

Princes Dock Boundary Wall
Planning Statement

PS/256320-02

5 December 2017

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

256320-02

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1 Introduction

1.1 Overview

- 1.1.1 This planning statement is submitted in support of a full detailed listed building planning application for the new access through the dock boundary wall and improved soft and hard landscaping at Princes Dock, Liverpool, L3 1QP (Northing 390758, Easting 333739).
- 1.1.2 This application will provide Princes Dock and the wider waterfront with a wider opening in the existing dock boundary wall allowing better connection in and out of Princes Dock to the wider City Centre and north Liverpool.
- 1.1.3 The application sets out a permanent solution to the opening in the wall which supports both vehicular and pedestrian traffic entering and leaving Princes Dock enabling the construction of four consented developments along William Jessop Way:
- Plot A-03: William Jessop House (application ref 15F/0560);
 - Plot A-04: The Lexington (application ref 16F/1370);
 - Plot A-05: Plaza 1821 (application ref 17F/0913); and
 - Plot A-06: Hive City Docks (application ref 17F/0546).
- 1.1.4 This planning statement provides a review of the proposed development against relevant national and local planning policies and guidance, identifying the key benefits arising from the proposal.
- 1.1.5 The document should be read alongside the accompanying suite of plans, drawings and further supporting documentation that make up this planning application. These support and enable the planning application to be validated and determined.
- 1.1.6 This application does not form part of the Liverpool Waters consent (application ref 10O/2424) but has informed the Princes Dock Masterplan that will be submitted to Liverpool City Council under a discharge of conditions application for condition 11 of the outline consent. Both applications will help update the proposals for Princes Dock and will allow the neighbourhood to remain consistent with all future developments. A Liverpool Waters Conformity Statement has been submitted as part of this application to show how the proposal does not negatively impact on the outline consent.

2 Site Background

2.1 The Development Site

- 2.1.1 The dock boundary wall is a Grade II listed feature and is within the Stanley Dock Conservation Area. Princes Dock sits outside the Liverpool Mercantile City World Heritage Site, but is within the Buffer Zone and is also within the setting of a number of important heritage assets (including the dock boundary wall).
- 2.1.2 The wall however is within the World Heritage Site and was constructed between 1816 and 1821 to provide security to the working dock and is a striking feature to the dock estate. It stands approximately 5.5 metres high and is 4 bricks thick, built in English bond.
- 2.1.3 Currently there are only two dock wall openings in use within Princes Dock, these are both pedestrian only. Neither of the openings are particularly legible or easy to find from the dock side.
- 2.1.4 As set out in section 1.1.3 above, the opening in the wall will be situated adjacent to four future developments along William Jessop Way.

2.2 Princes Dock

- 2.2.1 Princes Dock is located along the waterfront between the Pier Head to the south and Princes Half Tide Dock to the north. The site is bounded to the west by the river Mersey and Bath Street and New Quay to the east.
- 2.2.2 The nearest station is Moorfields Station, served by Merseyrail, approximately 350m from the southern end of the site. Lime Street is the nearest main line station and lies approximately 1.5km from the site.
- 2.2.3 The site is easily accessible on foot from the south and forms part of the waterfront walk. This accessibility to the waterfront currently ends at the northern edge of Princes Dock. The city centre lies to the south east of the site, with the Albert Dock and the other existing waterfront attractions to the south. Old Hall Street and the Central Business District is situated to the east of the site where Moorfields Station is located.

2.3 Relevant Planning History

2.3.1 The following applications were submitted and approved by Liverpool City Council within or around the development site. Further information regarding each application can be found on Liverpool City Council's website using the planning reference number provided.

2.3.2 03F/3687 – MSCP, Princes Dock

To erect multi storey split level car park on 18 levels with day nursery and accommodation on ground level for use for purposes within Classes A1 (retail) and A3 (food and drink)

The existing multi storey car park was given permission in 2003. Subsequent applications to increase the number of floors on the car park have been approved but have since lapsed.

2.3.3 03F/3943 – Plot 1, Princes Dock

To develop site by the erection of a residential development comprising 162 units together with associated car parking provision and ground floor A1 and A3 uses.

This planning consent was also given in 2003. It was given permission for a residential development consisting of different uses and car parking. This consent has since lapsed.

2.3.4 06/0592 – Dock Boundary Wall, Princes Dock

To create a new opening in the Princes Dock boundary wall adjacent to retail/multi storey car park and provide an interim landscape scheme.

This application was approved and carried out allowing for the opening in the dock boundary wall located closed to the proposed opening to occur. Once the proposed opening of the wall has taken place, this existing opening will be bricked up to allow for better legibility.

2.3.5 10F/2787 – Plot 3a, Princes Dock

Application to replace extant planning permission 07F/0028 (To erect a mixed development of 133 no. apartments, 129 no. bedroom hotel, 12,000 sqm of commercial offices and 500 sqm of retail floorspace, situated in a 34 storey tower and 8 storey building with a central piazza, 153 no. space basement car park, ancillary uses and associated infrastructure.

An extension of time limit application was submitted for an existing application that had previously received full planning consent for the above description of a plot adjacent to this specific development plot. This consent has since lapsed.

2.3.6 100/2424 – Liverpool Central and Northern Docks (Liverpool Waters Site)

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).

The vision of Liverpool Waters is to regenerate the 60 hectare historic dockland site to create a world-class, high-quality, mixed use waterfront quarter in central Liverpool. The scheme will create a unique sense of place, taking advantage of the sites' cultural heritage and integrating it with exciting and sustainable new development.

Princes Dock is identified as “phase 1” of Liverpool Waters and forms the ‘Princes Dock Neighbourhood’, 1 of 5 distinctive neighbourhoods making up the entire 60 hectare site. The original Liverpool Waters masterplan agreed in principle to a new opening within the historic wall where appropriate to help with accessibility and permeability through the masterplan and with surrounding areas.

2.3.7 12L/0428 – Bath Street and Junction of Dublin Street Dock Boundary Wall Alterations

To carry out alteration to dock boundary wall in connection with the proposed Liverpool Waters redevelopment scheme, including enlarging an existing opening on Bath Street and the creation of a new opening at the junction of Dublin Street/Regent Road and installation of new gate piers.

