



**Wirral Waters**

East Float Outline Planning Application

# Retail, Office and Leisure Impact Statement Addendum

June 2010

**PEEL LAND AND PROPERTY (PORTS) LTD**

**EAST FLOAT OUTLINE PLANNING**

**APPLICATION**

**RETAIL, LEISURE AND OFFICE STATEMENT**

**ADDENDUM**

**JUNE 2010**

## CONTENTS

1.	Introduction	1
2.	PPS4 – Summary of Key Policies	6
3.	RTP Report – Summary of Key Findings	9
4.	PPS4 Assessment	18
5.	Conclusions and Control Mechanisms	48

Appendices:

Appendix I: Revised Impact Tables

Appendix 2: Response to Objections

TA Ref: PEEM1030

LPA Ref:

Office Address: 10 Queen Square  
Bristol  
BS1 4NT

Telephone 0117 989 7000

Date of Issue: 07 June 2010

# 1. Introduction

- 1.1 This report has been prepared by Turley Associates on behalf of Peel Land and Property (Ports) Limited. The report forms an addendum to the 'Retail, Leisure and Office Statement' (RLOS) prepared by Turley Associates in connection with the East Float Outline Planning Application. It considers the proposal in relation to both new national policy guidance (Planning Policy Statement 4: Planning for Sustainable Economic Growth), and recently published evidence relating to the future retailing and leisure needs of the Wirral Metropolitan Borough Council (WMBC) area.
- 1.2 The broad scope of this report was agreed with Officers of WMBC (Turley Associates Briefing Note, 2<sup>nd</sup> February 2010).
- 1.3 The Addendum Report also responds to matters raised by Officers of WMBC, specifically:
  - Additional information requested by WMBC on 10<sup>th</sup> February 2010 (appended to correspondence dated 22<sup>nd</sup> February 2010) relating to the 'Retail, Leisure and Office Statement' (RLOS) (Turley Associates, December 2009).
  - Consideration of the potential cumulative effects of East Float application, when viewed in conjunction with the broader Wirral Waters and Liverpool Waters schemes, as they emerge as major regeneration proposals in their respective dockland areas.
  - Consideration of the impact of the proposal on existing convenience and comparison floorspace, including local centres, together with additional justification for the quantum of retail floorspace proposed at East Float. This further information was requested in email correspondence from WMBC dated 11 and 19 March 2010; this followed the submission of the Addendum Report to WMBC as a draft for comment on the 10 March 2010.
- 1.4 The report should be read in conjunction with further supplementary reports prepared on behalf of Peel, including 'The Economic Impact of East Float', (Regeneris, May 2010), and 'Office Market Positioning' (CBRE, March 2010).
- 1.5 In addition to the matters raised identified by Officers, various third parties have submitted representations to the application. We respond to these matters in Appendix 2.

## Context

- 1.6 The East Float application (submitted in December 2009) was supported by a 'Retail, Leisure and Office Statement' (RLOS) addressing retail policy considerations, including quantitative need and retail impact. This was prepared in relation to (then extant) national planning policy relating to retailing and town centres uses: – 'Planning Policy Statement 6: Planning for Town Centres'. The RLOS considered the proposal in relation to the principal PPS6 policy considerations: need, impact and sequential compliance.
- 1.7 On 29 December 2009 the government issued new guidance on economic development: Planning Policy Statement 4: 'Planning for Sustainable Economic Growth' (PPS4). This policy document relates to all proposals involving 'economic development', the definition of which includes retailing and 'town centre uses' including offices, leisure uses, retail floorspace, hotels and public and community uses. These uses comprise some 45% of the total development proposed at East Float (620,757 sq m gross); the composition of the development by use is summarised in Table 1.1 of the RLOS supporting the East Float application.
- 1.8 On 14 January 2010, WMBC Cabinet Members resolved that the 'Strategy for Retail, Town Centres and Commercial Leisure', a consultancy report prepared by Roger Tym and Partners (RTP) in December 2009, be approved as a material consideration for use by the Planning Committee in the determination of planning applications; and that the findings of the study be used to inform the content of the emerging Core Strategy Development Plan Document and the delivery of Investment Strategy priorities. This report quantifies the capacity of the WMBC area to accommodate additional retail and commercial leisure development in economic terms, and sets out strategies for future retail and leisure development in the Borough.
- 1.9 This Addendum Report considers the implications of new national policy (PPS4) and the 'Strategy for Retail, Town Centres and Commercial Leisure' (referred to below as the RTP report) for the East Float proposals. The report focuses in particular on the proposal's compliance with the relevant policies in PPS4.

## Scope of Addendum Report

- 1.10 Against this background, the scope of this report is as follows:
  - i) **New Empirical Evidence:** Re-assessment of the economic implications of the East Float application in light of the empirical analysis set out in the RTP report, focussing upon the principal PPS4 policy 'tests'.

- ii) **Impacts and Sequential Compliance:** An assessment of the proposals against PPS4 Development Management Policies: EC10 and EC14-17. In relation to EC10 impacts, this includes (in summary form and as required under each of the relevant criteria) information already submitted in connection with the application regarding matters such as accessibility, design and resilience to climate change. In relation to Policy EC16, existing material and revised analysis (drawing on the RTP report) is assessed against policy criteria. The impact analysis set out in the RLOS is extended in the Addendum Report to include impacts on existing convenience and comparison floorspace. In response to Officer comments, this includes local centres in the WMBC area.
- iii) **Location:** A revised assessment of the locational characteristics of the East Float proposal in light of the definitions in PPS4, such as distances from existing foci, including transport interchanges.
- iv) **Relationship with emerging plan making policies:** Brief consideration of the proposals in relation to PPS4 policies EC3-5.
- v) **Cumulative Effects:** Consideration of the proposals in cumulative terms (Liverpool Waters).
- vi) **Retail Control Mechanisms:** A review of potential retail control mechanisms including phasing, quantum of floorspace and distribution by 'quarter'.
- vii) **Other Matters:** Responses to specific matters raised by WMBC including further justification for the quantum of retail floorspace proposed based on examples of comparable developments. The scale of East Float's retail component is explored in further detail in Section 4 below.

1.11 In preparing the scope of this Addendum, it is important to note the clear statement within paragraph EC14.2 of PPS4 relating to uses that are ancillary within a project:

- *“The town centre policies in this PPS apply to planning applications for the above uses unless they are ancillary to other uses.”*

1.12 As such, it is Peel's view that the policies of PPS4 do not strictly apply to the some aspects of the East Float scheme, namely the retail and leisure components, which are ancillary to the dominant residential and commercial office uses.

1.13 Nonetheless, given the concerns raised by third parties in relation to the absolute scale of the proposed retail elements (albeit that they are in relative terms ancillary), it is considered appropriate to go beyond the requirements of PPS4 and

undertake a robust assessment of this element of the scheme. However, whilst this addendum sets out a robust PPS4 assessment, it must be appreciated that not all aspects of the PPS4 (insofar as it applies to 'retail development') are relevant and applicable to the ancillary retail elements of East Float.

- 1.14 In respect of the leisure elements of the scheme, these are also ancillary; however, we also test this aspect against PPS4.
- 1.15 In respect of the office element, as a main town centre use and a primary component of the East Float application, the full PPS4 assessment is undertaken in respect of impact, sequential and other policies.

### **Retail Floorspace Composition**

- 1.16 The RLOS considered the impact of East Float's retail component on the basis of two alternative scenarios: 30,000 sq m gross total of A1 retail floorspace of which the maximum quantum of either convenience or comparison floorspace would be 18,000 sq m (with the balance – 12,000 sq m - trading as either convenience or comparison floorspace).
- 1.17 On the basis of our additional analysis, we now recommend that the convenience floorspace is limited to a maximum of 12,000 sq m. A single scenario is therefore now assumed for the purposes the assessment: 18,000 sq m of comparison/non-food and 12,000 sq m of convenience floorspace.

### **Report Structure**

- 1.18 The report is structured as follows:

**Section 2:** Summarises relevant Policies in PPS4 and their applicability to the East Float proposals.

**Section 3:** Sets out the key findings of the RTP report and assesses its implications for the East Float proposal.

**Section 4:** Sets out revised analysis and considers economic implications in relation to PPS4 policies and other issues, including sequential compliance. This revised assessment is divided between impacts specific to 'town centre uses' and 'general/non-retail' impacts (Policies EC16 and EC10). We also consider the overall quantum of floorspace proposed at East Float as part of this assessment (under the 'Scale' sub-heading); this issue has been specifically raised by Officers following submission of the draft Addendum Report.

**Section 5:** Presents a policy summary relating specifically to PPS4 policy ‘tests’ and sets out our conclusions, together with the retail control mechanisms as informally agreed with officers of the LPA.

1.19 The revised retail impact analysis is appended (**Appendix 1**).

1.20 A response to PPS4 based objections is contained at **Appendix 2**.

## 2. PPS4 – Summary of Key Policies

- 2.1 PPS4 was published on 29 December 2009. It supersedes PPS6, PPG4 and PPG5. The new document also replaces paragraphs 53, 54 and Annex D of PPG13, as well as the economic considerations of PPS7.

### Scope of Policies

- 2.2 PPS4 relates to all proposals involving ‘economic development’; this is defined in the guidance. ‘Town centre uses’, which include leisure, office and retail proposals, are defined as a separate category of economic development to which additional policy ‘tests’ apply (in specific circumstances).
- 2.3 The non-residential component of the East Float application includes 620,757 sq m gross of development falling within the definition of ‘town centre uses’: offices; retail floorspace; hotel and conference facilities; and culture, education, leisure and community uses. These uses and the quantum of development by proposed use are shown on Table 1.1 of the RLOS (page 4).
- 2.4 There is an explicit requirement within PPS4 for Local Authorities to treat ‘favourably’ all planning applications that secure sustainable economic growth; however, specific policy tests apply to all proposals involving economic development, with additional policies applying to applications involving ‘town centre uses’. The focus of PPS4 policy is on impact and sequential compliance, including ‘general impact’ considerations (such as resilience to climate change, design and accessibility) and ‘town centre impacts’, including the implications of proposals for planned investments and the vitality and viability of town centre economies.
- 2.5 The requirement to demonstrate need (a matter considered in the earlier RLOS prepared by Turley Associates in support of the East Float application) has been removed in PPS4.

