

Planning and Regeneration Statement Addendum

On behalf of:
Derwent Holdings Ltd.

In respect of:
Edge Lane Retail Park Liverpool

Date:
October 2010

Reference:
JB/MA/1003708/R001m v1



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1.0 Introduction

- 1.1 This Planning and Regeneration Addendum Statement is submitted on behalf of our client; Derwent Holdings Ltd ('DHL') in support of a full planning application for the erection of a mixed use development on land at Edge Lane, Liverpool. The proposed development is comprised of retail, leisure and restaurant uses. In addition, the development includes associated car parking, landscaping, servicing, and other associated works.
- 1.2 The development will provide substantial improvements to the physical appearance of the Edge Lane Gateway, and the economic performance of the Retail Park as a key component of the Eastern Approaches SIA. The proposed units will provide flexible floorspace solutions for end occupiers, underpinned by the adopted Edge Lane Central Development Framework.
- 1.3 The application is made following pre-application consultation with Planning Officers, CABE (Commission for Architecture and the Built Environment) and Sport England. The case for development specifically looks at the impact upon strategies for retail and other town centre development across the City, direct contribution to economic development, and issues of residential amenity. The rationale for the design and layout of the units is addressed separately in the accompanying Design and Access Statement. Detailed consideration of the development in terms of its compliance with adopted policy from the Development Plan and national guidance is provided within a comprehensive accompanying Retail and Leisure Statement.
- 1.4 This Addendum Statement follows the registration of the application on 4.10.2010 and the receipt of comments from Officers during the application process. The statement clarifies matters in respect of employment land, as well as the protection of green space as requested.

2.0 The Application Site and Surroundings

Location

- 2.1 The application site is located to the south of Edge Lane, east of Liverpool City Centre. The site is bounded to the north by Edge Lane itself, with its north-eastern boundary formed by Rathbone Road. The south-eastern boundary is formed by the property boundaries of residential properties which take access from Oceanic Road, Binns Road, and Sapphire Street.
- 2.2 The site's eastern and southern boundaries are formed by highway (re-aligned Binns Road, leading to Crawford Way and then Pighue Road).
- 2.3 The application site extends to an area of approximately 21.5 hectares and the application site boundary is illustrated on submitted plan (ref. 10037 MAN 23).

Existing Development, Land Uses, and Other Features of Note

- 2.4 The application site principally falls within the allocated Edge Lane Retail Park, which is allocated as a Retail Warehouse Park in the Liverpool UDP (adopted 2002).
- 2.5 In addition, the north-eastern part of the site is currently used as Rathbone Road Recreation Ground. This is allocated as a Public Open Space within the UDP. To the western edge of the development site, between Binns Road and Milton Road, is a number of existing office units. These are allocated under policy E1 as Primarily Industrial Land.
- 2.6 The existing Edge Lane Retail Park is occupied by 26 commercial units, 10 of which are currently vacant. The site supports retail uses, leisure uses (cinema and gym), and restaurant uses (Frankie & Benny's, and McDonalds). The site also supports a cash and carry unit occupied by Booker. The retail units include vacancies, and the range of occupiers is comprised of national multiples, the majority of which would be referred to as bulky in nature. More detailed descriptions of this existing provision is provided within the accompanying Retail and Leisure Assessment.

- 2.7 Vehicular access to the application site is taken from Edge Lane and there is no through access to residential streets to the north. The pedestrian access to all units is taken from the existing internal car park.
- 2.8 The Rathbone Road Recreation Ground is an area of underused open space of circa 2.3 hectares, including grassed areas, permissive footpaths and play facilities in the form of a multi-use games area and a former BMX track.
- 2.9 Within the application site, to the western boundary, office units are laid out with an aggregate gross external area of 2622m². This is comprised of two standalone units over two floors with an aggregate gross external area of 1004m², and a further block with an aggregate gross external floor area of 1618m². This additional block is comprised of three units (each of which is on two floors) and internal circulation space (covered connecting corridors).

Surrounding Developments and Land Uses

- 2.10 The surrounding area is characterised by the Edge Lane Retail Park and underused land and buildings along Edge Lane. Although several of the retail units are now vacant the primary focus is for non-food retailing with ancillary leisure uses.
- 2.11 A small amount of general industrial space is included within the defined retail park opposite the application site to the south-east. Again, these units are dated, vacant and in need of significant investment.

Planning History

- 2.12 The planning records for the application site are comprehensive in scale. In planning terms, there is no evidence of a comprehensive initial application which sets the principle for its gradual development as a strategic retail park. In essence, the retail park has emerged through piecemeal applications which result in a range of planning units with design visions and restrictions which are bespoke to each.
- 2.13 The first pertinent application on the site is from 1988, for retail use between Edge Lane and Binns Road (88P/1227), which was approved. Further applications for retail

use were submitted in 1990 (90P/610) for 3 units; an application in 1992 (92P/0466); and a further application in 1993 in relation to five units. All of these were approved subject to conditions.

- 2.14 Applications for restaurant uses commenced in 1989 (for KFC on site, and the McDonald's immediately adjacent to) which have latterly been approved. The existing KFC restaurant to the north of Edge Lane results from a subsequent 1995 full application (95P/2223) approved and then built out. The KFC restaurant has also been subject to later applications for alterations to this building in 2001 and 2007 (07F/1649) which was approved.
- 2.15 Subsequent applications to vary the range of goods to be sold within specific units have been submitted and approved (including the 1997 application for the World of Leather unit and the 1999 application for Units 3a and 3b).
- 2.16 Mezzanine floors have been introduced into several of the existing retail units, many of which were completed as permitted development prior to the enactment of the Mezzanine Regulations in August 2006.
- 2.17 Subsequent to 2006, applications have been submitted both for new mezzanines (such as that in Unit 8, under application 08F/1232), and through the Certificate route to regularise the lawful status of mezzanine floors which were substantially built prior to the enactment of the 2006 Regulations. All of these have subsequently been approved.

3.0 The Regeneration Needs of the Area

- 3.1 Edge Lane lies at the heart of an already well established series of regeneration initiatives. In 2000 the Liverpool Strategic Regeneration Framework (Liverpool SRF) identified Edge Lane as a high priority for major improvement and investment to improve the image of this arterial city centre route.
- 3.2 In an attempt to initiate investment and development the area was identified for funding as part of the 2000/06 EU Objective One Programme; helping businesses to grow within the designated Eastern Approaches Strategic Investment Area (SIA).
- 3.3 Based on the EU Objective One Programme the Speke Garston Development Company (SGDC) commissioned a masterplan for the Eastern Approaches in 2003. This masterplan has formed the basis of numerous regeneration/development proposals throughout the SIA which has largely been focused on improving the facilities for economic development and creating a new 'gateway' image.
- 3.4 Edge Lane is seen as one of the most important routes into the City given its strategic location providing direct access onto the M62 motorway. As a consequence of the City Council's focus for new economic development within the Edge Lane corridor several projects have been completed such as the Wavertree Technology Park / Liverpool Innovation Park, Liverpool Digital, and the Wavertree Business Village.
- 3.5 However, Edge Lane is still a major focus for regeneration and this primary route into the city is still characterised by vacant industrial land and buildings many of which fall within the Edge Lane Central boundary. The primary function of the Edge Lane Central masterplan is therefore to bring about a holistic approach to regenerating these land uses which are crucial to the ongoing success of the Eastern Approaches SIA.
- 3.6 In January 2010 a Development Framework was approved by Liverpool City Council's (LCC) executive board. This document provides a strategic development framework for the regeneration of Edge Lane Central and aims to assist LCC in forward planning and the determination of planning applications. The approval of this framework shows the commitment LCC have to the regeneration of this area.

4.0 Development Proposals

- 4.1 The development proposals consist of a full planning application for the phased implementation of a mixed use development comprised of retail units, leisure units and restaurants. In addition to these end uses, the development proposes ancillary parking, landscaping, access works and other associated works. This application forms a key component emerging from the recently adopted Edge Lane Central Development Framework.
- 4.2 Full details of the proposal with regard to use, amount, layout, scale, appearance, and access are set out in the accompanying Design and Access Statement (Ref MA/MA/1003708/R004m).