This application was submitted in adjacent to the wider Liverpool Waters scheme. One of the openings was in a location close to the proposed alteration of the wall within Princes Dock. The application was withdrawn to allow more detailed documents and drawings to be submitted at a later date.

2.3.8 15F/0560 – William Jessop House, Princes Dock

To erect an eight-storey office building (Use Class B1) with flexible ground floor space for retail, financial and professional, food and drink and office use (Use Classes A1/A2/A3/A4/B1).

This proposal received permission in June 2015 and is one of the 4 developments noted in section 1.1.3. It sits adjacent to the proposal submitted within this planning application.

2.3.9 16F/1370 – The Lexington, Princes Dock

To erect a 34 storey residential tower (Use Class C3) comprising 304 private rented sector apartments and 40 car parking spaces, 76 cycle parking spaces together with plant, storage, reception, residential amenity areas, hard and soft landscaping and associated works.

This proposal received permission in September 2016 and is one of the 4 developments noted in section 1.1.3.

2.3.10 17F/0546 – Hive, Princes Dock

Application to enable the construction of a 31 storey residential tower (Use Class C3) comprising 278 private rented sector apartments and 27 car parking spaces (2 disabled), 3 motorcycle bays, 90 cycle parking spaces in addition to a ground and top floor restaurant/café (Use Class A3). Together with, plant, storage, reception, residential amenity areas and hard and soft landscaping on currently vacant brownfield land at William Jessop Way, Princes Dock.

This proposal received permission in August 2017 and is one of the 4 developments noted in section 1.1.3.

2.3.11 17F/0913 – Plaza 1821, Princes Dock

Application to erect 15 storey residential tower comprising 105 apartments (C3 Use) and two ground floor commercial units (A1/A3/A4 Use) with 26 external car parking spaces and landscaping works.

This proposal received permission in August 2017 and is one of the 4 developments noted in section 1.1.3.

2.3.12 The above applications show that development on or around the plot proposal has been supported for a number of years and this application

will support the existing developments within Princes Dock and sustain this location as a key area for growth for the City of Liverpool.

2.4 The Applicant

- 2.4.1 The Peel Group is a leading UK-based infrastructure, transport and real estate company. The firm has established experience in delivering major urban regeneration projects successfully. As well as Liverpool Waters, their long-term strategic projects include Wirral Waters; Liverpool 2 (Peel Ports); MediaCityUK; Port Salford and Trafford Quays. Such projects generally have involved partnerships with stakeholders, and in particular, local authorities.
- 2.4.2 Peel is joint owner of the Mersey Docks and Harbour Company Ltd. All of the land involved in the Liverpool Waters scheme is owned and controlled by Peel.

3 Development Description

3.1 Quantum of Development

- 3.1.1 This planning application is for a full detailed listed building planning application to create a new opening in the Princes Dock boundary wall adjacent to Bath Street. The application also includes associated hard and soft landscape works.
- 3.1.2 The application site area is 1,804 sqm and the proposals will include improved public realm work and an improved pedestrian and vehicular access into and out of Princes Dock through the existing dock boundary wall. The alterations are necessary to improve permeability and movement to and from Princes Dock and to allow convenience access for construction traffic for the proposed development along William Jessop Way in addition to residents, workers and visitors in the future.
- 3.1.3 Full design details are provided within the accompanying Design and Access Statement in addition to the Heritage Impact Assessment. The new opening has been carefully designed to be functional but still relate well to the historic boundary wall. It creates a very clear and direct connection across the dock and up towards the Central Business District.
- 3.1.4 The opening itself is part of larger proposals for public realm improvements with Princes Dock, along Bath Street and up to New Quay and the Strand.



Figure 1 – Extract from Site Location Plan detailing the development boundary

4 National Planning Policy Context

This section of the Planning Statement provides an overview of the spatial policy context for this development. This section should be read alongside the more detailed policy review as set out in Appendix A, which demonstrates how the proposal is supported by the identified policy objectives at the national, sub regional and local level.

4.1 National Planning Policy Framework

4.1.1 The National Planning Policy Framework (NPPF) was formally released in March 2012. It provides a national framework different to the previous Planning Policy Statements and Planning Policy Guidance Notes, which set out the Government's planning policies for England and how they are expected to be applied. There is a presumption in favour of sustainable development and economic growth, whilst balancing and protecting the needs and priorities of communities without adversely impacting on future generations.

4.1.2 Planning Authorities should give 'due weight' to relevant policies in their existing plans according to their degree of conformity with the NPPF. At present, the NPPF holds greater weight than both the Liverpool Unitary Development Plan and emerging Local Plan due to the case that these local policy documents are seen as out of date or invalid compared with the NPPF.

4.1.3 Three key themes running through the NPPF include:

- **Planning for prosperity (an economic role)** – ensuring that sufficient land of the right type and in the right places is available to allow growth and innovation;
- **Planning for people (a social role)** – promotion of strong, vibrant and healthy communities, meeting the need of present and future generations, and by creating a good quality built environment with accessible local services;
- **Planning for places (an environmental role)** – protecting and enhancing the natural, built and historic environment.

4.1.4 The document states encouragement should be given to solutions which reduce congestion (para 30).

4.1.5 The NPPF attaches great importance to the design of the built environment (para 56) and specifically aims to ensure that developments establish a strong sense of place and optimises the potential of sites to accommodate development and create safe and accessible environments (para 58). Decisions should address the

connections between people and places and the integration of new development into the natural, built and historic environment (para 61).

- 4.1.6 Planning policies and decisions should encourage the efficient use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value (para 111).
- 4.1.7 Heritage assets should also be recognised and applicants should describe the significance of any assets affected by a planning application and preserve them in a manner appropriate to their significance (para 128). If the proposal leads 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 securing its optimum viable use (para 134).
- 4.1.8 The development proposal conforms to the three roles described above in addition to the guidance set out in the document. Meetings have been held with the Council to discuss the wall opening and its relationship with the public realm. In addition to this, Historic England have also been consulted and a Heritage Impact Assessment has been produced to assess the proposals against the area's outstanding universal value. Overall, this development complies with relevant policies within the NPPF.

