have been produced (Planit-IE and KM Heritage).
- 13.3 The above assessments have allowed the identification and consideration of heritage assets on the site and in the surrounding area, including their significance and setting, and analysis of the potential impact of the proposed development upon these assets.
- 13.4 This section therefore considers the following:
 - Findings of the Artefact Appraisal and Heritage Asset Survey; and
 - Impact of the proposed development upon the identified heritage assets both within the site and in the surrounding area.

ARTEFACTS & HERITAGE ASSETS

- 13.5 The submitted Artefacts Appraisal comprises an inventory of all existing artefacts at BMD, including fixtures, furniture, railway tracks etc. This is based on site surveys undertaken in September 2019.
- 13.6 From this inventory, Planit-IE produced a Heritage Asset Survey, which considers only items of significant heritage value (as assessed by KM Heritage) linked to the listed structures on site, predominantly the BMD and Nelson Dock (northern) retaining walls. KM Heritage have provided details of the 'Heritage Value' of each item and each item has been given a classification relating to how it is affected by the application proposals.
- 13.7 Subsequent plans have then been produced to identify the impact of the proposed development upon the Heritage Assets i.e. whether they are to be:
 - Retained: either in-situ, repaired/remediated or lifted to proposed new level;
 - Replaced with new; or
 - Removed: either because they are damaged and to be discarded or if there is a potential future use elsewhere.
- 13.8 The Heritage Asset survey identified 188 assets and proposed an appropriate strategy for each, as detailed in the table below. Figure 13.1 shows that the majority of the assets are being retained and incorporated as part of the proposed development.

Figure 13.1: Summary of findings from Heritage Asset Survey

PROPOSED STRATEGY	NO. OF ITEMS	% OF ITEMS
Retain in-situ	37	20
Retain – repair / remediate	76	40
Retain – lift to proposed level	6	3
Replace with new	2	1
Remove (potential future use TBC)	56	30

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Remove (damaged – to be discarded)	11	6
TOTAL	188	100%

IMPACT OF THE PROPOSED DEVELOPMENT

Heritage Value

- 13.9 The Heritage Statement establishes that the designated heritage assets most relevant to the assessment of impact of the scheme are the World Heritage Site, assets within Bramley-Moore Dock itself, the Stanley Dock Conservation Area (SDCA), Nelson Dock (northern retaining wall) and the setting of nearby listed buildings (para. 7.3²¹). This includes consideration of the impact on OUV of the WHS, the special architectural and historical importance of the listed structures, the character and appearance of the Conservation Area and the setting of other listed buildings (para. 7.4).
- 13.10 The existing warehouse on the southern quayside (unlisted) is considered to be of no architectural interest and little historical interest (para. 7.21). The Heritage Statement concludes that the unlisted buildings on the site make a neutral contribution to the character and appearance of the conservation area, at best (para. 7.23).
- 13.11 The following heritage assets are considered to make a ‘Very High’ contribution to the OUV of the WHS (those in bold text are wholly or in part within the application site):
 - **BMD retaining walls, Grade II listed (para. 7.63);**
 - **Regent Road Dock Wall, Grade II listed (para. 7.70);**
 - **Hydraulic Engine House, Grade II listed (para. 7.76);**
 - Collingwood Dock, Salisbury Dock and **Nelson Dock retaining walls, Grade II listed (para. 7.83);**
 - Leeds-Liverpool Canal, Stanley Locks, Grade II listed (para. 7.95);
 - Stanley Dock Warehouse (north side), Grade II* listed (para. 7.100);
 - Hydraulic Tower to west of former North Warehouse at Stanley Dock, Grade II listed (para. 7.105);
 - Stanley Dock Warehouse (south of Tobacco Warehouse), Grade II listed (para. 7.109);
 - Stanley Dock Entrances, Grade II listed (para. 7.112);
 - Tobacco Warehouse, Grade II listed (para. 7.117);
 - Bonded Tea Warehouse, Grade II listed (para. 7.121);
 - Victoria Clock Tower, Grade II listed (para. 7.124);
 - Dock Master’s Office, Salisbury Dock, Grade II listed (para. 7.128);
 - Clarence Graving Dock, Grade II listed (para. 7.87); and
 - **Stanley Dock Conservation Area (SDCA) (para. 7.153).**
- 13.12 Stanley Dock (unlisted) is considered to make a ‘High’ contribution towards the OUV of the WHS (para. 7.91). The River Mersey Sea Wall, Bascule Bridge and the warehouse at No.

²¹ N.B. Paragraph references relate to the submitted Heritage Statement (KM Heritage) unless otherwise stated.

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68 Waterloo Road are noted as being undesignated heritage assets of Medium Value (para. 7.130, 7.137 & 7.157).

- 13.13 The application site is considered to form an important part of the character of Stanley Dock Conservation Area and therefore contributes to the area's contribution to the OUV of the WHS. However, the Heritage Statement notes that this contribution is lessened by the largely derelict status of the application site and the poor quality of the remaining structures, and the subsequent impact that this and the loss of activity have had on the character of the area (para. 7.152).

Mitigation measures

- 13.14 Further details of the mitigation measures proposed are provided in the Design & Access Statement, Construction Management Plan and Dock Infill Methodology submitted as part of this application. The following aspects of the proposed development have been taken into consideration by KM Heritage in the Heritage Statement and ICOMOS Heritage Impact Assessment. This includes measures which are inherent in the proposed design and which have been included following extensive pre-application consultation with Historic England and LCC (as detailed in the submitted Design & Access Statement).

- **Reuse of the Hydraulic Engine House:** The proposed retention of the Grade II listed building and the proposed repair and reuse of the currently derelict and purposeless building as an exhibition / cultural centre with ancillary café. The Heritage Statement identifies this proposed use as one which is sustainable, allowing the building to function independently, as well as being an anchor within the fan plaza, ensuring it remains as an 'integral part of the on-going activity' (para. 8.43).

The proposed North-South orientation of the stadium and its position within the application site has allowed for considerable space to be provided between the Hydraulic Engine House and the stadium building (compared to the approved development parameters for Liverpool Waters which positioned blocks substantially closer to the Hydraulic Engine House). This off-set allows the architectural interest of the tower to be retained (para. 8.48).

- **Water Channel:** The creation of a water channel between Sandon Half-Tide Dock and Nelson Dock will retain the visual connectivity of the dock system. Although the isolation structures at both ends of the channel (southern isolation structure is existing; northern isolation structure is proposed) mean that the channel is non-navigable, it still acts as a means to aid understanding and appreciation of the original inter-connected dock system (para. 9.17). The Heritage Statement concludes that the proposed water channel would '...ensure that this important element of their [the docks'] contribution to the OUV of the WHS is retained' (para. 8.64).

Furthermore, the creation of the water channel allows the western retaining wall of BMD to be exposed and for the 'knuckles' of the retaining walls to be exposed at the north-east and south-east corners of the water channel, where it meets the infilled space. This allows the existing western dock wall in particular to be exposed in its original water-setting, with associated capstans and bollards (para. 8.135).

- **Dock Infill Methodology:** The proposed methodology and materials to infill BMD has been based on the strategy to minimise physical harm to the listed retaining walls (as per the Wellington Dock infill to the north). The methodology and foundations design for the proposed stadium mean that the dock walls would not be damaged where they lie within

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the footprint of the stadium. The proposed strategy includes repair of the retaining walls where necessary.

Overall, the Heritage Statement considers this approach to provide ‘...considerable mitigation to the impact of the proposals’ (para. 8.10) and a ‘...genuine position of future ‘reversibility’’ (para. 8.17).

- **Stadium design:** This includes the following aspects:
 - **Scale** of the proposed building, resulting from a design process which has sought to minimise the building height to the minimum possible, which has reduced the impact on the city’s skyline and WHS, whilst still meeting the needs of the Club.
 - **Massing** of the building, particularly its base, to reflect the warehouse typology seen in the Stanley Dock Conservation Area and WHS.
 - **Materiality** of the building, which has adopted a similar approach to other historic buildings in the Conservation Area, using a limited palette of materials and a tonality of brick to ensure the stadium base sits comfortably alongside listed buildings on site such as the Hydraulic Engine House (para. 9.17).
- **Sensitive design of openings through Regent Road wall:** The proposed openings through the Regent Road wall have been kept to the minimum width required, as required following crowd modelling assessments. Regarding the impact of this approach on the wall, the Heritage Statement recognises that this ‘...ensures that its monumentality, and the pre-eminence of the existing entrances remain intact...’ (para. 8.10).

Each of the three proposed openings comprise four archways. The proposed design reinstates the overhead section of the wall (lintels rebuilt and dressed in the original stone) and establishes columns of existing stone to make up each arch. The associated gates and signage strategy²² have been designed to minimise the impact upon the listed wall itself.

- **Public realm design:** This includes the proposed exposure of the listed BMD retaining wall within the public realm to the east of the stadium and to the west.

As detailed above, the public realm design includes the retention of the majority of historical artefacts which surround the retaining walls of BMD and Nelson Dock, including the repair of assets where required. Such assets include granite setts, railway tracks, bollards and capstans. The Heritage Statement identifies that this will help to provide a visible memory of the former use of the site (para. 8.22).

The Heritage Statement recognises that the public realm has been designed to: ‘...recognise and celebrate the dock’s historic and functional past...through the use of existing surfaces, artefacts and the dock retaining walls themselves to ensure the memory of the dock is obvious and celebrated’ (para. 8.10).

Impact on Heritage

- 13.15 The Heritage Statement and ICOMOS Impact Assessment have taken account of the value of the heritage assets at the site and in the surrounding area and have assessed the impact of the proposed development upon these assets, taking account of the mitigation measures

²² Details of proposed signage will be subject to future planning applications and advertisement consents

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listed above. The following section summarises the main findings in relation to the heritage assets identified, grouped as follows:

1. Overall impact on the asset’s contribution to the Outstanding Universal Value of the World Heritage Site;
2. Effect of the proposed development upon an asset’s significance, including whether the harm is less than substantial or substantial in nature; and
3. Cumulative impact for both no. 1 & 2, considering if and how the impact of the proposed development alters once cumulative schemes (notably Liverpool Waters) are considered alongside the proposed development.

13.16 The following table summarises the findings of the ICOMOS Heritage Impact Assessment:

Figure 13.2: Summary findings of the ICOMOS Heritage Impact Assessment

ASSET	OVERALL IMPACT ON CONTRIBUTION TO OUV OF THE WHS	CUMULATIVE IMPACT (TAKING ACCOUNT OF CUMULATIVE SCHEMES ²³)
Hydraulic Engine House	<i>Change of use:</i> Very large beneficial effect <i>Overall impact of proposals:</i> Moderate / Large neutral effect	-
Bramley-Moore Dock Retaining Walls	Very large adverse effect	-
Stanley Dock Conservation Area (SDCA)	Large / very large adverse effect	Impact on wider area outside of BMD much reduced
Regent Road Dock Wall	Moderate / large adverse effect	-
Overall impact on the WHS		-
Nelson Dock	Moderate / large neutral effect	-
Tobacco Warehouse		Slight neutral effect
Victoria Clock Tower		Negligible neutral effect
Stanley Dock	Slight neutral effect	Neutral
Collingwood Dock		Negligible neutral effect
Salisbury Dock		Negligible neutral effect
Clarence Graving Dock		Neutral
Stanley Dock Warehouse (north side)		Negligible neutral effect
Hydraulic Tower (west of Stanley Dock)		-
Sea Wall		-
Leeds-Liverpool Canal	Neutral	-
Stanley Dock Entrances		-
Stanley Dock Warehouse (south of Tobacco Warehouse)		-
Bonded Tea Warehouse		-
Dock Master’s Office, Salisbury Dock		-

²³ A hyphen ('-') symbol is given where the cumulative impact is the same as the 'Overall impact on the contribution to OUV of the WHS'

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13.17 The following table summarises the findings of the Heritage Statement:

Figure 13.3: Summary findings of the Heritage Statement

ASSET	EFFECT	CUMULATIVE IMPACT (TAKING ACCOUNT OF CUMULATIVE SCHEMES ²⁴)
Hydraulic Engine House	<i>Change of use:</i> Considerable public benefit <i>Impact on setting:</i> Less than substantial harm (Minor)	-
Bramley-Moore Dock Retaining Walls	Substantial harm	-
Stanley Dock Conservation Area (SDCA)	Substantial harm	Impact on wider area outside of BMD much reduced
Outstanding Universal Value	Less than substantial harm (Minor)	-
Regent Road Dock Wall	<i>Proposed openings:</i> Less than substantial harm (Minor) <i>Impact of stadium on setting:</i> Not harmful	-
Tobacco Warehouse	Not harmful	Impact reduced further
Stanley Dock	Not harmful	Impact reduced further
Collingwood Dock		
Salisbury Dock		
Clarence Graving Dock		
Nelson Dock		
Stanley Dock Warehouse (north side)	Not harmful	Impact reduced further
Hydraulic Tower (west of Stanley Dock)	Not harmful	Impact reduced further
Stanley Dock Entrances	No impact	-
Victoria Clock Tower	Not harmful	Impact reduced further
Sea Wall	Not harmful	-
Leeds-Liverpool Canal	No impact	-
Stanley Dock Warehouse (south of Tobacco Warehouse)	Not harmful	-
Bonded Tea Warehouse	No impact	-
Dock Master’s Office, Salisbury Dock	No impact	-

- 13.18 The Heritage Statement identifies that for the majority of designated heritage assets, the level of impact is not considered to reach the threshold for ‘substantial harm’ and that the proposed development does not result in the total loss of significance of any asset (para. 10.8).
- 13.19 The main adverse impacts identified relate to the impact on the significance of the BMD retaining walls and the character of the SDCA.
- 13.20 Although physically the proposals will not harm the BMD retaining walls, it is the act of removing water through infilling and construction of the proposed scheme within the former dock water space which causes the harm by affecting a key element of the walls’ special architectural and historic interest (para. 10.9). It is these aspects of the proposal – the loss

²⁴ A hyphen (‘-’) symbol is given where the cumulative impact is the same as the ‘Effect’

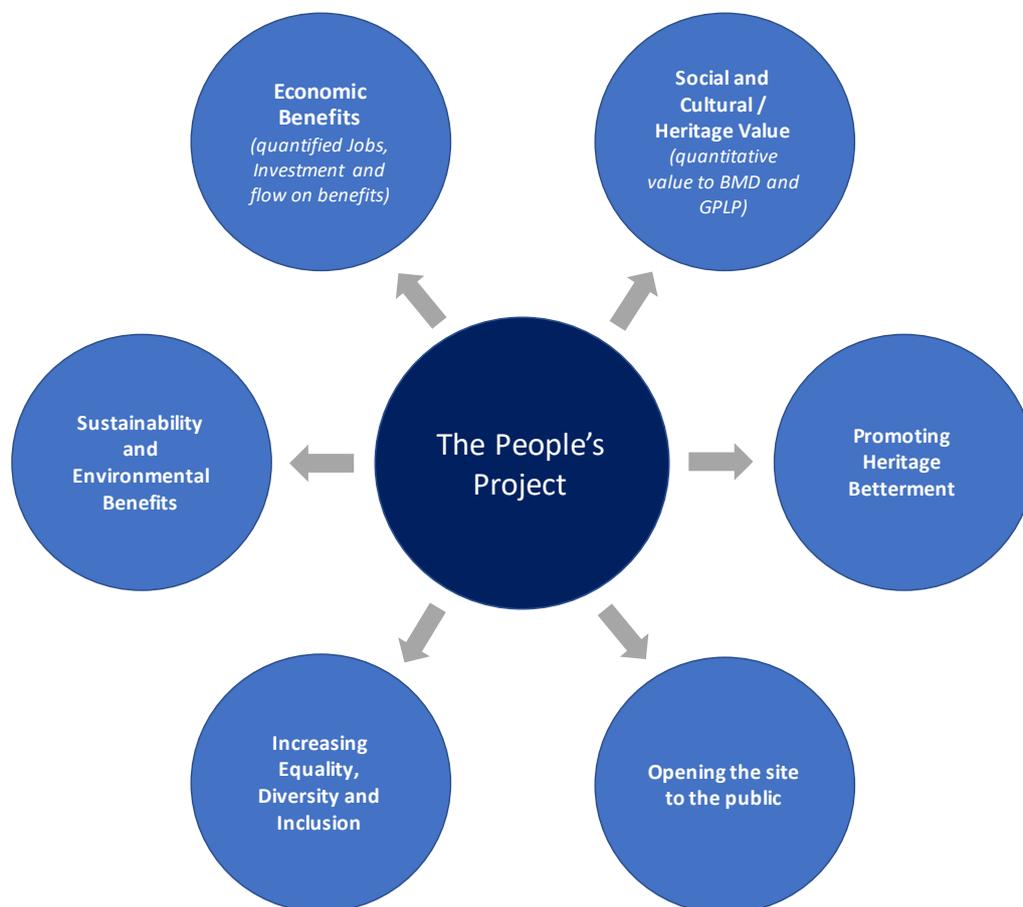
Heritage Considerations

- of the water and construction of a building within the dock waterbody – which causes the harm to the character and appearance of the SDCA, which persists despite the mitigation measures proposed through the methodology for dock infill.
- 13.21 The Heritage Statement notes that the impact on the Conservation Area is ‘primarily confined’ to Bramley-Moore Dock itself (para. 8.152). Although BMD forms an important part of the conservation area, it is only part of it and the interconnectivity with the remaining docks in the SDCA is retained through the creation of the water channel (para. 8.148).
- 13.22 The impact of the proposal on the character and appearance of the conservation area is regarded as substantial harm primarily because of the infill of the waterbody of the dock (para. 8.149).
- 13.23 The impact on the authenticity and integrity of the WHS arises from the infilling of one of the docks, alterations to the Regent Road Dock Wall and the impact on the setting of a number of heritage assets in the area. The impact of the proposed development on the authenticity and integrity of the WHS as a whole is considered to be ‘Minor’ and therefore less than substantial (para. 10.16).
- 13.24 Figures 13.2 and 13.3 demonstrate that where the identified cumulative developments (namely the approved Liverpool Waters development) result in a change to the impact of the proposed development upon heritage assets, in all cases this change is to reduce the impact of the proposed development upon heritage assets.
- 13.25 As well as the mitigation which has been proposed to reduce the adverse impacts upon the identified heritage assets, the proposed development will also result in public benefits, including the benefit identified in Figures 13.2 & 13.3 which is associated with the reuse of the Hydraulic Engine House. This benefit of the proposed development is detailed in the following section, alongside other economic, social and environmental benefits.
- 13.26 The Heritage Statement has identified that the proposed development will result in cases of substantial harm and less than substantial harm. Therefore, paragraphs 194 and 195 of the NPPF are engaged and the public benefits of the scheme should also be considered. Section 14.0 details the public benefits associated with The People’s Project, followed by Section 15.0 which weighs the heritage harm against the benefits.

14.0 Public Benefits

- 14.1 The People’s Project will deliver a development of the significance, scale and quality that could have a substantial impact, not only on the North Docks area of the WHS, the Goodison Park community and the communities of North Liverpool, but on the wider Liverpool City Region and North West. It is important to understand the implications of these impacts and how they will deliver the level of public benefits that will be transformational for the City. It will not only deliver considerable economic and social benefits but will be the most sustainable stadium in the Premier League.
- 14.2 Everton has commissioned a series of impact assessments²⁵, technical studies and undertaken analysis of the proposals for BMD and the GPLP to understand the combined quantitative and qualitative benefits that will arise from the People’s Project. These benefits are explored throughout this section. A summary of the public benefits that will be realised through the development of the People’s Project is illustrated in Figure 14.1 below.

Figure 14.1: Public Benefits of the People’s Project



Source: CBRE

- 14.3 The benefits of the People’s Project are considered in the context of the United Nations Sustainable Development Goals (‘UN SDGs’), which provide an internationally recognised

²⁵ These quantitative assessments are set out further within this section and include an ‘Economic Impact Assessment’ by CBRE (2019 - ES Volume III, Document 20.1), ‘Everton Football Club and Stadium: Social and Heritage Value Report’ by Simetrica (2019 - Standalone Report) and ‘The Societal Value of the Relocation of Everton Football Club by Real Worth (2019 – Standalone Report)

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set of objectives to 2030 that seek to achieve a better and more sustainable future; by addressing global challenges related to poverty, inequality, climate change, environmental degradation, peace and justice. The UN SDGs were adopted by all United Nations Member States in 2015.

- 14.4 The SDGs provide a useful measure of how the People’s Project will contribute to achieving internationally adopted objectives for sustainable development. The 17 UN SDGs, which are intrinsically interconnected, are illustrated in Figure 14.2 and the outputs of the People’s Project are considered against these goals as part of the conclusions to this section.

Figure 14.2: United Nations Sustainable Development Goals



Source: United Nations, 2019

- 14.5 At a national level, the NPPF places sustainable development is at its heart and recognises that there are three dimensions of sustainable development: economic, social and environmental (NPPF, Paragraph 8). These include:
- an **economic objective** – to help build a strong, responsive and competitive economy;
 - a **social objective** – to support strong, vibrant and healthy communities; and
 - an **environmental objective** – to contribute to protecting and enhancing the natural, built and historic environment.
- 14.6 These objectives are interdependent and need to be pursued in a manner which is mutually supportive. The public benefits of the People’s Project explored in this section are fundamentally rooted in the three pillars of the NPPF and support the overarching principles of sustainable development, from national through to local level.

ECONOMIC & SOCIAL BENEFITS

- 14.7 The economic and social benefits of the project are two key pillars of sustainable development in the context of the NPPF and contribute to addressing a range of indicators which underpin the UN SDG’s. To understand the social and economic impacts of the People’s Project, the Club has commissioned a series of assessments which quantify the economic, societal and cultural heritage value of the proposals to the people of Liverpool

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and the wider City Region. These studies are submitted as part of this planning application and include:

1. An economic impact assessment to understand the impact of the Club relocating to BMD (including an assessment of the economic impact of both BMD and the GPLP developments)²⁶;
2. An assessment of the social and heritage value of the new stadium development at BMD²⁷; and
3. An assessment of the societal value as a result of the relocation of the Club of the GPLP and the growth of EitC, which is directly attributable to the stadium move²⁸.

14.8 These studies provide a comprehensive assessment of the quantifiable public benefits of the project, which will have a significant impact on both the local community and the wider City Region. The headline quantifiable benefits of each assessment are summarised below. Full details of the methodology and outputs of these assessments can be found in the individual impact reports.

1. Economic Benefits

14.9 The Economic Impact Assessment has assessed the collective benefits of the People's Project based on core guidance including from the HM Treasury, The Green Book: Central Government Guidance on Appraisal and Evaluation (2018); Homes and Communities Agency (HCA), Employment Density Guide (Third Edition, 2015); HCA, Additionality Guide (Fourth Edition, 2014).

14.10 It recognises that the proposed new stadium project is not one project in isolation but a series of projects with significant and complex inter-relationships that require measurement and assessment. There are four key elements of analysis that were examined, including:

- The current baseline socio-economic contribution of Everton operating from Goodison Park;
- The additional (or incremental) impact of the new stadium proposals at BMD;
- The legacy impact of Everton as part of the Goodison Park community as a result of the redevelopment of the Club's existing stadium site (the GPLP); and
- The catalytic impact on surrounding neighbourhoods at BMD within the 'Northern Ten Streets' area (broadly including land within the Ten Streets to the north of the Titanic hotel)

14.11 The findings of the Economic Impact Assessment demonstrate that the People's Project will deliver transformational benefits for North Liverpool, the Liverpool City Region and the wider North West Region. The combined additionality of the new stadium, wider catalytic development (in the Northern Ten Streets area) and the GPLP demonstrate that the project will have very significant benefits for the City Region. The key headline impacts of the new stadium, the GPLP and the impact of the wider catalytic benefits on the Northern Ten Streets are set out in Figure 14.3.

²⁶ Economic Impact Assessment, CBRE, 2019 (ES Volume III, Document 20.1)

²⁷ Everton Football Club and Stadium: Social and Heritage Value Report, Simerica, 2019 (standalone report)

²⁸ The Societal Value of the Relocation of Everton Football Club, Real Worth, 2019 (standalone report)

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Figure 14.3: Headline Economic Benefits of the People’s Project

OUTPUT	NEW STADIUM AT BMD	GOODISON PARK LEGACY	WIDER CATALYTIC DEVT ADJACENT TO BMD ²⁹
CONSTRUCTION PHASE (LCR IMPACT)			
Construction Value	£335m	£76m	£212m
Construction Jobs	5,626	1,402	3,562
Construction GVA	£271m	£67m	£212m
Apprenticeships/Trainee Jobs	335	76	212
OPERATIONAL PHASE (LCR IMPACT)			
Net Additional Jobs & Supported Jobs	312	520	2,046
Net Additional GVA	£11.2m	£29.5m	£99m
Net Additional Wage Income (BMD) & Household Income (GPLP and Wider Scheme)	£14.5m	£6.8m	£28m
Net Additional Spend (suppliers, supporters, visitors and marketing)	£39.5m	£1.42m	n/a

Source: CBRE

- 14.12 The Economic Impact Assessment demonstrates that the People's Project will provide a once-in-a-generation opportunity to deliver significant economic benefits to Liverpool and to catalyse the regeneration of priority neighbourhoods in the north of the City which are in economic distress and rank below the City and National average on almost all indices of deprivation³⁰.
- 14.13 The project will not only deliver significant additionality in terms of jobs and investment, but will accelerate the development of key regeneration priorities along the Northern Docks including Liverpool Waters, the Ten Streets and the wider Atlantic Corridor regeneration area. The public benefits, which will deliver transformational jobs and investment into the City, should not be underestimated and offer an opportunity to truly transform the City and the City Region on a scale that has not been seen before in North Liverpool.
- 14.14 These benefits are additional to the societal and cultural heritage benefits of the project, which are explored in more detail below.

2. Social and Cultural Benefits

i) Social Benefits: Headlines

- 14.15 The People’s Project provides an opportunity to maximise the social benefits and value to the public, within its local community and across the City – delivering unique benefits that will induce social change, improve quality of life, raise attainment and deliver inclusivity across a wide range of communities in North Liverpool. Figure 14.4 provides a summary of the key social benefits of the project and part b) and c) of this section provides a summary

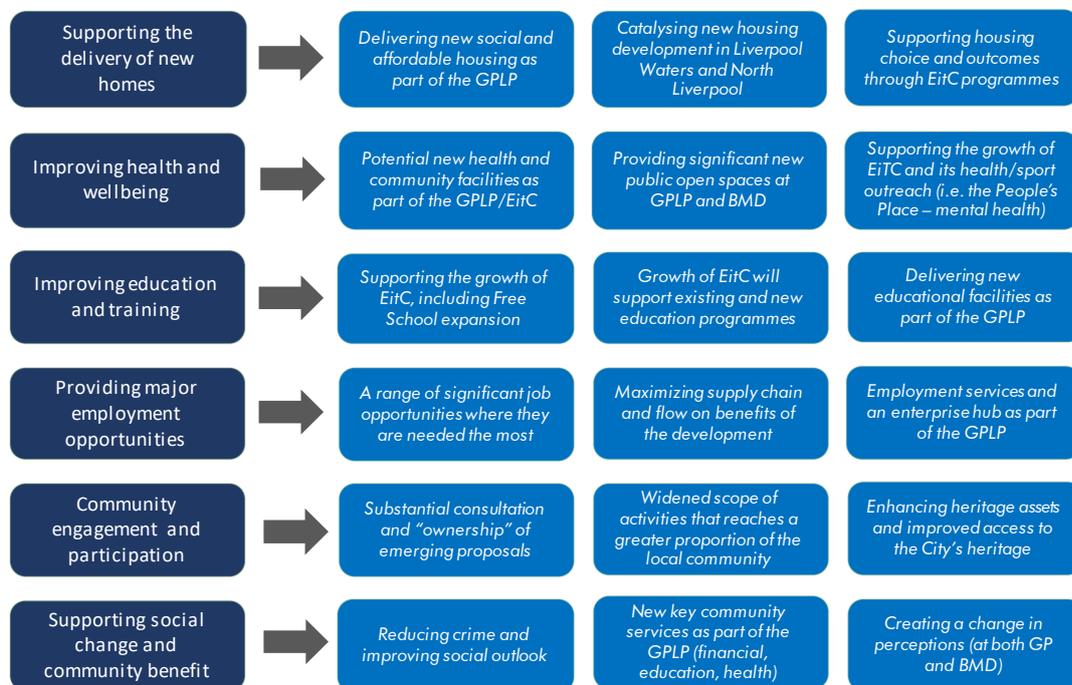
²⁹ This is an assessment of the catalytic impact on surrounding neighbourhoods at BMD within the ‘Northern Ten Streets’ area (broadly including land within the Ten Streets to the north of the Titanic hotel), based on an illustrative masterplan prepared by Stride Treglown Architects.

