

## Retail Statement

Land at Pall Mall  
Liverpool  
L3 6JB

On behalf of  
Nextdom Ltd  
Ayrton House,  
Parliament Business Park,  
Commerce Way,  
Liverpool,  
L8 7BA

Dickman Associates Ltd

**P O Box 97  
Bolton  
Lancs.  
BL1 9PT**

**April 2014**

**CHARTERED TOWN PLANNER**

Director: J Dickman BSc (Hons) DipTP MRTPI FRGS FRICS  
Company No 6874283, a company registered in England and Wales  
Registered office: 11 Riverside, The Embankment Business Park, Vale Road, Heaton Mersey, Stockport, SK4 3GN

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## **1.0 INTRODUCTION**

- 1.1 This retail statement supports the application for development of a weekly Sunday market on the land at Pall Mall, Liverpool owned by Nextdom Ltd.
- 1.2 This statement sets out the case for the proposed Sunday market. In line with relevant national and local planning policy guidance it provides a proportionate assessment of the proposal against the relevant policy related issues of the sequential approach and impact test.
- 1.3 This statement is set out as follows:
  - Section 2: Site Location &Description
  - Section 3: Background
  - Section 4: Planning History
  - Section 5: Planning Policy
  - Section 6: Proposed Use
  - Section 7: Potential Occupiers
  - Section 8: Assessment
  - Section 9: Conclusions
- 1.4 Additional detailed information is set out in the D&A, the transport statement and the business statement.

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## **2.0 SITE DESCRIPTION**

- 2.1 The site is about a mile north of Liverpool city centre in the portion of Pall Mall that lies to the north of Leeds Street. A former derelict industrial estate site or approximately 1.5ha, it is reasonably flat and currently used as a car park primarily by those working in the city centre during the week (Monday to Friday). The car park is informally laid out with a hardcore surface.
- 2.2 The main rail line from Liverpool to Southport forms the western boundary of the site and is elevated for the full length of the mutual boundary. There is a large rail arch which forms part of the site and is used for parking. Beyond the rail line fronting Great Howard Street are commercial and industrial uses
- 2.3 To the north and west of the site there are various 'B' class uses – quasi industrial and warehousing mainly. To the south are Mercedes, BMW and Seat car showrooms and to the SW there is a retail park that includes Costco and Toys R Us.
- 2.4 Access to the site is from Lanyork Road. There is a bus route along Pall Mall and the site is about 300m north of Moorfields Rail Station.

## **3.0 BACKGROUND**

- 3.1 The site has been used as a surface car park since the late 1980's following the demolition of the industrial units.
- 3.2 It is less than a third of a mile south of the site of the former heritage market at Stanley Dock which closed in December 2011 and which has so far not succeeded in finding a new 'home'.
- 3.3 With the recession have come changes in both employment and shopping such that people have had to manage their income more carefully. Whilst the car park is well used weekdays it is not currently open on weekends. The proposal to use this site for a new Sunday market would give an enhanced and alternative retail offer to compliment the regional centre (i.e. Liverpool city centre) which is on the immediate opposite side of Leeds Street from this proposal on a day when only one other market operates in the city council area.

## **4.0 PLANNING HISTORY**

- 4.1 Having checked Liverpool City Council's (LCC) online application list there seem to have been 4 previous applications on this site but as all pre date 2000 no detailed documents are available online.
- 4.2 Application 88P/2502 for use as a car park was approved with conditions on 13.2.89. Application 89/3099 again was for use as a car park but without complying with condition 1 on 88P/2502, which seems to have granted consent for limited time period. The extension of time was granted subject to conditions on 22.2.90.
- 4.3 Application 92/1521 by Microsafe car parks was for use of the car park for a Sunday market. This was refused on 15.10.92. The reasons for refusal being:

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*'1. Bearing in mind the scale of the proposed Sunday market there would be insufficient parking and servicing facilities on the site to serve the needs of stall holders and customers. The consequent parking and traffic movements in surrounding streets would cause detriment to highway safety and would provide a nuisance to neighbouring businesses and residents.*

*2. The use of this open site as a Sunday market brings with it a propensity for wind blown litter to be spread over a wide area especially at times of high winds. This would be to the detriment of the visual amenities of the area.'*

4.4 In 1999 a further application (99P/1261) was granted on 19.7.99 for the continued use of the car park subject to conditions.