4.2 Planning Practice Guidance

- 4.2.1 The Planning Practice Guidance (PPG) resource was launched on the 6th March 2014 seeking to make planning guidance easier and simpler for practitioners and the public. The PPG supports the NPPF, bringing together, and updating, previous guidance into one online resource, clarifying a number of key planning issues which were previously raised in complicated guidance.
- 4.2.2 Applicants proposing change that might affect the Outstanding Universal Value, integrity and, where applicable, authenticity of a World Heritage Site through development need to submit sufficient information with their applications to enable assessment of impact on Outstanding Universal Value (Reference ID: 18a-035-20140306).
- 4.2.3 Any works to demolish any part of a listed building or to alter or extend it in a way that affects its character as a builder of special architectural or historic interest required listed building consent (Reference ID: 18a-045-20140306).
- 4.2.4 Our application conforms to the above guidance and the NPPG further emphasises the importance of properly addressing key planning issues set out in the NPPF and backs up the viability of the proposed

development through the use of seeing positive planning proposals as sustainable development.

5 Local Planning Policy Context

Local Planning Authorities must determine planning applications in accordance with their development plan unless material considerations indicate otherwise. Although the NPPF holds greater weight over Liverpool's local policy due to an out of date local plan, relevant planning policy is still vital in decision making within Liverpool and this development proposal.

This section should be read alongside the more detailed policy review as set out in Appendix A, which demonstrates how the proposal is supported by the identified policy objectives at the national, sub regional and local level.

5.1 Liverpool Unitary Development Plan

- 5.1.1 The Liverpool Unitary Development Plan (UDP) was adopted in November 2002 and the majority of its policies were saved by the Secretary of State in 2007. The age of the document is such that many of the general policies in place are of broad relevance only, their detailed requirements having been overtaken by more up to date national policy guidance.
- 5.1.2 The annotations on the UDP proposals map (see figure 2) are of greater significance, indicating the Council's intentions, at the time the plan was adopted. The development site and Princes Dock as a whole falls under a '*site for various types of development*'. Overall, this policy (UDP E6) seeks regeneration of the land with a variety of land uses including residential, business and recreation. The relevant policy, and other policies in the plan, makes it clear that other land uses often will be appropriate providing they meet relevant criteria in the plan.
- 5.1.3 Within the UDP, it states that Princes Dock provides one of the major development opportunities in central Liverpool where planning permission exists on site for office, hotel, conference centre and

residential development with associated retail, car parking and support uses.

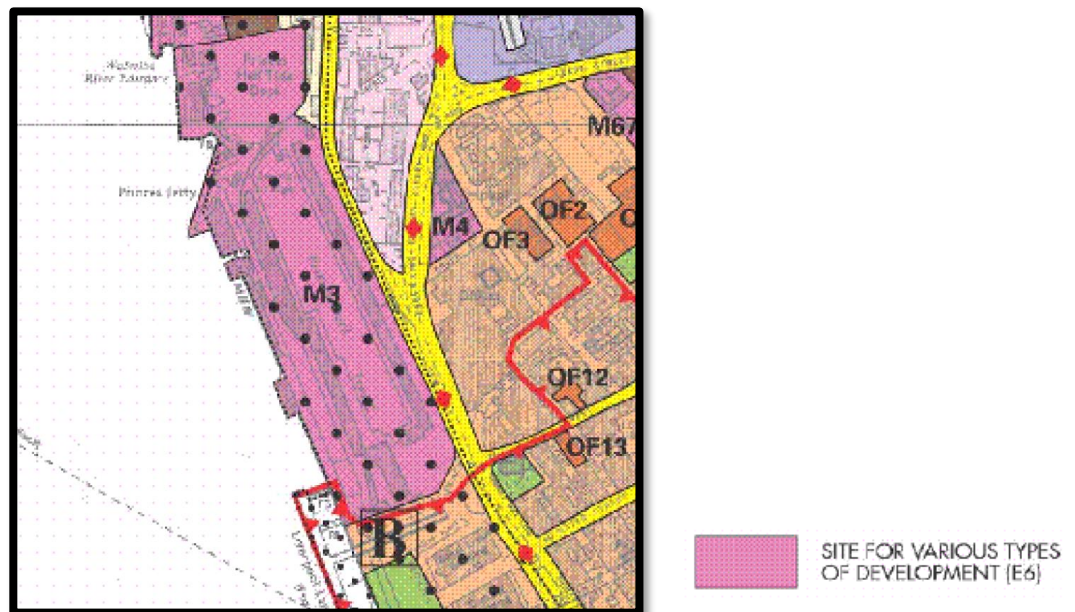


Figure 2 – Extract from Liverpool City Council's UDP (2002)

- 5.1.4 UDP HD4 states that consent will not be granted for external alterations to a listed building that would adversely affects its architectural or historic character or not be accompanied by the full information necessary to assess the impact of the proposals. Any works which are not of a high standard of design in terms of form, scale, detailing and materials will also not be granted consent.
- 5.1.5 UDP T10 highlights that construction of new roads will be supported only where it can be clearly demonstrated that it will achieve one of the following aims:
- I. Assist urban regeneration by attracting new investment through the opening up of employment and development opportunities; and/or
 - II. Secure environmental improvements by removing extraneous traffic from congested areas, particularly residential areas and other sensitive locations.
- 5.1.6 *Princes Dock within Liverpool's UDP is seen as a 'site for various types of development'. As Princes Dock provides one of the major development opportunities for mixed use, a strong connection to the rest of the City is required through this application. The development proposal should not be seen as something that does not comply with*

local policy. The proposal will help continue to regenerate this area of Princes Dock and help boost the vitality of the area.