³⁰ Economic Impact Assessment, CBRE, 2019 (ES Volume III, Document 20.1), Pages 22-28

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of the quantitative analysis that attributes a pound (£) value to the key social benefits of the scheme.

Figure 14.4: Headline Social Benefits of the People’s Project



Source: CBRE

ii) Social and Heritage Value of the New Stadium Development

- 14.16 The Club has commissioned a report by Simetrica to quantify (in monetary terms) the value that people place on cultural heritage in the city and specifically the impact and value of a new stadium for Everton at BMD. Simetrica has established best-practice methods for valuing cultural and sporting heritage based on the HM Treasury Green Book³¹ and applied by the Department for Digital, Culture, Media, and Sport (DCMS)³², Department for Transport (DfT)³³ and Historic England³⁴. On projects of national significance such Stonehenge and Manchester’s M60 orbital ring road.
- 14.17 The assessment is based on a Green Book compliant contingent valuation survey (delivered on a sample of Merseyside residents, both online and face-to-face undertaken in August/September 2019), which elicits preferences from respondents to hypothetical scenarios. These scenarios ask respondents to gauge their willingness to pay (WTP) for proposed changes that would enhance their welfare, or willingness to accept (WTA) compensation for those changes which would reduce their welfare. These scenarios are hypothetical, and respondents are not required to pay or receive compensation.

³¹ HM Treasury Green Book 2018

³² Bakhshi et al. 2015; Lawton et al. 2018; Fujiwara et al. 2018

³³ DfT 2014

³⁴ Eftec 2005

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- 14.18 The WTP and WTA of the overall samples³⁵ are considered and a total monetary value for each is derived, scaled up to the geography of the Liverpool City Region, to allow comparison of difference scenarios. The assessment of the social and heritage value of the new stadium and its supporting uses is calculated by combining the positive willingness to pay (WTP) of those who would prefer to have a stadium development at the site (76% of the sampled population) with the negative willingness to accept (WTA) compensation – which is the amount required to reimburse those who would prefer to keep BMD in its current condition (12% of the sampled population). This assessment provided the following results
- A present value (PV) for the stadium development among those who would be WTP for the new stadium of £218million over a 30-year evaluation period.
 - A present value (PV) among those who would prefer keeping BMD in its current condition of £13million over a 30-year evaluation period.
- 14.19 The two values must be considered in combination, since some respondents in Merseyside considered that they would be positively and some negatively affected by the proposed stadium development. The net present value of the stadium development at Bramley-Moore Dock to the Merseyside population is therefore positive at £205million over 30 years, which demonstrates that the people of Liverpool attach a significant positive social and heritage value to delivering a new stadium at BMD. This figure captures the wider social and heritage benefits and impacts of the new stadium and does not duplicate the above economic benefits (detailed in earlier in this section), which are additional to this figure.
- 14.20 This constitutes a total value which includes direct use value, the option to use the stadium, the non-use value of having a state-of-the-art stadium, and the community, social, economic and regeneration benefits it would bring to the city and the local area. This figure is considered to be conservative, as it only includes Merseyside residents, whereas people outside of Merseyside may value the stadium and its supporting uses both in terms of the option to use it, and as a non-use value to see the redevelopment of an area of Liverpool’s waterfront within the WHS which is currently underutilised, not accessible and largely invisible to the public.
- 14.21 A summary of the social and heritage impact of the new stadium development is provided in Figure 14.5, which demonstrates the survey options, including the willingness to pay for a new stadium at BMD (£218m) and the willingness to accept compensation for the loss of BMD in its current state (£13m). It demonstrates that the public overwhelmingly value the benefits of a new stadium in excess of the preservation of the dock in its current state.

Figure 14.5: Summary of the Social and Heritage Benefits of BMD

CULTURAL HERITAGE/LAND USE OPTION	PAYMENT VEHICLE	SURVEY SAMPLE SIZE	PRESENT VALUE OVER A 30-YEAR EVALUATION PERIOD (MERSEYSIDE RESIDENTS)
Stadium development at Bramley Moore Dock (amongst those in favour of this land use option)	Increase in monthly cost of living	719	Net Present Value (WTP – WTA)
Stadium development at Bramley Moore Dock (amongst those against this land use option)	One-off compensation payment	74	£205,014,007

Source: Simetrica

³⁵ A total of 2,000 people were surveyed across two separate survey questions

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iii) Societal Value of the Stadium Relocation to GPLP & EitC

- 14.22 An assessment of societal value of the GPLP and the growth of EitC which will occur as a result of the relocation of the Club has been undertaken by specialist Social Value Consultants Real Worth. This assessment considers the societal value creation of two elements of the People's Project:
 - The Goodison Legacy Project; and
 - The increase in operational capacity of EitC as a result of the stadium relocation.
- 14.23 Societal value is the quantification of the relative importance that people place on the social and environmental changes they experience in their lives. The assessment has been underpinned by a comprehensive socio-economic review of the areas influenced by the activities of EitC and the impacts of the GPLP aspects of the People’s Project. It is based on information obtained via direct interviews supported by information from monitoring reports, testimonials, case studies, participant survey information, academic studies and reports of EitC programs, other reporting requirements for funders and direct correspondence with program delivery teams.
- 14.24 This assessment has found that the combined societal value of the GPLP and EitC year-on-year between 2024 and 2033, which is directly attributable to the proposed relocation of the Club to BMD, is over £182M. EitC is predicted to generate significant social value, with 20% of its total growth over a 10 year period considered to be attributable to the stadium relocation – which is considered conservative. The additional value to the People’s Project is illustrated in Figures 14.6 and 14.7 below.

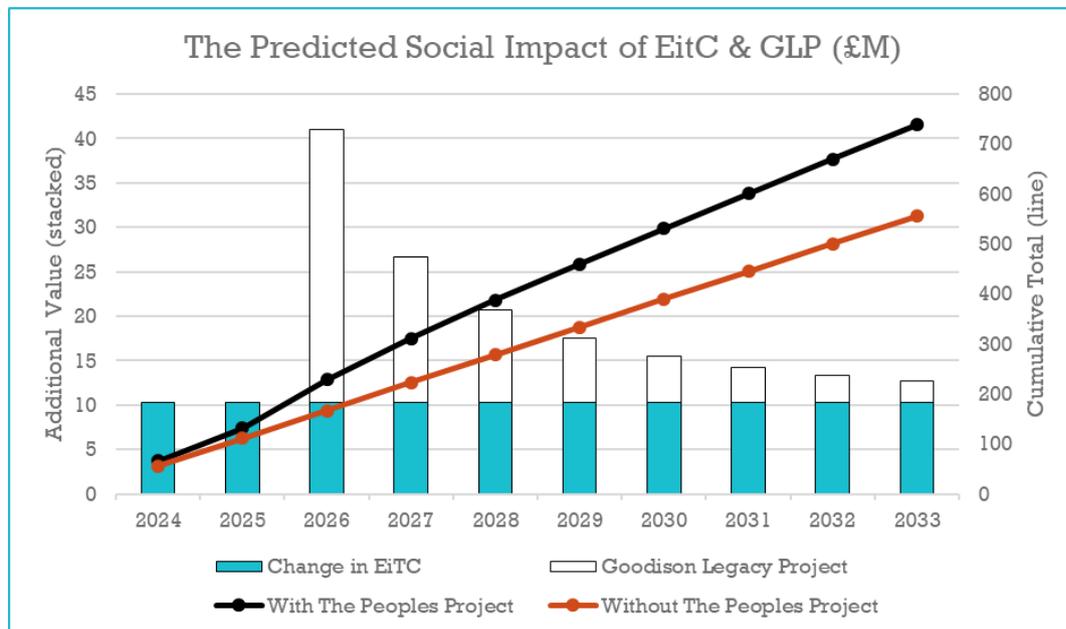
Figure 14.6: The Societal Benefits of GPLP and EitC

ACTIVITY	WITHOUT THE PEOPLE'S PROJECT (2024-2033)	WITH THE PEOPLE'S PROJECT (2024-2033)	ADDITIONAL VALUE FROM THE PEOPLE'S PROJECT (2024-2033)
EitC	556.0	658.9	102.9
Goodison Legacy Project	0.0	79.4	79.4
Grand Total	556.0	738.3	182.3

Source: Real Worth

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Figure 14.7: Chart Illustrating the Societal Benefits of GLP and EitC



Source: Real Worth

- 14.25 The cumulative increase of value over time demonstrates that the move to the new stadium will generate significantly more societal value than the Club can produce without the People’s Project. This increase represents help for many thousands of additional beneficiaries of both EitC, and those that will benefits from the delivery of the Goodison Park Legacy Project. While the amount of societal value generated by the combined projects is significant, it represents a conservative prediction and it is likely that the actual amount of societal value will be substantially more than is shown in the analysis. This assessment is separate to the economic impact assessment and social / heritage value assessment of BMD – and therefore can be considered to be additional.

3. Summary of Economic and Social Impacts

- 14.26 A quantitative assessment of the economic and social benefits of the People’s Project demonstrates that, in combination, the proposals will deliver a generational economic and social impact on the local communities of North Liverpool, the City of Liverpool, Merseyside and the in wider North West region. The project has the potential to generate more than £1.2bn of value to the economy and create at least 14,000 jobs in the City Region alone, with many more jobs created across the wider North West region. These benefits are considered to be a conservative estimate and do not include the impact of the project outside of the City Region.
- 14.27 Figure 14.8 brings together the combined economic and social value additionality of the new stadium, the wider catalytic development (in the Northern Ten Streets area), the Goodison Park Legacy project³⁶ and the growth of EitC as a result of The People’s Project. These aggregate calculations demonstrate that the project will have very significant benefits for the City Region and have the potential to truly provide a once-in-a-generation

³⁶ This includes the economic benefits (undertaken by CBRE) and quantitative benefits from social and heritage reports undertaken by Real Worth and Simetrica, which are additive benefits

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opportunity to deliver a project of a scale that can transform and catalyse development in North Liverpool, which is a major focus of regeneration in the City.

Figure 14.8: Headline Aggregated Social and Economic Benefits



Source: CBRE

PROMOTING HERITAGE BETTERMENT

- 14.28 The delivery of a new stadium at BMD has the potential to deliver heritage benefits both on-site and to the public in terms of enhancing degraded on-site heritage assets, improving access to the WHS and facilitating enhanced interpretation of the heritage and history of the WHS at the Northern Docks area in which BMD is located. These are significant benefits to the public which would not be delivered in the short to medium term without the intervention of Everton.

Access to the WHS: Increasing the Value and Use of BMD

- 14.29 At present, BMD and the Northern Docks are underutilised and inaccessible to the public, sitting behind the significant barrier of the Regent Road Dock wall. The new stadium proposals provide a significant opportunity to ‘open up’ the northern extent of Liverpool’s WHS and provide public access to a currently unseen part of Liverpool’s heritage. BMD and Nelson Dock form part of the Northern Docks Neighbourhood in the Peel Land & Property Liverpool Waters outline planning permission (LPA Ref: 100/242 and Non-Material Amendment 19NM/1121) and approved parameter plans, which identify that the site(s) are not expected to come forward for development until the 2036-2041. This is a significant lag in the delivery of development on the site, within which the site could remain underutilised and key assets such as the Hydraulic Engine House could be subject to further deterioration.

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- 14.30 An assessment undertaken by Simetrica³⁷ has sought to assess the value of the heritage and the WHS to the people of Liverpool. The study uses the principles of Willingness to Pay (WTP) to understand which elements of the WHS are valued by the public and how much these are perceived to be worth. The assessment found that:
- A very high proportion (over 90%) agreed or strongly agreed that it is important to preserve the historic character of our cities and that historic buildings should be preserved for future generations.
 - Only approximately half (51%) were familiar with the UNESCO Liverpool Maritime Mercantile City World Heritage Status.
 - The majority of people considered the Pier Head, Three Graces and Albert Dock as the most important aspects of the WHS (based on a ranking of Conservation Areas).
 - On average, people are willing to pay an average of £12.35 per household, per year to maintain UNESCO WHS status – equating to a present value (PV) of approximately £70m over a 30 year period for the Liverpool City Region.
 - However, statistical tests demonstrated that there is no significant difference in people's WTP for the UNESCO Liverpool Maritime Mercantile City WHS with (£12.06) and without (£12.64) Stanley Dock Conservation Area (within which BMD sits).
- 14.31 The above analysis demonstrates that the people of Liverpool clearly value heritage. However, the WHS status is lesser known and BMD (within Stanley Dock Conservation Area) is not perceived by the public as a key element of what they consider to be the WHS. Therefore, the assessment demonstrates that people value the WHS status almost the same with or without BMD / the Stanley Dock Conservation Area. This analysis suggests that there is a significant opportunity to enhance public perceptions and increase public benefits associated with the WHS in the Northern Docks, and at BMD – which in turn could support a better understanding and interpretation of the City's UNESCO World Heritage Status and Site.
- 14.32 The new stadium development presents a significant opportunity to realise this, with the same Simetrica assessment finding that the people of Liverpool value the new stadium development far in excess of the heritage value attributed to maintaining UNESCO WHS status – at a PV of £205m over a 30 year period (compared to £70m to maintain WHS over the same period). This suggests that the development of a new stadium at BMD will have significant social and heritage benefits for the public. In summary, the development of a new stadium at BMD will:
- Provide public access to BMD and open up the Northern Docks to the people of the City, increasing the use of the WHS and unlocking this important element of Liverpool's heritage for wider public use and enjoyment;
 - Unlocking currently inaccessible views and vistas within the WHS of both the Dock heritage and the City's unique waterfront infrastructure along the River Mersey;
 - Facilitate access to revitalised heritage assets within and surrounding the site, including the restored Hydraulic Engine House, listed dock retaining walls, on-site heritage features and the wider Northern Docks system;

³⁷ Everton Football Club and Stadium: Social and Heritage Value Report, Simetrica, 2019

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- Accelerate the development of the Northern Docks and prevent the further deterioration of heritage assets including the Hydraulic Engine House (given the approved phasing for the site between 2036 and 2041);
- Provide improved interpretation of the heritage and history of the Docks, including cultural and heritage uses in a restored Hydraulic Engine House (see section below) and interpretive public realm and signage (such as Quayside interpretive features along the River Mersey) which could be used to tell the story of the Docks and provide access to a Liverpool Waters Riverwalk along the banks of the Mersey;
- Strengthen the longstanding link between Football and the Docks, which have a historic and deeply embedded cultural connection, particularly for Everton, its fans and its former players which have been linked to the operational use of the Docks for generations including (which are explored in more detail below); and
- Opening up the site to a wider global audience to showcase the City’s heritage-led regeneration. The English Premier League is the most watched sports league in the world, with over £1.2bn unique viewers ‘tuning-in’ every weekend across 230 territories. This global coverage sets out the opportunity that exists to promote cities and their footballing cultural heritage, and to showcase Liverpool’s ‘heritage-led regeneration’, across the globe. An iconic stadium on the waterfront has the potential to provide greater visibility of the WHS from the air and offers an opportunity for broadcasters to capture a major stadium in this unique and spectacular setting.

Enhancing Heritage Assets: Hydraulic Engine House

- 14.33 The Grade II Hydraulic Engine House has deteriorated and been derelict for a significant period of time and is currently in a state of disrepair, contributing to the designation of the Stanley Dock Conservation Area on Historic England’s ‘At Risk’ register. It requires extensive but sympathetic renovation to make it safe and to bring it back into an active use that will support the public enjoyment of a key heritage asset (in line with Paragraph 185 of the NPPF which seeks positive and viable reuse of heritage assets). Without the People’s Project and without significant short-term investment, there is a genuine risk that the Hydraulic Engine House will be lost.
- 14.34 The proposals for the Hydraulic Engine House include:
- Undertaking a sympathetic but sustainable restoration in keeping with the heritage principles governing development in the docklands area;
 - Developing an outstanding cultural attraction centred around Everton and Docklands heritage in Liverpool;
 - Working with key partners to ensure the highest quality display features are incorporated into the space which is both flexible and dynamic and that allows the full breadth of Everton and Docklands heritage to be exhibited effectively; and
 - Establishing a high quality café / bistro facility on site for year round public use.
- 14.35 The Hydraulic Engine House will be set at the heart of new stadium development and be an iconic focal point within the proposed fan plaza. The proposals will involve integrating the Hydraulic Engine House into a key ‘offer’ for both supporters and visitors alike, with a significant exhibition of Everton Football Club and Liverpool Docks artefacts, memorabilia and displays. The Hydraulic Engine House will sit at the start/finish to the discovery of the Docks via the Liverpool Water’s Riverwalk, once the Liverpool Waters development has

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- been brought forward. From this point, the Hydraulic Engine House will be visible along and linked to the fan plaza and beyond.
- 14.36 On non-match days, visitors will be able to use this link to traverse between these locations, either starting or finishing their journey at the Hydraulic Engine House. This link will be key at integrating the building into the wider Northern Docks within its WHS context, and to increasing public access and use.
- 14.37 The Hydraulic Engine House will not only tell the story of the redevelopment of the Docklands and BMD, but provide an insight into the history of Everton Football Club. Crucially, it will explore the linkages between the Club and the Docks through the stories of the players who were also dockers, support the Club has provided for the Docks and dockers over the years, and the history Club's evolution in the context of the historical and ongoing operation of the Docks. It would also provide an educational facility for the benefit of visitors and schools, and provide an important resource to access historical and cultural information.
- 14.38 The exhibition space would be flexible and would allow the full breadth of both Docklands heritage and Everton's history to be exhibited effectively. It would tell the stories of the people of Liverpool - including footballers, dockers, and other key figures in the history of both Everton Football Club and the Docks.
- 14.39 Hydraulic Engine House would become a destination in its own right, marrying together a prestigious football club and a prestigious World Heritage Site, as a unique and special point of interest for Liverpoolians and tourists alike.
- 14.40 Key elements of the cultural and heritage exhibits that could be articulated through the Hydraulic Engine House include:
- **The Everton Collection** – the Everton Collection is rated by Christie's as the most comprehensive collection of football memorabilia in the world, containing over 20,000 items (of which only 1-2% of these items can be exhibited at any one time at present). The redevelopment and reuse of the Hydraulic Engine House therefore offers a significant opportunity to present some of these items which are currently inaccessible to Evertonians and wider football fans.
 - **Articulating connections between Everton and the Docks** - both the Docks and the Dockers are an important symbol of the city of Liverpool, embodying pride, resilience and hard work. The history of the dockers, the city and Everton is very much aligned and the move to Bramley-Moore Dock will enable the Club to reconnect with its dockland heritage. These connections have been fostered through longstanding relationships between football and the Docks which could be explored as part of the cultural exhibits at the Hydraulic Engine House, including:
 - **The history of football at the heart of Dockland culture** - the burgeoning development of the port of Liverpool coincided with the formation and indeed commercial success of both football clubs in Liverpool and dockers of local and national prominence became patrons of the Club in its earliest days, such as David MacIver, the co-founder of the Cunard Shipping Line. Furthermore, for many of the city's working class dockers, football was the central passion, and they would have made the journey from the Docks to the match to support Everton at Goodison Park on a Saturday afternoon, after their five-and-a-half-day week on the Docks.
 - **The history of players and the dockers** - not only have a number of Everton supporters been dockers, but there is also a connection between Everton players and the Docks,

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with a number of players who also made their living working on the Mersey Docks over the years which has intrinsically tied the Club to Dock heritage.

- **Deep-rooted charitable connections** - the Club has also sought to support the north Liverpool and dockers' communities in times of need. For example, during the 1893 trade depression in the port, which saw many skilled unions in Liverpool reporting depression in their industry and unemployment amongst their members, the board of Everton donated £1,000 to local poor relief charities and catered meals to 12,000 people. There are numerous examples of the charitable connections throughout the Club's history which demonstrate the longstanding and deep-rooted connections between football and the Docks.
- **The story of the "Toffees"** – the Club's unique nickname is linked to Everton's association with local toffee shops, with the two most famous and linked to the football club being 'Ye Anciente Everton Toffee House' and 'Mother Noblett's Toffee Shop'. Both toffee shops served Everton fans with sweet treats while watching the Blues play. This story is intrinsically linked to the Docks by the toffees key ingredient – sugar - which arrived into the city via the Docks and is a crucial ingredient of the City's Dockland heritage.
- **The history of Bramley-Moore Dock** – BMD opened in 1848 and was considered inadequate for its original Dock use by 1851 (after 3 years), when it then became used for coal handling until 1988 and was also the site of a former Tar Works. The Hydraulic Engine House exhibition offers the opportunity to re-tell the story of both BMD and the Northern Docks, which could bring to life a little known and now potentially forgotten part of Liverpool's heritage.

- 14.41 These historical and cultural connections are a crucial to understanding the heritage and evolution of both the Club and the City. They provide an insight into the social commentary which could form the basis of exhibitions and displays in the Hydraulic Engine House. There are clear links between the footballing history of the Club, the development and success (and indeed demise) of the Docks and specifically BMD, which can be told through the lives of key historical figures. This offering will be of interest to Everton supporters, other football fans, all Liverpoolians, visitors and tourists alike. In this context, not only will the Hydraulic Engine House be of interest on matchdays, but it will be a major destination in its own right on a year round basis.
- 14.42 The Hydraulic Engine House will be an iconic feature of the site which will generate significant public benefits through the enjoyment, interpretation and increased use and of the physical and cultural heritage of the WHS, BMD and the wider Northern Docks system.

Other Heritage Features

- 14.43 The new stadium will also deliver sensitive design and development that can enhance some and mitigate other impacts on heritage assets within the site, making these features more accessible for public use and enjoyment both now and into the future. An extensive overview of the heritage proposals is provided in Section 5.0 (Application Proposals) and Section 13.0 (Heritage Considerations) of this Planning Statement and in the submitted Heritage Statement, Design & Access Statement, Construction Method Statement and Dock Infill Methodology and include:
 - Water Channel - the creation of a water channel between Sandon Half-Tide Dock and Nelson Dock will retain the visual connectivity and expose the existing West Dock Wall to

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the water, providing an understanding and appreciation of the original inter-connected dock system.

- Stadium design – the design of the new stadium will reflect the warehouse typology seen in the Stanley Dock Conservation Area and WHS; and the materiality of the building has been sensitively designed to sit comfortably alongside listed buildings on site and in the surrounding area.
 - Public realm design - includes the proposed exposure of the listed BMD retaining wall within the public realm to the east of the stadium and to the west along with the retention of the majority of historical artefacts which surround the retaining walls of BMD and Nelson Dock, including the repair of assets, such assets include granite setts, railway tracks, bollards and capstans. The ethos of the public realm design has been to recognise and celebrate the dock's historic and functional past.
- 14.44 Overall, the proposed stadium will significantly improve the public use of the WHS and restore and retain key heritage assets that may be lost without short-term investment. It offers an opportunity to realise improvements through improved access to heritage, enhanced interpretation of the City’s heritage and the opportunity to enhance public perceptions and increase public benefits associated with the WHS, the Northern Docks and BMD. These benefits will enhance public perceptions, awareness and importantly the use and enjoyment of the WHS – ensuring its revival and renewed use for a new generation of people in the City following the decline of the Dockland industry.

SUSTAINABILITY AND ENVIRONMENTAL BENEFITS

- 14.45 Everton has commissioned BuroHappold Engineering to work collaboratively to develop a Sustainability Framework and Energy Statement, which includes a Sustainability Performance Framework that will set the platform for the Club to govern the future operation of the new stadium. The Sustainability Performance Framework will ensure key sustainability and environmental benefits are secured through the design of the People’s Project and will seek to make the new stadium the most sustainable in the Premier League.

Sustainable Design Features

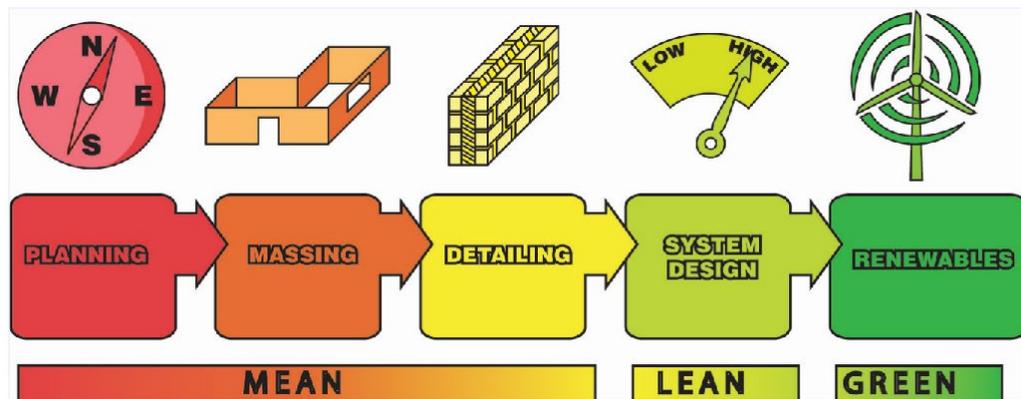
- 14.46 To ensure the design fundamentals and requirements of the Sustainability Performance Framework are embedded, the design team has adopted an integrated approach to sustainable design that will make the Everton’s new stadium the most sustainable Premier League stadium in the UK. The following sets out the key design strategies which have and are proposed to be adopted:

Resource Efficiency

- **Be lean, be clean:** a “Mean, Lean, Green” energy hierarchy (as illustrated in Figure 14.9 below) has been adopted during the design development to minimise energy demand and associated CO2 emissions. This is achieved through the adoption of passive measures including façade optimisation and natural ventilation in key spaces including all public concourses. Lighting will be high efficiency LED throughout with presence or absence detection within all stores, toilets, offices and changing rooms to ensure energy consumption is minimised in low utilisation spaces.