### Dominant and Ancillary Uses

- 2.6 There is a key distinction within the East Float application between the residential and commercial office elements of the scheme, which are the dominant, principal uses; and the retail, leisure, education and community uses, which are intended to be ancillary and supportive of the principal uses. The proposed mix and balance are integral to the vision and ‘placemaking’ approach to East Float.
- 2.7 Paragraph EC14.2 of PPS4 states that:
- *“The town centre policies in this PPS apply to planning applications for the above uses unless they are ancillary to other uses.”*

- 2.8 As proposed, the retail and leisure elements of East Float are ancillary. The related policies of PPS4 are clearly intended to apply to retail and leisure floorspace within 'retail and leisure developments' rather than that which is ancillary to other dominant uses.
- 2.9 However, it is recognised that the scale of ancillary retail and leisure uses proposed are in absolute terms themselves significant. It is also recognised that third parties have expressed concerns in respect of the retail elements of the scheme. As such, it is considered appropriate to go beyond the requirements of PPS4 and undertake a robust assessment of this element of the scheme. However, whilst this addendum sets out a robust PPS4 assessment, it must be appreciated that not all aspects of the PPS4 (insofar as it applies to 'retail development') are relevant and applicable to the ancillary retail elements of East Float. In respect of the leisure elements of the scheme, these are also ancillary, however, we also test this aspect against PPS4.
- 2.10 In respect of the office element, as a main town centre use and a primary component of the East Float application, the full PPS4 assessment is undertaken in respect of impact, sequential and other policies.

## **Key Policies**

- 2.11 The following objectives for sustainable economic growth underpin PPS4 and are relevant to the East Float proposals:
- *“build prosperous communities by improving the economic performance of cities, towns, regions, sub-regions and local areas, both urban and rural”*
  - *“reduce the gap in economic growth rates between regions, promoting regeneration and tackling deprivation”*
  - *“deliver more sustainable patterns of development, reduce the need to travel, especially by car and respond to climate changes”*
  - *“promote the vitality and viability of town and other centres as important places for communities”...(contd.)*
- 2.12 PPS4 differs from PPS6 and other national guidance in that it is structured in the form of specific policies, rather than general statements of policy guidance. These are divided between Development Management (EC10-19) and Plan Making policies (EC2-8).
- 2.13 The principal policies applicable to East Float's 'town centre uses' are: EC10, EC14, EC15, EC16 and EC17; these policies can be summarised as:

- **Policy EC10** applies to all applications relating to economic development proposals. EC10.1 requires a positive and constructive approach towards planning applications for economic development. Planning applications which secure sustainable economic growth should be treated favourably. EC10.2 identifies the relevant criteria against which proposals are to be assessed: carbon dioxide emissions and climate change; accessibility and traffic impacts; quality and inclusiveness of design; economic and physical regeneration; and local employment impacts.
- **Policy EC14** identifies the supporting evidence required for planning applications for main town centre uses (excluding 'ancillary' uses) and the floorspace thresholds that apply.
- **Policy EC15** sets out the sequential approach with reference to the site selection, the requirement for developer and operator flexibility in relation to development proposals, and operator business model considerations.
- **Policy EC16** applies only to main town centre uses (including retail proposals) and sets out the impact considerations applying to unplanned, edge and out-of-centre developments (in addition to those criteria identified under Policy EC10). These include the impact on existing, committed and planned public and private investment in a centre; vitality and viability and consumer choice; impacts on in-centre trade; appropriateness of scale; and locally important impacts as defined by LPAs.
- Policy EC17 sets out the basis for considering applications for main town centre uses not in a centre and not in accordance with an up to date development plan. It requires that such proposals need to meet the sequential approach and the 'balancing' of negative and positive impacts 'where no significant adverse impacts have been identified'.

2.14 Although the focus of this Addendum is on Development Management policies, a number of the Plan Making policies in PPS4 are also relevant given the reference to Wirral Waters as a key regeneration project in emerging policy. These principally include: **EC3: Planning for Centres**; **EC4: Planning for Consumer Choice and Promoting Competitive Centres**; and **EC5: Site Selection and Land Assembly for Main Town Centre Uses**.

2.15 We assess the East Float proposals in relation to the principal Development Management Policies in Section 4 below.

### **3. RTP Report – Summary of Key Findings**

#### **Strategy for Town Centres, Retail and Commercial Leisure – Roger Tym and Partners**

- 3.1 The 'Strategy for Town Centres, Retail and Commercial Leisure' report was prepared by Roger Tym and Partners (RTP) and approved by WMBC in January 2010 for development control purposes. The report considers the future retailing and leisure needs of the WMBC area, based on quantitative and qualitative analysis guided by the extant policy advice at the time of publication: PPS6, PPS12, and draft PPS4.
- 3.2 The consultant's economic analysis is based on a household telephone survey with a sample of 1,500 households; this was conducted in two tranches: in April 2008 and March 2009.
- 3.3 The report sets out capacity forecasts based on a range of expenditure retention and population scenarios; these include regeneration projects 'such as Wirral Waters', which has significant implications for population levels and economic activity in the WMBC area. The range of capacity forecasts reflects the various scenarios. These inform suggested strategies for meeting the Borough's future retail and leisure needs.

#### **Patterns of Spending**

##### ***Comparison goods***

- 3.4 The household surveys providing the basis for the economic analysis presented in the report indicate that Birkenhead town centre was the dominant comparison shopping centre in four of the 11 survey zones in March 2009, a reduction from seven zones in April 2008. This suggests that Birkenhead's influence has reduced over the period of time Liverpool One has been trading, the second phase of which opened in October 2008. Correspondingly, leakage to Liverpool city centre increased from 16 to 20 per cent over the period between the two household surveys.
- 3.5 Notwithstanding these impacts, Liverpool is not the dominant centre for any of the survey zones. While its influence is likely to grow as a result of the Liverpool One development, quality retail development in the Wirral would be well-poised to mitigate future increases in outflow.
- 3.6 In terms of comparison goods sub-sectors, the retention rate is lowest for the 'clothes and shoes' sector, which decreased from 60 to 58 per cent between the

two surveys, followed by 'specialist and other comparison goods'. In relation to the low retention rates in these sub-sectors, the report states:

*"This is an important piece of evidence which suggests the need to promote quality developments within and around Birkenhead Town Centre, which are targeted at higher value middle and up-market comparison retailers."*

### **Convenience goods**

- 3.7 While the report concludes that the household survey findings do not indicate a pressing need for an improved convenience offer, it is acknowledged that this is based on current circumstances; and that a qualitative need may arise in the future in areas such as Wirral Waters where substantial population growth is expected to take place.

### **Retail Need**

- 3.8 The report assesses the quantitative and qualitative retail need over the duration of the WMBC Core Strategy, i.e. to 2026.
- 3.9 Following an analysis of the household survey findings, the report maintains that the two principal destinations for comparison expenditure in the Wirral, namely Birkenhead town centre and the Croft Retail Park, are trading at levels in line with expectations. As a result, no adjustments for under or over-trading in these centres have been applied in RTP's analysis.
- 3.10 In terms of foodstores, the Asda stores at Liscard and Croft Business Park are believed to be trading substantially above the company average. The Morrisons in West Kirby and the Sainsbury's at Upton and Prenton are also believed to be over-trading, but to a lesser degree. Under-trading stores are believed to include Tesco Extra at Bidston, and Tesco at Heswall.
- 3.11 Although stores are over-trading in aggregate, the report concludes that this does not represent a quantitative need for new stores. It is believed that the proposed Morrisons in New Brighton will alleviate the over-trading at Asda in Liscard. Furthermore, due to the relative characteristics of the other under and over-trading stores, namely that the under-trading stores are out-of-centre and the over-trading stores are in centres, it is suggested that an overall position of over-trading should not be regarded as indicative of a need for new convenience goods floorspace, unless the extent of over-trading creates customer discomfort. As a result, similar to the comparison goods analysis, no adjustments for under or over-trading are made by RTP in the convenience goods analysis.

- 3.12 The report does, however, recognise the possibility that Wirral's overall catchment area may widen if the Wirral Waters scheme progresses, especially if the scheme is to include a high quality and specialist offer at East Float, and a major, nationally important retail and leisure destination at Bidston Dock.
- 3.13 Retail forecasting scenarios presented in the report are based on two sets of population growth assumptions, and four retention rate assumptions. Comparison retail need is further tested using high and low floorspace efficiency rate assumptions, resulting in 16 scenarios for comparison retail need, and eight for convenience retail need.
- 3.14 The two population growth scenarios used are the Office of National Statistics (ONS) 2006-based Population Projections, which were published in June 2008, and the same ONS projections with an allowance for the additional population growth likely to occur if the Wirral Waters scheme is implemented.
- 3.15 The report concludes that there is a negative residual requirement in the comparison sector in the period up to 2016, under all 16 scenarios. Beyond 2016, however, there is a positive residual need for comparison retail floorspace under most of the scenarios up to 2021, and all of the scenarios up to 2026. This is attributed to a period of higher expenditure growth that is anticipated to follow the current economic downturn.

3.16 The position is summarised in the following table:

<b>Quantitative Need in the Comparison Goods Sector (sq m net)</b>					
	2009-11	2009-14	2009-16	2009-21	2009-26
ONS-based Population Scenarios					
Retention Rate					
Moderate Decrease	-13,551	-16,447	-15,452	-479	11,306
Static	-12,440	-13,571	-11,330	7,984	25,001
Moderate Increase	-11,202	-10,366	-6,736	17,419	40,268
Significant Increase	-10,027	-7,325	-2,378	26,369	54,750
Moderate Decrease	-12,687	-14,355	-12,498	10,668	29,910
Static	-11,569	-11,431	-8,278	19,816	45,309
Moderate Increase	-10,322	-8,171	-3,574	30,013	62,475
Significant Increase	-9,139	-5,079	889	39,686	78,757
ONS + Wirral Waters Population Scenarios					
Retention Rate					
Moderate Decrease	-13,460	-15,650	-14,063	2,448	15,676
Static	-12,348	-12,752	-9,886	11,117	29,820
Moderate Increase	-11,109	-9,522	-5,230	20,781	45,587
Significant Increase	-9,933	-6,458	-814	29,948	60,542
Moderate Decrease	-12,595	-13,545	-11,076	13,831	34,824
Static	-11,476	-10,598	-6,799	23,201	50,726
Moderate Increase	-10,228	-7,312	-2,032	33,647	68,454
Significant Increase	-9,044	-4,196	2,491	43,555	85,270
Source: Strategy for Town Centres, Retail and Commercial Leisure, Table 5.9					

3.17 Although scenarios illustrating a decrease or a static retention rate have been included in RTP's analysis, the advice alongside this information indicates that it is

not sensible to plan for either of these possibilities, and that the Council should be aspiring to achieve an improvement to the current retention rate.