- 5.1.7 *The application is supported by a detailed Design and Access Statement and Heritage Impact Assessment which sets out key information to assess the impact of the proposals and show the design evolution of the proposal to a high quality scheme to ensure UDP HD4 is conformed to.*
- 5.1.8 *The scheme will help promote Princes Dock and through an enhanced connection to the wider City Centre will act as a catalyst to attract new investment and development opportunities. A Transport Statement has been submitted as part of this planning application which sets out how the new opening will not have a negative impact on the existing area in terms of congestion.*
- 5.1.9 *As stated above, Princes Dock provides development opportunities for a range of uses, therefore it is evident that the UDP provides strong support for regeneration of the site for the proposed development.*

5.2 Liverpool City Council's Local Plan

- 5.2.1 In February 2013, Liverpool City Council determined that previous strategic development planning work (i.e. Liverpool's Core Strategy Submission Draft 2012) should not be submitted due to changes in Government guidance and policy. Instead, a Local Plan for Liverpool should be prepared setting out strategic objectives and more detailed guidance for the next 15-20 years.
- 5.2.2 The new draft Liverpool Local Plan was approved for public consultation by the City Council's Cabinet on 19th August 2016 and the document went under consultation between 15th September 2016 and 31st October 2016.
- 5.2.3 Once adopted, it will replace the Liverpool UDP (2002) and will intend to address all relevant issues to provide the up to date, strategic planning policy framework for Liverpool.
- 5.2.4 As the Local Plan is still in the draft stages, it holds very little weight when determining this application. However, Liverpool City Council's Draft Local Plan (2016) will still be used and built upon to set out strategies, therefore it is of great importance that this is given some consideration within this application.

5.3 Liverpool City Council Draft Local Plan (2016)

5.3.1 Princes Dock is of central importance for delivery of employment and residential development in the emerging Core Strategy. The strategy carries forward the existing strategic investment area and growth point initiatives. The proposed development site is regarded as one of the ‘*major opportunity sites*’ for employment. Section 6 of the Local Plan sets out the vision and objectives for Liverpool City Centre and identifies three key planning issues for the areas as:

- Improving connectivity with other parts of the City Centre
- Enhancing the use of the waterspaces for recreational uses
- Ensuring opportunities for further investment are maximised

5.3.2 Policy HD1 require applications be fully justified and accompanied by full information necessary to assess the impact of the proposals on heritage assets. Proposals that affect heritage assets should be accompanied by a Statement of Significance which may form part of the Design and Access Statement and/or a Heritage Impact Assessment to demonstrate that the architectural and historic interest of the structure has been understood and accounted for in any proposals.

5.3.3 Policy CC8 sets out that development on the Waterfront should be of a high quality design that respects its sensitive historic surroundings, whilst making adequate provision for access. The policy sets out a number of objectives proposals should seek to do which include:

- Respect the form and mass of the dock estate and its industrial heritage and make provision for the repair, conservation, integration and interpretation of heritage assets;
- Reinforce the historic grain of buildings, water spaces and other spaces;
- Contribute towards enhanced pedestrian connectivity across ‘The Strand’, and making the riverfront more accessible to the public; and
- Provide enhanced pedestrian / cycle movement routes;
- Ensuring inclusive and usable public realm; and
- Ensure a safe, vibrant, inclusive, accessible and welcoming environment.

5.3.4 Policy CC9 states that the City Council will support proposals which facilitate greater access and recreation/leisure use of dock water spaces

and their quaysides and which contribute towards the creation of an inclusive and usable movement round along Liverpool's Waterfront.

5.3.5 *The site as a whole play a strategically important role within the Core Strategy and is set to be developed for a mix of uses to make a significant contribution to Liverpool's economic growth through new commercial and business employment opportunities. Therefore, this development proposal is in prime position in terms of planning strategy and local land use as it promotes Princes Dock further, making it accessible for all and the application conforms with the above policies.*

5.3.6 *The enhanced opening will allow the waterfront to be become part of the City Centre due to the ease of connectivity and the attractiveness of Princes Dock through careful landscaping and design work. The development contributes towards obtaining inclusive access for all and opening up waterfront areas.*

5.4 Liverpool Maritime Mercantile City World Heritage Site – Supplementary Planning Document (SPD) (2009)

5.4.1 Whilst the Liverpool UDP makes no reference to the World Heritage Site as it pre-dates the inscription of the WHS, this SPD provides interim planning policy guidance to ensure development proposals have due regard to the WHS.

5.4.2 The purpose of the SPD is to provide a planning framework for development which will enhance the City's heritage and boost investment, tourism and regeneration, encouraging economic regeneration with an emphasis on quality.

5.4.3 The document contains guidance regarding urban design principles likely to be accepted. These relate in particular to tall buildings and the maintenance of key views, but they also include a large number of more detailed design requirements.

5.4.4 Section 4.2.3 sets out that applicants for developments will need to undertake further analysis and assessment based on this material to clearly demonstrate that they understand the characteristics of their site

and its environs and that the design of their development has responds to the characteristics and OUV.

- 5.4.5 The SPD states in section 4.7.12 that proposals should improve public access to the existing waterspace or surrounding quaysides and should encourage the leisure and recreational use of water spaces.
- 5.4.6 *It is encouraged that development is sensitive to the requirement to preserve and enhance the setting, character and outstanding universal value of the WHS, more information relating to the developments setting is identified in the application's Heritage Impact Assessment and Design and Access Statement and shows how it does not negatively impact the Buffer Zone or World Heritage Site.*

5.5 Liverpool Maritime Mercantile City, World Heritage Site Management Plan (2017-2024)

- 5.5.1 The purpose of the management plan is to ensure the effective protection of the World Heritage Site for present and future generations. The document sets out to accomplish this through establishing a more valued role and active profile for the World Heritage Site in Liverpool through promotion, interpretation and celebration.
- 5.5.2 Within the document, Aim 2 ensures that the entire WHS is accessible to everyone with a high profile as a valued and fundamental element of the city's cultural heritage. Objectives are set to establish improved level of accessibility to the WHS and interconnectivity between the different character areas within it.
- 5.5.3 Aim 3 seeks to maximise the benefits the WHS brings to the City, using it more effectively as a lever for investment and to promote Liverpool as a destination to live, visit, study and do business.
- 5.5.4 *This development proposal seeks to enhance connectivity between Princes Dock and the wider City Centre therefore maximising the benefits of the WHS, promoting the area and encouraging growth. The proposals have been carefully considered within the setting of the World Heritage Site and as mentioned supporting documents including the Heritage Impact Assessment shows the impact the development has on the OUV and heritage assets.*

6 Benefits Associated with the alterations to the dock boundary wall

In assessing the potential effects of this proposed development, it is important to raise the significant regeneration benefits associated with this application.