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Figure 14.9: “Mean, Lean, Green” Energy Hierarchy



Source: BuroHappold Energy Statement, 2019

- **Be green, harness the environment:** opportunities to harness renewable and low-carbon energy sources on and around the proposed site will be adopted. The scheme will harness solar energy through the installation of 2,000 m² of photovoltaic cells, forming a canopy over the car park to the west of the proposed Water Channel).
- **Community energy catalyst:** there is the potential for a future connection to a district heating network, working with Peel Power and LCC as part of the Ten Streets SRF to capitalise on and contribute to a network in the North Docks at the appropriate time. This creates the potential for delivering low carbon heating and hot water to the building, and supports regional infrastructure aspirations for community energy systems.
- **Use water efficiently:** water efficient fixtures and fittings, including waterless urinals, will reduce potable water consumption and conserve precious water resources in times of increasing scarcity. Rainwater will be collected from the main stadium roof and reused in the stadium for public convenience facilities – with the capacity to collect 215,000 litres of water in a buried tank.
- **Implement a waste hierarchy:** the adopted waste strategy will set best in class operational waste reduction targets. The stadium will operate on a closed-loop recycling basis. Only recyclable materials where available will be used; food waste will be minimised and fully composted and the most advanced technology will be installed to predict customer demand.
- **Reuse materials:** all material that becomes available from the demolition of Goodison Park and BMD will be carefully detailed so that whatever can be reused will be utilised and everything that can't will be recycled in the most efficient manner, in line with circular economy principles
- **Utilise local supply chains:** the project will prioritise local suppliers and where possible those who procure raw materials from local sources. Through this, the project will also contribute to the expansion of the regional economy rooted in sustainable practices, products, and services.
- **Efficient construction processes:** the structural design will maximise opportunities for off-site fabrication, creating opportunities to drive resource efficiency throughout the construction process. The construction process will be low carbon, not just in offsite manufacture but also in the procurement requirements for low carbon concrete, asphalt, etc. A minimum of 90% of waste generated will be diverted from landfill.

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- **Address the performance gap:** commissioning, aftercare and a building energy management system will support efforts continuously to improve building performance in early stages of occupation and throughout the project lifecycle. This will be supported by a post occupancy survey following the first 12 months of occupation and institute effective monitoring thereafter.

Access and Mobility

- **Embrace future mobility solutions:** electric vehicle charging stations will be provided on-site, providing a visual statement of sustainable intent, and improving local air quality by attracting more electric vehicle users. The Government is committed to an all-electric future for motor cars and it is likely that soon after the completion of the stadium the UK will move to EV-only car sales. The People's Project will be there first with full provision of proportionate charging facilities for cars and bicycles.
- **The transport strategy:** a fundamental aspect of the strategy is to encourage visitors to consider travelling by sustainable modes. To make the stadium accessible and successful, appropriate facilities for travel by train, bus, walking and cycling (as well as surrounding parking zone restrictions) will be promoted so that visitors have an alternative choice to travelling by car. The proposed new stadium at BMD provides an opportunity for a modal shift from traditional travel patterns associated with Goodison Park to more sustainable options, due to the proximity of BMD to the city centre and the rail network at Sandhills Station, where accessibility and new pedestrian routes will support access to the site for fans and visitors.
- **Ensuring equality of experience:** a strategic approach to access and inclusion enables users to make effective, independent choices about how they use the stadium. The design solution considers not only those barriers that form physical constraints but also barriers experienced by people with learning difficulties, mental health issues, deaf and hard-of-hearing and the blind or partially sighted. Lifts will be provided to ensure safe and quick access for disabled users, with others being encouraged to use stairs as the primary mode of vertical circulation, with escalators being available during peak times to ease congestion. This strategy will be communicated through clear signage.

Sustainable Reuse of Site

- **Focus on embodied impacts:** existing sediment will remain, capped with a separation geotextile and marine-won sand fill placed on top. This strategy will avoid the need to dredge and dispose of 50,000m³ of dock deposits, reduce the total volume of fill by approximately 25,000m³ and reduce marine vehicular movements.
- **Unlocking views:** opening up a currently inaccessible site for public enjoyment enables the project to enhance access and connection to scenic views and the waterfront. For match and non-match day visitors, exposure to waterfront and natural views will support positive mental health outcomes and promote opportunities for social exchange.

Transition to the Future

- **Protecting against sea level rise:** site levels will be raised within the footprint of the stadium and surrounding access routes (7.3m AOD) to provide protection against flooding during extreme storm events. River Mersey flood levels for 2115 have been selected to account for close to 100 years of sea level rise. Beyond 2115 adaptation measures will be possible to mitigate flood risk into the future. SuDS features are being incorporated in the form of the water channel as a retention feature, alongside rainwater harvesting to enable the

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stadium to reuse water resources. A proprietary vortex separator unit prior to each discharge point is also provided that captures and retains sediments, oil, litter and floatables from surface water runoff to provide an enhancement in water quality.

- **Internal and external environments:** comfort is crucial to the experience of match and non-match day users. The design ensures comfort can be delivered in the context of a changing future climate. The likely increases in extreme weather, both hot and cold, would in any case demand close attention both to insulation and ventilation but the particular wind characteristics of Merseyside is of special importance. Wind tunnel testing has further informed the design of the public realm, to ensure a broad range of activities can be take place in this space, encouraging social exchange, exercise and relaxation.
- **Developing resilience:** the design allows for conventional resilience strategies including a battery storage system. This will provide seamless energy delivery in the event of power being lost during match and non-match days. The system will provide the appropriate resilience to the life safety systems and any life critical electronic equipment.

User Experience

- **Activating the public realm:** accessible on both match and non-match days, the public realm will be a flexible and accessible social space that encourages diverse use. Not only will this create a new venue for the City, but also improves access to an inaccessible area of the WHS and Stanley Dock Conservation Area and establishes a valuable resource for the community, which can help to build social cohesion and capital.
- **Safety and security is paramount:** the stadium design and configuration has been designed to ensure that a safe and secure environment is provided for users.
- **Digital service integration:** the stadium will take advantage of new technologies, digital services and systems to enhance the user experience. This will be balanced with the principles of transparency and intuitive technology use that does not impede the connection between the club, the fans, the atmosphere and the game.

Community Integration

- **Pro-environmental behaviours:** by building and operating sustainably the development will raise awareness of key sustainability issues and encourage pro-environmental behaviours within the stadium and public realm. The aspiration is that these behaviours permeate into actions beyond the stadium and public realm experience.
- **Demonstrating social value:** The Club proudly maintains and sustains 'The People's Club' title by listening to, investing in, working with and inspiring communities across the City and the region. As set out earlier, the People's Project creates a unique opportunity for the creation of local jobs, both in the construction and operation of the stadium and GPLP. Opportunities for the development of knowledge and skills will be facilitated through apprenticeships and the project will aim to develop an understanding of the built environment profession and career opportunities within this through site visits for local students.
- **Building on the success of EitC and the Club's commitment to Corporate Social Responsibility ("CSR")** – the delivery of the People's project will support the growth of the Club's award winning charity, EitC, and support the Club's award winning CSR agenda. 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. In the past 3 years alone, EitC and the

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Club have won a series of awards, including the Football Business Awards ‘Best Football Community Scheme – Premier League’, ‘Best Corporate Social Responsibility Scheme’, Best Club CSR or Community Scheme (Home Is Where The Heart Is); as well as the Northwest Football Awards ‘Best Community Initiative’. The relocation and growth of the Club and EitC will provide the platform to further develop and roll out award winning community initiatives.

OPENING THE SITE TO THE PUBLIC

14.47 As touched upon in the review of the key heritage benefits of the site, the site is currently underutilised, offers a low value use and provides no access for the public to enjoy or use the WHS in a meaningful or positive way. In order to bring the site back into positive use and to make the site accessible for the public, there is a significant amount of positive site enhancement required. This includes:

- **Land remediation** – BMD opened in 1848 but was inadequate for its original Dock use by 1851 (after 3 years), when it then became used for lower value coal handling uses until 1988. It is also the site of a former Tar Works which includes made ground, comprising various quantities of reworked natural material, brick, concrete, coal, ash, clinker, wood fragments and slag. Both the made ground and Dock itself contain localised hydrocarbon contamination and the potential for gas generation which are harmful to human health. The site therefore requires significant investment into site abnormals, including remediation and heritage restoration, with approximately £45m of investment required to make it accessible and available for public use – which would render the majority of other developments unviable.
- **Reducing flood risk** – site levels will be raised to protect the future use and enjoyment of the site from climate change, flood events and future rises in sea level.
- **Improving accessibility** – the site will be accessible by a variety of sustainable modes of transport, making the stadium accessible by train, bus, walking and cycling, linking into new cycle infrastructure investment along Regent Road. These initiatives, supported by new and improved routes to Sandhills Station, will make the site and the North Docks more accessible to the public. The site itself will be opened up to public use including accessible public realm, signage, wayfinding and access to on-site facilities.
- **Mitigating microclimate impacts and enhancing the external environment** – the design of the stadium and public realm has taken into account microclimate conditions and the changing future climate. It will ensure that the Dock becomes an active space for a variety of uses in a safe and comfortable environment.

DELIVERING EQUALITY, DIVERSITY & INCLUSION

14.48 A qualitative assessment has been undertaken which analyses Everton’s actions in support of equality, diversity and inclusion (‘EDI’) principles across all the Club’s operations, including staff, fans and the community – and explores how EDI considerations and/or initiatives will be taken forward as part of the People’s Project.

Staff

14.49 Everton is already committed to equality of opportunity in employment. The Club does not discriminate on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

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- 14.50 Examples of current staff initiatives undertaken by the Club include:
- **Staff engagement** - including raising awareness through All Together Now (the Club's flagship initiative to celebrate diversity and equality), encouraging staff engagement/championing of EDI activities and establishing Staff Inclusion Networks - a practical, working group approach to discussing issues and identifying appropriate actions (the Club has recently launched the first pilot Inclusion Networks - its LGBT+ and Women's Networks).
 - **Training** - including training in the Equality Act 2010 and incorporation into strategies and Action Plans, undertaking a training needs analysis to assess levels of awareness of EDI issues, implementing accessible recruitment and employment practices and championing the Club as a Level 2 Disability Confident Employer as part of the UK government's Disability Confident Scheme.
- 14.51 The delivery of the People's Project will allow the Club to further strengthen and deliver on its EDI commitment as part of plans to relocate to a new stadium at BMD. This includes:
- Placing EDI at the heart of the Club's future strategy and in the Club's behaviours.
 - Working to align the diversity of workforce with the local demographics with a focus on race, religion and disability as a result of findings from data collection, through Equality Action Plans.
 - Undertaking Equality Impact Assessments to identify key activities where action is required to mitigate risks that would result in negative impact across the nine protected characteristics.
 - Learning from the pilot Inclusivity Networks and applying lessons learnt to 'scale-up' the initiative.

Fans

- 14.52 Everton is committed to ensuring match-day or event experience is not compromised because of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.
- 14.53 Current initiatives by the Club include:
- **Combatting discrimination** - working with 'Kick It Out' to fight discrimination in English football. In March 2019, the Club also backed the Premier League's 'No Room for Racism' campaign, which is part of the Premier League's 'This is Everyone's Game' inclusion initiative.
 - **Premier League Accessible Stadia Guide (ASG) Standards³⁸** - Everton is committed to the ASG standards and has made significant investments to improve accessibility at Goodison Park, despite the ongoing development constraints associated with an ageing stadium.
 - **Consulting with fans to meet their needs** - the Club works with dedicated stakeholder groups from planning to the implementation of initiatives such as with the Everton Disabled Supporters Association (EDSA), and the introduction of special provisions for disabled supporters.

³⁸ Premier League Accessible Stadia Guidelines Report (2015)

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- 14.54 Accessibility considerations have been central to the design and planning process for the proposed stadium and making the stadium fully accessible to comply with (and exceed where possible) the established guidance³⁹. Key design principles include:
- Providing fully accessible facilities at the stadium which fully meet ASG and established accessibility guidelines – including step free circulation, level change mitigation and suitable seating to limit travel distances to less than 50m⁴⁰.
 - The inclusion of a full suite of sensory rooms, faith rooms, quiet rooms and dedicated changing places to ensure the stadium caters for all dedicated needs.
 - Extensive and inclusive consultation with a range of supporters, relevant experts (including the Corporate Access Forum) and the general public to ensure the needs of all are fully considered.
 - Improving access to the stadium by providing multi-modal access to the ground, accessible parking adjacent to the stadium and providing fully accessible wayfinding and signage.
 - Providing a full accessible public realm that respects its sensitive historic surroundings, delivering a safe, vibrant, inclusive, accessible and welcoming environment.

Community

- 14.55 The Club is a pillar of the local community and is committed to delivering a positive impact through EitC - the Club's official charity. Since it was founded in 1988, EitC has been at the heart of social interventions and to this day it prides itself on tackling issues that others shy away from. By doing this, EitC strives to support the most vulnerable and underprivileged members of the local community through providing healthcare, education, employment opportunities, housing, sports facilities and a sense of belonging to the Everton family.
- 14.56 At least 20% of EitC's future growth (which is considered to be conservative)⁴¹ is estimated to be attributable to the People's Project, including the relocation of Everton to BMD and the delivery of the Club's legacy project. As set out earlier, this growth and investment will have significant benefits for the local community and, aligned to this growth, the Club is committed to embedding and enhancing the guiding principles of EDI in future plans for EitC, such as:
- Maintaining and strengthening commitments to L4 and the surrounding areas to support inclusivity. EitC has a long-established relationship with the local community and will continue to support the improvement of people's lives. The new stadium will support the growth of EitC to expand its reach into new programmes, initiatives and development opportunities at Goodison Park and in the local community which will further place EDI at the heart of both EitC and the Club.
 - Extending inclusive support to the most vulnerable and tackling difficult issues. EitC does not shy away from issues that are hard to tackle and understands its responsibility to continue this approach to social initiatives such as tackling mental health problems, social

³⁹ Including the Guide to Safety at Sports Grounds Sixth Edition 2018 (The Green Guide), Accessible Stadia 2003 and BS 8300:2018 'Design of an inclusive and accessible built environment' (see submitted Design and Access Statement (MEIS, 2019) for full details.

⁴⁰ See submitted Design and Access Statement (MEIS, 2019) for full details

⁴¹ The Societal Value of the Relocation of Everton Football Club, Real Worth, 2019

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exclusion and/or employment opportunities for minority groups and the most vulnerable and disadvantaged.

- Meaningful engagement with the local community. One of EitC’s success factors is its ability to respond to the most pressing needs in the local community through engagement and outreach efforts to ensure all facets of the community feel included. This will be enhanced through the growth of EitC to inform new programmes and initiatives.
- Innovation and scale-up. EitC regularly develops and tests new approaches and works with partners to scale-up initiatives that have a positive impact. This could include issues such as access to capital and office space for start-ups which would be catalysed by the GPLP and support the Club’s existing and future EDI initiatives.

SUMMARY

- 14.57 It has been demonstrated that the People’s Project will have significant and tangible public benefits for both the immediate communities within which the project sits and for the wider Liverpool City Region. The project is a generational opportunity for Liverpool to deliver a project that will have a genuine impact on its communities and which will generate considerable benefits for a wide range of stakeholders across the City. The following diagram provides a summary of the key benefits of the People’s Project in the context of the three key pillars of sustainable development which are embedded in the NPPF.

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Figure 14.10: Summary of the People’s Project Public Benefits



Source: CBRE

Delivering on the UN Sustainable Development Goals

14.58 The substantial public benefits and scale of the People’s Project extend to a regional and national level of significance. There are clear benefits that permeate across the social, economic and environmental pillars of sustainability and which could support national and international goals for sustainable development. On this basis, Figure 14.11 provides an assessment of how the project, based on the wide ranging benefits of the proposals, will contribute to supporting the delivery of the UN SDGs.

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Figure 14.11: Contribution of the People’s Project to the UN SDGs

UN SDG’S	CONTRIBUTION OF THE PEOPLES PROJECT	REFERENCE
 <p>1 NO POVERTY</p>	<ul style="list-style-type: none"> Improving quality of life through the reduction in inequality and the creation of economic value — including significant jobs, investment and flow on economic benefits, locally and across the City Region. Creation of significant social benefits in communities surrounding Goodison Park and the new stadium (and across the wider areas of North Liverpool and the City Region). 	<ul style="list-style-type: none"> Economic Impact Assessment, CBRE Societal Value of the Relocation of Everton Football Club, Real Worth
	 <p>2 ZERO HUNGER</p>	<ul style="list-style-type: none"> Supporting the regeneration and renewal of North Liverpool (including County and Kirkdale Wards) which are communities suffering for severe deprivation (for example, child poverty stands at 39% in these Wards compared to 17% nationally⁴²). Supporting enhanced facilities for EitC (supported by GPLP and BMD investment) which will build on and enhance existing initiatives to improve socio-economic indicators and support the most underprivileged members of the community. Supporting new and significant community facilities around Goodison Park and Liverpool 4 — including health, education, enterprise and wellbeing facilities that will benefit the community for generations to come.
 <p>3 GOOD HEALTH AND WELL-BEING</p>	<ul style="list-style-type: none"> Supporting improved health in North Liverpool which scores poorly on almost all indices — i.e. life expectancy was 5 years lower than the national average in 2015-2017, severe mental health problems are more than double the national average and child obesity levels are extremely high (25.7% for 4-5-year-olds and 41.1% for 10-11-year-olds, compared to 9.3% and 19.6% respectively for the UK⁴³). Supporting the expansion of EitC (supported by GPLP and BMD investment) which is dedicated to providing health/sports facilities, tackling mental health issues and providing advice and support to the local community. Supporting new health facilities as part of the GPLP which will provide support for improved health outcomes in the local community. Delivering new open space provision for public use at both GPLP and BMD for a diversity of public uses. Delivering an estimated £127m additional in societal value that is directly attributed to improved health / wellbeing outcomes as a result of GPLP and the growth of EitC. Encouraging healthy and sustainable modes of transport as part of the new stadium development — using information and education to promote active travel choices, and raising awareness of more sustainable travel options. 	<ul style="list-style-type: none"> Societal Value of the Relocation of Everton Football Club, Real Worth Transport and Travel Assessment Plan, Mott MacDonald GPLP Planning Submission

⁴² The Societal Value of the Relocation of Everton Football Club, Real Worth, 2019, p9

⁴³ The Societal Value of the Relocation of Everton Football Club, Real Worth, 2019, p47-49

Public Benefits



- Improving access to education and training - in the North Liverpool wards, levels of educational attainment are significantly lower than the national average (for example, 41.6% of GCSE pupils achieved 5 A*-C grades in 2017 which was 20% lower than nationally⁴⁴).
 - Supporting a new education hub as part of the GPLP which will support new education and training programmes in L4.
 - Expanding the scope and reach of the Everton Free School which would be facilitated by the stadium move and investment in the GPLP.
 - Delivering an estimated additional £5m in societal value that is directly attributed to 'education and training' outcomes as a result of the BMD and GPLP projects.
 - Providing flexible space in the Hydraulic Engine House which can be used for schools and learning, and providing educational exhibits that will provide interpretive learning on the history, heritage and culture of the Docks.
- Societal Value of the Relocation of Everton Football Club, Real Worth
 - GPLP Planning Submission



- Building on and expanding the Club's pioneering equality, diversity and inclusion objectives – both now and as the Club moves into a new stadium.
 - Expansion of Equality, Diversity and Inclusion activities under the "All Together Now" programme - specific activities include the launch of the Women's Network. These programmes are proposed to be expanded by the Club as part of the stadium relocation.
 - Supporting the future development and expansion of EitC's 'Girls on Side' programme helping women with mental health issues.
 - Continued strong leadership from the club's female CEO e.g. discussing career opportunities for women in football with local school girls.
 - Scaling up initiatives such as 'Inclusivity Networks' through the growth of EitC, to promote gender equality.
- Information from current Everton Football Club EDI initiatives
 - EitC Growth Plans



- Adopting water efficient fixtures and fittings in the new stadium to reduce potable water consumption and conserve water resources for the local community and future generations.
 - The use of rainwater harvesting from the stadium to offset usage. A proprietary vortex separator unit prior to each discharge point is also provided that captures and retains sediments, oil, litter and floatables from surface water runoff to provide an enhancement in water quality.
- Sustainability Statement, BuroHappold
 - Energy Statement, BuroHappold
 - Design and Access Statement, MEIS

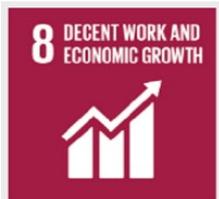


- Harnessing the use of solar energy through the use of photovoltaic cells (utilising 2,000sqm of PV cells above the surface car park).
 - An energy hierarchy adopted during the design of the stadium to minimise energy demand and emissions.
 - Ability to connect into and support the establishment of a future District Heating Network.
- Sustainability Statement, BuroHappold
 - Energy Statement, BuroHappold
 - Design and Access Statement, MEIS

⁴⁴ The Societal Value of the Relocation of Everton Football Club, Real Worth, 2019, p45

Public Benefits

- Electric vehicle charging points will be provided on-site to support the UK's move towards an all-electric future for motor cars – with the flexibility to expand and implement future mobility solutions.
- Commissioning and delivering aftercare and a building energy management system that will support continuous improvement in building performance.
- Commitment by the Club via the People's Project to deliver the objectives set out in the Sustainability Performance Framework.



- Supporting at least 14,000 new jobs for the City Region, including providing jobs for more than 600 new trainees / apprentices.
- Delivering jobs to meet local needs, from entry level to managerial jobs – where they are needed the most and in some of the most deprived areas of the UK in North Liverpool.
- Boosting the economy by delivering up to £1.2bn of economic and social value – offering an opportunity to deliver transformational economic growth.
- Catalysing the growth and renewal of regeneration priority areas in the North of the City.
- Supporting the development and regeneration of surrounding development including Liverpool Waters and the Ten Streets.
- Significantly increasing visitation and tourism in the City Region.
- Supporting the growth of public finances through Business Rates and Council Tax – which can be reinvested into local communities.
- Providing start up and enterprise job opportunities as part of the GPLP Enterprise Hub – delivering a pathway to sustainable job creation in North Liverpool.
- Continuing to develop recruitment and staffing policies to ensure they are inclusive and adhere to fair labour practices.
- Growth of EitC's education and employment programmes (through the GPLP and the new stadium development) which build the skills to equip participants for decent work and support economic growth.

- Economic Impact Assessment, CBRE
- Societal Value of the Relocation of Everton Football Club, Real Worth
- Everton Football Club and Stadium: Social and Heritage Value Report, Simetrica
- GPLP Planning Submission
- EitC Growth Plans



- Fostering innovation as part of the GPLP Enterprise Hub – supporting start up business, entrepreneurship and innovation.
- The new stadium development acting as a catalyst for the development of the Ten Streets, supporting creative enterprise, innovation and entrepreneurial business.
- Delivering innovative design and engineering as part of the new Everton Stadium with techniques such as the 'reversible' dock infill methodology that will protect the listed elements of the dock.
- Innovation in the operation of the stadium, including technology and energy saving techniques
- Digital service integration will take advantage of new technologies, digital services and systems to enhance the user experience. This will be balanced with the principles of transparency and intuitive technology use that does not impede the connection between the club, the fans, the atmosphere and the game.

- GPLP Planning Submission
- Design and Access Statement, MEIS
- Economic Impact Assessment, CBRE

Public Benefits



- Providing pathways to work in industry through the Growth of EitC’s education and training initiatives – fostering innovation and entrepreneurship in future generations.
- Supporting the use of the Hydraulic Engine House as a cultural asset with links to the knowledge economy, including the University of Liverpool and National Museums Liverpool.
- Supporting SME jobs in the local supply chain.

- Delivering a boost in GVA and wage income in the City Region.
- Supporting significant new jobs, both direct and indirect through local supply chains.
- Placing EDI at the heart of the Club's future strategy and in the Club's behaviours.
- Working to align the diversity of workforce with the local demographics with a focus on race, religion and disability as a result of findings from data collection, through Equality Action Plans – which would be further developed and implemented.
- Delivering a design solution will consider not only those barriers that form physical constraints but also barriers experienced by people with learning difficulties, mental health issues, deaf and hard-of-hearing and the blind or partially sighted.
- Providing a fully accessible stadium for disabled users in line with ASG and other guidance.
- Rolling out Equality Impact Assessments to identify key activities where action is required.
- Growth of the “All Together Now” initiative - activities promoting equality, diversity and inclusion across the workplace, fans and community.
- Learning from and developing new pilot ‘Inclusivity Networks’ and applying lessons learnt to scale-up the initiative through the growth of EitC.

- Economic Impact Assessment, CBRE
- Design and Access Statement, MEIS



- Facilitating access to revitalised heritage assets, including the Hydraulic Engine House and introducing new interpretive heritage features; such as a new water channel, interpretive signage and wayfinding, and access to the Liverpool Waters Riverwalk
- Providing investment totalling in the region of £45m to address site abnormalities including remediation and in restoring, conserving and promoting world heritage.
- Establishing a cultural centre at the Hydraulic Engine House as a centre-piece of the new stadium development – providing the opportunity to exhibit Everton and Dock artefacts and memorabilia and enhancing the experience of Dockland heritage for the public.
- Unlocking access to the WHS in the Northern Docks and at BMD for wider public use and benefit – which is currently inaccessible and in a state of disrepair.

- Heritage Statement, KM Heritage
- Hydraulic Engine House – Design Intent Report, Pattern Design
- Transport Assessment and Travel Plan, Mott MacDonald
- Sustainability Statement, BuroHappold
- Design and Access Statement, MEIS

Public Benefits

- Improving the interpretation and enjoyment of the City’s heritage through improved accessibility, public realm and interpretive features.
- Encouraging the use of sustainable modes of transport as part of the new stadium development. To make the stadium accessible and successful, appropriate facilities for travel by train, bus, walking and cycling will be promoted so that visitors have an alternative choice to travelling by car. The proposed new stadium at BMD provides an opportunity for a modal shift from traditional travel patterns associated with Goodison Park, supported by and improved access to the nearby Sandhills Station.
- Increasing site levels and protecting against flood risk via the implementation of SUDS water channel to mitigate against natural disaster.
- Providing an accessible public realm on both match and non-match days, offering an accessible social space that encourages diversity in its use.
- Mitigating impacts and enhancing the external environment through the design of the stadium and public realm, taking into account microclimate conditions and the changing future climate; ensuring the site becomes an active space for a variety of uses in a safe and comfortable environment.



- Supporting initiatives to improve resource and waste management at BMD —e.g. plastics recycling, food waste collection and management and water use.
- Adopting a waste management strategy that will adopt best practice waste reduction targets. A minimum of 90% of waste generated will be diverted from landfill.
- In line with the principles of a circular economy, capitalising on opportunities to reuse material from Goodison Park.
- Maximising the use of local suppliers, local manufacture and local services. The supply chain will be rooted in sustainable practices, products and services.
- Everton will continue its operations with improved transparency and traceability of its supply chain – providing future confidence that suppliers meet set standards for performance, behaviour and ethics.
- Everton will be industry leading in documenting, mapping and publishing its supply chain.

- Energy Statement, BuroHappold
- Sustainability Statement, BuroHappold
- Operational Waste Management Strategy, BuroHappold
- Construction Waste Management Strategy, BuroHappold
- Construction Management Plan



- Delivering the most sustainable stadium in the Premier League in order to deliver on the objectives of LCC’s Climate Change Emergency and support the UK’s move towards carbon neutrality in 2050.
- Harnessing solar energy through the use of photovoltaic cells.
- Adopting an energy hierarchy during the design of the stadium to minimise energy demand and emissions.