New Retail Development

- 4.3 A total of 47 retail units are proposed. The proposed site plan (ref. P3-101A) illustrates the layout of 37 retail units formed around the periphery of the site, with an additional 4 units, customer car parking and circulation routes towards the centre. In addition to this, a further six retail units are provided to the west of the railway line. Linkage between the core site and this area are provided in the form of a bridge for vehicles, pedestrians and cyclists.
- 4.4 The existing cinema and gym units will, upon completion of the leisure box, be re-clad to support retail uses. These units, which are referred to as proposed units 14-17, form a key part of the phase 2 tranche of retail development. The buildings will be modernised and altered to provide quality retail accommodation, much improved elevational treatments and improved servicing arrangements.
- 4.5 The proposed development seeks to replace the existing units, many of which have become vacant and/or used by bulky retail occupiers despite having lawful consent for unrestricted retail use. The retail development will come forward in two distinct phases, which serve to minimise the potential for adverse retail impact upon defined centres and recue the initial risk and investment for the applicant.
- 4.6 The development will benefit from separation of access/egress to the development

both for car-borne customers and for servicing movements. This approach reduces the concentration of vehicular movements on any given junction, thereby reducing the potential for localised congestion.

- 4.7 An “all movements” junction will be formed in its broadly existing location, to provide the primary access/egress to the core retail area which will also serve the Sanders relocation proposal (on the site of the existing Halfords and former MFI). This leads to customer parking areas (including undercroft) which are well related to retail units 1-41, as well as the restaurant units described at paragraphs 4.11-4.15 below.
- 4.8 Units 26-37 provide accommodation on two floors. Within these units the lower floor will be used for storage and servicing and will not form part of the net retail floorspace for the units.
- 4.9 Servicing for units 1-25, and units 42-47, is taken from a new access road taken from Binns Road which will be re-aligned. Servicing for units 26-37 is provided at undercroft level, with vehicles accessing the service yard off the new junction with Rathbone Road.
- 4.10 In terms of car parking, the development provides 1795 parking spaces, inclusive of undercroft spaces. This total is inclusive of spaces for Blue Badge holders and those requiring child spaces (101). In terms of cycle parking, 254 spaces are provided (106 for staff). Finally, in terms of motorcycle parking, 134 spaces are provided.

Restaurant Units

- 4.11 The proposed site plan illustrates the layout of 4 restaurant units within the site plus the retention of the existing McDonalds unit.
- 4.12 These are located towards the core of the site, at the intersection of key pedestrian routes through the site. The physical form of this area is intended to be strikingly different from the typical arrangement and form of such restaurants in other retail parks, which would be comparable to those in the existing retail park.
- 4.13 The occasional servicing requirements are accommodated through dedicated lay-by

areas off the internal circulation routes to the south and west of the units.

- 4.14 No end occupiers have been identified at this stage, albeit we believe it to be realistic that all or some of the existing occupiers (such as Frankie and Benny's) would decant into the new and improved facilities.
- 4.15 No dedicated car parking is provided for these restaurant uses, and it is envisaged that they will share the parking which is nominally related to the core retail area.

Leisure Unit

- 4.16 The proposed site plan illustrates the layout of a landmark leisure box framing the north-eastern corner of the site. This provides a substantial and striking modern building with contribution to the streetscene through its form, massing and siting close to the pavement edge. The building will provide quality units tailored for the needs of a cinema occupier, a gym operator, and whilst the third unit is more flexible this could realistically be occupied by a range of leisure operators (ten pin bowling alley being most likely in the current marketplace).
- 4.17 Whilst the core parking area is well related to the leisure unit in physical terms, additional undercroft parking and a dedicated access/egress is provided from a new junction taking access onto Rathbone Road. This also accommodates the limited servicing requirements of end occupiers of these leisure units.

Relocation of Existing Businesses

- 4.18 As part of the strategic regeneration of Edge Lane Central, much of the existing business and industrial space within the application site will be redeveloped as part of plans to consolidate the retail and leisure park, and improve the public realm. Details of the relocation of existing businesses (where this is practicable) are included within the Industrial Units Relocation Strategy Report (MA/MA/1003708/R008m).
- 4.19 The site of the existing Halfords and former MFI will be partially redeveloped to provide suitable relocation premises for Sanders. The existing Halfords building will be remodelled with office and loading bay to allow for this relocation. As well as this,

the creation of multiple units on the adjacent site will offer modern flexible business / industrial space suitable for the occupation of growing local businesses.

Relocation of Existing Recreational Space

- 4.20 The issue of the relocation of the recreational space currently provided by Rathbone Road Recreation Ground is dealt with in the Loss of Playing Pitches: Analysis and Mitigation Framework (KM/KM/1003708/R002m). In summary it has been agreed in principle that an offsite replacement multi-use games area should be secured as part of the planning application. It is expected that this will be done through a financial contribution in lieu of replacement on site provision.

5.0 Planning Policy Framework

National Planning Policy

- 5.1 As per Section 38 of the Town and Country Planning Act, development control decisions must be taken in accordance with the adopted Development Plan unless material considerations indicate otherwise. For the purpose of this application the Development Plan is the Liverpool Unitary Development Plan (UDP, adopted 2006).
- 5.2 The following national planning policy guidance is also relevant.

National Planning Policy

PPS1 Delivering Sustainable Development (2005) and PPS1 Supplement Planning and Climate Change (2007)

PPS1 sets out the Government's strategic objectives for the planning system, outlining sustainable development as the core principle underpinning planning (para.3).

- 5.3 In delivering sustainable development the general approach should be to;
- *"Promote urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe developments, and create new opportunities..."; and*
 - *"Promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings" (Para. 27).*
- 5.4 Sustainable development is centred around economic, social, and environmental factors and is not just focused on maximising efficiency and recycling land and buildings. Paragraph 5 clearly recognises this and states that planning should promote sustainable and inclusive patterns of urban development by;
- *"Contributing to sustainable economic development... and*
 - *Ensuring development supports existing communities".*

- 5.5 Paragraph 23 states that the Government is committed to promoting a strong, stable, and productive economy that aims to bring jobs and prosperity for all. In particular planning authorities should;

"Ensure that suitable locations are available for industrial, commercial, retail, public sector (e.g. health and education) tourism and leisure developments, so that the economy can prosper..."

PPS4 Planning for Sustainable Economic Growth (2009)

- 5.6 PPS4 was adopted in December 2009, and replaces:

- PPG4: Industrial, commercial development and small firms (1992);
- PPG5: Simplified Planning Zones (1992);
- Parts of PPS7 and PPG13; and
- PPS6: Planning for town centres (2005)

- 5.7 The Government's overarching objective is to achieve sustainable economic growth. To help achieve economic growth the statement recognises retail as a form of economic development. Paragraph 4 states:

"For the purposes of the policies in this PPS, economic development includes development within the B Use Classes, town centre uses and other development which achieves at least one of the following objectives:

- 1. provides employment opportunities,*
- 2. generates wealth, or*
- 3. produces or generates an economic output or product."*

- 5.8 Whilst PPS4 should be read as a whole, there is a logical structure which distils its advice into four key areas. Policy EC1 places a requirement upon local planning authorities to use evidence to plan positively; policies EC2-EC8 are concerned with plan making; policy EC9 places a clear mandate upon the need to complete monitoring and to update the evidence base; and finally there is a suite of

development management policies from EC10-EC19.

- 5.9 A detailed review of PPS4, and an interpretation of its guidance in the context of this application, is provided by the accompanying Retail and Leisure Statement. A key consideration is provided at paragraph EC10.1 of Policy EC10 which states that:

"Local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably."

- 5.10 Recognising the need for development to be sustainable in broad-based terms, policy EC10.2 requires all applications for economic development to be assessed against:

- Whether the proposal limits carbon dioxide and minimises vulnerability to climate change over the lifetime of the development;
- Whether the proposal is accessible by a choice of transport means;
- Whether the proposal secures a high quality design and inclusive design; and
- Impact on physical and economic regeneration; and
- Impact on local employment.