It is evident that there are significant benefits for this scheme to be approved and these are summarised below.

6.1 Strategic Benefits

- 6.1.1 Through the NPPF, sustainable development is one of the main Government objectives when it comes to planning applications and new infrastructure. This development is situated in Princes Dock where there has recently been consent for 4 office and residential buildings. The proposed development will contribute to these developments by providing a sustainable access route in and out of the area allowing Princes Dock to be better connected to the wider City Centre bringing Liverpool closer to the waterfront and promoting these historic areas.
- 6.1.2 It is hoped that this proposal in addition to the Princes Dock developments will act as a catalyst for Princes Dock and the wider brownfield land to the north attracting new businesses and developers to the area.
- 6.1.3 The new opening in the wall will also help link visitors to and from the City with the proposed Cruise Liner Terminal which is proposed along Princes Dock's waterfront.
- 6.1.4 All this will give the potential to bring positive benefits across Liverpool with this new development opportunity.

6.2 Physical Benefits

- 6.2.1 This development will bring more footfall onto Princes Dock, helping local businesses and enabling this primary business area to continue to prosper with a range of uses.
- 6.2.2 Improved public realm surrounding the site will help connect this vacant piece of land to the existing infrastructure of Princes Dock and the wider highways outside the boundary. Once the solution is in place, congestion within Princes Dock should be reduced as there will be an

additional opening allowing cars to leave the neighbourhood from the Multi-Storey car park, offices and the future residential developments.

6.3 Socio-Economic Benefits

- 6.3.1 This development will assist in unlocking the wider Liverpool Waters scheme, specifically the Princes Dock future developments and will help drive economic growth in this area of Liverpool. This application is necessary in order for the wider scheme to be sustainably achieved and will allow suitable access and permeability into the site.

6.4 Heritage Benefits

- 6.4.1 As stated in the supporting Heritage Impact Assessment, this application will help promote the listed dock boundary wall and conserve and protect the heritage asset. There will be a greater opportunity for the future interpretation and understanding of the docks through further archaeological and heritage investigations.

7 Consultation

- 7.1.1 The team have met with Liverpool City Council's planning and highways team to discuss the proposals and support the application in principle.
- 7.1.2 In addition to pre-application meetings with LCC, the team have informally met with Historic England through the Liverpool Waters Conservation Management Board who understood the importance of the proposal to enable greater connectivity between Princes Dock and the wider City Centre. Comments were made regarding the final material specifications and the handling and managing of historic assets, this is picked up in more detail within the Heritage Impact Assessment.
- 7.1.3 Peel have also met with local businesses and stakeholders to inform them of the proposals to ensure that they are aware of possible disturbances during the work but also highlight the long term advantages of development.

8 Support for proposed use

8.1 Conclusion

- 8.1.1 Sections 4, 5 and 6 state the case for support of this planning application demonstrating how the development is in compliance with relevant national and local planning policy and by taking into account other material planning considerations. Through this, the development should be granted planning permission.
- 8.1.2 As set out in this document and in further detail within Appendix A, national and local policies support this development. In order for Liverpool to progress and expand, securing future development through proposals such as this is vital for Liverpool's and the surrounding City Region's economic growth and waterfront enhancement.
- 8.1.3 The NPPF and local policy states that priority should be given to link areas of economic opportunity with areas in greatest needs of economic, social and physical restructuring and regeneration. This development will give the opportunity for other developments to come forward and be unlocked through the Liverpool Waters project and therefore represents an important economic opportunity in the context of Liverpool and the City Region.

APPENDIX A

Title of Policy/Guidance	Key Issues of Relevance to Liverpool Waters	Conformity of the development
<p><i>Liverpool Unitary Development Plan (2002)</i></p>	<p>Liverpool UDP comprises the statutory development plan for the area. Liverpool City Council's Local Plan will progressively replace the UDP. In the meantime the majority of policies were saved by the Secretary of State in a letter dated 18 September 2007 in order to ensure continuity in the plan-led system and a stable planning framework locally in particular, the continual supply of land for development. The extended policies need to be read in context. As advised by the Secretary of State:</p> <p><i>“...where policies were adopted some time ago, it is likely that material considerations, in particular the emergence of new national and regional policy and also new evidence, will be afforded considerable weight in decisions”.</i></p> <p>Strategic Objectives and Policies</p> <p>The UDP is in 2 parts. Part 1 deals with the strategy of the plan. Part 2 comprises the more detailed development control policies and specific proposals.</p> <ul style="list-style-type: none"> - Economic regeneration; - Environmental improvement; and - Reduction of inequality 	<p>This application conforms to the saved policies of the Liverpool UDP. Although it is recognised that the age of the document is such that many of the general policies in the plan are of broad relevance only, their detailed requirements having been overtaken by more up-to-date national policy guidance.</p> <p>In overall terms, the UDP provides broad support for regeneration within Liverpool especially within and around the development site.</p>

	These themes underpin certain strategic policies of the plan that are related to this development.	
	<p>Policy GEN1 – Economic Regeneration</p> <p>Aims to reverse the decline in economic activity, investment and employment which Liverpool has experience through:</p> <ul style="list-style-type: none"> - Identification of regeneration areas including the City Centre, the Waterfront, docks and hinterland; - The provision and servicing of sites for economic development and investment; and - Promoting and enhancing the role of Liverpool Airport and the City’s docks. 	<p>This development will clearly support economic regeneration. It will provide regeneration on a key brownfield waterfront site and create greater use of a key site in the docks and the City Centre.</p> <p>The proposal is clearly supported by Policy GEN1.</p>
	<p>Policy GEN3 – Heritage and design in the built environment</p> <p>Aims to protect and enhance the built environment of the City by preserving and enhancing historically and architecturally important buildings and area, encouraging a high standard of design, improving accessibility for areas with mobility impairments and by creating an attractive environment.</p>	<p>A Heritage Impact Assessment accompanies this application and identify historic and architectural parts of the site. Consideration has been given to ensuring that appropriate measures are taken to preserve and manage areas of heritage importance.</p> <p>The proposal therefore complies with Policy GEN3.</p>
	<p>Policy GEN6 – Transportation</p> <p>Aims to provide a balanced transport infrastructure which, amongst other things, provides access to facilities</p>	<p>The application is supported by documentation which demonstrate that the proposal will be accessible by a range of transport modes and will not negatively impact the surrounding area.</p>