4.5 We have spoken to Chris Riveland in the LCC City Centre Team who confirmed that in assessing this site the relevant document is NPPF and the focus should be on the sequential test and impact on other markets, as relevant.

## 5.0 PLANNING POLICY

### National Planning Policy Framework (NPPF)

5.1 The NPPF was adopted on 27.3.12 and came into immediate effect. It cancelled the previous PPGs/PPSs, including PPS4 but it did not cancel PPS4 practice guidance, which has subsequently been cancelled on 6.3.14 with the introduction of the Planning Practice Guidance.

5.2 NPPFs underlying premise is a presumption in favour of sustainable development unless material considerations indicate otherwise. It encourages development that supports economic, social and environmental improvements.

5.3 NPPF para 14 states in relation to applications:

*'For **decision-taking** this means:*

- *● approving development proposals that accord with the development plan without delay; and*
- *● where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*

*—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

*—specific policies in this Framework indicate development should be restricted.<sup>9</sup> '*

Superscript 9 refers to specially protected areas e.g. SSSI, National Parks, Green Belt or designated heritage assets.

5.4 Para 23 of NPPF relates to ensuring the vitality of town centres  
*'Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres*

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*over the plan period. In drawing up Local Plans, local planning authorities should:*

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
- promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;*
- 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;*
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;*
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;*

5.5 Paragraph 26 of NPPF states:

*‘When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). This should include assessment of:*

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.’*

5.6 Paragraph 27 of NPPF adds:

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*'Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.'*

5.7 The Planning Practice Guidance which came into effect on 6.3.14 on ensuring the vitality of town centres notes:

*'The National Planning Policy Framework sets out two key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions and may be useful in informing the preparation of Local Plans.'*

*The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test. The impact test determines whether there would be likely significant adverse impacts of locating main town centre development outside of existing town centres (and therefore whether the proposal should be refused in line with policy).'*

5.8 In the absence of an up to date Core Strategy or Local Plan therefore it is the NPPF that provides the policy basis against which to consider retail applications.

5.9 Two notable shifts in planning policy on retail matters emerged with NPPF in that there is now longer a requirement to demonstrate 'need' for a retail development and applicants no longer need to show that the scale of their proposal is appropriate to the scale and function of the centre to which it relates.

5.10 National policy now only requires applicants to consider the sequential approach and if the proposal exceeds 2500sqm the impact test i.e. the likely trading impacts.

### **Local Policies**

5.11 Liverpool UDP was adopted in 2002 so is not an up to date document in terms of NPPF. The subject site is shown as a being in a primarily industrial area (Policy E1).

5.12 Liverpool Core Strategy is not being pursued but rather under the 2012 Regulations LCC have decided to produce a Local Plan building on the work and studies undertaken for the Core Strategy. The Liverpool Local Development

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Scheme 2013 documents anticipates it will be late 2015 before an adopted Local Plan is in place.

5.13 The only adopted document therefore is the 2002 UDP which is now 12 years old and thus not an up to date document as required by NPPF.

5.14 In 2009 Liverpool City Council Retail Study was produced but this has been updated by the Liverpool City Council Retail and Commercial Leisure Study 2011. This in itself is also out of date as it pre dates NPPF and refers to the now cancelled PPS4 and the emerging Core Strategy, which also has been abandoned in favour of the Local Plan which is still a work in progress.

## **6.0 PROPOSED USE**

6.1 The proposed use is for a once a week market on a Sunday from 9am to 3pm

6.2 This will be part undercover in a purposed built open sided structure that will be used for undercover parking on weekdays. There will also be some outside stalls. The market will only use 2493 sqm gross of the overall site so that the remainder of site is still available for stall holder and customer parking providing a self-sufficient site but within easy walking distance of the city centre and Pier Head should customers wish to make multiple use trips.