- 5.11 Policy EC14 provides a framework of considerations for planning applications for main town centres uses, and introduces the detail and type of evidence and analysis required as part of a planning application. The detailed assessment of these analyses is to be undertaken relying upon the guidance of policy EC15 (sequential approach to site selection) and EC16 (impact). Policy EC17 then allows a balanced conclusion to be taken, based upon the planning judgments in respect of the requirement of policies EC15 and EC16, and other material considerations which may apply.

PPG17

- 5.12 This guidance defines the role of the planning system in assessing opportunities and needs for sport and recreation provision and safeguarding open space which has recreational value. The main objectives of PPG17 are that:

'Well planned and maintained open spaces and good quality sports and recreational facilities can play a major part in improving people's sense of well being in the place they live. As a focal point for community activities, they can bring together

members of deprived communities and provide opportunities for people for social interaction.’ And that: ‘Open spaces, sports and recreational facilities have a vital role to play in promoting healthy living and preventing illness, and in the social development of children of all ages through play, sporting activities and interaction with others.’

PPG13 – Transport (2001)

- 5.13 The overarching objective of PPG13 is the continued integration of planning and transport at the national, regional, strategic and local level. Main objectives of this guidance aim to (para. 4);
- *"promote more sustainable transport choices for both people and for moving freight;*
 - *promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and*
 - *reduce the need to travel, especially by car".*

Development Plan Policy

- 5.14 The Development Plan for the purpose of Section 38 of the Town and Country Planning Act comprises the Liverpool Unitary Development Plan (UDP, adopted 2002).

Liverpool Unitary Development Plan (UDP) (2002)

- 5.15 The majority of the application site is allocated as the Edge Lane Retail Warehouse Park. Policy S11 supports the retail warehouse use of the site although restricts the types of goods and size so as not to affect the vitality of other neighbouring centres.
- 5.16 One of the primary purposes of the plan is to promote economic development, set out in Policy GEN1. Policy GEN1 identifies the 5 areas of the city where land uses will be protected for continued business / industrial purposes and reflect the 5 SIA areas under the EU's Objective One funding programme started in 2000.
- 5.17 Policy GEN2 Open Environment states that one of the main aims of the UDP is to protect and enhance a network of open space throughout the city, particularly;
- 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;

- protecting and enhancing the recreational, ecological and amenity value of green space in the City;
- encouraging community involvement and promoting educational opportunities in the protection and management of the open environment in the City;
- protecting and improving linear recreation routes through the City; and
- protecting and enhancing the landscape, heritage and wildlife value of the watercourses in the City".

5.18 In terms of nature conservation, Policy OE5 states that the City Council will protect the nature conservation interests of open land by not permitting development that would have an adverse effect on legally protected wildlife species and policy OE 7 supports this by stating that it will support proposals which strengthen and enhance wildlife corridors in the city.

5.19 The existing Rathbone Road Recreation Ground carries the allocation as an area of Green Space within the UDP. Policy OE11 states that planning permission will not be granted for built development on any green space unless the proposed development can be accommodated without material harm to the recreational value, visual value and wildlife value of that green space unless various exceptions can be met. The site is also covered by Policy OE 12. This policy seeks to enhance the overall stock of publically accessible green space by improving existing quality and persuing opportunities for new recreational provision.

5.20 Policy C9 Outdoor Sports Facilities states *"the City Council will seek to retain all existing tennis, bowls and other multi purpose facilities, unless those facilities are to be satisfactorily replaced by a facility of equivalent or better quality in an appropriate location."*

5.21 Policy C10 states that the City Council, will seek to provide safe children's playgrounds throughout the city to a high standard.

5.22 Policy EP1 promotes the reclamation of derelict and vacant land supports the sequential approach to development with a focus on the sustainable reuse of land and buildings.

- 5.23 The specific design standards for development is set out in Policy HD18 which requires applications to comply with the following criteria;
- Appropriate scale, density and massing;
 - Local characteristics in design, layout and materials;
 - Appropriate building lines which relate to the locality;
 - External boundary and surface treatments relate well to the surroundings;
 - No adverse loss of amenity or privacy of adjacent residents;
 - Adequate refuse storage; and
 - Adequate arrangements for pedestrian and vehicular access.
- 5.24 Policy HD20 requires developers to incorporate measures in the design and layout of new developments which make provision for personal safety.
- 5.25 Policy E1 is concerned with Primarily Industrial Areas. It seeks to promote the use of allocated areas for B1/B2/B8 development. Proposal for other forms of development (i.e. falling outwith B1/B2/B8 uses) will be supported subject to them adhering to five stated criteria.

Other Relevant Planning Documents

- 5.26 The following planning documents are also relevant in striking a judgment as to the planning balance to be had for the assessment of the development's acceptability.
- Ensuring a Choice of Travel SPD (2008);
 - Liverpool Core Strategy (2008);
 - Merseyside Employment Land Study (2004);
 - Liverpool Economic & Employment Assessment Study (2008);
 - Liverpool Annual Monitoring Report (2008), and;
 - Edge Lane Central Development Framework (2010).

Ensuring a Choice of Travel SPD (2008)

- 5.27 The SPD sets car parking standards for various development proposals which for the purpose of this assessment can be summarised as follows;
- Class A1 non food retail (out of centre) – 1 space per 20 sq m floorspace.
 - Class A3 food and drink uses– 1 space per 5 sq m public floor area.
 - Class D2 assembly and leisure (cinemas)- 1 space per 6 seats

- Class D2 assembly and leisure (other uses)- 1 space per 23 sq m floorspace.

5.28 Policy T3 is concerned with disabled car parking provision, confirming that allocation is subject of negotiation beyond a given threshold (100 parking spaces) in the context of large developments such as this proposal. The SPD also sets standards for other modes of transport, including cycle parking provision and provision for taxis.

5.29 In addition, customer cycle parking facilities are required (standards are as follows):

- Class A1 non food retail – 1 space per 200 sq m floorspace.
- Class A3 food and drink uses– 1 space per 300 sq m floorspace.
- Class D2 assembly and leisure (cinemas)- 1 space per 80 seats
- Class D2 assembly and leisure (other uses)- 1 space per 50 sq m floorspace.

Liverpool Core Strategy (2008)

5.30 The Core Strategy Preferred Options were published for consultation in March 2008. However, in view of the changes made to the planning system, the Growth Points bid, and representations made by the Government Office for the North West, the Council re-consulted upon their Preferred Options in February 2010.

5.31 There are a number of relevant objectives contained within the revised preferred options document. Objective 1 seeks to ensure sustainable economic growth whilst addressing severe economic disadvantage in parts of the city. This objective makes particular reference to maximising the opportunities for economic growth, new business development and job creation along the Edge Lane Corridor.

5.32 The revised preferred options also set out a number of proposed policy approaches. Most notable of these is proposed policy approach 20 regarding out of centre retail facilities, this states that;

*'Appropriate proposals to modernise and enhance the shopping environment of **Edge Lane Retail Warehouse Park** will be supported provided that there would be no detrimental impact on the City Centre or nearby District Centres and it contributes to the wider regeneration of the Edge Lane Corridor.'*

Merseyside Employment Land Study (2004)

- 5.33 The 2004 WYG report assess the quality of employment sites throughout Merseyside and identified that although Liverpool had the largest supply of employment land over 26% of sites were judged to be of poor quality, affecting future use.
- 5.34 With regard to commercial implications the report concludes that demand for B1/B2/B8 uses across the region is declining (reflective of a more national trend) however the quality of space in Liverpool needs to be addressed. The report goes on to state that with relatively low take-up rates and significant employment land availability based on an average annual take-up of 8.18ha p/a the City will have a supply of 41 years. Importantly, this report was based on 2004 information, prior to the current economic difficulties.

Liverpool Economic & Employment Assessment Study (2008)

- 5.35 A more up to date assessment for the Liverpool City Region was completed in 2008 by GVA Grimley. The report identifies an oversupply of industrial land with floorspace rental levels below that of Bolton, Manchester, Warrington and Blackburn; suggesting a relatively low level of available stock. Notwithstanding this in quarter 2 of 2007 industrial yields stood at 5.75% compared with a national average of 5.5% - representing some level of progression in the Liverpool market.