- 3.18 There is a clear acknowledgment that this may be challenging, and that achieving the improvements to the Borough's comparison market would require a 'Wirral Waters type development'. This is understood to refer to the retail/leisure opportunity at Bidston Dock rather than the East Float proposals, where the retail and leisure components are ancillary. The final suggestion is, therefore, that a range of 46,300 sq m to 85,300 sq m net should be incorporated into the LDF for the period 2009 to 2026, this being the range generated by the scenarios incorporating population growth associated with the Wirral Waters scheme, and a moderate or significant increase in the retention rate.
- 3.19 Furthermore, the suggested strategy and recommendations in the final section of the report favour the scenario of significant, rather than moderate, increases in the retention rate.
- 3.20 With regard to convenience goods, the report maintains that the residual need from 2009 up to 2026 is negative, even under the more ambitious population growth scenario incorporating the Wirral Waters scheme. This is attributed to the low forecast rate of expenditure growth in the convenience sector, and the substantial turnover requirements of extant permissions, specifically the planned Asda and Morrisons superstores in Birkenhead and New Brighton.

<b>Quantitative Need in the Convenience Goods Sector (sq m net)</b>					
	2009-11	2009-14	2009-16	2009-21	2009-26
ONS-based Population Scenario	-7,266	-7,804	-7,733	-6,909	-6,395
ONS + Wirral Waters Population Scenario	-7,222	-7,406	-7,043	-5,631	-4,652
Source: Strategy for Town Centres, Retail and Commercial Leisure, Table 5.10					

### **Qualitative Need**

- 3.21 On the question of qualitative need, the report concludes that it is inevitable that the aggregate comparison retention rate achieved by Wirral's centres and stores will start to deteriorate unless there is a substantial, comparison retail-led development scheme. This should be of sufficient critical mass and quality to compete on a more equitable basis with Liverpool and Chester, and notes that at present there are no planning commitments in Wirral for this type of scheme.

## Strategies

- 3.22 In light of the current economic conditions, the report emphasises the importance of ensuring that regeneration continues, as this is a driver of the provision of employment and attracting investment into areas which would otherwise be neglected.
- 3.23 The need to consider the emerging proposals for Wirral Waters is therefore recognised as an imperative, given that the proposal is likely to exert a considerable influence over the future direction of growth in Wirral. The report acknowledges that even though the Wirral Waters site is out-of-centre, it would be capable of delivering a substantial mixed-use development including retail, residential, employment and commercial leisure elements and, when considered holistically, the benefits of the scheme could overcome any conflict due to its out-of-centre location in regional or local policy terms.
- 3.24 In order to assess various strategies, RTP have assumed that:

*“East Float will comprise high quality and specialist cafés, restaurants, boutiques and food retailers, complementary to the major mixed-use residential and employment development proposed, while Bidston Dock will be a major ‘nationally important’ leisure and retail destination”*

- 3.25 It should be noted in connection with these assumptions that the Bidston Dock element of the Wirral Waters proposals does not form part of the current outline application and will be the subject of a separate application and related retail and other assessments as part of that submission.

### Strategic Growth Options

Growth Option	Description
1. Dispersal across all 5 Town Centres (maintaining the 'status quo')	Distribution of floorspace in line with existing market share/current role.
2. Focus on Birkenhead Town Centre	Strategy of channelling strategic growth primarily into Birkenhead Town Centre.
3. Focus on Birkenhead and Liscard Town Centres	Strategy of channelling strategic growth primarily into the two largest town centres of Birkenhead and Liscard.
4. Focus on Birkenhead/Liscard Town Centres and Wirral Waters	Strategy of distributing strategic growth primarily into the two largest town centres of Birkenhead and Liscard, together with Wirral Waters.
5. Birkenhead Town Centre and Wirral Waters Focus	Strategy of focusing strategic growth in Birkenhead Town Centre and the

	proposed Wirral Waters development.
6. Wirral Waters Focus	Concerted strategy of focusing strategic growth predominantly on Wirral Waters.

Source: Strategy for Town Centres, Retail and Commercial Leisure, Table 6.1

3.26 The two preferred Growth Options presented in the report for distributing identified retail and leisure needs in Wirral are as follows:

- “Growth Option 5, which seeks to channel the majority of strategic growth towards Birkenhead town centre and Wirral Waters. However, it is important to note that this strategy will only be successful if a viable redevelopment scheme for the town centre can be brought forward, which would require the commitment of key landowners in Birkenhead town centre such as Warner Estates. If this Growth Option was to be pursued by the Council, it would be imperative that retail and leisure development at Birkenhead town centre and Wirral Waters is complementary.”
- “Growth Option 6, which focuses on meeting the majority of retail and leisure needs at Wirral Waters. This is the most deliverable Growth Option, since the land involved is in the single ownership of the developer (Peel Holdings), and the vision, planning and implementation strategy is already at a relatively advanced stage. We consider that this is the best long term opportunity to raise the profile of Wirral, and to re-position the Borough as a serious retail and leisure destination.”

3.27 Neither of the two options recommends that any change is made to Birkenhead town centre’s status as a strategic centre, or any amendment to its position in the sub-regional hierarchy of centres. Even in the event that the majority of retail and leisure development is focussed at Wirral Waters, a range of smaller scale development opportunities would be anticipated in Birkenhead town centre to provide retail, leisure and other town centre uses.

### **Designation of New Centres**

3.28 In discussing the possibility of designating new centres, the report emphasises that

*“the ‘Major nationally important retail and leisure destination’ which Turleys refers to in relation to Bidston Dock would have to come through the RSS process (we reiterate again here that Policy W5 of the existing version of the RSS would rule out any type of town centre designation at Bidston Dock)”*

- 3.29 At the LDF level, however, it is acknowledged that a key consideration for the Council in preparing its LDF will be whether or not to designate a new centre to support the new docklands community at Wirral Waters. RTP's initial view is that there is likely to be a strong case (our emphasis) for designating a new centre at Wirral Waters (paragraph 6.33 page 105).
- 3.30 The report advises that more detailed work would be required prior to any LDF designation, which could not be carried out until the proposals for Wirral Waters are clarified. The additional work suggested includes an analysis of the most appropriate location for a new local centre; an indication of the timescales for designation and the level of housing growth which could be expected to trigger this, and an assessment of the mix and scale of uses that would be acceptable at the centre.

### **Centre-Specific Strategy and Interventions**

- 3.31 With respect to interventions required for existing centres, the report suggests that there should be an aspiration to achieve a development scheme in Birkenhead town centre to attract new retail and leisure operators which are presently missing from the offer. However, it states that this should be carried out in a way which will achieve complementarity between the offer in Birkenhead town centre and Wirral Waters.

### **Implications for East Float Application**

- 3.32 We highlight the following from our review of the RTP report:
- The report recognises the benefits of a strategy based on increases in trade retention in the WMBC area to counter historic trends, in particular evidence of expenditure leakage (evidenced by the recent reduction in market share following the opening of Liverpool One).
  - In respect of comparison retailing and with allowance for population increases associated with Wirral Waters and increased retention, the capacity projections identified by RTP exceed, to a significant extent, the quantum of floorspace proposed at East Float. The c.68,500 sq m net capacity for comparison retailing assuming a moderate retention increase scenario, exceeds the projected quantum of net comparison floorspace (6,600 sq m net) at East Float by 61,900 sq m at 2026 (based on the indicative development trajectory and assuming 18,000 sq m gross of comparison retail in total).

- There is considerable additional capacity for comparison floorspace forecast by RTP to support other investment in Birkenhead town centre and elsewhere (by 2021 and 2026). This capacity is greater still under a 'significant retention increase' scenario. However, RTP's assessment of convenience goods capacity is 'negative' under all scenarios.
- RTP recognises the benefits of Wirral Waters as a regeneration project, and the potential ability of Wirral Waters/East Float to exert major influence over the future direction of economic development on the Wirral. When considered holistically, benefits are considered to overcome any policy conflicts due to location. RTP highlights the potential designation of a new 'centre' within Wirral Waters as a key consideration for the LDF.

## 4. PPS4 Assessment

- 4.1 This section of the Addendum considers the proposal in relation to PPS4 focussing, in particular, on the proposal's relationship with development management policies EC10 and EC14 – 17. The retail components of this assessment have been revised to incorporate elements of RTP's analysis reviewed in Section 3 above.
- 4.2 We also consider locational/sequential issues in response to matters raised by WMBC. This includes consideration of the definitions in PPS4 and the associated practice guidance.
- 4.3 The assessment is structured as follows:
- Supporting Evidence (EC14);
  - Impact Assessment (EC10 and EC16);
  - Locational and Sequential Issues (EC15);
  - Balancing Assessment and Cumulative Impacts (EC17); and
  - Relationship with Plan Making Policies.

### Supporting Evidence

- 4.4 In addition to the impact considerations against which all planning applications for economic development should be assessed, Policy EC14 of PPS4 requires applications for 'main town centre uses' to be supported by evidence relating to:
1. **Sequential Approach:** a Sequential Assessment under Policy EC15 is required for main town centre uses not in an existing centre, and not in accordance with an up to date development plan (EC14.3).
  2. **Impact Assessment:** required for Planning Applications for retail and leisure developments over 2,500 sq m gross, not in an existing centre, or in accordance with an up to date development plan.
- 4.5 As explained in sections 2 and 3 above, the ancillary nature of the retail and leisure components of the proposals means that PPS4 does not expressly require this evidence to be presented in respect of these components. However, it has been accepted that the evidence should be provided to allow the proposals to be considered against these policies. Additionally, the evidence must clearly be provided in respect of the proposed office uses.
- 4.6 The proposals should be assessed against the impact criteria in Policy EC16.

- 4.7 This Addendum focuses principally on the sequential and impact issues raised by PPS4 in relation to retail and leisure, and should be read in conjunction with the RLOS submitted with the planning application.
- 4.8 A separate Economic Impact Assessment by Regeneris Consulting considers the economic impacts of the office element in further detail, including potential impacts on Birkenhead town centre and Liverpool city centre. That assessment should also be read in conjunction with the RLOS in terms of its approach to planning policy, in particular sequential issues.
- 4.9 This Addendum report includes an analysis of the impact criteria in EC16 of PPS4 and a balancing judgement in terms of EC17 in relation to the office component. This draws on the findings of the Regeneris Economic Impact Assessment and the statements previously submitted with the planning application (RLOS and Planning Statement) as well as analysis within this statement.
- 4.10 There is no requirement to demonstrate need for the proposed main town centre uses, including retail; however, as noted above, evidence provided in the RTP report confirms significant retail expenditure capacity under each of the 'retention growth scenarios'. In the comparison goods sector, this is sufficient to 'absorb' retail development at East Float in economic terms and support additional development in Birkenhead and other centres. Additionally, the office floorspace is considered to be in line with regional and sub-regional strategy/policy and forecasts, as explained within the Economic Impact Assessment prepared by Regeneris Consulting.