6.3 We note that the site is outside the buffer zone of the Pier Head/Waterfront World Heritage Site in an area of mixed business/commercial/retail type uses (WHS SPD 2009) so superscript 9 of para 14 of NPPF does not apply to this scheme..

6.4 The area character is changing with the development of retail outlets (e.g. Tus R Us and Costco), modern car showrooms and other office buildings and uses such as car washes and vehicle hire particularly between Great Howard Street and Pall Mall and along the Leeds Street frontage. East of Vauxhall Rd apart from some residential development fronting Leeds Street much of the land behind is secondary/tertiary commercial/industrial units with pockets of derelict land. The proposed scheme on the subject site will improve the site and still offer competitively priced parking for office workers when they need it whilst widening the retail/leisure offer on a Sunday and recreating the employment and economic opportunity lost to the city since the closure of the Stanley Dock market.

## **7.0 POTENTIAL OCCUPIERS**

7.1 The application site offers a unique opportunity for a new Sunday market close to the site of the former Stanley Dock Heritage Market which ran for 30 years but for the last 3.5 years has been seeking a new location, to date without success.

7.2 The Great Homer Street (GHS) market is to be relocated as part of the Project Jennifer scheme and the new site for the market is only about half the size of the

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former site. We understand Sainsbury's have consent on the former GHS market site.

7.3 Consent for the redevelopment of the Tuebrook market site for a food superstore was granted in January 2014 and our clients informed us that the Broadway market is likely to be closing in the summer.

7.4 At present there are a number of markets in Liverpool (See Appendix A). Only 2 are permanent – St John's in the city centre which operates Monday to Saturday and Broadway which also operates Monday to Saturday. The other markets are for more limited periods of time on specific days or half the week (Mon-Sat). Since the closure of Stanley Dock Heritage market the only Sunday market currently operating in LCC area is at Edge Lane and this is a combined market/car boot sale. The site is on the north of Edge Lane near the Edge Lane Retail Park which includes a number of large out of centre type retail units e.g. B&Q, together with fast food restaurants e.g. McDonalds.

7.5 There are therefore a number of market traders who have traded in the area near Liverpool city centre for many years who have been displaced by these closures/ downsized relocations.

7.6 There is demand from these traders as demonstrated by the summary attached at Appendix B. Due to the redevelopment of market sites for retail stores and the closure or downsizing of sites more market traders are being displaced from Liverpool and have had to move to other markets as far afield as Manchester and North Wales. Many have expressed the wish to be able to trade in their original area i.e. Liverpool and this site would go some way to addressing this demand.

## 8.0 ASSESSMENT

8.1 As Liverpool's development plan is not up to date therefore NPPF is the policy to assess this proposal against. It will, in line with para 23 of NPPF, provide customer choice and a diverse retail offer enhancing the competitiveness of the city centre. Furthermore it also provides the opportunity to re-introduce/ create a new market, ensuring that markets remain attractive and competitive.

8.2 NPPF sets out the process that the sequential test is done first and only if the scheme exceeds 2500sqm is an impact assessment necessary. As the proposal is for 2493 sqm, so less than 2500sqm, an impact assessment is not required based on current national guidance.

8.3 In order to address the sequential approach we have contacted a number of firms of commercial surveyors in Liverpool to ascertain whether they had any sites within the city centre or edge of city centre area that might be of a similar size, proximity or suitable. None were found. We have also undertaken our own drive round the area to identify any other sites. These sites are listed at Appendix C. Being just to the north of Leeds Street the site is just on the northern outer edge of the city centre.

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8.4 We noted some 15 possible sites, though only 3 were within or closer to the city centre than the subject site. These 4 were the car park at Brownlow Hill which is too small to accommodate the stalls and stall holder parking and customer parking and too close to St John's market and is one of the main city centre car parks used by shoppers to the city centre throughout the week including Sundays. Land at Blackstock Street again too small to provide the space for the stalls and parking for the stall holders and customers. The NCP at Pall Mall which is of sufficient size but as a national parking firm they focus their business on parking and have not diversified so the site is unavailable. The Kings Car Park which serves the tourist attractions around Albert Dock and the cathedrals and is used throughout the week so not available.