- 5.36 The 2008 report also looked at market trends and demand concluding that there is clearly an oversupply of larger, poor quality industrial premises and stated;

"There is an apparent increasing demand for smaller units sized between 1,000 square feet and 4,000 square feet, with flexible tenures (particularly opportunities for owner occupation) driving the market"

- 5.37 Hybrid units are also in demand, with ancillary office space wanted side-by-side with general industrial premises. With regard to the future of the Eastern Approaches the report concludes that uses throughout the SIA need not focus on high-tech industries alone and indeed the Wavertree Technology Park includes a number of "alternative" industries. This "general demand" is important and should not be overlooked.

Liverpool Open Space Study (2005)

- 5.38 The Liverpool Open Space Study, completed in 2005, assesses and analyses the

quantity and quality of existing open spaces within Liverpool and identifies the varied functions of open spaces and the needs of local people.

- 5.39 The study identifies the provision of open space for Liverpool as a whole and within each ward. The average amount of public parks and open space per 1,000 population within Liverpool is 2.74 hectares and 6.84 hectares respectively. The existing Rathbone Road site lies within the Old Swan ward whilst the Robinson Willey site lies within Childwall ward.
- 5.40 The current provision of open space within Old Swan ward is 4.73 hectares of public parks, which is open space that falls within the typologies set out within this study, and a total of 9.24 hectares of open space. As the population of the Old Swan ward at 2001 was 12,398 this equates to 0.37 hectares of public parks and 0.71 hectares of open space per 1,000 population.
- 5.41 Within Childwall the current provision of open space is 9.36 hectares of public parks and a total of 87.49 hectares of open space. As the population of the Childwall ward at 2001 was 16,461 this equates to 0.57 hectares of public parks and 5.31 hectares of open space per 1,000 population.

Edge Lane Central Development Framework (2010)

- 5.42 The Development Framework for Edge Lane Central was adopted by the Council's Executive Board on 15th January 2010. The Development Framework advocates a strategic development framework for the regeneration of Edge Lane Central. The area covered by the guidance extends to 28.2 hectares and incorporates key sites in prominent positions such as Edge Lane Retail Park, the Rathbone Road Recreation Ground, and the former Ian Skelly Car Showroom.
- 5.43 The document recognises that the area is currently characterised by the poor urban environment with vacant and underused land and buildings throughout. It highlights that Edge Lane serves to isolate the existing retail park and disconnect the area from the surrounding community. This non-statutory planning guide intends to shape the regeneration of Edge Lane Central and provides information on the approach taken in terms of application strategy.

- 5.44 Through the implementation of the document Derwent Holdings Ltd, Liverpool City Council, and Liverpool Vision hope to deliver a holistic approach to guiding development, contributing to a new, high quality, sustainable mix of uses focused around improved public realm and open space. The principles set out in the document are intended to provide a clear guidance for stakeholders in the development process, ensuring that Edge Lane Central will offer opportunities for improved employment, retail, leisure, open space and residential development.

6.0 The Case in Support of the Proposals

6.1 This chapter assesses the proposal's compliance with relevant development plan policy and should be read alongside the accompanying documents and drawings.

6.2 The following issues are considered central to determination of the application proposals under Section 38(6) for compliance with relevant national guidance, development plan policies at regional and local level, and other material considerations:

- The Principle of Development;
- Impact on Employment Land Supply;
- Impact on Open Space Provision;
- Retail policy implications of the proposal;
- Contribution to Economic Development;
- Design Considerations;
- Impact on Residential Amenity; and
- Accessibility.

The Principle of Development

6.3 The development proposals are based on the redevelopment of an existing important retail and leisure park. This site will provide the opportunity for a reconfigured and higher quality retail and leisure park, better able to meet the non-food shopping needs of its immediate catchment. This application, as well as related applications being submitted by the same applicant, also provide mitigations for some elements of the proposal which would otherwise lead to an element of conflict with adopted Development Plan policy. The key considerations in this regard are loss of employment land, and loss of open space.

6.4 This approach is synonymous with the principles of national guidance and Development Plan policy which promote the efficient use of land through the re-use of previously developed land and buildings, as well as the demonstrable mitigations of otherwise adverse implications of a given development proposal.

6.5 The proposed new retail, leisure and restaurant units will replace existing units which

are tired, dated and in need of significant investment to secure their future use. Such units cannot compete against those within the competitor retail parks at New Mersey and Aintree, as well as the city centre following completion of Liverpool One.

- 6.6 The proposed redevelopment will seek to provide an offer that is at least equitable with New Mersey, and therefore reduce the extent of trade leakage from the local Edge Lane catchment to New Mersey. It is not considered realistic that the proposal will draw substantial trade from the city centre or smaller centres, particularly given the much enhanced offer and profile following the completion of Liverpool One which will be further reinforced by planned extensions to the St John's Centre. Nonetheless, the accompanying retail assessment has undertaken sensitivity testing which affords conclusions that the impacts will not be material adverse, even in the event that more trade is drawn from the city centre than would be anticipated.
- 6.7 The application site is allocated as a Retail Warehouse Park. The site has established retail use, with lawful planning consents in place for considerably more intensive use. This intensification could take the form of both increased active trading floorspace (through the occupation of vacant units and the occupation of substantially complete and permitted mezzanine floors); and the use of such buildings by more attractive end occupiers. Whilst the Park is principally occupied by bulky goods retailers, much of the consented floorspace would allow for less restricted non-food retail uses, and indeed food retail uses.
- 6.8 However, such an approach would fail to accrue any of the planning benefits that will be realised through the proposal. The incremental decline of the retail park in terms of its relative ability to attract quality occupiers results in a self-fulfilling prophecy. Significant investment and change is required to arrest this decline, and this must be done in a timely fashion to ensure that the developer is able to commit such investment to the project.
- 6.9 One of the primary purposes of the Development Framework for Edge Lane Central is to consolidate uses, allowing for a strategic approach to be taken in the spatial planning of the area through an area-based regeneration strategy. Taking such an approach through a comprehensive Masterplan offers the opportunity to consolidate similar uses within the main retail park, and provide new facilities for an improved retail and pedestrian environment.

- 6.10 The primary function of the application site east of Rathbone Road will be to provide a replacement park. A detailed application has been prepared (in consultation with officers, local residents, members and other key stakeholders) to promote a replacement park benefiting from the natural surveillance engendered by new family housing within the site and oriented to provide a carriage drive.
- 6.11 In terms of landscaped areas, this will be comprised of grassed areas, specimen trees, and herbaceous understory planting. This soft landscaping is complemented by hard landscaped pathways, boundary treatments and formal play areas to provide a genuine community facility with visual interest. This approach is entirely in accord with the objectives and requirements of Local Plan policy OE11.

Impact on Open Space Provision

- 6.12 The proposal redevelops the existing retail and leisure park, and also extends onto the Rathbone Road Recreation Ground towards the western edge of the application site. The majority of the application site is allocated as a Retail Warehouse Park within the 2002 UDP, however the Recreation Ground carries its own allocation under Policies OE 11: Protection of Green Space and OE 12: Enhancement of Green Space within the Liverpool UDP.
- 6.13 The existing Recreation Ground is sited within Old Swan ward, and incorporates grassed areas, permissive footpath routes as well as more formal play facilities. These principally include a multi-use games area and a skateboard/BMX park. The later has fallen into disuse and lacks ongoing maintenance. This park is principally used for informal, passive recreation such as walking and dog walking although due to the site size and positioning, its principle use is as a pedestrian cut through from neighbouring roads and destinations.
- 6.14 The site is bordered by railings and a row of mature poplar trees fronts Edge Lane. Opportunities for biodiversity are limited as the site is otherwise given over to mown grass, maintained by LCC.
- 6.15 The development proposals involve the complete redevelopment of this formal park and therefore an assessment of the proposals compliance with Policy OE11 and OE 12 is required

- 6.16 Policy OE11 contains 3 assessments. Planning permission will not be granted for development on existing Green Space land unless there is no demonstrable harm to its Recreational Value, Visual Value and Wildlife Value. These are assessed in turn below.