#### ***PPS4 Supporting Evidence***

- 4.11 Supporting material submitted with the application in December 2009 includes sequential analysis relating to the East Float development. This includes consideration of each of the 'sub categories' of main town centre uses (offices, retail, leisure, etc.); we revisit this assessment below in the context of PPS4.
- 4.12 The Impact Analysis in the RLOS, including contextual retail analysis and consideration of the structure and function of centres, was undertaken in the context of PPS6; much of this analysis is equally applicable under PPS4 policies. We have nevertheless revisited this analysis, taking into consideration the findings of the RTP report and having regard to the criteria identified under Policy EC16 of PPS4. In order to present a complete PPS4 assessment, we also set out below summary information relating to each of the criteria under Policy EC10; this is substantially drawn from material already submitted in connection with the application.

- 4.13 In relation to retail and town centre uses, the key methodological issues and parameters highlighted at paragraph 6.9 of our earlier RLOS (December 2009) continue to be relevant and applicable under PPS4. An economic methodology is required which is capable of assessing the impact of a substantial quantum of floorspace to be implemented incrementally over a c. 40 year time horizon. This approach, revised to incorporate RTP's analysis and presented in relation to PPS4 policies, is set out below.

## **Impact Assessment**

### ***General Impact Considerations – EC10***

- 4.14 Policy EC10 requires all applications involving economic development to be assessed against five criteria (a-e). The impacts of the proposal under EC10 are assessed as follows, and **apply equally to the office, leisure and retail elements** of the scheme, given that each is classed as economic development and essential to the overall mix and range of activities needed to support the masterplan:

#### **a) Sustainability and Climate Change**

- 4.15 Peel's aspiration for Wirral Waters is that the development should be an exemplar project in terms of the sustainability agenda. The general approach and targets to be adopted to ensure that this aspiration is realised are outlined in the Sustainability Statement submitted with the application. One key point to be noted in this respect is that the site and location themselves have a number of inherently sustainable attributes. The site constitutes previously developed land in the urban area, and is served by currently, under utilised infrastructure, including road and railways connections with spare capacity. The availability of urban infrastructure at East Float is a reflection of the historic loss of population and economic activity; the proposals seek to re-introduce sustainable economic activity to the area.
- 4.16 The development will also bring new employment opportunities into an area where there are significant levels of unemployment and 'worklessness', and into the inner urban area of a part of the City Region which currently experiences significant out-commuting (40,000 persons each day leaving the Wirral Borough area). In addition, the significant job creation will be accompanied over the lifetime of the Wirral Waters development by the construction of c. 15,000 new homes. This will locate new housing in the most sustainable part of the City Region (the 'inner areas' which are the first priority regionally for housing) and will in turn ease the pressure for development in less sustainable, central locations. Major mixed use development in this location will also provide the opportunity for large numbers of people to live within walking or cycling distance of their place of work. The East

Float Masterplan provides for a fully 'walkable' development, for enhanced links to the existing railway stations around the perimeter of the site, and for the penetration of new public transport links into the heart of Sky City.

- 4.17 The range and mix of 'main town centre uses' proposed are essential to creating the sustainability and regeneration benefits of the project. Without retail and leisure uses to support housing and offices, the development will not succeed. Without the office component, it cannot address the economic regeneration challenges of the area.
- 4.18 The proposals are also accompanied by a sustainable energy and waste strategy to ensure the development minimises its contribution to carbon emissions and maximises the use of renewable energy sources which will be developed as the scheme progresses. Peel is considering bringing the whole scheme forward using the BREEAM for Communities method; the initial appraisal that has been carried out against the relevant criteria has shown that the East Float Masterplan should perform well in all respects. In respect of resilience to climate change, the proposals have been assessed to establish the main areas of risk. The potential threat of tidal flooding from the River Mersey due to sea level rise has been assessed through a Flood Risk Assessment and is to be managed and mitigated through the detailed design process and a management plan.
- 4.19 Accordingly, our conclusion is that the East Float proposals will have predominantly positive impacts in terms of sustainability and climate change and that no material adverse impact will arise.

#### **b) Accessibility**

- 4.20 As indicated above, the site enjoys a highly accessible location, being within an existing urban area with substantial residential communities in close proximity, with immediate ease of access to the regional centre (Liverpool City Centre) and local centres including Birkenhead. The creation of a genuinely mixed use development, incorporating residential, employment and supporting retail, leisure and other services in one location, will allow for high levels of accessibility on foot, by cycle and public transport. The site is already served by a number of stations on the suburban rail network which provides a six minute connection to Liverpool Lime Street and which has significant underused capacity. This is of particular significance given the direction in PPS4 (footnote to Appendix B) that sites within the urban area that are within 500m of a railway station should be regarded as edge-of-centre locations for the purposes of office development; both Conway Park and Birkenhead Park stations allow East Float to fall within that definition.

- 4.21 These existing public transport connections will be added to and enhanced in line with the Guiding Principles for Sustainable Transport. There is also surplus capacity in the road network in the local area.
- 4.22 Accordingly, it can be concluded that the East Float development will enjoy a very high level of accessibility by a choice of means of transport in line with PPS4 objectives.

### **c) Design**

The success of Wirral Waters in creating a new world class, waterfront location for living and working is dependent upon the development achieving a very high quality of design, in the new buildings and the public realm and other aspects of the scheme. This is central to Peel's objectives and commitment to achieving this has been demonstrated already in its investment of substantial time and resources in engaging with Wirral Council, CABE and others in the development of the SRF and the East Float Masterplan. These have included three years of consultation with Wirral Council and three CABE Design Review Panels, with CABE's comments and contributions having been an important part of the design evolution process. Peel's commitment to achieving a high quality of design is clearly set out in the Design and Access Statement and Design Handbooks for each of the Quarters within the development. This commitment is also evident in the proposals to use a design panel to help secure the best detailed proposals as individual packages of development are prepared for reserved matters submissions.

### **d) Economic and Physical Regeneration**

- 4.23 A fundamental objective of the Wirral Waters development is to bring transformational physical change to a currently run down inner city area which has been deprived of new investment for decades, and to reverse the economic decline which has left some of the surrounding communities amongst the most deprived in the country. The potential benefits in terms of economic regeneration are clearly set out in the economic impact assessment work undertaken by Regeneris Consulting, which demonstrates the substantial positive benefits of the scheme.
- 4.24 PPS4 highlights economic regeneration and 'narrowing regional gaps' as key policy objectives. These proposals are located in a deprived area with a poor economic base and deep rooted social problems, where there is a chronic need for private investment and a declining availability of public resources (which have been available for the past 10-20 years, but which have not been able to reverse the cycle of decline for this area). The proposals are located in one of the most economically challenged areas of the United Kingdom. If they are not brought

forward, the ongoing dependency of the area on public subsidy (in particular through benefits' dependency, which is among the highest in the country) will see the cycle of decline continue to deepen.

- 4.25 Wirral Waters is the only initiative of sufficient scale and opportunity to allow inner Wirral to break out of this cycle. It will bring physical investment and new employment opportunities on a scale not achievable by any other programme or initiative realistically achievable in the area. It will transform the physical environment and with that, transform perceptions of the area and allow it to attract investment and become sustainable in the long term. It is therefore a regeneration priority of the highest order. The proposed 'main town centre uses' are fundamental to achieving these regeneration objectives. Without them, the 'place' to deliver these objectives cannot be successfully created.

#### **e) Employment**

- 4.26 The area around the East Float site currently experience very high levels of unemployment and second and third generation worklessness which, in turn, contributes to very significant disadvantage in terms of educational, health and other related measures of deprivation. There is an urgent and pressing need to reverse the long standing decline in employment opportunities, and Wirral Waters provides the only realistic opportunity to do this. More than 20,000 permanent (FTE) jobs will be created as a result of the development, together with many thousand indirect and construction jobs. Peel is already working with the Council and other partners to make sure that as many of these opportunities are genuinely accessible to local people and an obligation to continue and expand this partnership, and to monitor its effectiveness will form part of the S106 Agreement as set out in the Development Specification.

### ***Town Centre Impacts – EC16***

#### **Retail – assessment methodology**

- 4.27 In assessing retail impacts under Policy EC16 we have, as noted above, revised the economic analysis in our earlier report. The methodology, developed having regard to the specific characteristics of the proposal and its trajectory and extended development timescale, has been retained.
- 4.28 We have directly applied the following elements/outputs of RTP's analysis (up to 2026, the time horizon for RTP's assessment) to our model as follows (beyond which we have reverted to the assumptions in the RLOS):

- Base ONS population levels, population projections and per capita expenditure for the RTP study's Overall Catchment Area (OCA), which is broadly consistent with the boundaries of Wirral MBC.
- RTP's preferred expenditure growth rates for convenience and comparison goods.
- Comparison goods turnover estimates for Birkenhead and Liscard, and other centres in the WMBC area derived from RTP's analysis.
- Turnover estimates for existing foodstores and convenience floorspace, including local centres, also drawn from RTP's analysis
- SFT and floorspace efficiency assumptions adopted by RTP.

4.29 The baseline assumptions are unchanged. We have continued to assume that the retail floorspace proposed at East Float is ancillary to the development as a whole, and that retail/leisure uses will be sustained to a degree by the new residential population (on site) and worker in-migration. Using this model, the impact of the development arises from that proportion of expenditure required to sustain turnover, which must be captured from non-residents and non-workers. It is assumed that this is drawn into the development resulting in residual impacts on centres and retail facilities outside of the Wirral Waters site; in other words, that expenditure required to sustain floorspace not generated in-situ.

4.30 However, we have also assumed substantial 'outflow', particularly in the comparison goods assessment. Only 20% of comparison goods expenditure generated by residents of the scheme is assumed to be retained in the development; the corresponding proportion in the convenience goods assessment is 75%. The 'outflow' (that proportion of expenditure generated by the development but not retained on site – 80% and 25% of comparison and convenience spending respectively) will benefit surrounding centres (such as Birkenhead) thereby offsetting assessed 'negative' impacts. This will increase in monetary terms year-on-year as the East Float development emerges in accordance with the indicative trajectory. This assessment, as underpinned by these assumptions, is inherently cautious in our view.

4.31 Applying these 'inflow' and 'outflow' assumptions, we have sought to calculate impact in both conventional terms (the negative effects of trade diversion) and overall net impacts allowing for expenditure outflow; this analysis is set out in **Appendix 1** and summarised below.

4.32 Our earlier RLOS considered impacts on centres in aggregate. We have reviewed this approach as part of our revised assessment. Drawing (in part) on RTP's analysis, have sought to quantify impacts on comparison goods turnover in

Birkenhead and other centres. We have assumed that the bulk of the residual comparison expenditure is diverted from four main centres: Birkenhead, Liscard, Liverpool and Chester, with the balance diverted from local centres and other retail facilities.