8.5 Over half of the sites identified whether within or around the city centre were significantly smaller than the subject site, some were further removed from the city centre or adjacent to residential areas or areas being redeveloped for housing. Three were currently on the market for business, mixed use or storage and the site at Brunswick Dock has recently had planning for the relocation of the Stanley Dock Market refused as it was not considered an appropriate business use of the Brunswick Dock.

8.6 As a Sunday only market it will not conflict with any of the 3 current nearest markets, the permanent one in St John's Precinct open Monday to Saturday; the London Rd/Monument Place outdoor market open Thursday to Saturday and the Great Homer Street market open Saturdays only. It is sufficiently distant from the only current Sunday market/car boot in Liverpool at eastern end of Edge Lane (some 3 miles away) as to not conflict with that and as can be seen from the list of traders (Appendix B) will not be focussed on the 'car boot' element but on traditional market traders who have been displaced since the closure of Stanley Dock and the closure/ downsizing of other markets in LCC area.

8.7 It will provide an extra retail offer adjacent to the regional centre and the tourist attractions of the city centre for Sunday visitors and shoppers.

8.8 In regard to the fact there was a Sunday market previously refused on this site some 22 years ago. We comment:

- planning policy has changed significantly;
- the economic market too has changed with people seeking choice and good deals;
- the current proposal enables the stalls to be set up the stallholders to have a dedicated parking area as well as sufficient customer parking provision as made clear in the transport assessment;
- the scheme will not cause highway issues (see traffic assessment)
- the site will remain in car park use Monday to Friday so the applicants will ensure the site is kept in a tidy condition not strewn with litter. Indeed they have lined up private contract cleaners to ensure all litter/rubbish is removed before Monday morning and they have car park attendants who keep the car park clear during the weekdays.

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## 9.0 CONCLUSIONS

9.1 Liverpool does not have an up to date development plan therefore the proposal has to be tested against current national guidance.

9.2 The proposal is compliant with NPPF para 14.

9.3 It has been tested against the relevant retail sections of NPPF and national planning practice guidance and shown to comply.

9.4 The market will only be held on a Sunday and is of a size and scale that does not require an impact test and the sequential test has not identified any more suitable sites thus permission for this proposal should be granted.

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## **APPENDIX A**

### **List of existing markets**

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## LIVERPOOL MARKETS AND OPENING TIMES

Retail market and car boot sale\* Sunday 10am to 4pm  
Wholesale Fruit, Vegetable and Flower Market,  
Edge Lane,  
Liverpool,  
L13 2EP

Broadway (permanent) Monday to Saturday 9am to 5pm  
Broad Lane,  
Norris Green,  
L11 1JB

Garston Friday 9am to 3pm  
Speke Road,  
Garston,  
L19 2PA

Great Homer Street Saturday 8am to 3pm  
North General Market,  
Great Homer Street,  
L5 3LO

Wholesale Fruit, Veg and Flower Market Monday to Saturday 4am to 1pm, (4am to 9am on Saturday)  
Edge Lane,  
Old Swan,  
L13 2EP

Monument Place Thursday to Saturday 9am to 4pm  
London Road,  
L3 8JA

St John's (permanent) Monday to Saturday 8.30am to 5pm (5.30pm on Saturday)  
St John's Precinct,  
L1 1NR

Speke - -  
Closed on 18th December 2013. Looking for new site.

Tuebrook,  
L6 4BR  
Tuebrook Thursday and Saturday 9am to 3.30pm  
Dorset House,  
West Derby Road,

(\* Traders allowed on site from 8am. Cars £10, vans £15. For retail:

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- In metres: first 3 metres £25 (1 metre = approx. £8.30) then 0.30 per metre thereafter.
- Equivalent in linear foot: £2.50 per linear foot for the first 10 foot then £1 per linear foot thereafter.)