- Energy Statement, BuroHappold
- Sustainability Statement, BuroHappold
- Transport Assessment and Travel Plan, Mott MacDonald
- Design and Access Statement, MEIS

Public Benefits

- Ensuring best in class construction practice, the structural design will maximise opportunities for resource efficiency throughout the construction process. The construction process will be low carbon, not just in offsite manufacture but also in the procurement requirements for low carbon concrete, asphalt, etc. A minimum of 90% of waste generated will be diverted from landfill.
- Strong commitment by the Club via the People’s Project to deliver the objectives set out in the Sustainability Performance Framework.
- Promoting the use of low carbon, sustainable transport modes to minimise transport related emissions, and encourage active travel choices from staff, fans and visitors.
- Minimising environmental impact of the earthworks for the dock infill.
- Reducing flood risk and the potential for natural disasters by raising site levels.
- Supporting the reuse and recycling of materials through the construction and operational stages of the People’s Project.



- Sensitive fish relocation from BMD following a two-step exercise, including a bubble curtain and managing noise and vibration during the construction process.
- Ongoing monitoring of water quality.
- Existing Dock sediment will remain, capped with a separation geotextile and marine-won sand fill placed on top. This strategy reduces the total volume of fill by approximately 25,000m3 and will reduce marine vehicular movements.

- Design and Access Statement, MEIS
- Aquatic Ecology Report, WYG and Carcinus
- Construction Management Plan



- The reinvention of the site will seek to protect natural capital and habitats.
- The site has a history of coal handling (for 140 years) and is a former Tar Works which includes made ground, comprising various quantities of reworked natural material, brick, concrete, coal, ash, clinker, wood fragments, slag etc. The both the made ground and Dock itself contain localised hydrocarbon contamination and the potential for gas generation. The remediation of the site provides an opportunity to enhance the use of the site as a habitat and for public use.
- Additional tree planning and vegetation as part of the new public realm which will offer the opportunity to create new biodiversity and habitats.
- The introduction of Cormorant Rafts into Nelson Dock to replace and lost habitats.
- Sensitive lighting to minimise the impact on bat roosts in the Hydraulic Engine House.

- Sustainability Statement, BuroHappold

Public Benefits



- Reducing crime will be a continued priority through the increased activity of EitC and the development of the GPLP.
- Supporting and catalysing the growth of EitC as a major community institution through the development of the GPLP and the new stadium.
- The stadium will be safe and secure for users - the principles of Secured by Design and Crime Prevention through Architectural Design to have been adopted to ensure the safety of users is paramount.
- Supporting the growth and success of the Club as a major institution and source of civic pride in the City.
- Supporting the growth and enjoyment of football and the Premier League as a major City and global institution – watched by more than 1bn people across the world.
- Societal Value of the Relocation of Everton Football Club, Real Worth
- Statement of Community Engagement, Influential



- Supporting increased participation and engagement as part of the People’s Project – supporting empowerment and the ownership of the People’s Project proposals.
- Growing the reach of EitC as a key pillar of the community.
- Promoting pro-environmental behaviours within the stadium, public realm and encouraging the use of sustainable modes of transport.
- Delivering almost £4m into the public purse through Council Tax and Business rates for reinvestment in the City.
- Providing private finance to bring the site and its heritage assets back into use.
- Supporting partnerships to deliver heritage benefits, including the University of Liverpool and National Museums Liverpool/
- Statement of Community Engagement, Influential
- EitC Growth Plans
- Design and Access Statement, MEIS

Source: CBRE

15.0 Weighing the harm and benefits

- 15.1 The UDP (statutory development plan) was adopted in 2002 and therefore does not reference the World Heritage Site, which was inscribed in 2004. The statutory development plan is therefore silent in relation to policies regarding the impact of proposed development upon the WHS and Buffer Zone. Although the Council has published the World Heritage Site Supplementary Planning Document (2009), this is noted as being interim guidance (para. 1.5.7) which also predates the NPPF and does not include the ‘weighing’ exercise between heritage harm and public benefits.
- 15.2 Furthermore, CBRE considers that the adopted ‘saved’ UDP policies relating to the impact of development upon heritage assets (Policies HD4, HD5, HD9, HD11 and HD17) are not consistent with the NPPF assessment of harm specifically in not enabling:
 - An assessment of whether the harm caused is ‘substantial’ or ‘less than substantial’; and
 - The public benefits of a proposal to be used in assessing whether the harm identified is ultimately outweighed by public benefits (paras. 194-196).
- 15.3 Due to the lack of relevant policies relating to the WHS and the UDP policies being silent regarding any assessment of harm against public benefits, it is CBRE’s position that in assessing heritage harm the application proposal is assessed against the NPPF.

NPPF ASSESSMENT

- 15.4 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)).
- 15.5 Paragraph 195 of the NPPF states that:

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:

 - a) the nature of the heritage asset prevents all reasonable uses of the site; and*
 - 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*
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.*
- 15.6 As identified in Section 13.0 of this Planning Statement, which summarises the findings of the Heritage Statement prepared by KM Heritage, the harm to the Grade II listed Bramley-Moore Dock retaining walls and the Stanley Dock Conservation Area arising from the application proposal is assessed to constitute ‘substantial harm’ and therefore paragraphs 194(a) and 195 of the NPPF are engaged.
- 15.7 The Heritage Statement does however also conclude that the proposed development will cause less than substantial harm to a number of other designated heritage assets, including the WHS. As such, paragraph 196 of the NPPF is also engaged, which requires the harm to be weighed against the public benefits of the proposal, including securing its optimum viable use where appropriate.

Weighing the harm and benefits

- 15.8 Therefore, it is necessary in weighing the assessed harm against the benefits to address the following key points arising from the relevant ‘engaged’ NPPF paragraphs:
- 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).
- 15.9 The overarching assessment is therefore set out below.

NECESSARY & EXCEPTIONAL

- 15.10 CBRE determines that there are two robust reasons why the substantial harm to designated heritage assets identified in submitted Heritage Statement is necessary and exceptional:
1. The Club must move from its existing long-standing home at Goodison Park given the acknowledged significant physical, operational and financial constraints; and
 2. A comprehensive Alternative Sites Assessment (‘ASA’) exercise has identified there to be no feasible, practical or realistic alternative sites to accommodate a new stadium for the Club within an agreed area of search.
- 15.11 Whilst both reasons are covered in detail within this Statement and supporting documents within the wider planning application submission, a summary is provided below.

1. Goodison Park

- 15.12 In relation to the first justification point, as summarised in Section 4.0 of this Statement, there are many significant reasons why the existing Goodison Park stadium is no longer appropriate for the Club, including:
- Insufficient capacity: current demand requires more than 50,000 seats;
 - Inadequate viewing experience: including poor sightlines, obstructed view of the pitch, narrow terrace widths, poor quality seats and lack of comfort;
 - Accessibility issues: issues relating to disabled access and seating, lack of dedicated facilities, poor quality and access to facilities, insufficient Information Communications Technology; constrained physical surroundings and inadequate team and players’ facilities; and
 - Commercial limitations: the Club’s Business Plan and sporting ambition to be competitive at the elite level of the English Premier League and European Club competitions mean that changes are required to the existing facilities, including corporate hospitality, retail, food & beverage offer and media.
- 15.13 Goodison Park is within a tight urban setting. Redevelopment or expansion of the existing stadium would require the purchase of properties and would involve significant site assembly issues.
- 15.14 Fundamentally though, expanding/redeveloping the existing stands would not address the critical limitations of the building, including poor sightlines, lack of accessibility, the ageing nature of the existing stands and insufficient front and back of house facilities.
- 15.15 Ultimately it has been accepted through the Kirkby Inquiry that incremental (individual stand renovation) or complete redevelopment cannot be physically or viably achieved at Goodison Park. Whilst it remains the Club’s home, it is not fit for purpose in the 21st century

Weighing the harm and benefits

in a global football industry which has and continues to rapidly commercialise. The Club needs to move or risk moving further behind the domestic and European elite teams.

- 15.16 Overall, therefore, the need for the Club to leave Goodison is wholly justified and is necessary in the context of NPPF.

2. Alternative Sites Assessment

- 15.17 The Alternative Sites Assessment ('ASA') submitted with the planning application is crucial in demonstrating that the assessed 'substantial' harm to designated heritage assets is necessary and constitutes exceptional circumstances (i.e. a lack of an alternative site to accommodate the proposed development).

- 15.18 In recognition of the importance of this assessment to the overall planning balance exercise, the applicant has undertaken extensive pre-application consultation with Liverpool City Council and Historic England to underpin the assessment methodology and agree, in principle, a defined of search for the ASA. The ASA methodology has been undertaken on the following basis:

- **Area of Search:** it was agreed, without prejudice, that the area of search for the ASA would extend beyond what is considered to be a robust and reasonable area of search ('Extended North Liverpool area') to include South Liverpool and the entire LCC administrative area, to ensure that all sites across LCC and in South Sefton are considered as part of the ASA (para. 5.60, p.42) following discussions with Historic England.
- **Site Identification:** sites were identified through consultation with Officers from LCC and Sefton MBC, a review of existing and emerging policy allocations and sites promoted through the development plan, a review of previous site searches conducted by the Club and a primary search using Land Insight software. A site size threshold of 8ha was used to identify sites which is the minimum size which could accommodate a 50,000+ capacity stadium with car parking, circulation space and ancillary facilities.
- **Site Assessment Criteria:** each site identified was assessed key planning considerations including site context, planning policy and allocation, statutory designations, strategic and regeneration context, planning history, development status, landowner / developer aspirations (where known), accessibility, other development issues and alignment with the Club's requirements (as set out in Figure 21 of the ASA). The site conclusions form a summary assessment that qualitatively and holistically considers whether each site is a feasible practical or realistic alternative for a stadium development, based on the key principles of the Brighton and Hove Albion call-in decision including⁴⁵:
 - Is the site large enough for the proposed stadium and parking?
 - Are there any overriding site-specific planning issues?
 - Is site acquisition a realistic proposition?
 - Can the stadium be built without incurring unaffordable development costs on the site?
 - Is the site accessible by sustainable modes of transport?
 - Would there be any unacceptable environmental or visual impacts?

⁴⁵ 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

Weighing the harm and benefits

- 15.19 The ASA identified 50 sites which were assessed based on the above methodology. The ASA robustly concludes that there are no alternative (realistic, practical or feasible) sites, either within an Extended North Liverpool catchment or a wider LCC authority area (para. 9.5, p.74) that can accommodate the minimum requirements for a new stadium development.
- 15.20 Accordingly the ASA, prepared using a robust methodology and comprehensive assessment, has clearly demonstrated that the assessed ‘substantial harm’ to designated heritage assets is necessary as there is simply no other realistic, practical or feasible alternative site to accommodate the proposed stadium development.
- 15.21 This lack of an alternative site, allied to the pressing need to relocate from Goodison Park constitutes a ‘wholly exceptional’ justification in accordance with the NPPF (paragraph 194); this is despite the requirement for ‘wholly exceptional’ circumstances not being required as the assessed harm to the World Heritage Site (WHS) is anticipated to be less than substantial and therefore paragraph 194(b) of the NPPF is not engaged.
- 15.22 Therefore, in isolation of the significant public benefits of the application proposal (and cumulatively with the Goodison Park Legacy Project benefits), the requirement of NPPF paragraph 194(a), for substantial harm to Grade II listed buildings to be exceptional, has been robustly demonstrated in this instance.

WEIGHING EXERCISE

- 15.23 Having conclusively demonstrated that the substantial harm to designated heritage assets is exceptional and necessary, the following considers whether the substantial harm to designated heritage assets is necessary to achieve substantial public benefits (NPPF para. 195); this is accordingly the ‘weighing’ exercise⁴⁶.

Definition of Public Benefits

- 15.24 Planning Practice Guidance (PPG) defines ‘public benefits’ as anything which delivers economic, social or environmental objectives and should flow from the proposed development. PPG states that such benefits should be of a nature or scale to be of benefit to the public at large i.e. not just a private benefit; however, they do not always have to be visible or accessible to the public in order to be a genuine public benefit. Examples include removing risks to a heritage asset, securing the optimum viable use of a heritage asset or sustaining or enhancing the significance of a heritage asset (para 020 Reference ID: 18a-020-20190723).

Public Benefits

- 15.25 Section 14.0 of this statement presents, in significant detail, the wider public benefits associated with The People’s Project, including those associated with the environment, social value, the economy, heritage assets and equality / diversity, which can all be considered ‘public benefits’ in the sense that they do not serve a private benefit.
- 15.26 The socio-economic benefits of the application will have a far-reaching geographical impact, extending beyond the LCC administrative boundary to benefit the City Region and North West. The benefits are particularly transformative when considering the impact they

⁴⁶ Consideration of points a – d of NPPF paragraph 195, as an alternative to the ‘weighing’ exercise, is not considered relevant to the proposed development.

Weighing the harm and benefits

will have upon priority regeneration areas, which include some of the most deprived parts of North Liverpool and the UK (application site located within the Kirkdale ward; Goodison Park located within the County ward).

- 15.27 This Statement, and the reports which accompany this submission, have demonstrated that The People’s Project will have impacts which transcend the physical development of a stadium building and redevelopment of an existing stadium site. The catalytic impact associated with bringing forward development in the Ten Streets SRF area and accelerating the development of a part of Liverpool Waters which was initially proposed to be the last phase of development, together with The People’s Project itself (including the Goodison Park Legacy Project), represents a generational opportunity to invest in, and transform, North Liverpool.
- 15.28 Therefore, it is concluded that the public benefits outweigh the assessed substantial heritage harm to the BMD dock walls and Stanley Dock Conservation Area; and the less than substantial harm to the Regent Road Dock Wall and the overall World Heritage Site on a clear and convincing basis as per paragraphs 194-196 of the NPPF.

16.0 Other Planning Considerations

- 16.1 The following section summarises the other planning considerations that should be taken into account when determining this planning application. Aside from the heritage impacts and public benefits case, other considerations are grouped as follows:
1. Principle of development;
 2. Design;
 3. Other environmental effects; and
 4. Overall compliance with the statutory development plan.

1. PRINCIPLE OF DEVELOPMENT

- 16.2 This section considers the principle of developing a 52,888 capacity stadium at the site of Bramley-Moore Dock. It assesses the proposed development against policies which are relevant to the proposed use and location of the site (with the exception of the heritage impacts and public benefits which are covered in Sections 13.0 - 15.0 of this Planning Statement). This section considers:

- Site Allocation;
- Proposed use:
 - Football Clubs
 - Visitor Economy
 - Waterfront
- Reuse of underutilised space;
- Interaction with the approved Liverpool Waters development; and
- Interaction with the Ten Streets SRF area.

Site Allocation

- 16.3 The application site is allocated in the UDP (2002) as an area of Port. **Policy E3** supports the continued growth and development of the ports in Liverpool. However, the Committee Report for the Liverpool Waters outline application (reference 10O/2424) identifies that:
- In relation to Nelson Dock and BMD (referenced as ‘Neighbourhood E’) this allocation ‘...is undoubtedly out of date’ (pg. 111); and
 - ‘It should be noted that the Port Land allocation of Neighbourhood E no longer forms part of Peel’s Mersey Ports Master Plan.’ (pg. 112). The Report identifies that the site is physically separated from the operational Seaforth Docks by the Wastewater Treatment Works.
- 16.4 This is reiterated in the Peel Ports ‘Mersey Ports Master Plan: A 20 year Strategy for Growth’ (2011), which shows that BMD is within the Liverpool Waters area, rather than the operational Port.
- 16.5 The site is also located within the Developed Coastal Zone. **Policy OE4** establishes that the Council will support the restructure and regeneration of this area and support proposals which enhance its environmental quality, tourism potential and recreational facilities, particularly those which lead to improvements in the accessibility of the coast.

Other Planning Considerations

- 16.6 The remainder of this section demonstrates the compliance of the proposed development with Policy OE4 in relation to the regeneration of the area and introduction of a development with significant tourism and recreational potential.

Proposed use

Football Clubs

- 16.7 **UDP Policy C7** establishes that the City Council will assist both football clubs (Liverpool and Everton) in progressing development proposals, providing that these do not adversely affect residential amenity or conflict with other UDP policies. This is reiterated in the **emerging Local Plan**, which recognises in its Vision that there is a need for the sustainable development and redevelopment of unique and important assets in the city, including its football stadia.
- 16.8 The proposed development adheres to **emerging Local Plan Policy EC3** which establishes that the development of tourism and the visitor economy will be supported, including Everton Football Club, which will be supported and where appropriate protected and enhanced. **Emerging Policy EC4** also supports the sustainable development or redevelopment of Everton Football Club, providing that the proposals are of an appropriate scale, and subject to other relevant planning policies.
- 16.9 The importance of football is noted in the **LCR Growth Strategy (2016)** as a key cultural asset for the region.
- 16.10 As stated in Section 4.0 and 15.0, the redevelopment of Goodison Park is not considered possible and therefore the future of the Club must be at an alternative site, of which only BMD is considered a feasible, practical and realistic proposition.

Visitor Economy

- 16.11 The need to promote tourism and the visitor economy is identified in **UDP Policies E9** and **GEN1**, as well as the **emerging Local Plan** (policies EC4 and SP1). The importance of the visitor economy to the City Region is reflected across economic strategies, including the **LCR Growth Strategy (2016)**, which identifies the Visitor Economy as a strength of the region that has huge potential for growth. The vision of the strategy is for the City Region to become an internationally renowned thriving and vibrant destination for business and leisure visitors.
- 16.12 The **Strategic Investment Fund (SIF) Strategy (2018)** identifies the Visitor Economy sector as a priority for growth. Furthermore, the **Visitor Economy Investment Plan for Growth 2016-2025 (2016)** demonstrates the importance of this sector to the economy of the City Region.
- 16.13 The proposed development will not only contribute to the growth of the visitor economy through the hosting of football matches with a capacity of 52,888 people, but also through major events (other sporting events, music etc.) and the day-to-day use of the stadium. The latter includes the events listed in Section 5.0, such as conferences, weddings, stadium tours and exhibitions / conventions.
- 16.14 The attraction of the proposed development extends beyond the physical stadium building. The Hydraulic Engine House will be open as an exhibition / cultural centre throughout the year and will be an iconic start / end point to the proposed River Walk. The ability to access and appreciate the site throughout the year is a significant benefit of the project and is anticipated to have a positive impact on the visitor economy.

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- 16.15 The submitted Economic Impact Assessment considers that The People’s Project will attract 1.4m visitors to the city, which will deliver substantial benefits in terms of visitor expenditure for the city, including through the use of hotels, restaurants and visiting other attractions in the city.

Waterfront

- 16.16 **UDP Policy OE4** states the Council will support the Mersey Coastal Zone’s tourism potential and recreational facilities. **Policy GEN1** identifies the waterfront and docks as a Regeneration Area, where available resources should be concentrated. The need to support investment in the Waterfront area is reiterated in the Vision for the **emerging Local Plan**.
- 16.17 The importance of the waterfront to the City Region is recognised in Economic Strategies, including the **LCR Growth Strategy (2016)**, which identifies the waterfront as a key asset in which to deliver future development. The Growth Strategy supports developing key assets, amenities and attractions on the Waterfront.
- 16.18 The **Visitor Economy Investment Plan for Growth 2016-2025 (2016)** identifies the waterfront as an asset which makes it distinctive and therefore it forms part of the core proposition for the City Region.
- 16.19 Within the City Council’s **Inclusive Growth Plan (2018)** the Council will look to develop key economic sites, including the waterfront, by strengthening the offer of the waterfront with new developments, such as the proposed new stadium at BMD.
- 16.20 The proposed development of an iconic stadium for a world-renowned football club on the city’s waterfront therefore fulfils the aims and vision for the waterfront area, as set out in adopted and emerging policy and the economic strategies for LCC and LCR.

Reuse of underutilised space

- 16.21 The application site is under-utilised and semi-derelict. It is inaccessible to the public and contains heritage assets which are deteriorating. It is a brownfield site with an extensive history of heavy industrial activity and associated contamination (dock sides and within waterbody). The proposed development seeks to remediate the site and restore the Grade II listed Hydraulic Engine House. The proposals also seek to bring the site into public use, allowing the appreciation of the site’s heritage assets and waterfront location.
- 16.22 The reuse of this site aligns with **UDP Policy GEN8**, which seeks to recycle land for productive use. The proposed development also meets the requirements of **UDP Policy EP1**, which encourages the reclamation of derelict land and the restoration of neglected land, to be redeveloped for alternative uses. This approach is supported in the **NPPF** which seeks to make effective use of land and supports opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (para. 118).
- 16.23 The proposed remediation of the site and introduction of year-round access and activity to a key waterfront location are therefore considered to comply with national and local policy regarding previously developed sites.

Liverpool Waters

- 16.24 Chapter 2 of the submitted ES (Volume II) details the methodology used in the technical assessments and explains how the approved Liverpool Waters scheme (permission reference 10O/2424, latest Non-Material Amendment is 19NM/1121) has been considered as a cumulative development.

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- 16.25 The assessments have included the following scenarios (detailed further in Chapter 2 of the ES):
- Baseline (do nothing scenario);
 - Future Baseline (the Liverpool Waters consent);
 - The proposed development scenario (based on the proposed stadium but no further elements of Liverpool Waters built in the surrounding area);
 - The proposed development + Liverpool Waters; and
 - The proposed development + Liverpool Waters + other cumulative developments.
- 16.26 The assessments submitted as part of this planning application assume that the approved development blocks cannot be delivered on BMD as the stadium development would be delivered instead. However, the approved Northern Docks neighbourhood of Liverpool Waters includes development blocks that straddle the red line boundary of the BMD application site and Nelson Dock. Chapter 2 of the ES (Volume II) details how these blocks have been considered in the assessment, which has been to scale back these blocks which encroach into BMD, to the redline boundary. An offset of these blocks in Nelson Dock from the red line boundary with BMD may be required and the extent determined based on the findings of the EIA and further discussion with Peel Land & Property. As such, the scenario that has been assessed (development blocks in Nelson Dock built up to the redline boundary) is considered a worst-case scenario.
- 16.27 Section 3.0 of this Planning Statement identifies the permitted development for the Northern Docks area (Figure 3.2). However, this permission states the quantum of development for the Northern Docks neighbourhood and does not quantify the amount of development approved for BMD or Nelson Dock individually. Therefore, in terms of assessing the impact of the stadium development upon the ability for Liverpool Waters to be delivered in accordance with the approved quantum of development, it is assumed that the amount of development which could have been accommodated on BMD will be redistributed elsewhere within the Northern Docks neighbourhood. Therefore, it has been assumed that the development of the proposed stadium at BMD will not affect the delivery of the approved quantum of development elsewhere in Liverpool Waters.
- 16.28 In terms of the delivery of the approved residential development at BMD as part of the Liverpool Waters permission, this was identified in the approved parameters plan as being delivered in the period 2036-2041. This does not therefore affect the five year housing land supply for the authority and is indeed well beyond the plan period for the emerging Local Plan (2013 – 2033).
- 16.29 The stadium development will not therefore have an adverse impact on the authority's ability to meet national requirements regarding housing delivery.
- 16.30 In terms of conformity with the Liverpool Waters permission (latest non-material amendment reference 19NM/1121), the proposed stadium development is not an approved use and does not comply with the approved parameter plans in terms of extent or height. However, as stated in Section 5.0 of this Planning Statement, the approved maximum height for building plots within BMD as part of the Liverpool Waters permission was 38m; therefore the proposed stadium max height of 46.86m high exceeds the maximum approved height by only 8.86m.
- 16.31 Although not conforming with the approved use or massing of Liverpool Waters, the proposed development has been designed to accommodate and interact with the approved

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development at Nelson Dock (up to the application red line boundary). The inclusion of a River Walk through the site, which connects BMD to the wider Liverpool Waters area, is proposed in accordance with the requirement for Peel to provide the Merseyview Esplanade throughout Liverpool Waters. The Hydraulic Engine House, once renovated and reopened to the public, will act as the start or end point to the walk, which will stretch from BMD to the city centre, once the remainder of Liverpool Waters is developed. The River Walk is anticipated to attract visitors on non-match days and is an important aspect of the proposed development as it encourages activity throughout the year and allows the public to visit and interact with the heritage features at the site and the northern part of the WHS, which are currently inaccessible and unlikely to be delivered until 2036 (in accordance with the approved phasing plan).

- 16.32 The provision of the River Walk also accords with the Vision of the **emerging Local Plan Policy** for the 'Waterfront and its Fringes' sub-area and **Policy CC10**. Furthermore, the proposed stepped access along the western plaza (eastern edge of the water channel), accords with **emerging Local Plan Policy CC11**, which encourages the use of stepped dockside structures to gain access to the water level in order to enhance the interpretation of the cultural heritage of the historic dockland environment.
- 16.33 As detailed in Section 14.0 of this Planning Statement and the submitted Economic Impact Assessment, the catalytic impact of the stadium upon the northern part of the Liverpool Waters development has also been considered. The proposed stadium development is anticipated to accelerate the development of this part of Liverpool Waters.
- 16.34 Furthermore, in accordance with the approved phasing plan for Liverpool Waters, development at BMD was not expected to come forward for development until the 2036-2041 period. This is a significant time period in the delivery of development on the site, within which the site could remain derelict and key assets such as the Hydraulic Engine House could be subject to further deterioration.

Ten Streets

- 16.35 The **Ten Streets SRF** (2017) states that the stadium:
- '...has the potential to have a transformational effect on the North Docks and the framework area' (p.54); and
 - '...has the potential to facilitate rapid change, creating a catalyst that will accelerate the redevelopment of the wider framework area' (p.135).
- 16.36 The SRF notes that the Ten Streets area has the potential to support the proposed new stadium and assist in providing the connectivity and the types of facilities required.
- 16.37 The proposed development therefore supports the principles of the Ten Streets SRF and **emerging Local Plan Policy CC13**.
- 16.38 The submitted Economic Impact Assessment considers the potential catalytic impact of the stadium development upon the Northern Ten Streets area, defined as the area to the north of the Titanic Hotel. This is also summarised in the submitted Design & Access Statement.
- 16.39 The Economic Impact Assessment notes that speculative developers have already acquired and are proposing to develop sites in the Northern Ten Streets area on the basis of a new stadium being delivered at BMD, with land values being seen to reflect this. This demonstrates the potential significant regenerative impact that a new stadium could have upon this area, which the Assessment considers to be significant and which shows the

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additional value of the new stadium and its potential for wider transformational change in North Liverpool.

2. DESIGN

- 16.40 The submitted Design & Access Statement, prepared by Meis Architects, comprehensively considers the proposed design and appraises this against planning policy, including the World Heritage Site SPD (2009) and national policy, including the National Design Guide (2019).
- 16.41 This section of the Planning Statement does not seek to replicate this analysis, or that included within Section 13.0 of this Planning Statement and instead focuses on the following design-related issues:
 - Townscape & Visual Impact;
 - Daylight, Sunlight & Overshadowing;
 - Crime / Anti-Social Behaviour / Anti-Terrorism;
 - Crowd Control; and
 - Lighting.