		The development is supported by policy GEN6.
	Policy GEN 8 – Environmental Protection Aims to protect and enhance Liverpool’s environment by promoting the recycling of land for productive use through the treatment of vacant, derelict and underused land.	The development proposal is situated on underused brownfield land and therefore complies with Policy GEN8.
	Policy GEN 9 – Liverpool City Centre Aims to maintain and enhance the City Centre’s role and function as a regional centre.	The development aims to maintain and significantly enhance the Liverpool City Centre’s role as a regional centre and therefore is supported by Policy GEN9. As the site boundary is within the City Centre the development will help support the area and look to boost the centre’s economy and attractiveness.
	UDP Proposals Map The site is annotated in the UDP Proposals Map as being subject to: Policy E6: Site for various types of development Policy E6 : Mixed Use Area Policy E6 is concerned with mixed use areas and sites for various types of development. Planning permission is to be granted for those uses specified in “mixed use area profiles” subject to other relevant policies in the plan. On sites for various types of development, planning permission will be granted for uses specified in	Redevelopment of the site is supported by Policy E6.

	<p>schedule 6.3 of the UDP, subject to other policies in the plan. In assessing all development proposals under this policy located in the City Centre, the Council will promote mixed use development.</p>	
	<p>Princes Dock</p> <p>This area is subject to policy E6 as a site for various types of development and policy OE4 as part of the developed coastal zone. Under the latter, restructuring and regeneration is supported, enhancement of its tourism potential and improvements to accessibility of the coast. Table 6.3 of the UDP identifies the site as being suitable for use classes A1 (shops) / B1 (Business) / C3 (Dwellinghouses) / conference facilities and public open space.</p> <p>Paragraph 6.76 of the UDP refers to this 14 ha site as “one of the major development opportunities in central Liverpool”. It was noted in the plan that planning permission exists for office, hotel, conference centre and residential development with associated retail, car parking and support uses. Development needs to be sympathetic to the prominent historic Waterfront.</p>	<p>The former dockland is previously developed land within the coastal zone where regeneration is supported, particularly where there are improvements to accessibility to the coast. The proposal will improve the area, increase pedestrian movement between the docks and the adjacent main office area and contribute to the rise in City Centre living.</p> <p>The proposal is therefore supported by Policies OE4</p>
<i>Other relevant UDP Policies</i>	<p>In addition to the above a significant number of policies are also likely to be applicable to this site. The key relevant policies in the context of the proposal are summarised below</p>	

	<p>Policy HD12 – New Development adjacent to Conservation Areas Development on land adjacent to a conservation area will only be permitted if it protects the setting of the conservation area and important views into and out of it.</p>	<p>The development conforms with Policy HD12 as supporting documentation within this planning application sets out how the proposal has looked into protecting the setting and key views around the area. A Heritage Impact included within this planning submission investigates these further.</p>
	<p>Policy HD17 – Protection of Archaeological Remains The City will require that developments have the archaeological implications of their proposals assessed by a recognised archaeological body at an early stage, a programme of mitigation including investigation and recording is produced should archaeological assets be removed.</p>	<p>A Heritage Impact Assessment accompanies this application and identify historic and architectural parts of the site. Consideration has been given to ensuring that appropriate measures are taken to manage areas of heritage importance.</p> <p>The proposal therefore complies with Policy HD17.</p>
	<p>Policy HD18 – General Design Requirements This policy sets out requirements in relation to all detailed design considerations ensuring a high quality design with criteria including characteristics of local distinctiveness in terms of layout and materials, surface treatment and scale, density and massing.</p> <p>Policy HD19 – HD28 deal with a number of more detailed design considerations ranging from access for all to light spillage.</p>	<p>The supporting Design and Access Statement goes into further detail about the design of the development and having worked closely with Liverpool City Council and other stakeholders, the proposal has been well thought out regarding all design aspects of the proposal. Therefore Policy HD18-HD28 supports this application.</p>

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	<p>Policy T6 – Cycling The City Council will promote and support initiatives designed to maximise the role of cycling as a transport mode by ensuring that secure cycling parking facilities are provided in new development.</p>	<p>Assessments have been undertaken for this application and refers to the adequate amenities for cyclists within this development.</p> <p>Policy T6 therefore supports this application.</p>
	<p>Policy EP1 – Vacant, Derelict and Neglected Land The City Council will promote and encourage the reclamation of derelict land and the restoration of neglected land.</p>	<p>The proposal accords with Policy EP1 as the site is on underused brownfield land with no current formal use.</p>
<i>Liverpool City Council Draft Local Plan (2016)</i>		
	<p>Liverpool's Local Plan has been under preparation for a number of years and since the start of 2014 has been under review and is currently being adapted to form the framework for the Local Plan in Liverpool and will replace the City's UDP on adoption.</p> <p>This Local Plan will set out a spatial vision and strategic policies, detailing the development management policies and set out site allocations for all different land uses across the City.</p>	<p>This application conforms to several objectives and policies within this document but as the Local Plan is in draft format and has not undergone the final consultation or inspection phases the document has little weight over this application.</p>
	<p>The Local Plan is currently going through consultation therefore holds very little weight in regards to planning policy. However, it is important to review it in within this application to show how the development still complies with future policy.</p>	<p>In overall terms, the draft Local Plan provides broad support for regeneration within Liverpool especially within and around the development site known as Liverpool Waters.</p>