- 4.33 In the convenience assessment, we have apportioned the required inflows around existing centres and foodstores in the catchment area, with allowance also for commitments (see assessment under EC17 below), applying judgement as to the likely attractiveness and use of East Float as 'competition' to such centres. The judgements that we have made (expressed as percentage trade draws) are based on the location, accessibility, scale and quality of those centres relative to East Float. For centres and stores in Wirral MBC, the baseline turnovers are derived directly from the recent RTP analysis
- 4.34 The proportional inflows have been applied identically as outflows. The split of centres, both from which East Float attracts expenditure, and to which expenditure from residents and workforce would be directed, are therefore the same. So, for example, it is assumed that 5.5% of the inflow needed to support the scheme's comparison retailing component would be diverted from Birkenhead town centre, but that the town centre would then benefit from 5.5% of the surplus expenditure generated on site by residents through 'spin off'. However, it is the retained expenditure percentages (20% comparison and 75% convenience) that establish the magnitude of the expenditure captured from, and expended in, centres in the wider area.
- 4.35 This methodology can be summarised as follows:
- Stage 1: Calculate baseline turnovers with allowance for commitments and adjustments for floorspace efficiency (drawing on RTP's analysis);
  - Stage 2: Calculate the expenditure required to sustain the retail floorspace proposed at East Float as the development emerges in accordance with the trajectory (at each year and at key 'impact dates' – 2015, 2017 and 2022);
  - Stage 3: Calculate the expenditure generated by the emerging resident and worker populations, based on the same trajectory;
  - Stage 4: Calculate the 'inflow' (in monetary terms) required to sustain the retail floorspace assuming that a proportion only of on-site generated expenditure is retained, varying by goods category (20% of comparison and 75% of convenience spend generated by new residents; 5% and 50% respectively in the case of on site workers): Stage 2 minus Stage 3;

- Stage 5: Apportion inflow to centres applying trade draw assumptions based on factors such as distance, quality, attractiveness, degree of competition and 'trading overlap', etc, and calculate trade diverted in monetary terms;
- Stage 6: Calculate impacts at each design year in the conventional way: trade diversion as a percentage of baseline turnover;
- Stage 7: Calculate the 'outflow' generated by the development by goods category in accordance with the trajectory (focussing on the three design years: 2015, 2017 and 2022) – the 'reverse percentages' to those shown in Stage 4 focussing on resident populations only;
- Stage 8: Apportion outflow to centres and stores applying identical trade draw assumptions to Stage 5;
- Stage 9: Calculate the net turnover of centres and stores allowing for inflow and outflow: original baseline turnover minus trade diversion (from inflow) plus turnover uplift (from outflow) = net turnover in design years; and
- Stage 10: Calculate net impacts as a percentage of baseline turnovers in design years.

4.36 This analysis has been undertaken on the basis of the scenario outlined at paragraph 1.17 above: 18,000 sq m gross maximum of comparison floorspace, and 12,000 sq m gross maximum of convenience sales. The outputs are summarised in Tables 4.1 and 4.2 below; the full assessment is included in **Appendix 1**.

4.37 PPS4 (paragraph EC14.7) requires assessments of impact to focus 'in particular' on the first five years after the implementation of the proposal'. Policy EC16(d) refers to a different forecast period: up to five years from the time the application is made. In our revised and updated assessment, therefore, we have considered impacts in 2017 (five years after the initial implementation of the proposal based on the development trajectory) and in 2015 (five years from submission).

4.38 It should be emphasised, however, that a proportion only of the development will be implemented and trading at this stage (2015-2017) given the 2050 target date for overall completion of the East Float development. Therefore, we have considered impacts in 2022 (ten years after initial implementation) in order to consider the economic implications further into the development programme.

4.39 The RLOS included a series of retail tables; the supporting assumptions and inputs are explained fully in Section 6 of the RLOS report. We note reference in the

'additional information' requested by WMBC, 10 February 2010 (appended to J Wilkie's letter of 22 February 2010) to the lack of sufficient detail in our analysis relating to the 'information behind the calculations' (paragraph 11.8). WMBC has also suggested that the earlier statement does not follow the 'step by step approach' referred to in the PPS4 practice guide.

4.40 Revised tables are appended in full to this Addendum Report (**Appendix 1**). The methodology explicitly follows a 'step by step' approach (based on the stages outlined above), albeit in the context of the retail element being ancillary, and a development with a unique profile and trajectory necessitating a bespoke impact methodology.

4.41 On the basis of our revised analysis, we have calculated impacts on the comparison goods turnover of the principal shopping locations (Birkenhead, Liverpool, Chester and Liscard), and on local centres in the WMBC area. This is in specific response to the additional matters raised by Officers following the submission of the RLOS and draft Addendum.

#### **Retail - assessment**

4.42 In relation to convenience goods, a cumulative assessment has also been undertaken that allows for identified commitments; this is summarised below (under PPS4 Policy EC17). The summary in the table below (Table 4.2) does not include an allowance for commitments; it shows the estimated solus impacts only of the East Float development.

	2015 Impact	2015 net Impact	2017	2017 net Impact	2022 Impact	2022 net Impact
West Kirby Town Centre	-0.4%	0.0%	-0.7%	0.0%	-1.2%	+ 0.5%
Hoylake Town Centre	-0.9%	0.0%	-1.3%	+ 0.1%	-2.3%	+ 1.1%
Moreton Town Centre	-0.7%	0.0%	-1.1%	+ 0.1%	-1.9%	+ 0.9%
Upton Village	-0.3%	0.0%	-0.4%	0.0%	-0.7%	+ 0.3%
Junction One Retail Park, Bidston Link Road	-0.2%	0.0%	-0.3%	0.0%	-0.5%	+ 0.2%
Liscard Town Centre	-1.3%	0.0%	-2.0%	+ 0.1%	-3.5%	+ 1.6%
Wallasey Village	-1.4%	0.0%	-2.2%	+ 0.1%	-3.8%	+ 1.7%
Birkenhead Town Centre	-0.4%	0.0%	-0.7%	0.0%	-1.2%	+ 0.5%
Birkenhead (Grange Road West and Oxtan Road)	-0.8%	0.0%	-1.2%	+ 0.1%	-2.1%	+ 0.9%
The Rock Retail Park, Wirral	-0.8%	0.0%	-1.2%	+ 0.1%	-2.1%	+ 1.0%
Prenton (Woodchurch Road) Town Centre	-1.2%	0.0%	-1.9%	+ 0.1%	-3.3%	+ 1.5%

Croft Retail and Leisure Park (inc. Homebase)	-0.1%	0.0%	-0.2%	0.0%	-0.3%	+ 0.1%
Bromborough Village	-0.2%	0.0%	-0.3%	0.0%	-0.5%	+ 0.2%
New Ferry Town Centre	-0.9%	0.0%	-1.5%	+ 0.1%	-2.6%	+ 1.2%
Heswall Town Centre	-0.2%	0.0%	-0.3%	0.0%	-0.6%	+ 0.3%
Liverpool	-0.2%	0.0%	-0.3%	0.0%	-0.6%	+ 0.3%
Chester	-0.3%	0.0%	-0.5%	0.0%	-0.9%	0.4%

	2015 Impact	2015 net Impact	2017 Impact	2017 net Impact	2022 Impact	2022 net Impact
Morrison's, West Kirby	-0.7%	-0.5%	-1.1%	-0.7%	-1.8%	-1.2%
Other Stores, Hoylake Town Centre	-0.4%	-0.3%	-0.7%	-0.5%	-1.1%	-0.7%
Other Stores, West Kirby Town Centre	-0.5%	-0.4%	-0.9%	-0.6%	-1.5%	-1.0%
Somerfield, Moreton	-0.7%	-0.5%	-1.1%	-0.8%	-2.0%	-1.3%
Iceland, Moreton	-0.5%	-0.4%	-0.8%	-0.6%	-1.4%	-0.9%
Other Stores, Moreton Town Centre	-0.5%	-0.4%	-0.8%	-0.6%	-1.4%	-0.9%
Sainsbury's, Upton	-0.7%	-0.5%	-1.2%	-0.8%	-2.0%	-1.3%
Asda, Arrowe Park	-0.2%	-0.2%	-0.4%	-0.3%	-0.6%	-0.4%
Other Stores, Greasby	-0.6%	-0.4%	-1.0%	-0.7%	-1.7%	-1.1%
Asda, Liscard	-0.4%	-0.3%	-0.6%	-0.4%	-1.0%	-0.6%
Iceland, Wallasey	-0.7%	-0.5%	-1.1%	-0.8%	-2.0%	-1.3%
Other Stores, Liscard Town Centre	-0.5%	-0.4%	-0.8%	-0.6%	-1.4%	-0.9%
Other Stores, Wallasey Village Centre	-0.6%	-0.5%	-1.0%	-0.7%	-1.8%	-1.1%
Aldi, Birkenhead	-1.2%	-0.8%	-1.9%	-1.4%	-3.3%	-2.1%
Other Stores, Birkenhead Town Centre	-0.4%	-0.3%	-0.7%	-0.5%	-1.2%	-0.8%
Sainsbury's, Prenton	-0.9%	-0.7%	-1.5%	-1.1%	-2.6%	-1.7%
Tesco Metro, Rock Ferry	-0.2%	-0.1%	-0.2%	-0.2%	-0.4%	-0.3%
Tesco Extra, Bidston	-0.7%	-0.5%	-1.1%	-0.8%	-1.8%	-1.2%
Asda, Croft Business Park	-0.4%	-0.3%	-0.6%	-0.4%	-1.0%	-0.6%
Aldi, New Ferry	-0.3%	-0.2%	-0.5%	-0.4%	-0.9%	-0.6%
Somerfield, Bromborough	-0.4%	-0.3%	-0.6%	-0.5%	-1.1%	-0.7%
Other Stores, New Ferry Town Centre	-0.3%	-0.2%	-0.5%	-0.3%	-0.8%	-0.5%
Other Stores, Bromborough Village Town Centre	-0.5%	-0.3%	-0.7%	-0.5%	-1.3%	-0.8%
Somerfield, Bebington	-0.9%	-0.6%	-1.4%	-1.0%	-2.5%	-1.6%
Other Stores, Bebington	-0.7%	-0.5%	-1.0%	-0.7%	-1.8%	-1.2%

(Cross Lane)						
Tesco, Heswall	-0.3%	-0.2%	-0.5%	-0.3%	-0.8%	-0.5%
Aldi, Heswall	-0.4%	-0.3%	-0.6%	-0.4%	-1.0%	-0.6%
Other Stores, Heswall Town Centre	-0.3%	-0.2%	-0.5%	-0.4%	-0.8%	-0.6%
Morrisons, New Brighton	-0.6%	-0.4%	-1.0%	-0.7%	-1.7%	-1.1%
Asda, Birkenhead	-1.1%	-0.8%	-1.8%	-1.3%	-3.1%	-2.0%
Northbank East	-4.4%	-3.1%	-7.0%	-5.0%	-12.1%	-7.8%

4.43 This retail impact analysis indicates the following:

- Comparison goods impacts are low in all cases.
- With allowance for outflow, impacts on the comparison sector are mostly positive by 2022 (turnover higher than baseline).
- In the convenience assessment, impacts are similarly low and are offset and reduced by outflow. The retail facility forecast to experience the highest individual impact is Northbank East.