Townscape & Visual Impact

- 16.42 There are several policies which seek to protect important views and vistas affecting listed buildings and within Conservation Areas and the city centre. This includes **UDP Policy HD11, HD18 and HD5**. The **NPPF** promotes development which is sympathetic to local character and history, including the surrounding built environment and landscape setting (paras. 127 & 192).
- 16.43 Further detail is provided in **emerging Local Plan Policy HD2**, which states that development with an adverse impact upon the views of the Waterfront or key Landmark buildings and vistas (with regard to the WHS SPD) will be refused. Furthermore, **emerging Local Plan Policy UD6** requires new tall buildings to make a positive contribution to the streetscape and skyline of Liverpool.
- 16.44 The Council defines tall buildings which are ‘high-rise’ as those which are significantly taller than surrounding buildings, typically of 15 storeys or 45m or higher (WHS SPD, para. 4.6.3). At 46.86m high, the stadium building is therefore considered high-rise; albeit only slightly exceeds this threshold.
- 16.45 In accordance with emerging Policy UD6, a Townscape & Visual Impact Assessment (TVIA) has been carried out which also considers cumulative developments (ES Chapter 17). The viewpoints used in this assessment have been based on those detailed in the **World Heritage Site SPD (2009)** and have been agreed with LCC as part of the pre-application process.
- 16.46 The TVIA considers the impact of the proposed development during both the construction and operational phases. During the construction phase, in the Proposed Development Scenario, it is concluded that there will be significant adverse impacts on the BMD waterbody & associated dock walls, the Hydraulic Engine House, the Waterfront and its Fringes City Centre Character Area, the WHS SPD Character Area 3 (Stanley Dock Conservation Area), Viewpoint 3 (Regent Road), Viewpoint 8 (Bascule Bridge), Viewpoint 26 (Trafalgar Dock) and Viewpoint 27 (south-western edge of Trafalgar Dock). However, these affects are short-term as they relate to the construction period only.

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- 16.47 The operational period of the Proposed Development Scenarios anticipated to result in adverse impacts (significant) for some receptors, including:
- Major adverse impact on the BMD waterbody and associated dock walls;
 - Moderate adverse impact on Viewpoint 3 (Regent Road) on a match day (day and night-time); and
 - Moderate adverse impact on Viewpoint 8 (Bascule Bridge) on a match day (day and night-time) and non-match day (night time);
- 16.48 There are several beneficial (significant) impacts on the townscape character and viewpoints identified as a result of operational phase of the Proposed Development Scenario, including:
- Moderate beneficial impact on the Hydraulic Engine House;
 - Moderate beneficial impact on the Waterfront and its Fringes City Centre Character Area;
 - Moderate beneficial daytime impact on the Residential Docks Townscape Character Area – in the daytime (match / non-match day) and at night on a match day;
 - Moderate beneficial impact on Viewpoint 3 (Regent Road) on a non-match day at daytime;
 - Moderate beneficial impact on Viewpoint 8 (Bascule Bridge) on a non-match day at daytime;
 - Moderate beneficial impact on Viewpoint 26 (Trafalgar Dock);
 - Moderate beneficial impact on Viewpoint 27 (south-western edge of Trafalgar Dock); and
 - Major beneficial impact on the WHS SPD Character Area 3 (Stanley Dock Conservation Area).
- 16.49 Overall, the TVIA concludes that significant townscape and visual effects are likely to occur within the local environs of the site only.

Daylight, Sunlight & Overshadowing

- 16.50 In accordance with **UDP Policy HD18**, the proposed development has been designed to avoid severe loss of amenity or privacy to adjacent residents in terms of Daylight, Sunlight & Overshadowing and has considered the impact on both existing residents in the local area and also potential future residents associated with the approved Liverpool Waters development at Nelson Dock.
- 16.51 In relation to tall buildings, the World Heritage Site SPD states that new development should not obscure, detract from or overshadow the city's skyline (para. 4.6.19). **Emerging Local Plan Policy UD2** requires development proposals to demonstrate the establishment of sufficient sunlight and daylight. In accordance with these policies, a Daylight, Sunlight & Overshadowing assessment has been carried out and is reported in ES Chapter 15.
- 16.52 The assessment concludes that the residual impact of the completed development upon both daylight and sunlight levels is anticipated to be negligible.

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Crime / Anti-Social Behaviour / Anti-Terrorism

- 16.53 Paragraph 95 (and footnote 41) of the **NPPF** require developments to take account of security and defence requirements, particularly for areas where large numbers of people will congregate, including at stadia.
- 16.54 Counter terrorism measures have been incorporated into the design and proposed security strategy. The proposed strategy has been developed following consultation with the Merseyside Police Counter-Terrorist Security Advisor and the Design out Crime Officer as well as Officers from LCC's Building Control team.
- 16.55 In relation to crime specifically, the **NPPF** (para. 127(f)) requires developments to ensure that crime, or the fear of crime, do not undermine quality of life, community cohesion or resilience.
- 16.56 In accordance with the NPPF and **UDP Policy HD20**, the submitted Security Planning Report, prepared by Buro Happold, identifies potential security threats and proposes a series of measures to reduce the associated risks, following extensive consultation with Merseyside Police.
- 16.57 Proposed measures include Vehicle Access Control Points within the site; establishment of road closures prior to, during and after an event; installation of temporary Hostile Vehicle Mitigation measures on adjacent roads outside of the site during road closure periods; search and screening of vehicles and visitors (including bag searches); the extensive use of CCTV; site boundaries which allow the site to be secured if necessary; appropriate training and briefing of staff; and access control to different areas of the stadium building.
- 16.58 Furthermore, appropriate levels of lighting are to be used internally and externally, to assist both natural and remote surveillance.
- 16.59 The proposed development will bring public activity to a currently inaccessible site, which will provide the opportunity for passive and natural surveillance to deter crime or the fear of such activity in the area.
- 16.60 The Security Strategy demonstrates that consultation has been undertaken with relevant statutory bodies to develop a robust strategy to minimise security threats, in accordance with current best practice and design.

Crowd Control

- 16.61 Public safety should be promoted in new developments (**NPPF** para. 95). Extensive crowd modelling has been undertaken to inform the proposed development, ensuring that safe egress from the stadium building and site can be achieved, in accordance with relevant guidance.
- 16.62 The crowd modelling has been used to inform the minimum width, location and number of the proposed openings required through the Grade II listed Regent Road, to enable safe and timely egress from the site, based on the stadium building being used at full capacity.
- 16.63 Crowd disaster and violence has been considered as part of the EIA. The Transport chapter of the ES (Chapter 7) proposes the adoption of crowd safety policies and measures to minimise the risk of crowd disaster and violence. This includes the creation of an Event Safety Policy, Event Day Contingency Plan, Event Transport Strategy, the Club's Safety Policy and its Working Contingency Plan.
- 16.64 With these measures in place, the ES Chapter concludes that crowds will move through a managed environment with police and crowd and traffic marshals controlling traffic and

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pedestrian movement and reducing risk of disaster. Through this mitigation, it is considered that there are sufficient measures and controls in place that would effectively manage the risk of crowd disaster or violence occurring and mitigate the impact should such an event occur.

Lighting

- 16.65 A lighting assessment has been carried out to understand the impact of the proposed lighting upon existing and future receptors and to ensure that light spillage is minimised, in accordance with **UDP Policy HD28** and the **NPPF** (para. 180).
- 16.66 As well as amenity impacts, a key consideration is that the lighting provision is the minimum required for operational and safety reasons.
- 16.67 The Lighting ES Chapter (Chapter 16) identifies several mitigation measures to reduce the potential for adverse effects associated with lighting. For the construction period this includes angling lights to point into the site, switching lights off outside of working hours and using LED energy efficient lights. These measures can be secured via a Construction Environmental Management Plan (CEMP). During operation, the lighting impacts will be mitigated through adherence to a curfew, with lights closest to the committed development at Nelson Dock (Liverpool Waters) on the East Quay being switched off after 11pm.
- 16.68 Following the implementation of these mitigation measures, the residual lighting impacts are expected to be negligible to minor adverse during the operation of the stadium development.

3. OTHER ENVIRONMENTAL EFFECTS

- 16.69 In accordance with **UDP Policy EP15** and relevant legislation, this application is accompanied by an Environmental Impact Assessment (EIA) which considers the potential environmental impacts arising from the proposed development. Details of the impacts and proposed mitigation measures are provided in the Environmental Statement (Volumes 2 & 3). The following provides a brief summary of the environmental effects against the policy requirements at national and local levels.

Transport

- 16.70 In accordance with requirements of **UDP Policy T15** and the **NPPF** (para. 111), the impact of the proposed development upon the highway network has been considered in the Transport Assessment.
- 16.71 The match day transport strategy encourages sustainable modes of transport, including walking, cycling, bus / shuttle bus and rail. Within the site, 152 cycle spaces will be provided initially, with potential to increase the provision if demand increases. A two-tier cycle shelter will be available for staff use, which will accommodate 30 bicycles. This quantum has been proposed following discussions with Highways and Planning Officers at LCC.
- 16.72 As detailed in Section 5.0 of this Statement, the match day rail strategy includes the use of an external corralling area on land adjacent to Sandhills Station to manage the use of this station in the post-match period by arranging queues and marshalling people at the appropriate time to board a train.
- 16.73 The strategy to encourage use of these sustainable modes of transport on both event and non-event days accords with **UDP Policies GEN6, T6** and **T7** and the **NPPF** (Chapter 9 & para. 91).

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- 16.74 In accordance with **UDP Policy T4**, the match day transport strategy has identified three locations for taxi rank facilities at Boundary Street, Dublin Street and Sandhills Lane.
- 16.75 In accordance with **UDP Policy C7⁴⁷**, a strategy has been devised to reduce the impact of match day parking on the local area through a series of proposed road closures and parking restrictions in surrounding roads, to prevent visitors from parking within residential and business areas.
- 16.76 Regarding on-site parking, the proposed development includes an integrated multi-storey car park and an area of surface car parking, which combined provide 481 spaces. This amount of parking is considered suitable to meet the needs of the Club and accords with the considerations of **UDP Policy T12**. Of these spaces, 70 (14.5%) will be accessible bays. This exceeds the requirement of **UDP Policy T13** and the Council's **Ensuring a Choice of Travel SPD (2008)**. The location of the accessible bays in the multi-storey car park is close to the lifts and entrance to the stadium, as required in **UDP Policy T13**.
- 16.77 Furthermore, of the 481 car parking spaces proposed, 24 will include electric vehicle charging points. Four of these spaces will be accessible bays. Such provision aligns with the **NPPF** (para. 110(e)). The proposed provision of charging points equates to 5% of the total car parking spaces proposed and accords with **emerging Local Plan Policy TP8**.
- 16.78 The Transport Assessment concludes that there is sufficient capacity on the transport network in the area to serve the new stadium at BMD. Through the measures proposed the target mode splits can be achieved for each mode of transport. Furthermore, the supporter travel survey (which informs the Transport Assessment), identifies a potential modal shift with fans looking to reduce journeys made by car (69% modal share at Goodison Park compared with 43% anticipated modal share at BMD), in favour of travelling by train or bus to BMD.
- 16.79 Therefore, the proposed development is considered acceptable in terms of highways impact.

Noise

- 16.80 A Noise Assessment has been carried out to identify the potential impact of the proposed development and propose suitable mitigation measures, to ensure that the development accords with **UDP Policy EP11** by protecting amenity and environmental health.
- 16.81 The Noise Assessment, as reported in ES Chapter 9, identifies several potential sources of noise, including noise associated with construction activities, traffic associated with events and noise associated with crowds, use of the PA system and noise levels from events within the stadium.
- 16.82 For the construction phase, suggested mitigation includes the use of best practice measures to minimise noise impacts. Such measures can be secured via a CEMP. In addition, a 2.4m solid hoarding is proposed to be erected around the site boundary during construction.
- 16.83 To restrict noise impacts during operation, it is proposed that noise limits are set in relation to breakout from building services plant, conference and exhibition spaces, to achieve levels at least 10db below background noise levels. This restriction could be secured via a planning condition.

⁴⁷ However, as noted in Appendix 2, the proposed development does not fully comply with Policy C7.

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- 16.84 The proposed development is anticipated to have significant major / moderate adverse noise impacts which would affect a small number of receptors. However, these impacts are associated with the match / event day operations within the stadium, in the period leading up to the match / event and during the match / event itself and therefore will not be constant. As a result, it is not considered that this impact is unacceptable to the level which would warrant refusal of the planning application. Therefore, the proposed development complies with Policy EP11.

Air Quality

- 16.85 **UDP Policy EP11** also relates to air quality and establishes that developments which have potential to generate unacceptable air pollution will be resisted. To demonstrate accordance with this policy an Air Quality Assessment has been carried out and the findings are reported in ES Chapter 8.
- 16.86 For the construction period, proposed mitigation measures include establishing a routing plan for construction vehicles, to avoid the Sefton Air Quality Management Area (AQMA) and the use of best practice methods to limit dust emissions during demolition and construction works, to be incorporated into a CEMP.
- 16.87 In accordance with the requirements of the UDP and **NPPF** (para. 180), suitable mitigation measures have been proposed to minimise the impact of the development upon air quality.
- 16.88 Following the adoption of the recommended mitigation measures during the construction phase, the development is not considered to be contrary to any of the national, regional or local planning policies.

Ground Conditions

- 16.89 In accordance with **UDP Policy EP2** the Environmental Statement includes several assessments regarding contaminated land, which accompany ES Chapter 10 'Ground Conditions'.
- 16.90 As required in the **NPPF** (para. 170), despoiled, degraded, derelict, contaminated and unstable land should be remediated and mitigated, where appropriate. The submitted information relating to ground conditions acknowledges that the responsibility for securing a safe development rests with the developer and/or landowner (**NPPF** para. 179).
- 16.91 Following the implementation of mitigation measures, secured through the production of a Remediation Strategy, Verification Report and CEMP, the residual environmental impacts upon ground conditions are anticipated to be negligible.

Flood Risk

- 16.92 The prevention of flooding is detailed through **UDP Policy GEN8** and **EP13**, which require developments to avoid being at adverse risk of flooding, including avoiding increasing the risk of flooding in the surrounding area. This is reiterated in the **NPPF** (para. 163).
- 16.93 In accordance with the **NPPF** (para. 163) a site-specific Flood Risk Assessment has been produced which considers the risk of flooding at the site, the potential impacts of the proposed development and proposes suitable mitigation measures.
- 16.94 In addition to measures which are inherent in the design, including the establishment of raised site levels in certain areas to 7.3m AOD finished floor level (following consultation with the Environment Agency and LCC as Lead Local Flood Authority (LLFA)), suggested mitigation includes establishing a flood warning and emergency plan prior to occupation;

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raising of sensitive equipment at ground floor; and restriction of access in certain areas during storm events.

- 16.95 In accordance with **UDP Policy EP12** development must not adversely affect the quality or supply of surface water or ground water. The **NPPF** encourages the use of sustainable drainage systems, unless there is clear evidence that this would be inappropriate (para. 165).
- 16.96 The submitted Drainage Strategy has considered a range of sustainable drainage options, in accordance with national policy. As agreed with the Environment Agency, LCC and United Utilities, the surface water will discharge into the tidal River Mersey, via the wider dock network. In addition, the water channel within the site will act as a retention pond and will deliver a benefit to water quality by settling out silt and trapping debris before discharge into adjacent docks. The drainage system has also been designed to accommodate climate change.

Archaeology

- 16.97 In accordance with **UDP Policy HD17** and the **NPPF** (para. 189), an Archaeological Desk Based Assessment and associated ES Chapter (Chapter 19) have been produced to assess the archaeological implications of the proposed development.
- 16.98 Several mitigation measures are proposed, to be secured via a planning condition, including sampling / selective excavation to identify and record heritage assets; conducting a historic building survey; implementation of an archaeological watching brief; and evaluation trenching (followed by full excavation if appropriate).
- 16.99 Following the implementation of the proposed mitigation measures, the anticipated residual impact is negligible.

Ecology

- 16.100 The ecological assessments which accompany this application consider the impact of the proposed development upon aquatic and terrestrial ecology in light of **UDP Policies OE5, OE6** and **OE7**, which seek to protect nature conservation sites, habitats and protected species.
- 16.101 Following consultation with Natural England and the Merseyside Environmental Advisory Service (MEAS), the assessments consider the impact of the proposed development on the following nearby designations:
 - Mersey Narrows & North Wirral Foreshore SPA (Special Protection Area) & Ramsar;
 - Mersey Estuary SPA;
 - Liverpool Bay SPA;
 - Ribble & Alt Estuaries SPA & Ramsar;
 - Mersey Narrows SSSI (Site of Special Scientific Interest); and
 - North Wirral Foreshore SSSI.
- 16.102 The ecological assessments, as reported in ES Chapters 12 & 13, align with the requirements of the **NPPF** (para.175) in identifying the requirement for avoidance of harm, mitigation or compensation.
- 16.103 During construction, a range of mitigation measures are proposed, including:

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- Establish 2 floating pontoons in neighbouring docks;
 - Remove vegetation outside of bird breeding seasons;
 - Provide alternative bat roosts (5 no.) and supervising works that may affect roost space;
 - Apply for a European Protected Species Licence in relation to bats;
 - Undertake fish rescues and translocations during construction;
 - Installation of a bubble curtain to prevent fish from re-entering;
 - Water quality monitoring throughout construction; and
 - Implementation of a CEMP to resolve any incidents of environmentally harmful substances affecting fish species.
- 16.104 Several mitigation measures are also proposed during the operational phase, including the use of non-reflective glass or installation of patterning, fritting, UV glass or netting on the exterior façade. An additional mitigation measure is that during operation, hydrological connectivity between Nelson Dock and Sandon Half-Tide Dock will be re-established. Flow will be governed by a series of submerged pipes installed within the western water channel.
- 16.105 Following the implementation of these measures, the residual impacts on aquatic or terrestrial ecology are anticipated to be negligible or not significant.

Wind

- 16.106 The **World Heritage Site SPD (2009)** establishes that new tall buildings should not have a negative impact on microclimate, particularly key pedestrian routes and public spaces (para. 4.6.19). This is reiterated in **emerging Local Plan Policy UD5** which lists a series of criteria for new development proposals, including that micro-climate issues have been considered.
- 16.107 In accordance with these material considerations, a comprehensive wind assessment has been conducted using both CFD modelling and wind tunnel testing (Chapter 14 of ES Volume II). Following this the layout and design of the proposed development was amended to mitigate unsafe wind exceedances, including the relocation of the MSCP, which was originally proposed as a separate structure on the western quayside of BMD to an integrated car park within the West Stand of the stadium building. Additional design interventions include wind baffles, tree planting and porous screens, fences and gates.
- 16.108 Additional mitigation measures include the establishment of a robust monitoring process to monitor wind conditions. This will be used to trigger restrictions to public access to some amenity spaces around the site in high wind speed conditions. With this system in place, the terrace level amenity areas within the stadium and the ground level amenity space to the west of the stadium will only be accessible when wind conditions are safe and suitable for sitting use (ground level) or sitting / standing use (terrace level).
- 16.109 As such, the wind conditions at the site have been taken into account from an early stage in the design process, with design interventions and additional management measures proposed to mitigate the adverse wind impacts identified.

4. OVERALL COMPLIANCE WITH THE STATUTORY DEVELOPMENT PLAN

- 16.110 Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town & Country Planning Act (1990) require applications to be determined in

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accordance with the statutory development plan, unless material considerations indicate otherwise.

- 16.111 Appendix 2 of this Planning Statement assesses the proposed development against relevant policies of the statutory development plan. This demonstrates that generally the proposed development complies with the statutory development plan; however, there are twelve UDP policies which the proposed development does not fully comply with. These policies are:
- **GEN2:** Open Environment
 - **GEN3:** Heritage and Design in the Built Environment
 - **E3:** Port Development
 - **E9:** Leisure Development
 - **HD4:** Alterations to Listed Buildings
 - **HD5:** Development Affecting the setting of a Listed Building
 - **HD8:** Preservation and Enhancement of Conservation Area
 - **HD9:** Demolition of Buildings in Conservation Areas
 - **HD11:** New Development in Conservation Areas
 - **HD18:** General Design Requirements
 - **S12:** Out-of-Centre Retailing
 - **C7:** The Football Clubs
- 16.112 In many cases, the proposed development complies with the majority of the policy but as one or two criteria are not satisfied a conclusion has been drawn that the proposed development is not fully compliant. Some of the other policies which the proposed development does not comply with are considered out-of-date.
- 16.113 The Summary Conclusions of this Planning Statement are set out in the next section, demonstrating how the degree of compliance of the proposed development with the UDP should be considered in determining this application.

17.0 Summary Conclusions

- 17.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town & Country Planning Act (1990) require applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.
- 17.2 Appendix 2 and Section 16.0 have demonstrated that generally the proposed development is in accordance with the UDP, with the exception of 12 policies, many of which relate to heritage. As established in legislation, the application must be determined with regard to the statutory development plan unless material considerations indicate otherwise.
- 17.3 A key material consideration in this case is the National Planning Policy Framework (NPPF). The NPPF (para. 11d) state that where there are no relevant development plan policies, or the policies most important for determining the application are out-of-date, permission should be granted, unless:
- i. the application of policies in the NPPF which protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against NPPF policies as a whole.
- 17.4 The most important policies for the determination of the proposed development relate to heritage assets, as the site is located within the Liverpool Maritime Mercantile City World Heritage Site (WHS), within the Stanley Dock Conservation Area, contains several Grade II listed assets and is within an area containing numerous listed buildings.
- 17.5 As detailed in Section 15.0, the heritage policies of the statutory development plan (UDP, 2002) can only be given limited weight and are considered out-of-date due to their lack of consistency with the NPPF and absence of policies regarding the WHS. Although the Council published the World Heritage Site Supplementary Planning Document in 2009, this is noted as being interim guidance (para. 1.5.7) which also predates the NPPF and does not include the 'weighing' exercise between heritage harm and public benefits.
- 17.6 Furthermore, the site allocation policy (UDP Policy E3) relating to Port use of BMD is considered out-of-date, as noted in the Liverpool Waters Committee Report (application reference 10O/2424).
- 17.7 Therefore, CBRE concludes on the basis of the above that paragraph 11d of the NPPF is engaged.

HERITAGE CONSIDERATIONS

- 17.8 The following summarises the appraisal of the proposed development against NPPF policies which protect areas / assets of particular importance (para. 11d(i)), which is detailed in Sections 13.0 to 15.0 of this Statement:
- **Heritage considerations:** The submitted Heritage Statement and ICOMOS Heritage Impact Assessment consider the impact of the proposed development upon the identified heritage assets, taking account of the various mitigation measures inherent in the design. The assessments have identified that the proposed development will result in substantial harm upon the Grade II listed BMD retaining walls and the Stanley Dock Conservation Area. It is anticipated that the proposed development will result in less than substantial harm to the UNESCO World Heritage Site, the Grade II listed Regent Road Dock Wall and the setting of the Grade II listed Hydraulic Engine House.

Summary Conclusions

- **The Need to Move:** The requirement for Everton to develop a new stadium is long-standing and the search for an alternative site began over twenty years ago. The significant constraints of Goodison Park include:
 - Its limited capacity;
 - Inadequate viewing experience;
 - Accessibility issues;
 - Insufficient facilities; and
 - Commercial limitations in an increasingly competitive environment.

Ultimately it has been accepted through the Kirkby Public Inquiry⁴⁸ that incremental (individual stand renovation) or complete redevelopment cannot be physically or viably achieved at Goodison Park. Whilst it remains the Club's home, it is not fit for purpose in the 21st century in a global football industry which has and continues to rapidly commercialise. The Club needs to move or risk falling further behind the domestic and European elite teams and sporting brands.

Overall, therefore, the need for the Club to leave Goodison Park is wholly justified and is necessary in the context of NPPF.

- **Lack of a feasible, practical or realistic alternative site:** As detailed in Section 4.0 of this Statement and the submitted Alternative Sites Assessment, the redevelopment or expansion of Goodison Park is not considered an option.

Section 15.0 of this Planning Statement details that following an extensive site search and appraisal of potential sites, reported in the CBRE Alternative Sites Assessment, there are no alternative sites to BMD which could accommodate the requirements of Everton's new stadium, either within the Extended North Liverpool catchment or the wider LCC authority area. For various reasons, none of the 50 sites assessed are considered to be feasible, practical or realistic options for a new stadium development.

In accordance with paragraph 194 of the NPPF, substantial harm to the Grade II listed assets has been demonstrated to be exceptional. Paragraph 195 of the NPPF requires substantial harm to be necessary. It is considered that the Alternative Sites Assessment and Planning Statement have demonstrated that the proposed development meets both policy tests.

- **Public Benefits:** Section 14.0 of this Planning Statement details the various public benefits associated with The People's Project. The People's Project will have benefits in terms of the environment, social value, the economy, heritage assets and equality / diversity, which can all be considered 'public benefits'.

The submitted Heritage Statement acknowledges that the proposed restoration of the Grade II listed Hydraulic Engine House to allow for its viable future use is a considerable public benefit.

This Planning Statement has demonstrated that the socio-economic benefits of The People's Project are anticipated to have a far-reaching geographical impact, going beyond the LCC administrative boundary to benefit the City Region and North West. The benefits are particularly transformational when considering the impact they will have

⁴⁸ Appeal reference: APP/V4305/V/08/1203375, application reference: 08/00001/HYB

Summary Conclusions

upon priority regeneration areas, which include some of the most deprived parts of North Liverpool and the UK.

This Statement, and the reports which accompany this submission, have demonstrated that The People’s Project will have impacts which transcend the physical development of a stadium building and redevelopment of an existing stadium site. The catalytic impact associated with bringing forward development adjacent to the Ten Streets SRF area and accelerating the development of a part of Liverpool Waters which was initially proposed to be the last phase of development, together with The People’s Project itself, represents a generational opportunity to invest in, and transform, North Liverpool.

Therefore, it is concluded that the public benefits are substantial.

- **Weighing exercise:** On the basis of the above, it is concluded that the significant public benefits outweigh the heritage harm (substantial and less than substantial) associated with the proposed development, in accordance with paragraphs 195 and 196 of the NPPF.

OTHER CONSIDERATIONS

- 17.9 Paragraph 11d(ii) requires consideration of the adverse impacts of the development to understand whether such impacts demonstrably outweigh the benefits.

Liverpool Waters

- 17.10 As detailed in Section 16.0 of this Statement, the proposed development does not undermine the approved Liverpool Waters scheme from being delivered. The assumptions made in the submitted technical assessments have been the removal of the approved development from within BMD itself and minor reductions to the development blocks within Nelson Dock.
- 17.11 Section 16.0 of this Planning Statement has demonstrated that the proposed development will not have an adverse impact on the authority’s ability to meet national requirements regarding housing delivery, as the amount of development which could have been accommodated on BMD under the Liverpool Waters permission will be redistributed elsewhere within the Northern Docks neighbourhood.

Environmental Impacts

- 17.12 The potential environmental effects of the development have been fully assessed during the Environmental Impact Assessment process, as documented in the submitted Environmental Statement and accompanying technical appendices.
- 17.13 Where an adverse impact has been identified, a series of mitigation measures have been proposed to reduce the impact.

Design

- 17.14 As demonstrated in the submitted Design & Access Statement, the proposed design has evolved as a result of consultation, including extensive engagement with LCC and HE. The design of the proposed stadium and public realm are of a high quality and are a direct response to the location of the site within the WHS and SDCA, as well as in response to the listed heritage assets located within the site and in the surrounding area.
- 17.15 As detailed in Section 13.0, the design approach has sought to mitigate harm to heritage assets through consideration of the following:

Summary Conclusions

- Incorporation of a water channel into the proposed site layout;
 - Scale of the stadium building;
 - Massing of the stadium building;
 - Materiality;
 - Sensitive design of openings through Regent Road; and
 - Public realm design.
- 17.16 As demonstrated in Section 16.0, the proposed design has had appropriate regard to Townscape & Visual impact; Daylight, Sunlight & Overshadowing impact; crime / anti-social behaviour / anti-terrorism; crowd control; and lighting.