Recreational Value

- 6.17 In order to consider this policy and to assess harm, it is necessary to assess the existing recreational value of the existing Rathbone Recreation Ground. This issue is covered in more detail in the document 'Loss of Playing Pitches: Analysis and Mitigation but in summary it is clear from a site inspection that the existing park has very little recreational value. It is essentially a pedestrian cut through from Edge Lane to Rathbone Road facilitated by the hardsurfaced pathways. Whilst formal recreation facilities exist on site in the form of a skate/ BMX park and full sized tarmac football pitch these are not used by any local team or organisation and their quality and maintenance is evidence of that.
- 6.18 Any recreational value offered by Rathbone Recreation Ground at present, is purely passive; i.e. residents benefit from the reduced density of the urban environment that the park currently provides.
- 6.19 Turning to the assessment of the policy requirements, the redevelopment of this site would undoubtedly result in the loss of its recreational function; albeit we consider this severely restricted. However Policy OE 11 provides the exception that such a loss may be acceptable where a replacement facility of equal quality and suitable size is provided at a suitable location to ensure that an area of open space deficiency is not created.
- 6.20 The development framework for the Edge Lane area involves the creation of a replacement park facility on the site of the former Robinson Willey factory at Mill Lane. This proposal, which is currently the subject of a separate planning application under consideration by LCC provides both formal and informal replacement recreation space. In purely quantitative terms, the proposed replacement park results in a larger area for passive recreation. It will also include two formal play areas for younger children; one at each end of the park.

- 6.21 Draft proposals are also being prepared for the provision of a replacement of the existing 0.5ha playing surface at the existing Rathbone Recreation Ground in association with LCC officers and Sport England. These proposals involve the provision of two multi use games areas that will be incorporated within wider LCC sports development proposals at existing parks within the vicinity of the site.
- 6.22 On the issue of the part of this policy that tests 'open space deficiency' it should be noted that the 2005 Open Space Study measures public access to open space by ward. This ward-based approach could be potentially problematic where open space facilities are located towards ward boundaries. Such study limitations are relevant in this case, as the Edge Lane Central area falls over two electoral wards (Old Swan and Childwall), as well as being adjacent to two others.
- 6.23 Public access to park provision within the study is measured by linear distance to a public park from any given point within each electoral ward. Where the figure is low (say 10%), this means that public parks are easily accessible from the majority of the given ward. Where the figure is high (say 90%), this means that there is extremely limited access to public parks from the majority of the given ward.
- 6.24 In geographic terms, 50.4% of the Old Swan ward area is over 280m from a public park and 27.4% over 400m from a public park. Within Childwall 49.7% of the ward area is over 280m from a public park and 27.2% over 400m from a public park. These two wards have the 9th and 10th highest levels of areas of park deficiency within Liverpool.
- 6.25 When making such assessments however, it is necessary to take a common-sense approach to the typologies used to quantify open space provision. Whilst it is necessary to use some form of geographical boundary when assessing open space deficiency, in practice the delineation of these boundaries is an arbitrary measure and does not follow important natural or man-made barriers to movement. Clearly residents are more likely to visit parks which meet their needs in qualitative terms and are easily accessible, regardless of their location in a given electoral ward.
- 6.26 The proposed locations for the replacement park facility at Robinson Willey and the replacement pitches within existing LCC parks are both accessible to the local communities they serve and are attractive in terms of their enhanced qualitative

offer. The location of the replacement pitches will be influenced entirely by Officers at LCC to ensure these proposals target tangible deficiency in provision. As such, we consider that the proposals comply with the provisions of policy OE11 relating to safeguarding recreational value.

Visual Value

- 6.27 This element of policy OE11 seeks to safeguard the visual amenity offered by existing green space in terms of views and vistas, protection of key frontages, trees, other landscape features and its importance as open land in an otherwise closely developed area. This arm of the policy also seeks to protect the relationship of the green space in a network of other greenspaces.
- 6.28 Due to the nature of the proposals for the Rathbone Recreation Ground, it is not possible for the development the subject of this application to comply with this policy. However, as documented above, the provision of a replacement park at Robinson Willey will replace this site with green space offering enhanced visual value. The density of the urban environment is no increased as the Robinson Willey proposals replace an area of derelict buildings and hard surfaces with an open green space environment. Opportunities exist to enhance planting to include the provision of many mature trees within the park and the principle of permeability and public access lead the design of the replacement park.
- 6.29 Furthermore, the public realm that is integral to the redeveloped retail and leisure park forms a part of a green network of public areas that continues across the former Skelly's site and links to the newly created replacement park. This provides an enhanced green network that has been one of the main drivers of the proposals for Edge Lane as defined within the Development Framework.
- 6.30 Accordingly, whilst the proposals cannot satisfy this part of the policy when taken forensically, the main objective of Policy OE11 is achieved.

Wildlife Value

- 6.31 The final assessment made under Policy OE11 is the consideration of the wildlife value of the green space. The Ecology Report submitted with the planning application

confirms that the existing Recreation Ground contains very little nature conservation value. The site is dominated by mown grass, common to playing fields. The tree cover on site is limited to a stand of early mature Aspen (*Populus tremula*) along the northern boundary and large standard-sized London Plane and Common Lime on the northern side of the tarmac football field. Along the eastern boundary, young trees include solitary Grey Alder (*Alnus incana*), Laburnum (*Laburnum anagyroides*) and Cherry sp. (*Prunus sp.*). Lines of young Maple sp. (*Acer sp.*) and Oak sp. (*Quercus sp.*) have been planted on the north-eastern part of the grassland but many have been vandalised and destroyed. The planted trees consist of a high proportion of non-native species with no significant ecological value and no Tree Preservation Order status; their removal would be of no ecological or amenity consequence.

- 6.32 The replacement park provides an excellent opportunity to plant semi mature trees in a well surveyed environment that will ensure their survival and enjoyment by all. Whilst grassland will also dominate at the Robinson Willey park, there is much greater opportunity for a greater diversity of planting. Accordingly, the proposals comply with the final part of policy OE 11 in that they do not harm features of nature conservation value; and go further in that they secure an enhanced environment for bio- diversity in the local area.

Enhancement of Green Space

- 6.33 This part of the site is also covered by allocation OE 12 which seeks to enhance the overall stock of green space by improving existing facilities and seeking opportunities for new recreational provision in areas of deficiency. Whilst the current proposals for the site make this policy redundant somewhat, the general thrust of the policy namely enhancing the quality and quantity of green spaces and recreational facilities is supported by the Applicants proposals to replace the park and playing pitches.

Environmental Improvement

- 6.34 A further key priority of the Framework is to create radical and marked improvement

to the streetscene. The Edge Lane corridor is identified as an Environmental Improvement Corridor under Policy OE15. The proposals as part of the wider Edge Lane Central approach therefore provide significant positive contribution towards the realisation of the aims and objectives underpinning Local Plan policy OE15.

- 6.35 As part of the strategic regeneration of the area the dated industrial units within the main retail park, most of which are vacant, will be cleared to make way for an improved public realm along Edge Lane, with business / industrial relocated into new development proposed as part of a separate application north of Edge Lane (app ref. 10F/1491).
- 6.36 The primary use of the application site (north of Edge Lane) would be within Class B1, B2 and B8. All these uses are considered entirely appropriate in this location falling within the Eastern Approaches SIA, identified by UDP Policy GEN1 as a focus for new and improved facilities for business and industrial opportunities. Development within the SIA's also support the fundamental spatial principles of the RSS set out in Policy RDF1 and LCR1.