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## **APPENDIX B**

### **List of trader interest**

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Name	goods	take stall at site?	currently trade Sat	worked at Stanley Dock
John Burns	furniture	5	Greaty	yes
Sandro	Menswear	4	Tuebrook	yes
Billy	sportswear	4	Greaty	yes
Gerrard	fishing	3	Greaty	yes
Lee	Military	2	Greaty	yes
Kevin/Mark	Soft Furnishings	2	Greaty	yes
Terry	reveloution blind	2	Greaty	No
Vicki	Babywear	2	Greaty	yes
Andy	butcher	3	Greaty	yes
Joe	toiletries	3	Greaty	yes
Rodney	Toys/Sweets	2	Greaty	yes
Joe	Hardware	3	Greaty	yes
Phil	toiletries	3	Tuebrook	yes
John	wallpaper	3	Tuebrook	yes
Shaun	household	3	Greaty	yes
Ronnie	Paint/DIY	2	Greaty	yes
Tim	Menswear	2	Greaty	yes
Jessica	Hair and beauty	1	Tuebrook	No
Dave	football goods	2	Tuebrook	yes
paul	Fruit/veg/flowers	4	Greaty	yes
brain	cards	3	Greaty	yes
lee	pets goods	1	Greaty	yes
Dennis	Bedding	2	Greaty	yes
Mick	Pound Line	1	Greaty	yes
Ken/Shire	cosmetics	1	Greaty	yes
Mohamed	ladies fashion	3	Greaty	yes
Collette	catering	3	Greaty	yes
john	rugs	2	Greaty	yes
Ken Locke	Ladies wear	4	Greaty	yes
john	carpets	2	Tuebrook	yes
Marion	flowers	2	Tuebrook	yes
john	white goods	3	Tuebrook	No
dental spa	teeth	1	Kirby	No
Howard/Elaine	cakes	2	Kirby	yes
abbey foster	parties	1	Greaty	No
Gary	food	3	Kirby	yes
cliff	Menswear	5	Greaty	No
john	catering	3	Greaty	yes
Neil	clothes	2	Kirby	yes
Lorraine	women's fashion	3	Kirby	yes
Pat	Girls fashion	4	Greaty	yes
Jason	Menswear	4	Greaty	yes
Ross	toiletries	5	Greaty	yes

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Roy	Bedding	3	Greaty	yes
Simon	bags	3	Greaty	yes
john	socks	3	Greaty	yes
Margy	Ladies vintage	2	Greaty	yes
Mike	Multi Gift Sets	5	Greaty	yes
Mrs Murphy	Hats Scarfs	2	Greaty	yes
Mike	Boots and Posters	4	Greaty	yes
Ray	clothes	3	Greaty	yes
Russell	clothing	3	Greaty	yes
tom	ladies fashion	4	Greaty	yes
Neil	pancakes	1	Greaty	no
Ste	Bread - cake	2	Greaty	yes
Lorraine	fancy goods	3	Greaty	yes
paul	kids clothes	2	Greaty	yes
R. Young	Fashion	2	Greaty	yes
Paul	cosmetics	2	Greaty	yes
'Lyndsey	doughnuts	2	Greaty	yes
Gary	Fireplaces	3	Greaty	yes
Dave	Bedding	3	Greaty	yes
Bob	Catalogue	6	Greaty	yes
Francis	Menswear	2	Greaty	yes
David	bag luggage	2	Greaty	yes
B.Scriven	Garden wholesale	3	Greaty	yes
A.Woods	Menswear	2	Greaty	No
R.Duke	Breadman	1	Greaty	yes
Ste	plants	3	Tuebrook	yes
Alec and Pat	Home ware	3	Tuebrook	yes
veronica	Soft Furnishings	2	Tuebrook	yes
Stephen	fancy goods	2	Greaty	yes
I.Gill	Fashion	3	Tuebrook	yes
Alan	shoes	3	Tuebrook	yes
Mike	pet food	2	Greaty	yes
carl	garden ornaments	2	Greaty	yes
G.Tuthill	Fashion	3	Greaty	yes
Tony	Underwear	3	Greaty	yes
Terry	marks and spencer	4	Greaty	yes
Darren	household	4	Greaty	yes
A.Lolden	fruit and Veg	2	Tuebrook	yes
tom Clarke		2	Greaty	yes
J.Stokes	plants	4	Greaty	yes
Sarah Edgar	Nail bar	1	Greaty	no
Francis	fancy goods	1	Tuebrook	yes
ray	computers	2	Tuebrook	yes
M.fulerton	Babywear	2	Greaty	yes
Syed	Fashion	3	Greaty	yes