Public Consultation

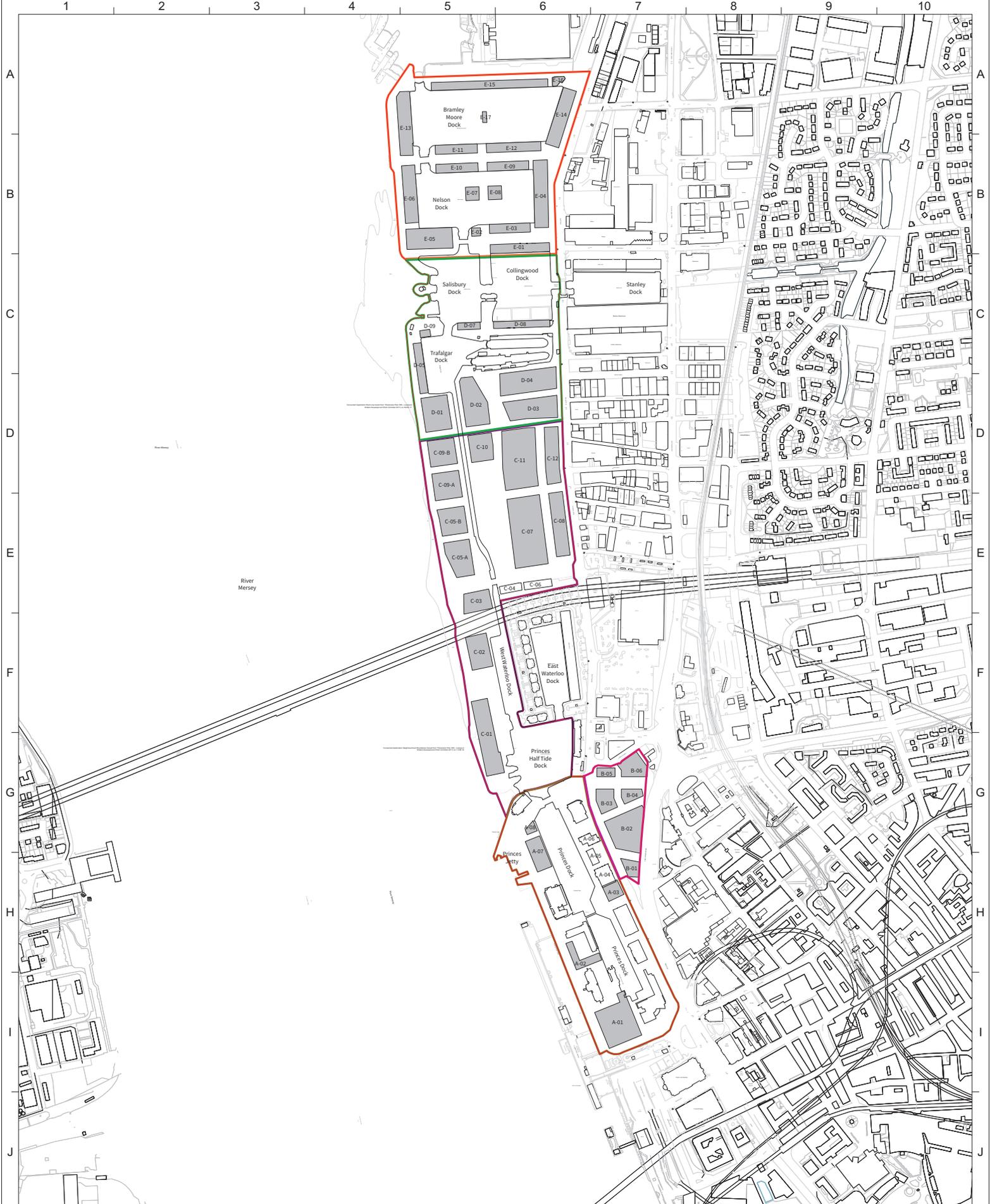
- 17.17 The applicant has engaged with the public during a two stage consultation process involving a City Region-wide roadshow. The public consultation was far reaching and produced an overwhelming response with over 63,000 respondents across both consultations.
- 17.18 Of note, a statistically significant number of responses came from people who are not Everton fans or who do not follow football at all, demonstrating that the interest in The People's Project goes beyond the activity on the pitch.
- 17.19 When asked, 96% of respondents to the second stage public consultation favoured the continuation of The People's Project, compared to 1% who favoured the dock being left in its current state.
- 17.20 The results of the consultation demonstrated the significant and ongoing support for The People's Project as a whole.

SUMMARY

- 17.21 Despite the acknowledgement that the proposed development will result in heritage harm (including instances of both substantial and less than substantial harm), in accordance with paragraph 11d(i) of the NPPF, the application of Framework policies regarding the conservation and enhancement of the historic environment do not provide a 'clear reason' for refusing the development.
- 17.22 It is also concluded that there are no adverse impacts which would significantly and demonstrably outweigh the identified benefits (paragraph 11d(ii)).
- 17.23 Although Appendix 2 has demonstrated that generally the proposed development complies with the policies of the statutory development plan, there are some instances of non-compliance. However, the benefits of the proposed development are a material consideration in the planning balance, which outweigh the non-compliance of the proposed development to a small number of UDP policies.
- 17.24 Therefore, as directed by the NPPF presumption in favour of sustainable development (paragraph 11), the applicant invites Liverpool City Council's positive determination of the planning application.
- 17.25 Positive determination of this application is the first step in delivering transformational change in North Liverpool, as part of The People's Project.

APPENDIX 1 – LIVERPOOL WATERS PARAMETERS PLAN





- Liverpool Waters Outline Application Redline Boundary
- Princes Dock (Neighbourhood A)
- King Edward Triangle (Neighbourhood B)
- Central Docks (Neighbourhood C)
- Clarence Docks (Neighbourhood D)
- Northern Docks (Neighbourhood E)
- Development Plots
- 'Commenced' Standalone Applications

NOTE: The consented outline planning permission red line, neighbourhood boundaries and development plots have been traced from the original parameter plans PDFs in lieu of appropriate DWG information

Issue	Date	Status	Drawn	Approved
10	25.04.19	For Planning	CH	PS
09	09.04.19	For Comment	CH	ALC
08	04.04.19	For Comment	CH	ALC
07	02.04.19	Planning	CH	ALC
06	12.02.19	For Comment	CH	ALC
05	25.09.18	For Comment	CH	ALC
04	11.02.18	For Comment	ALC	PS
03	30.08.18	For Comment	CH	ALC
02	20.08.18	For Comment	CH	ALC
01	13.08.18	For Comment	CH	ALC
00	18.07.18	For Comment	CH	ALC

Client	Peel Holdings	
Project	Liverpool Waters	
Dwg Title	Parameter Plan 005 Liverpool Waters Development Plots	
Created on	25.04.19	CH
Created by	CH	PS
Approved by	PS	PS
Scale	1:7500	A3
Dwg No.	1868-VW-005	Issue No.
		10

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NOTE:

- Do not scale from this drawing.
- Always work to noted dimensions.
- All dimensions are in millimetres unless otherwise stated.
- All setting out, levels and dimensions to be agreed on site.
- The dimensions of all materials must be checked on site before being laid out.
- This drawing must be read with the relevant specification clauses and detail drawings.
- Order of construction and setting out to be agreed on site.

APPENDIX 2 - STATUTORY DEVELOPMENT PLAN COMPLIANCE ASSESSMENT

COMPLIANCE WITH THE UNITARY DEVELOPMENT PLAN (ADOPTED 2002)

UDP POLICY	RELEVANT TO PROPOSED DEVELOPMENT (Y / N)	COMPLIANT (Y / N)	EXPLANATION
<p>GEN1 Economic Regeneration</p> <p>The Plan aims to reverse the decline in economic activity, investment and employment which Liverpool has experienced in recent years through:</p> <ul style="list-style-type: none"> i. the identification of Regeneration Areas in which available resources for regenerating the City's economy will be concentrated. These are: <ul style="list-style-type: none"> - City Centre, and in particular the Main Retail Area and the Paradise Street Development Area (PSDA) - Waterfront, Docks and Hinterland - Eastern Corridor - Speke/Garston - Gillmoss/Fazakerley/Aintree. ii. the provision and servicing of sites for economic development and investment, and the protection of adequate reserves of industrial/business land from other types of development; iii. encouraging small scale economic development in appropriate locations throughout the City; iv. strengthening the commercial role of the City Centre; v. promoting and enhancing the role of Liverpool Airport and the City's docks; vi. promoting the principle of mixed use development in appropriate locations; vii. maximising the contribution of telematics to the securing of economic regeneration; viii. promoting the role of Liverpool as a regional retail, cultural and tourism centre; ix. encouraging leisure developments in locations which complement the economic functioning of existing shopping centres, or in other highly accessible locations where there will be no significant harm to vitality and viability elsewhere; and x. promoting regeneration within the City's most deprived communities by seeking, through policies within the Plan, to facilitate the work being undertaken by the Local Partnerships. 	Y	Y	<ul style="list-style-type: none"> i. The site is located within the Waterfront, Docks and Hinterland Regeneration area and the proposed development represents a significant investment in this area which is anticipated to have catalytic impacts in regenerating North Liverpool; ii. The proposed development represents a significant investment albeit is not economic (B-Use Class) development; iii. n/a; iv. n/a; v. The proposed development will open up a currently inaccessible part of the City's dockland and significantly enhance the public realm in this area; vi. The application seeks permission for a range of events which would provide a mix of activity within the area. This, combined with the reuse of the Hydraulic Engine House as a cultural / exhibition centre, will promote the principle of mixed used development; vii. n/a; viii. The People's Project is anticipated to attract 1.4 million visitors to the city and will therefore make a significant contribution to the city's role as a regional cultural and tourism centre; ix. The proposed development is situated in a highly accessible location with regard to public transport and therefore in transport terms is an appropriate and sustainable location; and x. The site is located within Kirkdale, which includes some of the most deprived areas of the city. The proposed development will deliver significant public benefits to this area.
<p>GEN2 Open Environment</p>	Y	N	<ul style="list-style-type: none"> i. n/a;

<p>The Plan aims to protect and enhance a network of open space throughout the City, with emphasis placed on the following:</p> <ul style="list-style-type: none"> i. protecting the City's strategic open land (Green Belt and Green Wedges) from inappropriate development; ii. protecting areas of intrinsic landscape value; iii. protecting ecologically important sites in the City; iv. protecting the City's undeveloped coastal zone; v. enhancing open areas with potential for the development of countryside environments and pursuing opportunities to fulfil this potential; vi. protecting open space for recreational use and maintaining the standards of provision set out in the Plan, whilst recognising that the nature of recreational activity may change; vii. designating a hierarchy of public open space to ensure that there is a convenient and accessible network of quality open space for all residents of the City; viii. protecting and enhancing the recreational, ecological and amenity value of green space in the City; ix. encouraging community involvement and promoting educational opportunities in the protection and management of the open environment in the City; x. protecting and improving linear recreation routes through the City; and xi. protecting and enhancing the landscape, heritage and wildlife value of the water courses in the City. 			<ul style="list-style-type: none"> ii. n/a; iii. The submitted Ecology Assessments and Environmental Statement Chapters regarding Ecology (12, 13 and 22) have identified that there are no significant adverse impacts on ecological designations as a result of the proposed development. Appropriate mitigation has been proposed for the impact of the proposed development upon terrestrial ecology; iv. n/a; v. n/a; vi. n/a; vii. The proposed development includes extensive public realm around the site which will be accessible throughout the year, opening up a currently inaccessible part of the city for visitors, eventually linking to the city centre through the Liverpool Waters development, once built; viii. n/a; ix. n/a; x. The proposed development includes provision for a River Walk, which will connect the proposed development to Liverpool Waters to the south, once developed, and provide a connection to the city centre; and xi. The proposed development is anticipated to result in substantial harm to the Stanley Dock Conservation Area and Grade II listed Bramley-Moore Dock walls, primarily due to the infill of an existing waterspace. Therefore, the proposed development does not fully comply with this aspect of the policy. To mitigation the impact of the proposed development upon heritage assets a water channel will be created between Sandon Half-Tide Dock to the north and Nelson Dock to the south. Although this will be non-navigable (due to existing isolation structure between Nelson Dock and BMD and a proposed isolation structure between BMD and Sandon Half-Tide Dock, the water channel will ensure visual connectivity between the docks. <p>Therefore, as the proposed development does not comply with part (xi) of this policy, it is not wholly compliant with this policy of the UDP.</p>
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<p>GEN3 Heritage and Design in the Built Environment</p> <p>The Plan aims to protect and enhance the built environment of the City by:</p> <ul style="list-style-type: none"> i. preserving and enhancing historically and architecturally important buildings and areas and, where appropriate, improving them through the leveraging of available funds; ii. encouraging a high standard of design and landscaping in developments; iii. improving accessibility for people with mobility and sensory impairments; and iv. creating an attractive environment which is safe and secure both day and night. 	Y	N	<ul style="list-style-type: none"> i. The submitted Heritage Assessment concludes that the proposed development will result in substantial harm to the Grade II listed BMD retaining walls and the Stanley Dock Conservation Area, therefore not complying with this element of the policy. There will also be less than substantial harm upon the setting of the Grade II Hydraulic Engine House, the Outstanding Universal Value of the World Heritage Site and the Grade II listed Regent Road Dock Wall; ii. It is considered that the proposed buildings and landscaping are of a high standard of design which responds well to the surrounding area and is the result of extensive pre-application consultation with Liverpool City Council (LCC) and Historic England (HE); iii. The proposed development will open up a currently inaccessible part of the WHS and allow public access throughout the year. Access will be inclusive for those with mobility and sensory impairments; and iv. The proposed development will create an attractive environment with a sensitive lighting strategy and in-built security features, ensuring it is safe and secure during both day and night time. <p>Therefore, as the proposed development does not comply with part (i) of this policy, it is not wholly compliant with this policy of the UDP.</p>
<p>GEN4 Housing</p>	N		
<p>GEN5 Shopping</p>	N		
<p>GEN6 Transportation</p> <p>The Plan aims to provide a balanced provision of transport infrastructure which:</p> <ul style="list-style-type: none"> i. provides access to employment, leisure, retail and other facilities for all of the City's residents; ii. meets the transport needs of people who are economically and socially disadvantaged; iii. allows for the safe, efficient and easy movement of goods into and throughout the City, in order to help secure the regeneration of the local economy; iv. protects & enhances the environment through reducing the reliance on the private car. v. promotes, in conjunction with the Passenger Transport Authority, investment in the public transport network and associated facilities; vi. improves facilities for cyclists and pedestrians; 	Y	Y	<ul style="list-style-type: none"> i. The implementation of the Match / Major Event Day Transport Strategy will ensure that a modal choice can be provided to all supporters / visitors travelling to the application site and that sustainable modes of transport are attractive and accessible, to reduce the reliance upon private vehicles. The site is also accessible via public transport for non-match / non-event days; ii. The measures proposed through the Match / Major Event Day Transport Strategy will ensure that a high quality public transport service can be accessed, thus ensuring that the site is accessible to people across the authority and City Region without the need to own a car. The site is also accessible via public transport for non-match / non-event days; iii. n/a;

<ul style="list-style-type: none"> vii. provides a framework for investment in the efficiency of the road system; and viii. reduces the availability of car parking facilities which would attract car borne commuters. 			<ul style="list-style-type: none"> iv. See (i) and (ii). In addition, parking restrictions and temporary road closures will further act to reduce reliance on the private car and encourage use of sustainable transport modes. The relocation of Everton from Goodison Park to BMD presents an opportunity for a modal shift to non-car modes given the proximity to Sandhills station, bus links and distance along a direct walking route to the city centre; v. n/a; vi. The Match / Major Event Day Transport Strategy will encourage access via walking. For example, parking restrictions and temporary road closures will limit vehicle access, providing more space for pedestrian movement. Cycle parking provision will be made on site for 152 bicycles. Within this number, 30 spaces will be accommodated within a two tier cycle shelter, allocated for staff members to encourage cycling to work. Furthermore, the Council has recently implemented improvements to walking and cycling along Regent Road through the installation of a segregated cycle lane; vii. n/a; and viii. See response to (i), (ii) and (iv). In addition, 481 car parking spaces will be provided on site, which in relation to the proposed capacity of the stadium (52,888) means that non-car modes will form a significant part of the travel strategy for visitors to the stadium.
<p>GEN7 Community Facilities</p> <p>The Plan aims to promote the satisfactory provision and distribution of community facilities - including recreational, leisure, health, education and social facilities - for all the City's residents.</p>	Y	Y	<p>The proposed development will create a leisure facility which can be used and visited throughout the year by the local community – both through the relocation of the stadium, with enhanced facilities compared with the existing Goodison Park stadium, and the restoration and reuse of the existing Hydraulic Engine House.</p>
<p>GEN8 Environmental Protection</p> <p>The Plan aims to protect and enhance Liverpool's environment by:</p> <ul style="list-style-type: none"> i. promoting the recycling of land for productive use through the treatment of vacant, derelict and underused land; ii. controlling uses which can contribute to the incidence of land, air, water pollution and light spillage; iii. seeking to secure the efficient disposal of waste and to encourage recycling, reclamation and reuse of waste wherever possible; iv. protecting land drainage and preventing flooding; 	Y	Y	<ul style="list-style-type: none"> i. The proposed development will redevelop an under-used site in the Northern Docks area, which is predominantly derelict and ensure it is publicly accessible. Proposed land remediation will ensure that the land is safe to develop; ii. The impact of the proposed development has been considered in terms of ground conditions, air quality, water quality and light spillage, with mitigation measures proposed through the assessments, where required, to ensure that the scheme is acceptable in planning terms;

<ul style="list-style-type: none"> v. investigating and promoting the concept of renewable energy; and vi. ensuring that all developments (including minerals operations) are carried out with due consideration for the environment and public health 			<ul style="list-style-type: none"> iii. An operational waste management strategy has been developed to ensure that there is sufficient space and arrangements in place to allow the efficient disposal of waste and recyclables. In addition, a Construction Waste Management Strategy has been developed to maximise re-use/recovery opportunities and minimise off-site disposal during the construction period; iv. The submitted Flood Risk Assessment demonstrates that the proposed development will not increase the risk of flooding at the site or elsewhere; v. Renewable energy methods have been considered in the submitted Energy Statement and photo-voltaic panels are proposed as part of the stadium design; and vi. The impact of the proposed development upon the environment and public has been assessed within the submitted Environmental Statement with mitigation measures proposed where necessary, to ensure that the scheme is acceptable in planning terms.
GEN9 Liverpool City Centre	N		
E1 Primarily Industrial Areas	N		
E2 Office Development	N		
<p>E3 Port Development</p> <ol style="list-style-type: none"> 1. The City Council will support the continued growth and development of both the Port of Liverpool and Garston Port, as major contributors to the local economy and providers of employment to the City's residents, and as significant catalysts to further economic development in the City and sub-region. 2. In assessing development proposals within the port areas, the City Council will take into account: <ul style="list-style-type: none"> i. protection of the amenity of existing residential and business users in adjoining areas, particularly in relation to increased traffic generation and environmental quality; ii. impact on potential development sites in adjoining areas; iii. impact on nature conservation and other environmental concerns; iv. design criteria (including standards of materials, site layout, landscaping, pollution control and waste storage) appropriate to the riverside location; and v. impact on the capacity of the highway network. 	Y	N	<p>The proposed development is not a port-related development and the application would therefore represent a 'departure'.</p> <p>However, the Committee Report for the Liverpool Waters outline application (reference 100/2424) identifies that:</p> <ul style="list-style-type: none"> - In relation to Nelson Dock and BMD (referenced as 'Neighbourhood E') this allocation '...is undoubtedly out of date' (pg. 111); and - 'It should be noted that the Port Land allocation of Neighbourhood E no longer forms part of Peel's Mersey Ports Master Plan.' (pg. 112). The Report identifies that the site is physically separated from the operational Seaforth Docks by the Wastewater Treatment Works. <p>This is reiterated in the Peel Ports 'Mersey Ports Master Plan: A 20 year Strategy for Growth' (2011), which shows that BMD is within the Liverpool Waters area, rather than the operational Port.</p>

			<p>Although the proposed development is not compliant with this policy, it is considered that this policy is out-of-date.</p> <p>The following assesses the proposed development against Part 2 of this policy and demonstrates compliance:</p> <ul style="list-style-type: none"> i. The Environmental Statement demonstrates that where adverse impacts on the amenity of surrounding receptors or traffic have been identified, suitable mitigation measures have been proposed to make the development acceptable in planning terms; ii. See response to (i); iii. See response to (i); iv. The proposed development represents a high quality design, in terms of both building and landscaping, which responds to the riverside location, ensuring that pollution control measures are in place through the Drainage Strategy and that appropriate waste storage is available; and v. The proposed development can be accommodated by the existing transport network and target mode splits can be achieved.
E4 Airport Development	N		
E6 Mixed Use Areas and Sites for Various Types of Development	N		
<p>E8 Tourist Attractions and Facilities</p> <p>The City Council will support the development of tourism in Liverpool by:</p> <ul style="list-style-type: none"> i. protecting and improving visitor attractions; ii. promoting and encouraging the development of new tourist attractions and accommodation, particularly within the City Centre; iii. improving visitor support facilities; iv. ensuring that all visitor attractions are properly signed; v. carrying out environmental improvements to key visitor linkages; vi. improving promotion and information facilities; and vii. establishing links with other tourist attractions throughout the North West. 	Y	Y	<ul style="list-style-type: none"> i. n/a; ii. Complies with this policy through the development of a new tourist attraction on the waterfront – both the relocated stadium with enhanced facilities and through the preservation, enhancement and reuse of the Hydraulic Engine House. The relocation to BMD will significantly enhance the Club as a visitor attraction; iii. Through the reuse of the Hydraulic Engine House it is anticipated that visitor support facilities, including toilets and a café will be provided for visitors to the cultural / exhibition centre and those using the Engine House as the start / end point to the River Walk. Details of the proposed layout of the Hydraulic Engine House will be provided through subsequent listed building consent applications; iv. A signage strategy will be developed at the detailed design stage to adhere to this policy requirement;

			<p>v. The proposed River Walk will link to Liverpool Waters in the future, once Nelson Dock is developed, and therefore provide visitors with an attractive walking route from the proposed stadium and Hydraulic Engine House as the northern most point of the WHS to the city centre in the south;</p> <p>vi. n/a – this will be addressed at the detailed design stage;</p> <p>vii. See point (v).</p>
<p>E9 Leisure Development</p> <p>1. 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:</p> <p>i. the applicant clearly demonstrates that there is a need for the proposal and that a sequential approach to site selection has been adopted;</p> <p>ii. the design and scale of the proposal is appropriate to the particular location and the surrounding area;</p> <p>iii. residential amenity is not adversely affected;</p> <p>iv. highway, traffic and servicing matters are addressed to the satisfaction of the local planning authority;</p> <p>v. it is demonstrated by the applicant that the proposal, either by itself or in conjunction with other proposals, will not undermine the vitality, viability or predominant retail function or evening economy of any nearby Town, District or Local Centre;</p> <p>vi. the site is, or will be made, highly accessible to modes of transport other than the car; and</p> <p>vii. the proposed development would not prejudice or undermine other Plan policies or objectives.</p>	Y	N	<p>The application site occupies an out of centre location and therefore does not comply with Policy E9. Furthermore, a sequential test, impact assessment and assessment of need have not been carried out; albeit the submitted Alternative Sites Assessment demonstrates that there are no alternatives within the Extended North Liverpool catchment or the wider LCC authority area.</p> <p>It should be noted that the policy is out-of-date in terms of its inconsistency with the NPPF. National policy no longer requires applicants to demonstrate a need for the amount of retail development proposed. Furthermore, the NPPF establishes a threshold for undertaking impact assessments (2,500 sq m) (para. 89), which should be used where there is no locally set threshold, as is the case for Liverpool’s statutory development plan.</p> <p>Regardless of the above, as the sequential and impact tests have not been carried out the proposed development does not comply with this policy.</p>
HD1 Listed Buildings	N		
HD3 Demolition of Listed Buildings	N		
<p>HD4 Alterations to Listed Buildings</p> <p>1. Consent will not be granted for:</p> <p>i. extensions, external or internal alterations to, or the change of use of, or any other works to a listed building that would adversely affect its architectural or historic character;</p> <p>ii. applications for extensions, alterations to, or the change of use of, a listed building that are not accompanied by the full information necessary to assess the impact of the proposals on the building; and</p>	Y	N	<p>The Heritage Assessment submitted as part of this planning application identifies that the proposed development will result in substantial harm to the Grade II listed Bramley-Moore Dock retaining walls and less than substantial harm to the Grade II listed Regent Road Dock Wall.</p> <p>The proposed change of use of the Hydraulic Engine House (Grade II listed) will have a considerable public benefit. The impact of the proposed stadium upon the setting of the Hydraulic Engine House is anticipated to be less than substantial.</p>

<p>iii. any works which are not of a high standard of design in terms of form, scale, detailing and materials.</p> <p>2. Where the adaptive reuse of a listed building will be used by visiting members of the public, the needs of disabled people should be provided for in a manner which preserves the special architectural or historic interest of the building.</p>			<p>Regarding Part 2 of the policy, the proposed reuse of the Hydraulic Engine House will be made accessible to all through the renovation of the building and change of use to an exhibition / cultural centre. Details will be provided as part of future listed building consent applications.</p>
<p>HD5 Development Affecting the Setting of a Listed Building Planning permission will only be granted for development affecting the setting of a listed building, which preserves the setting and important views of the building. This will include, where appropriate:</p> <p>i. control over the design and siting of new development; ii. control over the use of adjacent land; and iii. the preservation of trees and landscape features.</p>	Y	N	<p>The Heritage Assessment submitted as part of this planning application identifies that the proposed development will result in substantial harm to the Grade II listed Bramley-Moore Dock retaining walls and less than substantial harm to the Grade II listed Regent Road Dock Wall.</p> <p>The proposed change of use of the Hydraulic Engine House (Grade II listed) will have a considerable public benefit. The impact of the proposed stadium upon the setting of the Hydraulic Engine House is anticipated to be less than substantial.</p> <p>The Heritage Assessment considers that the proposals will preserve the setting and important views of the other listed buildings in the vicinity. Where the setting is changed, in the majority of cases it will be minimal and mitigated through the nature of the design of the proposals.</p>
<p>HD6 Churches and Cathedrals</p>	N		
<p>HD7 Conservation Areas</p>	N		
<p>HD8 Preservation and Enhancement of Conservation Areas The City Council will take positive action to secure the preservation or enhancement of conservation areas and will:</p> <p>i. seek support and funding from all available sources for the repair of buildings and environmental improvements; ii. prepare action plans for priority areas; iii. use its available powers to secure the removal of features which significantly detract from the character of the area; and iv. provide planning guidance and advice to owners and developers.</p>	Y	N	<p>Although this policy relates to the Council's role regarding Conservation Areas, it should be noted that the proposed development is anticipated to result in substantial harm to the Stanley Dock Conservation Area.</p>
<p>HD9 Demolition of Buildings in Conservation Areas</p>	Y	N	<p>The Heritage Assessment identifies that the only structures that would be demolished as part of the proposed development are not listed and are considered to make a neutral contribution to the character and appearance of the Conservation Area.</p>