4.44 The analysis shows the impact of East Float on committed foodstores, but not the combined impact of these with East Float on existing centres. This is explored below.

4.45 In relation to Policy EC16 criteria and drawing on this analysis, our policy assessment is as follows:

- a) The development is self-sustaining to a degree as a result of the substantial on-site population increase and new economic activity generated by the scheme, although Liverpool, Birkenhead and other centres will also benefit from expenditure outflow. The analysis demonstrates that the proposal will not have a significantly adverse impact on existing, committed and planned public and private sector investment in a centre in the catchment area. Moreover, it will result in enhanced catchment expenditure that will offset impacts on existing centres and other future retail developments.
- b) The negative impact of the proposal (diversion associated with inflows only) on existing town centres is negligible, the maximum comparison goods impact being 1.4% on Wallasey Village centre in 2015 (2.2% in 2017). The proposal represents no threat to the vitality and viability of Wallasey or any other centre; accordingly, the proposal will not threaten local consumer choice and the range and quality of the existing comparison and convenience retail offer. Consumer choice would be enhanced.

- c) There are no allocated out-of-centre sites in the Wirral MBC area. This criterion does not apply in this case.
- d) The proposal has been assessed having regard to spending growth, existing in-centre turnover, and incremental development in accordance with the indicative trajectory. The comparison goods impacts of the development five years from the time the application is made and after initial implementation (2015 and 2017) are negligible in relation to all defined centres. The RTP report identifies significant expenditure capacity (post 2021) on the basis of preferred retention scenarios for comparison floorspace. There are no implications for the rural economy. Although RTP identify 'negative capacity' for convenience goods, the assessed lack of need is not the principal consideration under the PPS4 impact test. The diversion from convenience floorspace is considered not to be sufficient to result in adverse impacts on existing centres. This conclusion is drawn allowing for the cumulative effects of commitments (see below). Overall impacts in relation to this criterion are considered to be 'not significant'.
- e) There is a clear requirement to provide facilities of a significant scale and critical mass to regenerate the Docklands environment. The proposal is considered to be of an appropriate scale; the projected incremental growth of the development limits impacts under other criteria in this policy. The issue of the overall scale of retail floorspace proposed at East Float is considered in further detail below.
- f) No locally important impacts are currently defined in policy.

4.46 It is concluded that there are no 'significant adverse impacts' under the terms of Policy EC16 taking into consideration the revised analysis.

#### **Leisure - assessment**

4.47 In respect of the leisure components of the scheme, these are ancillary to the office and residential development but are potentially significant in their own right. As such it is appropriate to undertake a broad assessment. Paragraphs 7.14 to 7.19 of the RLOS provide an initial broad assessment of the leisure elements, which concludes (using the RTP study) that there is likely to be significant growth in the leisure market in Wirral, supporting additional new development.

4.48 In addition, the following points address the relevant PPS4 tests:

- **EC16.1 (a):** the impact of existing, committed and planned investment will be minimal. There are emerging proposals within and around the edge of Birkenhead town centre which include leisure uses, for example the Woodside masterplan proposals. However, these are being promoted by Peel and are very much seen as a complementary part of the wider regeneration of the area. Additionally, as is evident from the retail assessment, the overall impact of East Float will increase further the economic function and spending power within inner Wirral. Clearly not all leisure needs can or should be met 'on site' such that East Float is also likely to support further leisure investment in the town centre and elsewhere. Importantly it could help underpin the proposals for New Brighton currently under construction.
- **EC16.1 (b):** the overall impact of the East Float proposals on town centre viability and vitality is considered to be positive. The re-population and regeneration of the area will bring new investment and have an overall beneficial impact on Birkenhead and other centres. In terms of the leisure component of East Float, this in itself may assist in attracting residents and businesses to the area, an effect which will not stop at the boundary of East Float. Through the 'place making' approach (and in particular the transport and public realm proposals) the aim is to bring far reaching regeneration across the Laird Grid to the town centre. The availability of a range of leisure activities across the inner urban area of Wirral will assist the town centre and the wider regeneration of the area.
- **EC16.1 (c):** we are not aware of any allocations for leisure outside the town centre which might be affected by the leisure component of East Float.
- **EC16.1 (d):** applies to a 'retail or leisure proposal', which this is not. It requires an assessment of the impact of a proposal on in-centre trade/turnover and on trade in the wider area, taking account of current and future expenditure capacity. As the RTP study shows, there is significant capacity for additional leisure development in Wirral. The priority for this will be the town centre, however, in terms of providing an appropriate degree of ancillary on-site leisure facilities and an iconic cultural/leisure attraction at a unique location at The Point, together with enhancements to transport linkages and public realm, the leisure component of East Float is considered to represent a complementary approach to the town centre. There is also an important qualitative differentiation to be drawn between the type of leisure facilities which exist at present in inner Wirral and the type of leisure facilities sought

through the East Float proposal. It is considered that the quality of leisure facilities proposed at East Float can only be achieved at East Float.

- **EC16.1 (e):** applies to in-centre or edge-of-centre locations, rather than the 'out-of-centre' location under the PPS4 definition for the leisure element.
- **EC16.1 (f):** there are clear and pressing locally important regeneration issues. The delivery of the leisure component of East Float, as a key plank of the place making approach, is a vital part of securing the wider regeneration of the area. The general impact considerations which have been set out above under Policy EC10 are all relevant to the leisure component.

4.49 In conclusion, the leisure element will not result in any significant adverse impacts when tested against a range of issues. Conversely, the proposals will bring long lasting, wide reaching benefits to existing centres in Wirral. The proposals therefore clearly perform extremely well when tested against Policy EC16.

#### **Office - assessment**

4.50 The assessment of the proposed office development is principally set out in the Economic Impact Assessment by Regeneris Consulting. This builds upon the work undertaken in the RLOS and the Regeneration Statement looking at the need, impact and sequential issues associated with the office component. It is not appropriate to repeat all the analysis and findings here.

4.51 Additionally, it is noted that Paragraph 7.6 of the Practice Guidance confirms that there is no established methodology for assessing impact for office developments. The onus is on the applicant and LPA to undertake an appropriate assessment that is fit for purpose. It is considered that the extensive consultation undertaken between the Council, Peel (and also with Liverpool City Council) through the preparation of the Regeneris assessment ensures that a robust and fit for purpose assessment has been undertaken.

4.52 Nonetheless, it is considered appropriate to consider the assessment against the impact tests of policy EC16 of PPS4 as follows:

- **EC16.1 (a):** the Regeneris assessment establishes that the office market in Liverpool is unlikely to be significantly impacted by the office element of East Float. In particular, East Float will provide a different market offer to the core CBD offer and the extension of the city centre offer through Liverpool Waters. Regeneris also find that the office market of Birkenhead, being small and weak, is in need of a wider transformation of

the type only achievable through a project of the critical mass of East Float. The key aspect for Birkenhead is ensuring that physical (transport and public realm) links are improved and that the regeneration benefits are delivered for the wider area through co-ordinated partnership working.

- **EC16.1 (b):** the overall impact of the East Float proposals on town centre viability and vitality are considered to be positive. The repopulation and regeneration of the area will bring new investment and have an overall beneficial impact on Birkenhead and other centres. In terms of the office component of East Float, this is the most important element in attracting new employment markets to the area and thus delivering the regeneration benefits of the project. The assessed retail impacts show how the working and resident population will have a net beneficial impact for Birkenhead and Liverpool, along with other centres. The Regeneris assessment shows the potential 'multiplier effects' of direct, indirect and induced impacts for centres. It also assesses in considerable detail the 'displacement' issue and concludes that this is unlikely to result in any significant impact.
- **EC16.1 (c):** the impact on allocations outside the town centre will be minimal, The Regeneris assessment, informed with the Wirral Employment Land Study (WELS), shows that there is a need for additional high quality office locations in Wirral.
- **EC16.1 (d):** applies to retail and leisure development, not office development.
- **EC16.1 (e):** for the purposes of an office assessment, East Float is 'edge of centre'. The work undertaken by Regeneris shows that East Float will in essence help deliver the established growth requirements of both the City Region (Liverpool City Region Development Programme and TMP forecasts) and the Wirral peninsula (WELS and Wirral Investment Strategy). For the former, East Float makes up a relatively modest share of the City Region's future growth of office accommodation, complementing the city centre and major out-of-centre business parks. For the latter, East Float is the single most important project in helping Wirral deliver the scale and quality of office development it needs to address its economic challenges and its 'B1 deficit', regenerate its inner areas and ensure it can move from a position of dependence on Liverpool and West Cheshire to one of 'inter-dependence' (thus reflecting the Northern Way City Relationships Liverpool study). In accordance with C30 of the Practice Guidance, it is therefore the case that office

accommodation needs have been established at City Region and local level, the scheme has been assessed against them and has been found to be delivering an appropriate and proportional element of the need of the both locality and City Region. The proposals are also delivering the RES and RSS. It is important that for the office assessment, it is recognised that the 'centre' can be considered in City Region terms, where East Float sits on the edge of the Regional Centre (and will form part of its long term expansion), and in local Wirral terms, where East Float will reconnect the inner area through the sustainable regeneration of Birkenhead Docklands.

- **EC16.1 (f):** The Regeneris assessment and various other background reports by Peel identify a range of clear and pressing locally important regeneration issues. The delivery of the office component of East Float is fundamental to securing the regeneration and sustainable development of the area. The general impact considerations which have been set out above under Policy EC10 are all relevant to the office component.

4.53 In conclusion, the office element will not result in any significant adverse impacts when tested against a range of issues. Conversely, the proposals will bring long lasting, wide reaching benefits to existing centres, most notably in Wirral but also within the wider City Region. The proposals therefore clearly perform extremely well when tested against Policy EC16. The statement at C33 of the Practice Guidance that "*qualitative considerations and other wider Government objectives such as regeneration will also have a key bearing when assessing office needs*" is directly applicable to East Float. The office element will deliver a wide range of Government objectives, being fundamental to a project that will transform a deprived, unsustainable place to a successful, regenerated, sustainable community.