Sports Pitch Provision

- 6.37 In respect of playing pitch provision, the existing multi-use games area on Rathbone Road Recreation Ground is treated as a playing pitch for the purpose of PPG17 analysis and Policy CP9 of the 2002 UDP.
- 6.38 This issue is covered in greater detail within the Loss of Playing Pitch Strategy which also accompanies this application (KM/KM/1003708/R002m). This predominantly deals with the loss of playing pitch from Rathbone Road Recreation Ground which would not be replaced within the replacement park. Policy CP9 of the UDP seeks to retain existing pitch facilities unless these facilities can be **suitably** replaced (DPP emphasis).
- 6.39 Whilst the replacement park proposal provides more than adequate qualitative mitigation for the loss of open space, it does not mitigate the loss of playing pitches. In practice, this mitigation could be provided by direct replacement or through the use of a financial contribution in lieu of on site provision.

- 6.40 Early pre-application dialogue sought to provide these playing pitches on site, but it became evident that this was contentious as it would create amenity issues. More generally, it was felt by stakeholders (including CABE) that the replacement sports pitches sat poorly with the wider design ethos, and were incongruous.
- 6.41 Taking these points on board, the applicant is working with LCC to identify a suitable scheme to mitigate for the loss of the tarmac multi-use games area, and a location upon which it should be sited. Whilst several options exist, it is important that the facility meets local needs in terms of the facilities it provides and its physical proximity to the immediate catchment. The strategy for taking this forward is provided by the accompanying Loss of Playing Pitch Strategy.

Allocated Employment Land

- 6.42 Policy E1 of the Liverpool UDP identifies part of the application site as Primarily Industrial Land. This policy supports the use of such sites for B1-B8 uses, and sets out a criteria led approach for taking forward other uses. This area of land currently supports B1 office uses, locally known as Montrose Business Park. This land is owned by the applicant, with tenants on fixed-term lease arrangements.
- 6.43 The UDP was produced in 2002, with employment land policy provided by PPG4. Employment land was defined as being inclusive of B1-B8 uses only. More recently, the compass of employment land has been broadened with the adoption of PPS4 in December 2009. PPS4 defines employment uses in terms of those which are employment generating, separating out into main town centre uses and other employment uses. Read as a whole, these employment generating uses would include the following end uses:
- Retail,
 - Leisure,
 - Food and Drink,
 - Financial Services,
 - General Industry,
 - Warehousing,
 - Offices, and
 - Other employment uses.

6.44 The existing office units occupy a gross external floor area of 2622m², which is comprised of the units themselves and areas for internal circulation. In terms of the effective employment land supply, this is best referred to by assessment of the net lettable internal area. On this basis, discounting for external walls and communal circulation areas, these buildings provide a lettable area in the order of 2290m².

6.45 The policy sets out a criteria-led approach to the assessment of alternative uses (i.e. those outwith B1, B2 and B8) on allocated sites. We address these requirements on a criterion by criterion basis.

Planning permission for other uses will only be granted where the proposal would clearly act as a catalyst to the comprehensive redevelopment of the site or area primarily for industrial/business use.

6.46 This application is substantive, but must itself be read as a component part of the wider Edge Lane Central development. It is of course accepted that the proposed development seeks to deliver A1 development upon the part of the application site allocated under policy E1. A1 development is employment generating, and is an accepted PPS4 employment use.

6.47 The implementation of the proposed development will necessitate the closure of the Montrose Business Park (B1 uses) which provides 10 units, of which four are understood to be vacant at this time. In addition, the application site includes the Booker unit on Pighue Lane (B8 trade counter uses), as well as the mixed commercial buildings on Tapley Place (many of which are vacant).

6.48 The proposed redevelopment of the Halfords/MFI site provides flexible accommodation, more than adequate to relocate the existing occupiers in qualitative and quantitative terms. This is subject of a separate application for light industrial uses (B1-B8 uses) providing 4922m² flexible employment floorspace, which is awaiting determination. This is slightly larger than the existing accommodation within the application site, but these existing buildings are highly inefficient, many of which are vacant and all beyond their economic life.

6.49 The Edge Lane Central development does not identify express relocation units for the B1 uses at Montrose Business Park or indeed the B8 use which is enjoyed by Booker

Cash and Carry. These could individually occupy units as promoted by the light industrial application, but in reality relocation off-site would be more plausible.

- 6.50 Feasible opportunities can be provided in the immediate locale, on allocated employment land which is currently underused. Indeed, Liverpool Innovation Park represents a re-use of a group of iconic local buildings for employment uses. It provides more than 1 million square feet of flexible space for growing businesses, which is inclusive of office space, light industrial accommodation and research and development. It currently supports 69 businesses, with extensive additional accommodation ready for occupation but currently vacant.
- 6.51 According to Liverpool Innovation Park's own letting material (sourced online 16 October 2010) there are 45 office units unlet within the Innovation Park, ranging from 24m² to 7190m² each. Of relevance to the 6 occupiers within the Montrose Business Park, 8 suitable opportunities (available units with a floor area between 150-400m²) in the Innovation Park which is an underused asset in an immediately adjacent location.
- 6.52 In terms of occupation suitable for the Booker unit, again available accommodation is available in the locale. This would include units on Mill Lane (within 400m of the application site), as well as several other suitable units within the locale.
- 6.53 As is set out within the remainder of this Planning and Regeneration Statement Addendum, this proposal is the central catalyst for a hugely significant regeneration of the Edge Lane Central area (covering more than 28 hectares) for business use, which represents the key residual land interest (more than a half mile of frontage) that impedes the completion of the objectives for the Eastern Approaches Strategic Investment Area.
- 6.54 The Edge Lane Central development provides an opportunity for multi-sector commercial development including:
- Retail;
 - Leisure;
 - Food and Drink;
 - Healthcare;

- Industrial;
- Warehousing; and
- Trade Counters.

6.55 Edge Lane Central represents an opportunity to bring forward gateway development occupying more than half a mile of key frontage to the city centre from the strategic road network. In net employment terms, the Edge Lane Central development provides in the order of 1500 new jobs.

Planning permission for other uses will only be granted where the proposal would not prejudice the long term development of the area primarily for these uses.

6.56 The proposal occupies part of an E1 allocation, but should be recognised as occupying the substantial minority of this allocation. The majority of this allocation is taken up by the Innovation Park which is (as previously stated) extensive and, to a significant degree, underused.

6.57 In reality, the implementation of the proposal makes the Innovation Park a highly attractive alternative to local businesses who may seek to relocate. This would, rather than prejudice the long term development of the allocated E1 area, actually serve to reinforce it and promote its ongoing vitality.

Planning permission for other uses will only be granted where the proposal does not involve the development of a warehouse in the City Centre in excess of 2,500 square metres.

6.58 The site is outside the defined City Centre, and therefore this criterion is not applicable.

Planning permission for other uses will only be granted where the proposal would not cause unacceptable traffic and highway congestion and related problems or have an adverse impact on residential amenity or on the operation of existing businesses.

6.59 The application is accompanied by a comprehensive and robust transport assessment which concludes that the proposal is acceptable on transportation grounds. In terms of residential amenity, the application is accompanied by both

noise and air quality assessments, each of which concludes that the application is acceptable.

Planning permission for other uses will only be granted where the proposal would not conflict with other policies in the Plan.

- 6.60 The application is accompanied by very extensive technical documentation which clarify that the proposal is wholly acceptable, read as a whole, on policy grounds.

Policy E1 Summary

- 6.61 The above assessment has considered each of the five criteria underpinning development in E1 sites outwith B1-B8 uses, and demonstrated that all are satisfied.

Impact on Employment Land Supply

- 6.62 In terms of employment land supply, the proposal will result in the loss of land which historically supported B Class uses. Whilst it is noted that the Development Plan position is that employment land supply is directed to B Class uses, we highlight that PPS4 does make expressly clear that a broader range of uses should now be referred to as contributory to economic development. This includes retail and leisure uses.
- 6.63 This statement should be read in conjunction with the applications for the creation of the replacement park (on the former Robinson Willey site) and that for industrial units on the former MFI site, as well as the re-use of the former Halfords building to relocate the Sanders building and ancillary trade counter uses (app ref. 10F/1491). Specifically, the Planning and Regeneration Statement accompanying the industrial application highlights the district-wide position in terms of employment land supply, and the implications of the proposals upon this backdrop.
- 6.64 Key points from this analysis can be found in terms of the plentiful employment land supply (equivalent to 41 years historic take-up), and the fact that older units (such as those within Edge Lane) fail to meet occupier requirements and therefore their retention would fail to deliver positive contribution to the supply of readily available quality employment space in any event.