<ol style="list-style-type: none"> 1. There will be a presumption in favour of the preservation of any building, part of a building or structure in a conservation area which makes a positive contribution to the character or appearance of the conservation area. 2. The City Council will consider proposals for the demolition of any building or structure which makes a positive contribution to the character or appearance of the conservation area against the following criteria: <ol style="list-style-type: none"> i. the importance of the building, its intrinsic architectural and historic interest and its contribution to the character or appearance of the conservation area; ii. the condition of the building and the cost of repairing or maintaining it; iii. the adequacy of the efforts made to retain the building in use; and iv. the contribution of any new proposal to the character and appearance of the conservation area. 3. Applications must be accompanied by all the information necessary to judge the application against the above criteria, including fully detailed plans for the redevelopment. 4. Where a building makes little or no contribution to the character of the conservation area, proposals for demolition will be considered in the light of the alternative proposals for the site and the contribution made to preserving or enhancing the character of the conservation area. 5. Where appropriate, the City Council will not grant consent for demolition unless there are approved detailed plans and evidence that a contract has been let for the full implementation of the development scheme. 			<p>Therefore, Parts 1 - 3 of this policy do not apply.</p> <p>The following assesses the scheme against Parts 4 & 5 of this policy:</p> <ol style="list-style-type: none"> 4. The proposed development has been designed to ensure the new structures respond to the materiality and form of existing buildings within the Conservation Area, and the ability of the area to accommodate large buildings. <p>Although the impact on the Conservation Area has been mitigated to a large degree through a design process that fully recognises that which makes the designated area special, the Heritage Assessment concludes that the proposed development will result in substantial harm to the Conservation Area. Therefore, the proposed development does not comply with Part 4 of this policy.</p> <ol style="list-style-type: none"> 5. Detailed plans of the proposed development have been provided.
HD10 Alterations of Non-Listed Buildings in Conservation Areas	N		
<p>HD11 New Development in Conservation Areas</p> <ol style="list-style-type: none"> 1. Planning permission will not be granted for: <ol style="list-style-type: none"> i. development in a conservation area which fails to preserve or enhance its character; and ii. applications which are not accompanied by the full information necessary to assess the impact of the proposals on the area, including all details of design, materials and landscaping. 2. Proposals for new development will be permitted having regard to the following criteria: <ol style="list-style-type: none"> i. the development is of a high standard of design and materials, appropriate to their setting and context, which respect the character and appearance of the conservation area; 	Y	N	<p>The following assesses the proposed development against Part 1 of the policy:</p> <ol style="list-style-type: none"> i. The submitted Heritage Assessment identifies that the proposed development will result in substantial harm to the Stanley Dock Conservation Area; and ii. The Environmental Statement, submitted plans and standalone documents provided contain the full information necessary to assess the impact of the proposals on the area. <p>The following assesses the proposed development against Part 2 of the policy:</p>

<ul style="list-style-type: none"> ii. the development pays special attention to conserving the essential elements which combine to give the area its special character and does not introduce changes which would detract from the character or appearance of the area; iii. the proposal protects important views and vistas within, into and out of the conservation area; iv. the proposal does not lead to the loss of open space or landscape features (trees and hedges) important to the character or appearance of the area; v. the development does not generate levels of traffic, parking, noise or environmental problems which would be detrimental to the character or appearance of the area; and vi. the proposal has a satisfactory means of access and provides for car parking in a way which is sympathetic to the appearance of the conservation area. 			<ul style="list-style-type: none"> i. The proposed development is of a high standard of design which has taken account of its setting within the Stanley Dock Conservation Area in terms of building scale / massing and materiality. The design has evolved following extensive consultation with HE and LCC. However, the proposed infill of BMD as part of the proposed development is anticipated to result in substantial harm to the Conservation Area; ii. See response to 2(i); iii. A Townscape & Visual Impact Assessment has been undertaken which identifies moderate and major adverse impacts on townscape character and some viewpoints during the construction phase, albeit these are temporary. During operation of the proposed development, the significant impacts are mostly beneficial, with one instance of moderate adverse impact. However, once accounting for the Cumulative development scenario (including Liverpool Waters), this impact reduces to no longer being significant; iv. n/a - there are no open space or trees / hedgerows located on site currently; v. The submitted Environmental Statement assesses the potential for the proposed development to result in adverse environmental impacts and proposes mitigation measures where necessary to ensure that development is acceptable in planning terms. There are significant major / moderate adverse noise impacts anticipated to affect a small number of receptors, however these impacts are associated with the match day / event day operations with the stadium – in the period leading up the match / event and the match / event itself - and therefore will not be constant. The submitted Transport Assessment demonstrates that the proposed development can be accommodated by the existing transport network and target mode splits can be achieved; and vi. Car parking and access to the site are considered satisfactory and the site access has been informed by vehicle tracking and crowd modelling. The majority of the proposed car parking is within a MSCP which is integrated into the West Stand and therefore designed in a sympathetic manner with regard to the Conservation Area and which blends in with the rest of the stadium.
<p>HD12 New Development Adjacent to Conservation Areas</p>	<p>N</p>		

HD13 Shopfronts on Listed Buildings and in Conservation Areas	N		
<p>HD14 Streetworks in Conservation Areas</p> <p>The City Council will seek to protect and enhance the quality and appearance of streets, footpaths and other public spaces in conservation areas by:</p> <ol style="list-style-type: none"> i. relaxing highway standards where these are onerous and detract from the area, subject to safety interests; ii. retaining existing natural materials and using traditional materials and techniques for paving; iii. ensuring street furniture is kept to a minimum and is of good design and any redundant street furniture removed; and iv. ensuring that special care is taken in all works carried out by the Council, Statutory Undertakers, Private Developers and Owners. 	Y	Y	<p>At present there are no public spaces, streets or footpaths within the application site. Adjacent to the site is a recently installed footway and cycleway which has been completed by LCC.</p> <p>The following appraises the proposed public realm design against the criteria of Policy HD14, where applicable:</p> <ol style="list-style-type: none"> i. n/a; ii. An Artefact Appraisal and Heritage Asset Survey have been carried out to understand the heritage value of remaining artefacts on site, including capstans, railway tracks, mooring posts, to understand their potential for reuse on the site as part of the proposed development; iii. The strategy regarding street furniture has been to minimise the amount proposed and position required street furniture to ensure that it does not obstruct the movement of vehicles or people around the site; and iv. A high quality public realm design has been proposed which takes account of the history of the site and Conservation Area.
HD15 Historic Parks, Gardens and Cemeteries	N		
HD16 Protection of Ancient Monuments	N		
<p>HD17 Protection of Archaeological Remains</p> <ol style="list-style-type: none"> I. The Council will seek to protect other sites of archaeological importance. Where development is proposed in areas of known or suspected archaeological importance the City Council will require that: <ol style="list-style-type: none"> i. developers have the archaeological implications of their proposals assessed by a recognised archaeological body at an early stage and the results submitted as part of the planning application; ii. important archaeological remains and their settings are permanently preserved in situ; iii. where in situ preservation is not justified and disturbance by development is acceptable in principle, the applicants undertake an agreed programme of mitigation including investigation, excavation and recording before development begins, or as specified in the agreed programme; and 	Y	Y	<p>An Archaeological Desk Based Assessment has been carried out and is submitted as part of the planning application. The scope of this assessment has been agreed with the Merseyside Environmental Advisory Service.</p> <p>This assessment proposes a series of mitigation measures including sampling / selective excavation, photogrammetric surveys, evaluation trenching and historic building surveys to identify and record heritage assets prior to development commencing.</p>

<p>iv. conflicts regarding archaeological issues and development pressures are resolved by means of management agreements.</p> <p>2. The City Council will continue to support the Merseyside Sites and Monuments Record held by the National Museum and Galleries on Merseyside, to ensure that archaeological evidence, both above and below ground is properly identified, recorded and protected.</p>			
<p>HD18 General Design Requirements</p> <p>When assessing proposals for new development, the City Council will require applications to comply with the following criteria, where appropriate, to ensure a high quality of design:</p> <ul style="list-style-type: none"> i. the scale, density and massing of the proposed development relate well to its locality; ii. the development includes characteristics of local distinctiveness in terms of design, layout and materials; iii. the building lines and layout of the development relate to those of the locality; iv. external boundary and surface treatment is included as part of the development and is of a design and materials which relate well to its surroundings; v. all plant machinery and equipment are provided within the building envelope or at roof level as an integral part of the design; vi. the development pays special attention to views into and out of any adjoining green space, or area of Green Belt; vii. the development has regard to and does not detract from the city's skyline, roofscape and local views within the city; viii. the satisfactory development or redevelopment of adjoining land is not prejudiced; ix. there is no severe loss of amenity or privacy to adjacent residents; x. in the case of temporary buildings, the development is of a suitable design and not in a prominent location; xi. adequate arrangements are made for the storage and collection of refuse within the curtilage of the site and the provision of litter bins where appropriate; xii. the exterior of the development incorporates materials to discourage graffiti; and xiii. adequate arrangements are made for pedestrian and vehicular access and for car parking. 	Y	N	<p>The submitted Design & Access Statement demonstrates general compliance with such design considerations. In summary:</p> <ul style="list-style-type: none"> i. The proposed scale and massing have been progressed following a review of the context in which the application site is located, including the height of nearby listed buildings in particular; ii. The chosen materiality for the proposed stadium has taken reference from surrounding buildings, including listed buildings within the Stanley Dock Conservation Area, in terms of type of materials, colour and tone of materials; iii. The layout of the proposed development has been shaped by the need to ensure a water channel is kept through the site, creating visual continuity through the application site. Other factors which have influenced layout include the proximity of the stadium building to the Grade II listed Hydraulic Engine House and how the footprint of the stadium affects the ability to reveal the Grade II listed Bramley-Moore Dock walls; iv. The proposed development incorporates significant areas of public realm, the materiality of which seeks to incorporate existing features of the hardscape and proposes the use of new materials which are sensitive to the site context. v. The required plant and machinery have been designed within the building to minimise the visual impact; vi. n/a;

		<p>vii. A Townscape & Visual Impact Assessment has been undertaken which identifies moderate and major adverse impacts on townscape character and some viewpoints during the construction phase, albeit these are temporary. During operation of the proposed development, the significant impacts are mostly beneficial, with one instance of moderate adverse impact. However, once accounting for the Cumulative Development Scenario (including the approved Liverpool Waters scheme, application reference 100/2424), this impact reduces to no longer being significant;</p> <p>viii. This planning application has considered the potential impact of the proposed development on the ability to deliver the approved Liverpool Waters consent, concluding that the proposed stadium does not undermine the delivery of the Liverpool Waters scheme;</p> <p>ix. There are significant major / moderate adverse noise impacts anticipated to affect a small number of receptors, however these impacts are associated with the match day / event day operations with the stadium – in the period leading up to the match / event and the match / event itself and therefore will not be constant;</p> <p>x. n/a;</p> <p>xi. An operational waste management strategy has been submitted as part of the planning application to demonstrate that adequate provision for the storage and removal of waste and recyclables has been considered. The proposed development includes the provision of litter bins throughout the public realm areas;</p> <p>xii. The site will be managed by the Club's on-site security and provides overlooking around the site to deter such instances of crime / damage. Specific materials have not been incorporated at this stage; and</p> <p>xiii. As demonstrated through the Transport Assessment, vehicle tracking and crowd modelling, adequate arrangements have been made for pedestrian and vehicular access and car parking on site.</p> <p>Due to instances of adverse impacts in terms of townscape / viewpoints and noise and the lack of anti-graffiti measures this stage, the proposed development does not fully comply with Policy HD18.</p>
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<p>HD19 Access for All</p> <ol style="list-style-type: none"> 1. In accordance with its equal opportunities policy, and in order to achieve a fully accessible environment for everyone, the City Council will ensure that: <ol style="list-style-type: none"> i. all new non-residential development proposals provide suitable provision for disabled people, both as employees and customers; ii. access to and egress from existing buildings and their surroundings is improved as opportunities arise through alterations, extensions and changes of use; and iii. 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. 2. Where the City Council considers there to be evidence of local need, it will negotiate with developers for an element of housing to be accessible to disabled people to facilitate independent living where this is reasonable and realistic. 	Y	Y	<p>Part 1:</p> <ol style="list-style-type: none"> i. The proposed development is accessible for disabled visitors and employees. The proposed design has evolved following consultation with LCC's Access Officer and the Council's Corporate Access Forum; ii. The proposed change of use of the Hydraulic Engine House to a cultural / exhibition centre will ensure that the building is accessible. Any changes to the building to ensure it is accessible will be addressed through future applications for listed building consent; iii. The extensive public realm areas proposed have been designed to ensure they are accessible to all, in terms of level changes, the positioning of street furniture, the use of lighting, the proximity of accessible parking spaces and the use of tactile paving / warning strips to inform people of changes to the use of space or levels. <p>Part 2: n/a</p>
<p>HD20 Crime Prevention</p> <ol style="list-style-type: none"> 1. The City Council will encourage developers, in the design and layout of new developments, to incorporate measures which reflect the need to make proper provision for personal safety and crime prevention, paying particular attention to: <ol style="list-style-type: none"> i. increase the overlooking of public areas; ii. incorporate the use of hard and soft landscaping arrangements in ways which do not create hiding places; iii. the design and relationship of car parking, particularly its lighting and visibility, from buildings; iv. the design and location of entrances and pedestrian circulation within and out of the site; and v. making a clear distinction between public and private space and providing 'defensible space'. 2. The City Council will seek to create a safer environment by: <ol style="list-style-type: none"> i. providing and maintaining adequate street lighting; ii. discouraging pedestrian underpasses and improving those that remain; 	Y	Y	<p>A Security Planning Report has been prepared following consultation with the Merseyside Police and is submitted as part of this planning application. Regarding Part 1 of the policy (Part 2 relates to the Council's role in creating a safe environment and therefore is not applicable):</p> <ol style="list-style-type: none"> i. The public realm which surrounds the site is accessible throughout the year and is overlooked by the stadium building and CCTV. The areas around the stadium, including concourse spaces, have been designed to provide a high degree of natural surveillance. The proposed additional openings through the Regent Road Dock Wall improve inter-visibility between the site and surrounding area; ii. The soft landscaping has been designed to ensure planting does not obstruct the vision of people occupying the spaces. The positioning of street furniture has had regard to the need to reduce the opportunity for hiding places and ensure that people are encouraged to use the whole of the public realm area surrounding the site, to encourage natural surveillance;

<ul style="list-style-type: none"> iii. improving security in council owned car parks; iv. examining the feasibility of extending Closed Circuit Television to other problem areas of the city; v. tackling problems of defensible space in problem council estates with extensive common areas through the Estates Action programme; and vi. encouraging the creation of lively and varied environments, to increase activity and passive surveillance. 			<ul style="list-style-type: none"> iii. Only authorised users will be permitted access to the car parking areas (both surface and MSCP), having to pass via the security booth to gain entry to the site. The lighting design has been informed by security requirements to ensure adequate visibility. The MSCP is within the stadium building and the surface car park is overlooked by the west stand of the stadium; iv. Stadium entrances will be well lit and clearly signed. Entrances will have lockdown capability or will be operated from staff access cards / permit to work for contractors; and v. Public and private spaces are well defined through the use of security control facilities and intruder detection. Physical measures and operational processes will be employed to communicate a clear concept of defensible space during all modes of stadium operation.
<p>HD21 Energy Conservation In order to conserve energy resources the City Council will expect developers to minimise the overall demand for energy arising from their development proposals by taking into account the need for energy sensitive siting, orientation and layout in the design of new developments.</p>	Y	Y	The submitted Energy Statement demonstrates that the proposed development adheres to the Mean, Lean and Green hierarchy, with reduction of energy consumption prioritised.
HD22 Existing Trees and Landscaping	N		
<p>HD23 New Trees and Landscaping All new development proposals should make proper provision for the planting and successful growth of new trees and landscaping, including any replacement planting provided as compensation for the loss of any trees due to development and in particular should:</p> <ul style="list-style-type: none"> i. provide high quality landscaping and boundary treatment including the submission of such details as part of any full planning application; and ii. promote nature conservation through the use of native species and the creation of wildlife habitats where appropriate. 	Y	Y	<p>The landscaping strategy proposes to introduce grasses and trees to a site which currently does not include soft landscaping.</p> <p>The species of trees and grasslands have been chosen to withstand the conditions of a marine environment, to encourage successful growth. A mix of native and non-native species have been chosen for their hardiness and survivability.</p>
<p>HD24 Public Art The City Council will:</p> <ul style="list-style-type: none"> i. encourage the provision of appropriate new works of art, including the visual arts, crafts and landscape design, within public places and as part of new development proposals. Such works of art will be expected to contribute to their surroundings and the amenity of the wider area; and 	Y	Y	The submitted Design & Access Statement establishes the high-level strategy for site interpretation, including the interpretation of the Club's history and of the site's maritime history. Further details of the public art / interpretation strategy are to be provided at detailed design stage.

ii. protect and maintain in good condition, including their re-siting where appropriate, the City's stock of statues.			
HD25 Advertisements	N		
HD26 Satellite Dish Aerial / Telecommunication Installations	N		
HD27 Telecommunications Code Systems Operators	N		
<p>HD28 Light Spillage</p> <p>The City Council will require developers to take account of the following principles in schemes where external lighting is required;</p> <p>i. the lighting scheme proposed is the minimum required for security and working purposes to undertake the task, and</p> <p>ii. light spillage and potential glare is minimised particularly to:</p> <ul style="list-style-type: none"> - residential and commercial areas; - areas of wildlife interest; and - areas whose open landscape qualities would be affected, particularly those open areas on the urban fringe. 	Y	Y	<p>A Lighting Assessment has been undertaken and is submitted as part of this planning application. The lighting strategy has been designed with the principle of ensuring that the lighting is the minimum required for security purposes and to meet required standards. Mitigation has been proposed for the lighting which will be adjacent to the proposed residential development at Nelson Dock (as part of the Liverpool Waters scheme). This mitigation is in the form of adherence to a curfew, with lights closest to the committed development being switched off after 11pm.</p>
OE1 The Green Belt Boundary	N		
OE2 Development in the Green Belt	N		
OE3 Green Wedges	N		
<p>OE4 The Mersey Coastal Zone</p> <p>1. Within the Undeveloped Coastal Zone the City Council will:</p> <p>i. not grant planning permission for development proposals which do not require a coastal location, unless:</p> <ul style="list-style-type: none"> - they are clearly related to the recreational use of the zone and are of a scale and nature which will not adversely affect the landscape quality, nature conservation and archaeological value of the coast; or - the proposed development cannot realistically be located elsewhere in the City by virtue of the nature of the proposal. <p>ii. initiate its own, and support other appropriate proposals, which improve the coast's landscape quality and accessibility for recreation, whilst protecting its nature conservation value.</p>	Y	Y	<p>The site is located within the Developed Coastal Zone. The proposed development complies with this policy (Part 2) as it seeks to regenerate an under-utilised site and develop a new stadium which will be a significant tourism and recreation attraction. The site will also open up a currently inaccessible site, thus providing improvements in accessing the waterfront. The proposed public realm will ensure that the application site links up to the wider River Walk to be created between the city centre and BMD as part of the Liverpool Waters development.</p>

<p>2. Within the Developed Coastal Zone, the City Council will support proposals which further the restructuring and regeneration of the zone and enhance its environmental quality, tourism potential and recreational facilities, particularly those which would lead to improvements in the accessibility of the coast.</p> <p>3. The City Council will support, where relevant, the objectives of the Mersey Estuary Management Plan for the management of the coastal zone.</p>			<p>The proposed development is in accordance with the Mersey Estuary Management Plan (Part 3 of Policy OE4) in terms of the consideration that has been given to the potential impact of the development upon water quality, ecology, townscape, pollution and flood risk/ drainage. As required in the Merseyside Estuary Management Plan, waterside features are to be preserved as part of the proposed development, where possible, including capstans and mooring posts.</p> <p>The proposed development complies with the Merseyside Estuary Management Plan in terms of regenerating an under-used site and creating a further tourist attraction along the waterfront.</p>
<p>OE5 Protection of Nature Conservation Sites and Features</p> <p>1. The City Council will seek to protect the nature conservation interest of open land and the water environment in the City by not permitting development which would:</p> <ul style="list-style-type: none"> i. destroy, fragment or adversely affect directly or indirectly a designated or proposed Special Protection Area (SPA), Ramsar site, or Site of Specific Scientific Interest (SSSI), unless the City Council is satisfied that there is no alternative solution and there are imperative reasons of overriding public interest; ii. destroy, fragment or adversely directly or indirectly affect a Site of Nature Conservation Value as identified by the City Council unless it can be clearly demonstrated that there are reasons for the proposal including benefits to the community, which outweigh the need to safeguard the substantive nature conservation value of the site; iii. destroy, fragment or adversely affect, directly or indirectly, a Regionally Important Geological /Geomorphological Site (RIGS) unless it can be demonstrated that the benefits of the proposal to the community outweigh the need to safeguard the geological value of the site; iv. have an adverse affect on legally protected wildlife species; or v. destroy, fragment or adversely affect, indirectly or directly, sites with known conservation value in a neighbouring authority area. <p>2. In assessing criteria ii to iv full account will be taken of proposed mitigation measures.</p>	Y	Y	<p>Taking account of proposed mitigation measures, the proposed development is not anticipated to result in significant adverse ecological effects, either in relation to protected species or designated sites.</p>
<p>OE6 Development and Nature Conservation</p> <p>In the circumstances where development is permitted on or adjacent to any sites covered by policy OE5, which in the case of the Mersey Estuary will be subject to the most rigorous examination, the City Council will seek to minimise potential damage by:</p>	Y	Y	<p>Assessments regarding the aquatic and terrestrial ecology of the application site and the impact of the proposed development upon the two, have been carried out and are submitted in support of this planning application, as summarised in ES Chapters 12 and 13. Where the requirement for mitigation has been identified in these assessments this has been proposed and will be secured via planning condition.</p>

<ul style="list-style-type: none"> i. requiring developers to undertake a site investigation to identify the nature conservation interest of the site; ii. requiring developers to set out proposals for the protection and management of the nature conservation value of the site; and iii. considering the use of conditions and/or planning obligations to safeguard the nature conservation interest and/or provide compensatory measures for any nature conservation interest damaged or destroyed during the development process. 			
<p>OE7 Habitat Creation and Enhancement</p> <ul style="list-style-type: none"> 1. The City Council will seek to enhance the nature conservation interest of open land and water courses in the City by: <ul style="list-style-type: none"> i. supporting and initiating proposals for habitat creation and enhancement particularly within Sites of Nature Conservation Value and those other sites which, although do not meet the criteria required to be designated as an SNCV, are considered to be of value for nature conservation; ii. supporting proposals which strengthen and enhance wildlife corridors in the City; iii. managing its own land, and particularly the City's parks, in a manner more positively beneficial to wildlife and encouraging other landowners to do the same where appropriate; iv. encouraging the reopening of culverted water courses where opportunities arise and supporting the Alt 2000 initiative; v. encouraging developers to undertake landscaping in an ecologically sensitive manner; and vi. encouraging and supporting community groups, schools and other organisations to work in partnership with the City Council on habitat creation and enhancement initiatives. 2. In addition to the designation of Mull Wood Local Nature Reserve at Croxteth Park, the City Council will seek to designate further Local Nature Reserves (LNRs) in the City and secure appropriate management regimes with initial consideration being given to: <ul style="list-style-type: none"> - Mill Wood - Otterspool Gorge - Childwall Woods and Fields - Land adjacent to Garston Gas Works - Hillfoot Road and Simpsons Pavilion - Melrose Cutting 	Y	Y	<p>Part 1.</p> <ul style="list-style-type: none"> i. n/a; ii. n/a; iii. n/a; iv. n/a; v. The proposed development introduces tree planting and soft landscaping to the site. Following the ecological assessments, several mitigation measures will be incorporated into the landscaping proposals (secured via condition), including 2 floating rafts / pontoons and the provision of additional bat roosts; and vi. n/a. <p>Part 2. n/a</p>

- Mersey Estuary - Croxth Country Park (extension to existing Local Nature Reserve)			
OE9 Fazakerley Ecology Park	N		
OE10 The Mersey Forest	N		
OE11 Protection of Green Space	N		
OE12 Enhancement of Green Space	N		
OE13 Protection of Allotment Sites	N		
OE14 Open Space in New Residential Developments	N		
OE15 Environmental Improvement Corridors	N		
OE16 The Leeds and Liverpool Canal	N		
OE17 The Recreational Route Network 1. The City Council will develop, safeguard and enhance a network of recreational routes for both cyclists and pedestrians throughout the City with particular emphasis placed on: <ol style="list-style-type: none"> i. establishing a public rights of way network; ii. linking public open spaces and New Countryside Areas in the City; iii. linking the network with routes in adjoining authorities; iv. pursuing the completion of and improvements to the key recreational routes ie. The Trans Pennine Trail (Mersey Way and Loop Line) and Leeds and Liverpool Canal towpath route; and v. seeking extensions and improvements to the remainder of the network. 2. Development proposals which would sever a public right of way or a recreational route which the Council considers should be retained, will only be permitted if the developer can demonstrate that an acceptable and equivalent alternative is provided.	Y	Y	<p>Although part 1 of this policy relates to the City Council's role and approach to the Recreational Route Network, there are aspects of the development proposals which relate to recreational routes. The creation of the proposed River Walk, which will eventually link through to Liverpool Waters (once Nelson Dock is developed), and the wider city centre, will provide a recreational route for cyclists and pedestrians adjacent to the River Mersey. The proposed development creates a phase of this route within the application site boundary, allowing for future connections to the south.</p> <p>Furthermore, the proposed development will result in the opening up of a currently inaccessible site, thus establishing a new, high quality recreational route to the city's waterfront from the east.</p> <p>The Council has implemented a series of improvement works to the Regent Road highway, including a footway and cycleway. The proposed development involves minor changes to the levels of this link, which will be addressed via a Section 278 Agreement and will ensure that the proposed development does not prevent the use of this cycle way and footway.</p> <p>In relation to part 2 of this policy, the proposed development will not affect a public right of way or recreational route.</p>
H1 The Provision of Land for New Housing	N		

H2 Housing Renewal	N		
H3 City Centre Living	N		
H4 Primarily Residential Areas	N		
H5 New Residential Development	N		
H6 Sheltered Housing	N		
H7 Conversion of Buildings for Multiple Occupation	N		
H8 House Extensions	N		
H9 Provision for Gypsy Sites	N		
S1 City Centre Retail Development in the Main Retail Area	N		
S2 Paradise Street Development Area	N		
S3 Improving the City Centre Shopping Environment	N		
S4 London Road Shopping Area	N		
S5 District Centres	N		
S6 Development in or in the Edge of District Centres	N		
S7 Improvements to District Centres	N		
S8 Local Centres	N		
S9 Neighbourhood Centres / Parades	N		
S10 Shopping Parks	N		
S11 Retail Warehousing	N		
S12 Out-of-Centre Retailing 1. Retail development outside the City Centre Main Retail Area, PDA, the London Road Shopping Area, the District and Local Centres will only be permitted where: <ol style="list-style-type: none"> i. it can be demonstrated that the proposal, either by itself or in conjunction with other proposals, does not undermine the vitality and viability of any identified centre or any similar centre in an adjacent local authority area; ii. there is a proven need for the level of retail floorspace proposed as part of the development; iii. a sequential approach has been adopted which demonstrates that a suitable site is not available in or at the edge of the City Centre or one of the other centres identified in the UDP; 	Y	N	The site is out-of-centre and is not an allocated retail site. However, a retail sequential test and impact test have not been carried out as the retail element of the proposed development – predominantly the Club Shop – is location-specific and ancillary to the primary use of the proposed development as a stadium.