	<p>There are a number of spatial priorities contained within the draft Local Plan regarding the city's future. The one that is most relevant to this development however is STPI1 – Spatial Priorities for the Sustainable Growth of Liverpool</p> <p>STPI1 seeks to create a robust and regionally significant competitive economy and thriving and attractive residential neighbourhoods, development including the provision of new homes and land for employment uses in sustainable locations. Liverpool Waters is stated as one of the key locations for this type of development activity.</p>	<p>The development will help encourage growth within Princes Dock and therefore will satisfy City Centre demand and helping to build a sustainable neighbourhood in line with the objective of STPI1. This development will also act as a catalyst with other emerging developments in Princes Dock to promote future development within Liverpool Waters.</p>
	<p>Within the Liverpool City Centre Vision Princes Dock has been allocated as an area for future commercial needs and opportunities and the Council looks to have this part of Liverpool maximised by 2033.</p> <p>The waterfront has been allocated as a Character Area which looks to create a world-class, high-quality, mixed-use Waterfront Quarter to support the delivery of a commercial and residential led mixed-use development at Liverpool Waters.</p>	<p>The fact that the development will be located in a site which has been recognised as an area which for future business needs and opportunities shows that the position of this proposal is in a prime location and will support the area well.</p>
<i>Other relevant Core Strategy Policies</i>	More specific policies are highlighted in this document, the relevant ones are set out below	

	<p>CC8 – Waterfront Design Requirements Development on the waterfront should be of a high-quality design that respects its sensitive historic surroundings, whilst making adequate provision for access, parking and servicing and not undermining local amenity and operations of business.</p>	<p>The design team have been in talks with Liverpool City Council and key stakeholders regarding the development's design and the orientation as well as how the opening works with the rest of Princes Dock. The opening will have a positive contribution to the context and place making and the reinforcement of local distinctiveness and will enhance the character of the area therefore conforming to CC8. Further information can also be found within the Design and Access Statement and the Statement of Community Involvement.</p>
	<p>CC10 – Liverpool Waters Liverpool City Council will support subject to relevant policies in this plan, planning applications to deliver the vision for Liverpool Waters.</p>	<p>As this development plot is within the Liverpool Waters land and assists in the vision for the overall project this application conforms to policy CC10.</p>
	<p>Policy EC5: Mixed Use Areas and Sites for Various Types of Development 1. In Mixed Use Areas, to be designated on the Policies Map, planning permission will be granted for those uses to be specified in Mixed Use Area profiles subject to the provisions of other relevant Plan policies. 2. On Sites for Various Types of Development to be identified on the Policies Map, planning permission will be granted for the uses to be specified in a Schedule, subject to the provision of other relevant Plan policies.</p>	<p>This development is part of several proposals coming forward in the near future. With the committed development of the neighbouring residential and business proposals there will be an additional need to provide services for the users of these developments.</p> <p>The design team will work with Liverpool City Council, local community and neighbouring developments to ensure that there will be no negative impact on the area to ensure the development conforms to EC5.</p>

	<p>Policy HD1 Designated Heritage Assets</p> <p>1. Consent or permission will not be granted for:</p> <p>a. applications which are not fully justified and accompanied by full information necessary to assess the impact of the proposals on the heritage asset. Proposals that affect heritage assets should be accompanied by a Statement of Significance which may form part of a Design and Access Statement, and/or a Heritage Impact Assessment to demonstrate that the architectural and historic interest of the structure has been understood and accounted for in any proposals.</p> <p>b. development or works which are unsympathetic to the heritage asset and/or its setting in terms of its architectural, historic, cultural or artistic significance. In considering any proposals, the quality of the design and layout and materials will be taken into account.</p> <p>2. Where a proposal is likely to result in harm to, or loss of, a heritage asset or its setting, the granting of permission or consent will be exceptional other than where the public benefits considerably outweigh the harm to the asset or its setting. These benefits will be proportional to the significance of the asset and to the level of harm or loss proposed.</p> <p>3. Granting of permissions or consents where a proposal is likely to result in substantial harm to the significance, or loss of, a designated heritage</p>	<p>A Heritage Impact Assessment has been submitted as part of this application and demonstrates that the architectural and historic interest of the dock boundary wall has been understood and therefore conforms to Policy HD1.</p>
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	asset will be wholly exceptional. In such cases the applicant will be expected to demonstrate that all reasonable efforts have been made to sustain the existing use or to find viable alternative uses and should be the minimum necessary. Where substantial harm to a listed building is unavoidable for reasons of safety or other extenuating circumstances, the asset must be fully recorded and the record and commentary deposited with the Local Planning Authority and the Historic Environment Record. 4. Proposals for development in the World Heritage Site and its buffer zone will protect its Outstanding Universal Value as set out in the Liverpool Maritime Mercantile City World Heritage Site Supplementary Planning Document.	
	Policy TP5 – Cycling Cycling Proposals for new development should: <ul style="list-style-type: none"> a. Demonstrate that they will have a positive impact on the cycling network and its users; b. Provide appropriate cycle access and sufficient, secure cycle parking facilities; and c. Provide evidence that it supports the vision and objectives of the City Council’s cycling strategy and the Liverpool City Region Transport Strategy for Growth. 	The supporting Design and Access Statement clearly establishes that the development will provide sufficient cycle access for the residential population of the area. The proposal conforms with Policy TP5 .
	Policy TP6 Walking All new development proposals should: <ul style="list-style-type: none"> a. protect, maintain and where appropriate improve the existing pedestrian infrastructure; 	The supporting Design and Access Statement clearly sets out how pedestrians have been catered for in the design of the opening and its surroundings. The proposal conforms with Policy TP6 .