- 6.65 This changing trend and sector shift at the national level away from primary and secondary has been evident throughout UK cities such as Liverpool where the historic focus and availability of employment generating land and building was more focused on heavy industrial given its geographical position. This was recognised in the analysis of market trends in the 2008 GVA Grimley report where it was noted that;
- "There is an apparent increasing demand for smaller units sized between 1,000 square feet and 4,000 square feet, with flexible tenures (particularly opportunities for owner occupation) driving the market"*
- 6.66 The proposed development of the former Halfords (change of use and reconfiguration) site provides direct and seamless relocation premises for Ray Sanders Ltd, with unit design developed to meet the needs of this end occupier. In addition, the reconfiguration of the Halfords unit allows for subdivision so as to incorporate the two trade counter units which currently sit adjacent to Sanders.
- 6.67 In addition, the redevelopment of the adjacent land will deliver 16 new industrial / business units integral to the wider regeneration objectives of Edge Lane Central. The proposals offer flexible floorspace solutions for different and growing local enterprise, with unit sizes ranging from circa 930 sq m-3720 sq m, inclusive of modest mezzanine floors which provide additional storage and staff accommodation.
- 6.68 This design solution sits well with the site's physical constraints, and fits seamlessly with the identified need for quality new employment premises (of the appropriate size and configuration) to meet the needs of commercial occupiers as identified in the 2008 Employment Land Review. These units are sufficiently adaptable to meet the myriad requirements of occupiers falling within use classes B1/B2/B8. As compared to the existing larger poor quality dated units which form the bulk of the existing employment land supply, which are unattractive and consequently in oversupply, these units will provide tangible positive contribution to the supply of employment land. This conclusion can be drawn even before weight is afforded to the economic development benefits which should be accrued in the context of PPS4.
- 6.69 The regeneration of Edge Lane Central reflects the aspirations of the applicant, Liverpool City Council and Liverpool Vision in delivering a holistic approach to guiding development, contributing to a new, high quality, sustainable mix of uses focused around improved public realm and open space.

Retail policy implications of the proposal

- 6.70 The application is accompanied by a comprehensive retail and leisure statement (ref. MA/MA/1003708/R003m) which deals with retail policy considerations from the Development Plan, national policy guidance and other material considerations. The assessment provides comprehensive consideration of the policy tests outlined at policies EC10 and EC14 of PPS4 as well as the retail policy implications of the 2002 UDP, and other material considerations.
- 6.71 The application undertakes a cumulative impact approach underpinned by primary survey data previously relied upon by LCC. This analysis, which builds in the long-term trading impacts of developments in the city centre (including Liverpool One and St John's extension), district and local centres (such as Park Road and Great Homer Street), and other approved developments in out-of-centre locations (such as the extension of the Tesco store at Deysbrook).
- 6.72 The retail impact assessment demonstrates that the majority of trade will be drawn from overtrading competitor retail parks, and that the extent of retail impact upon defined centres (city centre and smaller centres) will be limited and will not create material adverse impacts upon their ongoing vitality and viability.
- 6.73 Nonetheless, the assessment provides further reassurance in the form of sensitivity tests to afford judgment that even extremely cautious assumptions would not result in material adverse impact upon the vitality of defined centres or upon the achievement of plan-led objectives.
- 6.74 The proposal is therefore entirely compliant with the tests which are drawn together at policy EC17 of PPS4, and the requirements of UDP Policy S9 which is applicable in this case.

Contribution to Economic Development

- 6.75 It has been identified above that the proposals will give not rise to any demonstrable harm to the supply of employment land and buildings in the local area, or Liverpool more generally. If tangible harm had been realised, this could have a detrimental impact on the opportunities now or in the future for direct inward investment in Liverpool which is likely to be concentrated away from traditional industrial uses.

- 6.76 In addition, the retail impact assessment demonstrates that the majority of its trade will be drawn from other strategic retail parks located beyond defined centres, including those that are heavily overtrading at this time. It would therefore be wholly unrealistic to suggest that there will be material adverse impact upon defined centres, and subsequently no genuine prospects for tangible reduction in ongoing vitality and viability, let alone store closures. Similar conclusions would be drawn in the context of overtrading competitor retail parks, which would return to sales performance more typical of such locations following the cumulative impact of various retail developments (not just the proposal at hand).
- 6.77 Situated in the Eastern Approaches SIA the fundamental UDP objectives under Policy GEN1 are to protect land and buildings for business and industrial purposes. Since adoption of the UDP, the latest Government thinking on employment generating uses is set out in PPS4. This national planning policy guidance states that local authorities should support a wider and more flexible approach to employment generating uses, recognising the contribution of sectors other than traditional 'B' uses.
- 6.78 In order to adjudge the extent of benefits to be accrued, it is of course important to set in context the relative deprivation/affluence of the local area. Whilst various indicators can be used for the relative current deprivation of a given area, the benchmark indicators are typically those of unemployment and the Index of Multiple Deprivation which gives an aggregate view of deprivation.
- 6.79 Unemployment data is provided at ward level, whilst IMD data is provided at Super Output Area level which allows more detailed analysis. Whilst the site sits towards the boundaries of a number of wards, the majority of the site falls within Old Swan ward.
- 6.80 Data from the "All Wards-Ward Profile" published by LCC in August 2010 illustrates that Job Seeker Allowance claimant levels are in the order of 7.4% for Old Swan, higher than the Liverpool average of 6.8%. Both of these figures have risen since 2008, albeit these changes may be likely to be ramifications of wider difficulties in the macro-economy.
- 6.81 In terms of mean family income levels, the "All Wards-Ward Profile" report again illustrates that 2008 income levels in Old Swan (£27,845) is below the district average (£28,991). In addition, the rate of annualised growth in Old Swan is

marginally less than the Liverpool average. This would suggest that this inequality gap is growing.

- 6.82 In terms of housing, the composition of the housing mix underpinning the existing supply is again pertinent. In terms of the proportion of housing supply that would fall within Council Tax bands C and above, the level in Old Swan is 5.8%. This compares unfavourably with the district average of 22.1%. This suggests that the range and type of housing available within the vicinity of Edge Lane Central is predominantly small starter housing, and that the supply of larger family housing is very limited.
- 6.83 Focusing upon net job creation, the proposals will provide temporary construction employment as well as permanent direct employment. The extent of permanent employment is estimated using the industry standard 2004 Arup Employment Densities Guide which provides employment density per unit area of built development by end use, as well as plot ratios.
- 6.84 The existing development upon the site supports retail uses, leisure uses, restaurant uses, and the quasi-industrial uses of Ray Sanders Ltd. The existing bulky retail-based employment is estimated at 230 full time equivalent jobs (inclusive of the Halfords unit which is located immediately beyond the site), whilst the leisure employment (cinema and gym) is estimated at 90 full time equivalent jobs. In addition, the Sanders operation is nominally estimated at 50 full time equivalent jobs, with on-site restaurants supporting a further 50 jobs.
- 6.85 In addition to the above uses, the application site includes office uses on Montrose Business Park which are estimated to support circa 60 jobs, with the Booker unit supporting circa 30 jobs. In aggregate terms therefore, the development site supports circa 510 full time equivalent jobs at this time.
- 6.86 The proposed application will support a range of uses including retail, restaurants and leisure. In terms of these retail units, it is envisaged that they will be occupied by a range of part-bulky occupiers and therefore a mid point position is taken.