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Zed	clothing	2	Greaty	yes
Leanne	communion	2	Greaty	yes
Terry	Leather goods	4	Greaty	yes
Tony	Linen & Curtains	4	Greaty	yes
Daniel	Goods Hire	2	Greaty	yes
Georgia	Cards and Balloons	2	Greaty	No
Christine	vinyl's	4	Greaty	yes
PJ	carpets	3	Greaty	yes
Lynsey	nails and beauty	2	Greaty	No
Lillian	Hair	2	Greaty	No
Stephen	e-cigs	2	Greaty	No
Jodie	kids clothes	2	Greaty	No
James	Football kits	4	Greaty	yes
	Vapour cigs and			
Joseph	gifts	4	Greaty	No
James	Toys	3	Greaty	yes
Darren	gifts and glass	2	Greaty	yes
Hanna and Tina	household	6	Greaty	yes
Anthony	Body Pump	3	Greaty	No
Harry	Rugs and acc	4	Greaty	yes
Papparazi Jenny	ladies fashion	4	Greaty	yes
Helen	kids accessories	2	Greaty	yes
Sharon	Sweets	3	Greaty	yes
Kyle	electrical items	2	Greaty	yes
Collette	Glasses	1	Kirby	No
Julie	flowers	2	Kirby	No
Lisa	gifts	4	Kirby	yes
Marie	Make up	2	Kirby	yes
Ian	catering	3	Kirby	yes
Hanna	household	6	Kirby	yes
Mrs McGovern	dental	1	Kirby	no
Terry	Asian traders	22	Town	yes
Anthony	belts and scarfs	2	Greaty	no

## CHARTERED TOWN PLANNER

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## **APPENDIX C**

### **List of sites considered**

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**Sequential site search assessment re Nextdom Ltd site at Pall Mall, Liverpool**

- 1 Selbourne Street land adjacent to Women's Hospital car park, 0.57ha too small.
- 2 Grafton Street 0.98ha too small, close to existing and new housing sites, possibly former gas works so likely contaminated. Further from city centre
- 3 Brunswick Dock 27,000sq ft currently on the market through Mason & Partners and CBRE and location of recent planning refusal for relocated Stanley Dock Heritage Market
- 4 Caryl St/Hill St 0.4ha too small, site split by a road and close to housing. Further from city centre
- 5 Cains Brewery 1.2ha has pp which includes a market but not let to date. Further from retail part of city centre
- 6 Kings car park, Blundell Street 1.1ha serves City centre and tourist attractions on waterfront and the cathedrals. Not available
- 7 Secure Storage site Regent Rd 0.4- 12ha on market through Legat Owen Not available and part of waterfront redevelopment
- 8 Home and Communities agency land at Great Howard Street – 1ha not available, further from city centre
- 9 NCP, Pall Mall 2.3ha active car park, within the city centre, not available
- 10 Leeds Street car park 0.76ha too small
- 11 Pumpfield St – derelict site 2.3ha not available and further from city centre
- 12 Blackstock Street 0.48ha too small, close to housing
- 13 Brownlow Hill car park 0.7ha within city centre, well used car park, too small
- 14 Low Hill/West Derby Rd – 1.43ha on the market through GVA Grimley and Edmund Kirby for mixed use redevelopment, not available, close to houses and further from the city centre
- 15 Surface car park West Derby Rd 0.31ha too small further from city centre

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