<ul style="list-style-type: none"> iv. the scheme would not by its nature or scale, either individually or cumulatively, prejudice or delay the Council's Strategy for securing a major retail and mixed use redevelopment and renewal scheme in the Paradise Street Development Area (PSDA); v. the proposed development is readily accessible by public transport, cycling and walking; vi. traffic generated by the proposed development can be accommodated safely on the local highway network, there will be no adverse impact on overall travel patterns and appropriate car parking and servicing arrangements can be provided; and vii. the proposed development would not unduly harm environmental or residential amenities. <p>2. Where planning permission is granted for an out-of-centre development, planning conditions may be attached to that permission to ensure that the development does not subsequently change its character unacceptably.</p> <p>3. If considered necessary by the City Council, planning applications for out-of-centre retail development must be accompanied by a full justification of the proposal. This should include evidence on:</p> <ul style="list-style-type: none"> i. possible harm to development plan strategy; ii. whether the applicant has adopted a sequential approach to site selection, and the availability of suitable alternative sites; iii. 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; iv. the impact on the Council's strategy for securing a major retail and mixed use redevelopment and renewal scheme on the PSDA; v. the site's accessibility by a choice of means of transport; vi. likely changes in travel patterns over the catchment area; and vii. significant environmental impacts. 			<p>It should be noted that the policy is out-of-date in terms of its inconsistency with the NPPF. National policy no longer requires applicants to demonstrate a need for the amount of retail development proposed. Furthermore, the NPPF establishes a threshold for undertaking impact assessments (2,500 sq m) (para. 89), which should be used where there is no locally set threshold, as is the case for Liverpool's statutory development plan.</p> <p>Regardless of the above, as the sequential and impact tests have not been carried out the proposed development does not comply with this policy.</p>
S13 Use of Shops for Class A2 (Financial and Professional Services) Uses	N		
<p>S14 Use of Shops and Other Premises for Class A3 (Food and Drink) Use</p> <p>1. In the City Centre Main Retail Area and in the District and Local Centres planning permission for A3 uses at ground floor level will be permitted provided the proposal:</p> <ul style="list-style-type: none"> i. does not result in the loss of shopping floorspace which if used for A3 use would undermine the vitality and viability of the parent centre; 	Y	Y	<p>Part 1 of the policy does not apply as the site is within an out-of-centre location.</p> <p>Regarding Part 2 of the policy, it is not anticipated that the inclusion of A3 uses within the proposed development would generate a level of disturbance / nuisance, significant traffic movement or demand for parking as the proposed A3 uses are small-scale and ancillary to the main use of the site.</p>

<ul style="list-style-type: none"> ii. would not increase the level of disturbance or nuisance to a level that would be unduly detrimental to the amenities enjoyed by anyone living nearby; and iii. would not generate traffic movements or a demand for parking that would be unduly detrimental to highway safety or residential amenities. <p>2. Elsewhere in the City A3 uses will be permitted provided the proposal:</p> <ul style="list-style-type: none"> i. would not increase the level of disturbance or nuisance to a level that would be unduly detrimental to the amenities enjoyed by anyone living nearby; and ii. would not generate traffic movement or a demand for parking which would be unduly detrimental either to highway safety or residential amenity. 			
S15 Use of Shops and Other Premises as Amusement Centres	N		
S16 Shopfront Design	N		
T1 Bus Facilities	N		
T2 Rail Facilities	N		
T3 Merseyside Rapid Transit	N		
<p>T4 Taxis</p> <p>Developments which are likely to be used by the public will be required to incorporate provision for taxi and Hackney Carriage facilities where there are no existing facilities in close proximity to the site, or where the scale and nature of development will generate a demand for taxi and Hackney Carriage facilities.</p>	Y	Y	<p>The submitted Match / Major Event Day Transport Strategy includes a Taxi Strategy which provides three taxi ranks: Sandhills Lane, Boundary Street and Dublin Street in order to manage the demand for Hackney Carriages associated with the proposed development. The proposed strategy has been prepared in consultation with relevant taxi providers.</p> <p>On a non-match / non- major event day, taxis will be able to use the small parking area at the south-east corner of the site as a drop-off / pick-up point.</p>
T5 Cross River Ferries	N		
<p>T6 Cycling</p> <p>The City Council will promote and support initiatives designed to maximise the role of cycling as a transport mode by:</p> <ul style="list-style-type: none"> i. adopting a Cycling Strategy for Liverpool which will include the formulation of a Strategic Cycle Route Networking and the setting of targets regarding cycle use; ii. improving the condition of designated cycle routes in the City; 	Y	Y	<ul style="list-style-type: none"> i. n/a; ii. n/a; iii. The need for cyclists to access the site on both a match day and non-match day has been taken into account as part of the proposed development. This includes consideration about required changes to levels immediately adjacent to the site at Regent Road, to ensure that the recently installed cycle lane is retained; iv. n/a; v. n/a; and

<ul style="list-style-type: none"> iii. catering for cyclists' needs in the design of all new highway improvement schemes, traffic management schemes, road safety schemes, the road maintenance programme, and giving consideration to the provision of safe cycling routes through all major development and redevelopment sites; iv. improving road signage, road conditions, junction priorities and carriageway crossings where cycle routes join highways; v. introducing appropriate traffic calming and speed reduction measures on designated cycle routes and areas of high cycle usage; and vi. ensuring that secure cycling parking facilities are provided at locations regularly visited by the public and requiring new developments to provide secure cycle parking facilities. 			<ul style="list-style-type: none"> vi. Cycle parking provision will be made on site for 152 bicycles. Within this number, 30 spaces will be accommodated within a two tier cycle shelter, allocated for staff members to encourage cycling to work.
<p>T7 Walking and Pedestrians The City Council will implement measures to encourage walking as a mode of transport and to make the pedestrian environment safer and more convenient by:</p> <ul style="list-style-type: none"> i. improving signing, lighting, surfaces, visibility and crossing places throughout the City and particularly within the City Centre, District Centres and other shopping centres; ii. eliminating pedestrian subways and footbridges where safe alternative ways of crossing roads can be provided; iii. improving access and mobility for all pedestrians, and particularly disabled people and carers with small children; iv. developing safer routes to schools, play areas, parks and other community facilities; v. investigating the feasibility of formulating a Walking Strategy which will include the designation of a Strategic Pedestrian Route Network; vi. Catering for pedestrians' needs in the design of all new highway improvement schemes, traffic management schemes, the road maintenance programme, and giving consideration to the provision of safe and convenient walking routes through all major development and redevelopment sites; and vii. investigating the possibility of introducing traffic calming measures and speed reduction measures in areas where heavy pedestrian flows are experienced or can be anticipated. 	Y	Y	<ul style="list-style-type: none"> i. The Council has recently installed a new footway along Regent Road adjacent to the site access; ii. n/a; iii. The public realm areas around the site have been designed to be inclusive and accessible for all, regarding the need to minimise street furniture, ensure adequate lighting and provide level / step-free access routes; iv. n/a; v. n/a; vi. The proposed development has taken account of the need to ensure safe pedestrian access into and through the site, providing separate pedestrian and vehicular accesses into the site; and vii. The temporary road closures associated with the match / major event day transport strategy will limit vehicle access, providing more space for pedestrian movement.
<p>T8 Traffic Management</p> <ul style="list-style-type: none"> 1. Priority for investment in roads will be given to the maintenance and enhancement of the Primary and Strategy Route Network. Schemes will be implemented which: <ul style="list-style-type: none"> - improve public transport facilities and services; 	Y	Y	<p>Although this policy establishes the Council's priorities for investment in roads, the supporting policy text refers to the Football Clubs of Liverpool as being an area of concern to the City Council, particularly relating to car parking on match days.</p>

<ul style="list-style-type: none"> - improve road safety; - protect and improve the environment, particularly for local residents; - improve conditions for pedestrians and cyclists; - open up or improve access to areas of employment; and - optimise the efficient operation of the highway network. <p>2. A series of appropriate traffic calming measures will be implemented in particular residential areas and local and district shopping centres.</p>			<p>The submitted Transport Assessment concludes that the proposed Match / Major Event Day Transport Strategy, including areas of event day parking controls, will ensure that the proposed development can be accommodated by the existing transport network and the target mode splits can be achieved. This will encourage people to use travel options which are non-car based.</p>
<p>T9 Road Safety</p> <p>1. Road safety measures will be implemented with the aim of:</p> <ul style="list-style-type: none"> i. reducing the number of road accident casualties in Liverpool, by 890 per year within the Plan period; ii. reducing the proportion of fatal and serious road traffic accidents in Liverpool; and iii. minimising the risk of accidents on new roads, and reducing accidents wherever changes are made to the existing highway network. <p>2. Particular attention will be given to reducing the risk of accident and injury to the more vulnerable road users, including children, the elderly and cyclists.</p>	Y	Y	<p>The submitted Environmental Statement (Chapter 7: Transport) identifies that once mitigation measures are in place, the residual impact of the proposed development upon road safety is anticipated to be negligible.</p>
<p>T10 New Road Schemes</p>	N		
<p>T11 Major Road Corridors</p> <p>1. The following five major road corridors have been identified for improvement measures:</p> <ul style="list-style-type: none"> - Eastern Corridor: (including A57 Prescott Road, A5047 Edge Lane, A5080 Edge Lane Drive and B5178 Picton Road/Wavertree Road); - Riverside Corridor North: (including the A5036 Waterloo Road/Regent Road, A565 Great Howard Street/Derby Road and A5038 Vauxhall Road); - Riverside Corridor South: (including A561 Park Road/Aigburth Road/St Mary's Road/Garston Way/Speke Road/Speke Boulevard, A5036 Sefton Street and Riverside Drive); - North East Corridor: (including A59 Scotland Road/Kirkdale Road/Walton Road/County Road/Rice Lane/Walton Vale/Warbreck Moor); and - City Orbital Corridor (including A5058 Queens Drive). 	Y	Y	<p>Recent investments have been made to Regent Road, within the Riverside Corridor North, including the addition of a segregated cycle lane. It is considered that several changes to levels along Regent Road in the vicinity of the application site will be required to accommodate the volume of pedestrians travelling to/from the application site on a match / large scale event day. Such changes include lowering existing kerbs to allow coaches/HGVs to turn into the site and providing a ramp from the existing cycle lane to the new pavement at top-of-kerb level to remove the additional levels change. The proposed works will be agreed via a Section 278 Agreement as necessary and will not conflict with the aims and objectives of Policy T11.</p>

<p>2. Along these corridors, resources will be targeted for the design and implementation of measures designed to:</p> <ul style="list-style-type: none"> - improve the image of the City for visitors, residents and potential investors; - improve conditions for local residents, businesses, pedestrians and cyclists; - facilitate the efficient operation of public transport services; and - ensure the most efficient and effective use of the Major Road Corridors, in order to relieve sensitive locations of heavy traffic. 			
<p>T12 Car Parking Provision in New Developments</p> <p>1. All new developments including changes of use, which generate 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. Additional space for non operational car parking will be permitted up to a maximum standard. This will be determined by:</p> <ul style="list-style-type: none"> - the nature and type of use; - whether off-site car parking would result in a danger to highway and pedestrian safety; - whether the locality in which the proposed development is located is served by public car parking facilities; - whether off-site parking would result in demonstrable harm to residential amenity; and - the relative accessibility of the development site by public transport services. <p>2. The City Council will investigate the feasibility of levying commuted sums from developers in lieu of car parking provision for developments within the City Centre controlled parking zone.</p>	Y	Y	<p>Across the proposed MSCP (internal to the West Stand) and the surface car park, there are a total of 481 car parking spaces. The majority of these will be used by supporters, visitors, the club owners and directors.</p> <p>The Transport Assessment has also considered off-site car parking availability and has proposed areas of residential and industrial event day parking controls, in order to minimise the impact of parking off-site for existing residents and businesses in the surrounding area.</p> <p>The proposed amount of car parking on-site accords with Part 1 of Policy T12 and the intention to encourage non-car borne methods of transport to the proposed development.</p> <p>The application site is considered to be highly accessible to non-car modes of transport.</p> <p>Part 2 of the policy does not apply.</p>
<p>T13 Car Parking for the Disabled</p> <p>Car parking for the disabled should be provided in accordance with the following specific standards:</p> <ol style="list-style-type: none"> i. a minimum of 6% of the first hundred parking spaces in a development should be reserved for Orange Badge holders. Thereafter, the number of spaces will be negotiable; ii. parking bays should be wide enough to facilitate the easy transfer of a wheelchair to and from a car; iii. disabled parking bays should be clearly marked as such and be located close to the point of access to and from the development served; and iv. within multi-storey car parks, disabled parking bays must be adjacent to lifts. 	Y	Y	<p>70 of the proposed 481 on-site car parking spaces will be allocated as disabled spaces. This equates to 14.5% of the overall parking provision. 5% of the accessible bays will be allocated as electric vehicle accessible bays.</p> <p>Within the MSCP, the accessible bays are located close to entrances and lift provision. Within the surface car park the accessible bays are located at the northern end, closest to the stadium access.</p>

			Designated bays will be set out in accordance with BS 8300-1 figure 4 with a standard bay of 2400mm x 4800mm with 1200mm access zones to either side of the space and a marked 1200mm rear safety zone.
T14 City Centre Car Parking Strategy	N		
T15 Traffic Impact Assessment <ol style="list-style-type: none"> 1. Where planning permission is sought for new development which is likely to result in a material change in the character or volume of traffic on the surrounding highway network, the applicant will be required to submit a full Traffic Impact Assessment (TIA). Proposals which exceed any of the following parameters will generally require a TIA as part of the planning application: <ol style="list-style-type: none"> i. residential developments in excess of 200 units; ii. business development (Use Classes 81 and 82) in excess of 5,000 square metres gross; iii. warehousing development (Use Class 88) in excess of 10,000 square metres gross; iv. retailing development (Use Class A 1) in excess of 1,000 square metres gross; v. 100 trips in/out combined in the peak hour; and/or vi. 100 on-site parking spaces. 2. Where extra traffic generated by a proposed development requires road or public transport improvements in the vicinity of the scheme (or beyond), to the extent that works are necessary to enable the proposed development to proceed, conditions may be imposed on any planning permission making its implementation subject to the completion of the works. Where transport improvements will be needed to enable the proposal to go ahead, these should be provided first. 	Y	Y	<p>A Transport Assessment has been carried out and is submitted as part of this planning application.</p> <p>The Transport Assessment concludes that the proposed development can be accommodated by the existing transport network and target mode splits can be achieved.</p> <p>Regarding Part 2 of the policy, where off-site highways amendments have been identified as being required as a result of the proposed development these are to be addressed through a Section 278 Agreement. The proposed works to the land adjacent to Sandhills station, in order to provide a coralling area on match days, are to be agreed via a Section 106 Agreement.</p>
T16 Park and Ride	N		
C1 Social Facilities	N		
C2 Care Facilities	N		
C3 Health Facilities	N		
C4 Child Care Facilities	N		
C5 Schools	N		
C6 Universities and Colleges	N		
C7 The Football Clubs	Y	N	The proposed relocation of Everton Football Club to Bramley-Moore Dock, as considered in this table, does not fully comply with all relevant UDP policies and therefore does not meet the requirement of Part 2 of this policy.

<p>1. In recognition of the car parking and other amenity problems experienced by many residents living within the locality of Liverpool and Everton Football Clubs, particularly on match days, the City Council will seek to provide effective solutions to remedy these problems, and to maintain and enhance residential amenity in the area.</p> <p>2. The City Council will assist both clubs in progressing their development proposals, provided that these do not adversely affect residential amenity and are in accordance with other policies in the Plan</p>			
C8 Indoor Sports Facilities	N		
C9 Outdoor Sports Facilities	N		
C10 Children's Play Areas	N		
<p>EPI Vacant, Derelict and Neglected Land</p> <p>1. The City Council will promote and encourage the reclamation of derelict land and the restoration of neglected land and will encourage the development of these and other vacant sites for appropriate uses.</p> <p>2. The City Council will maintain a comprehensive register of vacant, derelict and neglected land which will aid in prioritising sites for reclamation and investment under the Land Reclamation Programme and other funding strategies.</p> <p>3. In determining priorities for derelict land reclamation, particular attention will be given to:</p> <ul style="list-style-type: none"> i. the contribution the reclamation of the site would make to achieving the aims of urban regeneration and to aiding the implementation of policies in this Plan; ii. the need to facilitate inward investment opportunities and create jobs; iii. the degree of contamination, dereliction or danger posed by the site; and iv. The need to integrate with, and support, other regeneration initiatives and agencies in order to maximise the benefits of reclamation. <p>4. In any reclamation scheme for derelict land, the City Council will seek opportunities to retain, enhance or create features of ecological value.</p> <p>5. Where development is not immediately forthcoming on vacant land, the City Council will encourage temporary uses provided that:</p> <ul style="list-style-type: none"> i. the scheme includes suitable landscaping, surfacing and perimeter treatment; and ii. the long term development of the site is not compromised. 	Y	Y	<ol style="list-style-type: none"> 1. The site is semi-derelict and the Grade II listed Hydraulic Engine House is currently in need of repair and restoration as it has been vacant for a significant period of time. Although there are two businesses located at the site, their leases expire in May 2020. The proposed development will bring the site into public use and ensure it is used throughout the year, bringing activity and substantial investment to a neglected part of the city. 2. n/a; 3. The proposed development of the site will contribute towards urban regeneration and represents a significant investment to North Liverpool, including the creation of thousands of jobs during both the construction and operational phases of development. The ground conditions of the site have been assessed and the development of a Remediation Scheme will be conditioned as part of a future planning approval. This will mitigate the risk posed by potential contamination. 4. As part of the proposed development, ecological features will be included as part of a mitigation strategy, including the addition of 2 floating rafts / pontoons and the provision of additional bat roosts. In addition, trees and soft planting will be introduced at the site; and 5. n/a.

<p>EP2 Contaminated Land</p> <ol style="list-style-type: none"> 1. Before determining any application for planning consent on land which the City Council considers is seriously contaminated, the Council will require the applicant: <ol style="list-style-type: none"> i. to submit details of a site survey identifying the type, degree and extent of any contamination; and ii. to submit details to the City Council of specific remedial measures required to deal satisfactorily with any hazard, together with the proposed timescale for the implementation of the measures. 2. Planning permission will only be granted prior to a full site investigation, where the Council considers that any known or suspected contamination is unlikely to adversely affect the proposed redevelopment. This permission may be subject to conditions requiring a site investigation together with the remediation of any contamination. 	Y	Y	<p>This planning application is accompanied by a Desk Study Report, Geo-Environmental Interpretative Report and Environmental Statement Chapter regarding Ground Conditions (Chapter 10). As summarised in ES Chapter 22, the proposed mitigation measures relating to Ground Conditions include the development of a Remediation Strategy and Construction Environmental Management Plan (CEMP) to be secured via a planning condition and implemented by the contractor, recorded in a Verification Report.</p> <p>With the proposed mitigation measures in place, the resulting residual impacts relating to Ground Conditions are assessed as being of negligible impact.</p> <p>Therefore the proposed development accords with Part 2 of this policy.</p>
<p>EP9 Waste Storage</p> <p>Planning permission will only be granted for development generating commercial waste where there is:</p> <ol style="list-style-type: none"> i. adequate provision for the on-site storage of all waste arising from the operation of the premises; and ii. adequate access to enable waste to be transferred effectively to a licensed waste disposal contractor. 	Y	Y	<p>The submitted plans and Operational Waste Management Strategy demonstrate that adequate provision has been made in the stadium's central waste and recycling area for the on-site storage of all operational waste.</p> <p>The servicing routes around the site have been tracked to ensure that refuse vehicles can access the waste storage areas and remove waste and recyclables from the site.</p>
EP10 Hazardous Substances	N		
<p>EP11 Pollution</p> <ol style="list-style-type: none"> 1. Planning permission will not be granted for development which has the potential to create unacceptable air, water, noise or other pollution or nuisance. 2. Where existing uses adversely affect the environment through noise, vibration, soot, grit, dust, smoke, fumes, smell, vehicle obstruction or other environmental problems, the City Council will: <ol style="list-style-type: none"> i. seek to reduce the problem on site; ii. refuse planning permission for development which would result in a consolidation or expansion of uses giving rise to environmental problems; iii. impose appropriate conditions on any permission which may be granted and/or obtain legal agreements in relation to such a permission, in order to regulate uses; iv. take enforcement action where appropriate; and v. in appropriate circumstances, compulsorily acquire the premises whilst endeavouring to assist in the relocation of the firm, where resources permit. 	Y	Y	<p>As previously stated, the proposed development is anticipated to have significant major / moderate adverse noise impacts which would affect a small number of receptors. However, these impacts are associated with the match day / event day operations with the stadium – in the period leading up the match / event and the match / event itself and therefore will not be constant.</p> <p>The Environmental Statement (Chapter 22) concludes that the residual impact of the proposed development upon air quality and water quality are not substantial.</p> <p>As a result, we do not consider that this impact is unacceptable to the level which would warrant refusal of the planning application. Therefore the proposed development complies with Policy EP11.</p>

<p>3. In the case of new development close to existing uses which are authorised or licensed under pollution control legislation, and which are a potential nuisance to the proposed development, planning permission will not be granted unless the City Council is satisfied that sufficient measures can and will be taken to protect amenity and environmental health.</p>			
<p>EP12 Protection of Water Resources</p> <p>1. Planning permission will not be granted for development which, in the opinion of the City Council following consultation with the Environment Agency, would adversely affect the quality or supply of surface water or groundwater as a result of:</p> <ul style="list-style-type: none"> i. the nature of the surface or waste water discharge; or ii. unsatisfactory arrangements for the disposal of foul sewage, trade effluent or surface water; or iii. the disturbance of contaminated land; or iv. the spillage or leakage of stored oil or chemicals. <p>2. Planning permission will not be granted for developments involving local abstraction of surface or ground water which in the opinion of the City Council following consultation with the Environment Agency would:</p> <ul style="list-style-type: none"> i. increase requirements for water, unless an adequate water supply already exists or would be provided in time to serve the development; or ii. pose an unacceptable risk to the current supply of water users. 	Y	Y	<p>The proposed drainage scheme has been discussed with the Environment Agency, United Utilities and LCC as the Lead Local Flood Authority. Chapter 11 of the submitted Environmental Statement considers the impact of the proposed development upon water quality and water supply. The chapter recommends the adoption of mitigation measures during both the construction and operational phases. For the construction period the proposed mitigation includes the development of a Construction Environmental Management Plan (CEMP) to establish measures such as using recycling water systems, using rainwater harvesting, use of damping down measures and incorporation of interceptors where appropriate. Operational measures include the development of an efficient water supply (including leak detection) and use of low flow fittings, including waterless urinals.</p> <p>The ES concludes (Chapter 22) that the proposed development will not have a significant adverse impact on water quality or supply during either the construction or operation of the proposed development.</p> <p>Part 2 of this policy is not applicable.</p>
<p>EP13 Flood Prevention</p> <p>1. Unless appropriate alleviation or mitigation measures are carried out, planning permission will not be granted for development which would:</p> <ul style="list-style-type: none"> i. be at direct unacceptable risk from flooding; ii. be likely to increase the risk of flooding elsewhere; iii. cause loss of access to watercourses for future maintenance; iv. result in an adverse impact on the water environment due to additional surface water run off; or v. have adverse effects upon the integrity of tidal and fluvial defences. <p>2. All works in, under, over or adjacent to water courses, waterbodies and the coast will need to be approved by the Environment Agency's Environmental Appraisal Procedure. Culverting and diversion will not be permitted except to enable reasonable access over a watercourse.</p>	Y	Y	<p>The submitted Flood Risk Assessment (FRA) has been produced following consultation with the Environment Agency and LCC as the Lead Local Flood Authority. The FRA demonstrates that with mitigation measures in place and taking account of climate change:</p> <ul style="list-style-type: none"> i. the proposed development will not be at an unacceptable risk of flooding; ii. the proposed development will not increase the risk of flooding elsewhere; iii. there will be no loss of access to watercourses for future maintenance; iv. there will be no significant adverse impact due to additional surface water run off; and v. there will be no adverse effects upon the integrity of tidal and fluvial defences.

EP14 Development by Public Utility Companies	N		
EP15 Environmental Impact Assessments 1. All planning applications and development proposals should include sufficient information to enable the City Council and consultees to assess potential environmental impacts accurately. 2. If the City Council believes that the scheme may have significant environmental impacts by virtue of the size, location or type of development, the applicant must provide the City Council with the results of an Environmental Impact Assessment prior to the determination of the application.	Y	Y	The applicant has undertaken an Environmental Impact Assessment and the findings are presented in the submitted Environmental Statement.
EP16 Renewable Energy	N		
EP17 Minerals	N		

COMPLIANCE WITH THE JOINT MERSEYSIDE & HALTON WASTE LOCAL PLAN (ADOPTED 2013)

JOINT WASTE POLICY	RELEVANT TO PROPOSED DEVELOPMENT (Y / N)	COMPLIANT (Y / N)	EXPLANATION
<p>WM8 Waste Prevention and Resource Management</p> <p>Any development involving demolition and/or construction must implement measures to achieve the efficient use of resources, taking particular account of:</p> <ul style="list-style-type: none"> Construction and demolition methods that minimise waste production and encourage re-use and recycling materials, as far as practicable on-site; Designing out waste by using design principles and construction methods that prevent and minimise the use of resources and make provision for the use of high-quality building materials made from recycled and secondary sources; Use of waste audits or site waste management plans (SWMP), where applicable, to monitor waste minimisation, recycling, management and disposal. <p>Evidence demonstrating how this will be achieved must be submitted with development proposals of this type</p>	Y	Y	<p>A Construction Waste Management Strategy has been developed to maximise re-use/recovery opportunities and minimise off-site disposal during the construction period.</p> <p>This strategy adheres to the Waste Hierarchy and looks at methods to manage materials on-site and monitor progress through a Resource Management Plan.</p>

<p>WM9 Sustainable Waste Management Design and Layout for New Development</p> <p>The design and layout of new built developments and uses must, where relevant, provide measures as part of their design strategy to address the following:</p> <ol style="list-style-type: none"> 1. Facilitation of collection and storage of waste, including separated recyclable materials; 2. Provide sufficient access to enable waste and recyclable materials to be easily collected and transported for treatment; 3. Accommodation of home composting in dwellings with individual gardens; 4. Facilitate small scale, low carbon combined heat and power in major new employment and residential schemes, where appropriate. 	Y	Y	<ol style="list-style-type: none"> 1. The submitted plans and Operational Waste Management Strategy demonstrate that adequate provision has been made in the stadium's central waste and recycling area for the on-site storage of all operational waste. The proposed development includes the provision of litter bins throughout the public realm areas; 2. The servicing routes around the site have been tracked to ensure that refuse vehicles can access the waste storage areas and remove waste and recyclables from the site; 3. n/a; and 4. n/a.
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