DESCRIPTION	SQ M GIFA/ JOB	SQ M GIFA	FTE JOBS
Non Food Retail (non bulky)	30	38068	1269
Bulky non food retail	90	18049	200

Cinema	90	6195	68
Other Leisure	40	12389	310
Restaurants	13	960	74
TOTAL	N/A	N/A	1921

- 6.87 On this basis, it is estimated that these retail units will support in the region of 1,470 full time equivalent jobs. In addition, the enhanced leisure facilities are estimated to provide circa 375 jobs, with the restaurant uses to provide circa 75 jobs. In aggregate terms therefore, the development site could support circa 1920 full time equivalent jobs upon full implementation. However, this development also provides the opportunity to deliver other employment generating development in the form of the industrial application as well as the extension to the Rathbone Hospital.
- 6.88 In terms of the industrial application, this provides direct and seamless relocation for Sanders and related trade counter uses (50 jobs). It is also geared towards the occupation of 'small business units', and the proposed additional 16 units alone will accommodate circa 8 business relocated from Binns Road Trading Estate, with the 8 residual units generating circa 50 additional jobs in Liverpool. The flexibility of the units does allow for variations in use, such as using floorspace for storage and distribution uses where densities are reduced. However, even using this 'worst case' scenario the proposed new units will still generate over 35 new local jobs.
- 6.89 The proposals seek to create more flexible business space to ensure the future use of the units, entirely in accordance with one of the fundamental objectives of PPS4 which seeks to promote economic development through a more flexible and responsive planning system. The localised need for this approach was highlighted in the 2008 GVA Grimley study which identified a direct need for smaller 'hybrid' units where tenants and owners may be able to use floorspace as ancillary office space. The use of mezzanine floors in the development seeks to create this ancillary space and deliver more flexible space to promote new business start ups along Edge Lane.
- 6.90 The extension to the Rathbone Hospital, which is subject of an outline planning application (10F/0947), would provide additional office accommodation as well as ward space and other occupational therapy facilities. Whilst it is likely that some of this additional space would be used to address existing operational matters, an extremely robust and cautious estimate would suggest 20 additional full time equivalent jobs.

- 6.91 In net terms, the aggregate net employment generation resultant from this proposal (both the application itself, and the two employment generating applications which are intrinsically linked) will be in the order of 1,500 jobs. Whilst it cannot be guaranteed that all of these jobs will be retained locally, it would of course be envisaged that these opportunities could be realised locally with the participation of Job Centre Plus and other relevant service providers.
- 6.92 In summary, the proposals will have a direct positive impact on the continued economic development of the Edge Lane Corridor providing flexible floorspace to meet an identified need across the City. The proposals will enable the realisation of in excess of 1,600 net additional jobs, entirely in accordance with PPS4 which seeks to create a more flexible planning system to promote economic development.
- 6.93 In terms of the impact of the proposal upon relative deprivation in the locality, the opportunities for local job seekers to realise the benefits of new employment are manifest. Whilst it is inevitable that some jobs will be taken by other residents of Liverpool, even if only 6% of these proposed jobs (96 jobs) fell to residents of Old Swan ward, this ward would move from being well below district average levels of employment, to better than district average.
- 6.94 In addition the proposals will contribute to continued direct inward investment into Liverpool and accord with the principles of the Eastern Approaches SIA and UDP Policy GEN1 promoting economic development.

Impact on Residential Amenity

- 6.95 The proposed new commercial units will replace the existing units supporting the same end uses, albeit that many of these existing units are vacant. The existing units, although they have been vacant for a number of years operate without any restriction on noise or operating hours. The development proposals therefore offer the opportunity to engender planning controls to deliver a mechanism by which the amenity of residential neighbours is protected and improved compared with the fallback position. The application is accompanied by a noise assessment, which provides detailed consideration of the existing and proposed noise environment. This assessment concludes that, subject to specific mitigation measures, that the noise implications of the proposal will not result in material adverse impacts upon the residential amenity of given receptor properties in the vicinity of the application site.

- 6.96 Finally, matters of boundary treatments and the detailed management of servicing can be controlled through use of an appropriately worded planning condition. This approach will ensure that the development as a whole, as well as constituent units, can operate efficiently without causing any significant harm to residential amenity by way of noise disturbance. The proposals are therefore entirely in accordance with PPG24 and UDP Policy HD18.

Accessibility

- 6.97 The accompanying Transport Assessment provides an extremely robust basis to understand the existing base position, and models the extent and implications of the likely development traffic both now and in the design year of 2020.
- 6.98 The Transport Assessment concludes that all junctions will work within design standards in the design year, and that there will be no material adverse impacts upon the safe and effective operation of the local highway network.
- 6.99 In addition, the proposed development is entirely in accord with the parking standards recommended by the adopted Ensuring a Choice of Travel SPD. For the sake of clarity, the proposal meets the requirements of Policy T3, as well as the more onerous requirements as set out in the tabular advice following paragraph 4.45 of the SPD. This means that the provision of car parking spaces for staff and customers does not exceed those maximum levels set out, whilst the provision for Blue Badge drivers meet those targets set.
- 6.100 Similarly, provision for non-car modes (cycle and taxi) upon the site is compliant with the requirements of the SPD.
- 6.101 Finally, the site is located on a highly accessible key transport corridor with frequent bus services which pass the site with bus stops nearby in both directions. This, alongside the excellent footway links along the corridor and into adjacent residential areas, ensures that the area is highly accessible and well served by a range and choice of means of transport.
- 6.102 The development is therefore entirely in accordance with the aspirations and objectives of PPG13 and the adopted SPD.

7.0 Key Indicators of the Opportunity

7.1 This is a very significant development, which has been carefully prepared following the valuable input of officers, members, retained advisors and other stakeholders. These stakeholders have been broad-based and include the local business community, residents and organisations including the likes of Liverpool Vision and CABE at national level.

7.2 These contributions have been extremely valuable, and have allowed the applicant team to shape and prepare a scheme for submission which genuinely delivers at multiple levels. However, some of the key benefits are strategic in nature and can be set out simply in bulleted form. In key terms, the opportunity provides:

- £200m investment to the Eastern Gateway;
- 1500 net additional jobs;
- Improvements to 0.5 mile length of key gateway to the city centre;
- 47 non food retail units;
- 3 leisure units;
- 4 restaurants;
- Substantial investment in public realm;
- Major investment in highway infrastructure;
- Replacement park provided at developer expense;
- Enables the extension of Rathbone Hospital, with substantial subsidy to MerseyCare; and
- Replacement sports pitch facilities to be funded by the applicant

7.3 Whilst the application provides very compelling strategic benefits, it is also able to deliver on a detailed basis in respect of landscaping, design and environmental performance. With these in mind, and detailed consideration of pertinent planning policy matters, it is also clear that the application is entirely suitable for planning approval.

8.0 Conclusions

- 8.1 The development proposals will provide for a mixed use development comprised of retail units, leisure units, restaurants, and public realm works. In addition to these end uses, the development proposes ancillary parking, landscaping, access works and other associated works. This application forms a key component emerging from the recently adopted Edge Lane Central Development Framework.
- 8.2 The proposals will replace existing units which are moving beyond their economic life, and are now into underused as a result of under-investment by the landowner in recent years, coupled with very substantial investment and enhancement of competitor retail parks and other locations in the interim period. This development proposal provides the step-change improvement in the quality of provision, whilst delivering a much improved streetscene and the potential for much more effective planning controls in order to provide certainty in terms of both residential amenity and in terms of retail policy matters.
- 8.3 Whilst this application is itself significant in terms of quantum of development and the net economic benefits to be accrued, it should properly be seen as part of a much wider and cohesive Edge Lane Central initiative as endorsed by Executive Board on 15th January 2010. This itself is then integrated within the Eastern Approaches SIA which directs the local planning authority to encourage and promote development which improves the economic performance of the city both along the corridor, and in the city centre itself as a result of the improved appearance of this key gateway corridor.
- 8.4 Scheme design has emerged through an organic and iterative process whereby the need for a paradigm shift improvement to the existing retail park has been set in balance with competing objectives. These objectives are the promotion of the quality of streetscene, and protecting the amenity of nearby residents. Through careful consideration of these key issues, the resultant scheme's intrinsic elements (its layout, scale, massing and design vision) result in a scheme which truly delivers.
- 8.5 In conclusion, the proposals are synonymous with the objectives of national policy and the Development Plan. In practice, it provides tangible positive contribution towards the realisation of the underlying principles of the UDP and Core Strategy.