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	<p>b. not adversely impact on the pedestrian or the environment and provide appropriate pedestrian access; and</p> <p>c. improve the safety and security of pedestrians</p>	
<i>National Planning Policy Framework (2012)</i>		
	<p>The National Planning Policy Framework (NPPF) was formally released in March 2012. It provides a new national framework different to the previous Planning Policy Statements and Planning Policy Guidance Notes, which set out the Government's planning policies for England and how there are expected to be applied.</p> <p>Planning Authorities should give 'due weight' to relevant policies in their existing plans according to their degree of conformity with the NPPF.</p>	<p>At present, the NPPF holds greater weight than both the Liverpool Unitary Development Plan and emerging Local Plan due to the case that these local policy documents are seen as out of date compared with the NPPF.</p>
	<p>7. There are three dimensions to sustainable development:</p> <ul style="list-style-type: none"> - economic; - social; and - environmental. <p>These dimensions give rise to the need for the planning system to perform a number of roles:</p> <ul style="list-style-type: none"> • an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and 	<p>This development contributes to each of these roles. The proposal will enhance Princes Dock, attract residents and businesses, allow a better sense of place and promote the historic environment through careful design.</p>

	<p>innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;</p> <ul style="list-style-type: none"> • a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and • an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. 	
	<p>14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.</p>	<p>This development proposal accords with the development plan and meets the development needs in the area by promoting sustainable patterns of development from new residents and businesses, therefore the application conforms to section 14.</p>
	<p>23. Planning policies should be positive, promote competitive town centre environments</p>	<p>The development will contribute to the vitality of the City Centre through the provision of</p>

	<p>and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:</p> <ul style="list-style-type: none"> - recognise town centres as the heart of their communities and pursue policies to support their viability and vitality; - allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites; - recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites 	<p>enhanced public realm in a high quality built environment on an appropriate site for mixed use development. It therefore conforms to section 23.</p>
	<p>30. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development</p>	<p>The development seeks to ease congestion within Princes Dock through a new opening in the dock boundary wall.</p>

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	which, where reasonable to do so, facilitates the use of sustainable modes of transport	
	37. Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.	The development conforms to sections 37 and 38 by providing housing in the City Centre with employment, shopping and leisure activities within walking distance.
	<p>56. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.</p> <p>57. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.</p> <p>60. Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.</p> <p>61. Although visual appearance and the architecture of individual buildings are very</p>	<p>As mentioned, the design team have met with Liverpool City Council and key stakeholders to discuss the design and layout of the proposal. Several meetings have enabled the development to progress ending with the submitted design.</p> <p>The development achieves a high quality of design and reinforces local distinctiveness and the heritage assets around it (further information on this can be found in the Design and Access Statement and further supporting documentation). These communications have led to a scheme which overall, provides a proposal which is of high quality and is innovative.</p> <p>Sections 57, 60 and 61 of the NPPF are therefore answered through these methods.</p>

	important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.	
	111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.	The development is situated on underused brownfield land in a key strategic location. It therefore satisfies para 111.

	<p>128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>134. Where a development proposal will lead to less than substantial harm to the significant of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.</p>	<p>Section 128 and 134 is complied with through the supporting Heritage Impact Assessment that describes the heritage assets within and around the development site and assesses the Outstanding Universal Value.</p>
<i>Liverpool Maritime Mercantile City World Heritage Site - Supplementary Planning Document (2009)</i>		
	<p>The purpose of the SPD is to provide a planning framework for development which will enhance the City's heritage and boost investment, tourist</p>	<p>The SPD contains very strong support for the principles of new development and the</p>

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	and regeneration. Overall, it is intended as a policy document which will encourage economic regeneration with an emphasis on quality. The development site is situated within the Buffer Zone of the WHS.	uppermost significance has been given to heritage issues when developing this proposal.
	The overarching aim of the SPD is to provide guidance for protecting and enhancing the outstanding universal value of Liverpool Maritime Mercantile City WHS whilst encouraging investments and development which secures a healthy economy and supports regeneration.	This is evidenced in the Heritage Impact Assessment and the Design and Access Statement which support this application. This information helps conform to this SPD.
	<p>Specific general guidance relevant to the Buffer Zone is given in the document in relation to:</p> <ul style="list-style-type: none"> - General design - Public realm - Views to, from and within the WHS - Riverside Development <p>The key elements are that:</p> <ul style="list-style-type: none"> - All significant development proposals need to consider the relationship between the development and the WHS and the impact the development would have. - Architectural excellence is sought throughout the WHS and Buffer Zone, respecting, responding to and enhancing its context. 	

	<p>The overall aim is to create a cohesive and exciting waterfront of both historic and contemporary buildings sitting in harmony. New buildings and structures should not dominate existing landmarks or significant obstruct key views.</p>	<p>The proposals are in line with the World Heritage Site SPD.</p>
<p><i>Ensuring a Choice of Travel - Supplementary Planning Document (2008)</i></p>		
	<p>The SPD seeks to ensure that a choice of access by all modes of transport is provided to new development, reduce the environmental impact of travel choices, improving safety, promoting healthier lifestyles, reducing the level of traffic growth and promoting the provision of less car parking spaces where appropriate.</p> <p>Specifically for Liverpool, the SPD seeks to:</p> <ul style="list-style-type: none"> - enable the provision of a balance transport infrastructure which provides access to employment, leisure, retail and other facilities for all visitors; and - provide a framework for future investment in the City's strategic road and rail network where new development would create additional travel demand. <p>The SPD incorporates a Minimum Accessibility Assessment and car parking standards and sets</p>	<p>Key supporting documents including the conclude that this development would not have a negative impact on the surrounding area therefore conforms with this SPD.</p>

	requirements for Transport Assessments and Travel Plans to support planning applications.	
<i>Liverpool City Centre Strategic Investment Framework (2012)</i>		
	<p>The Liverpool City Centre Strategic Investment Framework (SIF) is a strategy which will guide investment across the City Centre over the next 15 years. It contains over 120 individual actions and will provide the environment and conditions for increased investment and business growth.</p> <p>The SIF expresses high level aspirations and as such is not a document that will represent a material consideration in planning policy terms. It is expected that any development arising from the framework will need to be delivered in accordance with the NPPF and the city's Local Plan.</p> <p>In section 05/01 Waterfront, the completion of Princes Dock is mentioned and how doing this will allow the area to be animated with places to live, work and visit.</p>	<p>The Liverpool City Centre SIF shows support for development that encourages people to live and work near the Waterfront.</p> <p>Liverpool City Centre Strategic Investment Framework therefore supports this proposal.</p>
<i>Design for Access for All – Supplementary Planning Document (2011)</i>		
	Inclusive design focuses on disability as a social issue, and enables everyone to use an environment in the way it was intended rather than making accessibility an afterthought.	The development fully considers the needs of disabled people. As such, the development conforms to the SPD.

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	The needs of disabled people need to be taken into account at the earliest stages of planning a new development.	
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