### ***Sequential and locational issues***

4.54 Notwithstanding that Policy EC14.2 does not apply to 'ancillary uses', as explained in sections 2 and 3 above, the sequential and locational policies of PPS4 are to be considered for the retail, leisure and office elements of the scheme. Policy EC15 sets out the relevant criteria and considerations, including locational sequence (in-centre to out-of-centre), scale, flexibility and disaggregation, and other policy requirements.

4.55 East Float's retail floorspace and other town centre uses have been assessed for sequential compliance in the earlier RLOS. The assessment parameters are identified at paragraph 5.8; the centres included in the sequential exercise are

listed at paragraph 5.9. In relation to the scheme's office and leisure components, additional analysis is set out at paragraphs 7.9-7.13.

- 4.56 In its interim consultation response (additional information requested by LPA on 10 February 2010) the Council has indicated (paragraph 11.6) that it would like to see the sequential assessment strengthened. It is however noted that this should be assessed prior to the determination of the application, although the scope and nature of the assessment could be influenced by the conditions the applicant is willing to accept.
- 4.57 The essential elements of our assessment are that the office development needs to have very substantial critical mass if it is going to be successful in making Wirral Waters a new business location capable of attracting regional, national and international occupiers. Hence it cannot be disaggregated onto a number of much smaller sites in existing centres.
- 4.58 Indeed, there are no centres where such needs can be met, as explained at paragraphs 7.9 to 7.13 of the RLOS. As a result is not considered necessary to undertake any detailed sequential analysis. In support of this, we would also highlight the following points arising from PPS4 and the Practice Guidance:
- 4.59 Section 6 of the Practice Guidance is heavily focussed on retail proposals. It is clear that the sequential approach is intended to apply to 'retail development' rather than retail uses where they are principally ancillary, particularly if they are part of (and tied to) a larger development which will bring overall net benefits to existing centres. It is also clear that the Guidance was not drafted with large mixed-use transformational regeneration projects in mind, as it is not easily applied to such development.
- 4.60 Paragraph 6.9 of the Practice Guidance states that local authorities should consider the relative priorities and need of different main town centre uses, recognising their differing operational and market requirements. It goes on to say that a town centre office development will serve a different function and market compared to a business park. The local needs and priorities in this case are for a major scale investment by the private sector in knowledge-based activity and new housing, which can only be achieved at any significant scale at East Float. The operational and market requirement is for large scale, flexible, deliverable land, capable of delivering those needs and priorities; this is expanded upon further in the Office Market report by CBRE and the Economic Impact Assessment by Regeneris Consulting. Such land and market opportunity exists at East Float, but not elsewhere in any sequentially preference location within inner Wirral. Indeed, even within the wider City Region and Region, East Float is sequentially preferable to most out-of-centre business park and major investment locations that are not located in the city centre or existing centres.

- 4.61 There are many such locations which have (and continue to receive) planning designations and permissions, in addition to having benefitted from substantial public subsidy. Hence, for the office element, in overall sequential terms, given that the only sequentially preferable locations are Birkenhead town centre (which is too constrained and cannot deliver the scale of change required) and Liverpool City Centre (which does not deliver regeneration for inner Wirral), East Float is the only location to meet the need of inner Wirral and one of the most sequentially preferable locations within the City Region. Paragraph 6.9 therefore supports the sequential approach taken.
- 4.62 A key point in respect of PPS4 and the sequential approach for offices is that East Float can now be regarded as 'edge-of-centre' (and within the 'second priority' for economic development regionally, the HMRI/inner area – Policies LCR2 and RDF1 of RSS) given the proximity of public transport interchanges, having previously been out-of-centre within the second priority. The Regional Centre is the first priority for economic development.
- 4.63 The 'checklist' provided on page 6.52 of the Practice Guidance forms a useful reference for East Float. Specifically in response to each point:
- *What is the scale and form of development needed?* The scale and form of development needed cannot be located in an existing centre.
  - *Is the need 'location specific' or even site-specific, or is it more generalised?* **The need is both location and site specific.** This applies to the ancillary retail/leisure uses and also for the office uses given that no other site in Wirral (and very few in the wider Region) are capable of accommodating the scale of private investment and regeneration benefits.
  - *Are the PSA and wider town centre properly defined in the development plan?* The PSA and wider town centre were properly defined in the Wirral UDP but this predated Wirral Waters and the replacement of these policies has not yet occurred via the LDF.
  - *How should the site/proposal in question be defined? Is it 'in centre', 'edge of centre' or 'out of centre'?* The East Float site is 'edge of centre' for offices and 'out of centre' for the ancillary retail and leisure uses. In broad City Region terms it is located within an accessible part of the inner urban area adjoining the Regional Centre.
  - *Have all more central opportunities been considered/identified?* All more central opportunities have been considered and identified. Wirral Council has been seeking major investment of this scale and nature for many

years and it is evident that no other site can accommodate the anything akin to East Float, the only comparables being Woodside and Wirral International Business Park (as assessed in the RLOS).

- *Have they been thoroughly tested, having regard to their suitability, viability and availability having regard to the identified need/demand and the timescale over which it arises?* Alternatives have been tested at a broad level in the RLOS in respect of the main town centre uses. The alternatives have been well tested by time and the public resources which have been available but failed to deliver the scale of change needed. They have also been reviewed again through 3 years of discussions with Wirral Council on Wirral Waters, together with a thorough review of retail centres through the RTP study. In that context, there is no need for any further detailed analysis of suitability/viability/availability/need/demand/timescales etc given that the overall position is so clear and evident
- *Has this assessment adopted a sufficiently flexible approach?* Our approach is predicated on the need for major private investment in inner Wirral in order to deliver major regeneration benefits. The certainty and critical mass needed to allow the private sector to successfully commit to investing in this location mean that the office element (and residential) need to be substantial. The physical challenge and scale of the dock system alone require the scale of development proposed in order to create a new place. If this ambition is substantially reduced, the critical mass and required viability (both financial and place making) will undermine the ability to deliver. The assessment itself is flexible in that it could equally have been argued that East Float is a unique proposition on a unique site, and that as such no consideration of sequential issues is appropriate.
- *Has the potential to overcome any obstacles to the availability of more central sites been discussed with the LPA?* This has been discussed extensively, and assessed through the Council's Employment Land Study and Retail/Leisure Study. It is evident through consultation and through these studies that there is no comparable location for major investment in Wirral. With regard to Birkenhead town centre it is also evident that despite the desire of the Council, a favourable policy position, major public funding availability and good market conditions for most of the past 10-15 years, the town centre has not been able to secure major investment and has declined as a result. The fundamental challenges for Birkenhead are perception and market expenditure, both of which will be

assisted by Wirral Waters, which should allow the town centre to rationalise and refocus its future in a sustainable manner.

- 4.64 Paragraph 6.54 of the Practice Guidance states that locationally specific development which cannot take a *flexible or disaggregated approach*, should be clearly justified by the applicant. No further guidance is provided on this subject. However, we would consider that the wide ranging and thorough justification of the proposals contained within the suite of supporting documents, are sufficient to meet any reasonable application of this test.
- 4.65 In addition, it is clear in Policy EC15.1 (d iv) that disaggregation is a concept intended to apply to 'retail or leisure development' rather than office development or retail/leisure uses ancillary to other uses.
- 4.66 EC15.2 requires that LPAs take account of 'genuine difficulties operating the proposed business model' from a sequentially preferable site. In response it is appropriate to state that providing the retail/leisure components of East Float 'off site' would completely undermine the business model of a major mixed-use waterfront regeneration project and therefore undermine the project as a whole.
- 4.67 In overall conclusion, the retail and leisure components of the development are ancillary to its major business and residential elements and are needed to support the investment that will need to be made in them. Hence, this need cannot be met in a location which is remote from the East Float development itself. This position still holds and has been reinforced by the further work on markets undertaken by CBRE. Hence, our earlier conclusion that there are no other sites suitable, viable or available to accommodate the East Float proposals within the catchment area remains valid, despite the RLOS having considered other sites. In short, the development cannot be located on any other site. The issue of sequential compliance should be viewed in this context: the regeneration need in this case is location and site specific and is not of a more 'generalised nature'.
- 4.68 As the 'sequential test' in PPS4 is not materially different from PPS6, it is concluded on the basis of our earlier analysis that there is compliance also with Policy EC15 of PPS4.
- 4.69 The above factors underpin our conclusion that there is compliance with the sequential approach in this case. It is relevant also to note that, since the submission of the application, further discussions have taken place with the Council regarding the conditions that would be appropriate to ensure that the retail development (including the food and drink elements of the scheme) do remain both ancillary and in proportion to the business and residential development on the site. Agreement in principle has been reached to a set of conditions as set out in Section 5 below.

### ***Scale of East Float's retail component and trading characteristics***

- 4.70 Wirral Council has requested that the justification for the overall quantum of proposed retail floorspace at East Float be strengthened, including reference to other schemes, and how the development might work (email of 11 March 2010, and Appendix B to letter dated 17 February 2010). These issues were considered initially in the RLOS, which incorporated an analysis of the retail structure of other developments. In response to this request, we have undertaken further research on the principal retail comparable, Canary Wharf. This is set out below.
- 4.71 The RLOS confirmed (at paragraph 1.12) that East Float's retail component is an integral part of a major, mixed-use development proposal. Although the retail element is substantial at 60,000 sq m gross, it should be viewed in the context of a development comprising some 1.4 million sq m gross of overall floorspace to be developed over a c. 30 year plus time horizon. The RLOS emphasised that the retail floorspace would form only **4.3%** of the total development and that East Float should be viewed holistically; the scheme's retail component would not become a retail destination in its own right but would be ancillary to the proposal as a whole.
- 4.72 Information in relation to comparable developments was set out at paragraphs 2.6-2.8 of the RLOS. We noted that the retail component of the principal comparables ranged from 4.8% (Canary Wharf) to 11.4% (Brindley Place) of total floorspace, but in all cases was ancillary to a primary employment function. Although East Float differs in that regeneration would be driven by both residential and employment development of significant scale (as opposed to office floorspace alone), the principles underpinning the scheme are the same: retail and other floorspace (leisure, hotels, etc) supporting a development with a primary focus as a location for living and working.
- 4.73 Canary Wharf (CW) remains the most direct retail comparable example in the UK to East Float. CW comprises approximately 1.3 million sq m gross of total floorspace, of which 62,700 sq m gross is retail floorspace – 4.8% of the total (similar statistics to East Float, although we note that higher retail floorspace totals for CW are suggested in published research, up to 114,769 sq m gross in the Mayor of London assessment). In relation to retailer profile, CW contains a high proportion of quality retailers trading in mainstream and specialist sectors in addition to a range of foodstores and other convenience floorspace; it is anticipated that East Float will have a similar retail mix.
- 4.74 We have reviewed available research relating to the trading profile of retail floorspace at CW; relevant publications include the 'London Town Centre Assessment', Mayor of London (GLA Stages 1 and 2, September 2004), and the 'London Borough of Tower Hamlets Retail and Leisure Capacity Study: Final Report', Roger Tym and Partners, January 2009. We have also commissioned

population data from Pitney Bowes Business Insight (PBBI) in order to quantify population levels in the CW development and in adjoining areas. These reports and data confirm the following:

- Notwithstanding the scale of retail floorspace at CW, the retail (non-commuter) catchment area is relatively constrained, market penetration being largely confined to the immediate Docklands area (GLA, 2004).
- Impacts on neighbouring sub-regional centres are low (less than 1%) and the impact on the West End is estimated at only 0.1% (GLA, 2004).
- The convenience retailers at CW serve a high volume of commuters; there is accordingly emphasis on top-up/'basket trade' rather than main food shopping and we conclude from this that impacts are likely to be disbursed rather than concentrated on main food destinations in surrounding areas (GLA, 2004).
- The recent RTP 'London Borough of Tower Hamlets Retail and Leisure Capacity Study' indicates that CW is the main comparison goods destination in only two of the survey zones in the Tower Hamlets' catchment area; this influence is confined to the Isle of Dogs/Docklands and neighbouring Chrisp Street areas (confirming the conclusions of the earlier Mayor of London/GLA study). Apart from the Stratford zone (where Stratford is the main centre) the West End is the main shopping destination in all other zones. In relation to higher value comparison goods sectors, the West End is the dominant shopping location. The West End's market share of the clothing and footwear sector is four times greater than CW's in the Tower Hamlets study area (28% compared with 7%) (RTP, 2009).
- Information obtained from PBBI indicates a catchment population for CW of only 4,005 (in 2007) in the development itself, or 27,957 (in 2007) if the remainder of the Isle of Dogs is included.

4.75 This research confirms that retail floorspace at CW fulfils a specific function that reflects its ancillary role relative to a primary use (in this case, substantial office development). CW's catchment area for comparison goods is constrained (largely confined to the Docklands area); it is subordinate in shopping terms to a larger centre (the West End) enjoying much lower levels of market penetration for high value goods; its convenience function primarily relates to its role as a focus for employment; impacts on 'competing centre' are negligible, notwithstanding the substantial quantum of retail development concentrated at CW; and impacts on the closest 'regional centre' are virtually imperceptible (at 0.1%).

4.76 Applying these characteristics to East Float suggests the scheme's retail element will trade as follows:

- The retail component will function as an ancillary element of a much larger development.
- The catchment area will be similarly constrained, largely confined to the development itself and immediate adjoining areas.
- Impacts on 'competing centres' (such as Birkenhead) will be low.
- Impacts on 'regional destinations' (Liverpool and Chester) will also be low, and these centres will continue to achieve high levels of market penetration in the Wirral, particularly in high value comparison goods sectors. Their continuing dominance as regional destinations will not be threatened.
- The convenience function will primarily serve the scheme itself and those working in the development, with limited implications for local centres and freestanding foodstores.

#### ***Balancing assessment and cumulative impacts – EC17***

4.77 Policy EC17 of PPS4 seeks to balance all of the relevant considerations relating to developments for 'main town centre uses' not located in an established centre, and not in accordance with an up-to-date development plan. As noted above, the principal considerations are sequential compliance and impact (both general and retail/economic). The Policy directs refusal where there is conflict with either element of the policy; where there is not, and where 'no significant adverse impacts' are identified, positive and negative impacts are then considered as part of the overall 'balancing' process. The requirements of policies EC15, EC10.2 and 16.1 therefore provide a 'gateway', beyond which other material considerations come into play.

4.78 On the basis of our revised analysis and the matters set out in our earlier report, we conclude the following:

- There is demonstrable compliance with the requirements of the sequential approach, albeit that this is not strictly required for the ancillary retail & leisure uses.
- In relation to the relevant criteria in EC10 and EC16, there is clear evidence that the proposal will not lead to significant adverse impacts. It therefore complies with the 'gateway' element of Policy EC17 at paragraph

EC17.1; there is no basis on which to refuse the application due to policy conflicts.

- Impacts on centres will, moreover, be offset by the 'outflow' of expenditure generated by the emerging residential population at East Float. This will bolster the economic performance of centres in WMBC and neighbouring areas. Our retail assessment has been extended in this Addendum Report to include an analysis of **net economic effects**: impacts on the turnover of centres and other retail facilities allowing for both trade diversion and turnover uplift through 'spin off'. The outputs of this analysis support the overall conclusion that impacts will not be adverse.

4.79 In relation to the balancing of positive and negative impacts (paragraph EC17.2a), the material submitted with the application confirms the substantial benefits associated with the development. These are identified in detail in much of the submitted material, including: the regeneration and enhancement of a significant area of derelict and semi-derelict docklands; the creation over 20,000 FTE jobs on site together with further positive benefits to the local economy through multiplier effects; the provision of major new infrastructure including significant investment in public transport; a mix of uses that will act as a major impetus to economic activity in the WMBC area and wider region.

4.80 Cumulative assessment is required under Policy EC17 of PPS4 and is considered below. There are no major comparison goods commitments that necessitate additional cumulative analysis. We have, however, considered the cumulative effects of East Float in combination with Liverpool Water, and with committed foodstores (with planning permission) in the WMBC area. Liverpool Waters is not a commitment but is included in order to respond to concerns raised by consultees.

### **Cumulative Effects – Liverpool Waters**

4.81 The issue of the cumulative impact of East Float with Liverpool Waters, emerging proposals also by Peel for a scheme adjacent to Liverpool city centre, have been raised by consultees.

4.82 Policy EC17.2b of PPS4 refers to cumulative effects in the context of permissions, completed developments and schemes under construction. Liverpool Waters is currently an emerging proposal that does not benefit from planning permission; there is no requirement in policy to consider cumulative effects where proposals have no formal planning status.

4.83 Due to the significant scale of development proposed at Liverpool Waters, we have nevertheless sought to assess cumulative impacts in broad terms. The Liverpool Waters project team is currently preparing the planning application with a target

submission date of summer 2010; full information relating to the scheme is presently incomplete. Although development quanta are not fixed at this stage, indicative proposals suggest that the development will comprise up to 1.85 million sq m of total development, of which 58,000 sq m gross would be A1 and A2 use class floorspace, 26,610 sq m A3/A4 use; 297,070 sq m office development, and 90,000 sq m of C3 residential. A PPS4 assessment required in relation to this development is currently in preparation.

- 4.84 We have discussed this with Peel's consultants, WYG Planning, in order to gauge the potential cumulative impacts of the development in combination with East Float/Wirral Waters.
- 4.85 WYG advise that, in common with East Float, Liverpool Waters will be principally sustained by population growth and economic activity on site. The retail and leisure floorspace will be similarly ancillary to the development as a whole and scheme planning is taking place on this basis.
- 4.86 In relation to the convenience retailing component of the scheme, all of the expenditure required to support the quantum of floorspace proposed will be generated by the resident population. In the case of comparison shopping, the expenditure generated by the development could support up to three or four times the level of floorspace that is proposed to be located on the site (based on the assumption that 20-25% of this expenditure is retained within the Liverpool Waters scheme).
- 4.87 These assumptions are consistent with those underpinning our impact model:
- 20% of comparison goods expenditure retained on the East Float site – 80% outflow to Birkenhead and other centres.
  - 75% of convenience expenditure retained – 25% outflow.
  - 5% of on site workers' generated expenditure retained; 50% in the case of convenience spending.
- 4.88 The out flowing expenditure will benefit Birkenhead, Liverpool and other centres; the relevant analysis is set out in **Appendix 1**.
- 4.89 Due to its proximity to the city centre and the significant scale of development proposed, WYG considers that 70-75% of spending created by the development will be 'exported' to neighbouring centres, the principal beneficiary being Liverpool city centre. Liverpool Waters is therefore likely to benefit the city centre to a significant degree by delivering a large number of potential customers/shoppers (and associated expenditure) directly adjacent to the Regional Centre.

4.90 The impacts associated with East Float are assessed to be “not significantly adverse” for the reasons set out above. The emergence of the Liverpool Waters development will result in the further mitigation of these impacts on the basis of these assumptions. The combined impact of East Float and Liverpool Waters is therefore assessed to represent no material threat to the regional shopping function of the city centre.

### Cumulative Effects – Foodstores

4.91 We have considered the cumulative effects of the East Float proposals in combination with permitted foodstores in the WMBC area. The principal commitments are:

- Morrisons, New Brighton
- Asda, Birkenhead
- Northbank East (operator unknown at this stage).

4.92 We have undertaken the cumulative assessment on an identical basis to the solus impact analysis (summarised at paragraph 4.35 above). We have estimated the trade draw of committed developments from centres, and then assessed the impact of East Float on the revised baseline turnover. The overall impacts have then been calculated cumulatively, both in conventional terms (as a percentage impact on centre/store turnover) and with allowance for outflow (applying the methodology described above). The outputs of this analysis are included in **Appendix 1** and summarised in Table 4.3 below.

	2015 Impact	2015 net Impact	2017 Impact	2017 net Impact	2022 Impact	2022 net Impact
Morrison's, West Kirby	-10%	-10.4%	-10.2%	-9.9%	-9.5%	-8.8%
Other Stores, Hoylake Town Centre	-7.8%	-7.7%	-7.6%	-7.4%	-7.1%	-6.7%
Other Stores, West Kirby Town Centre	-8.5%	-8.3%	-8.2%	-7.9%	-7.6%	7.0%
Somerfield, Moreton	-7.6%	-7.4%	-7.2%	-6.9%	-6.4%	-5.7%
Iceland, Moreton	-4.8%	-4.6%	-4.5%	-4.2%	-3.9%	-3.3%
Other Stores, Moreton Town Centre	-7.5%	-7.3%	-7.2%	-7.0%	-6.6%	-6.1%
Sainsbury's, Upton	-12.3%	-12.1%	-11.9%	-11.6%	-11.1%	-10.4%
Asda, Arrowe Park	-14.4%	-14.3%	-14.2%	-14.1%	-14.0%	-13.7%
Other Stores, Greasby	-7.5%	-7.3%	-7.2%	-6.9%	-6.4%	-5.8%
Asda, Liscard	-14.3%	-14.2%	-14.1%	-13.9%	-13.7%	-13.3%

Iceland, Wallasey	-5.5%	-5.3%	-5.1%	-4.7%	-4.2%	-3.5%
Other Stores, Liscard Town Centre	-7.2%	-7.0%	-6.9%	-6.6%	-6.3%	-5.8%
Other Stores, Wallesey Village Centre	-3.3%	-3.1%	-2.9%	-2.6%	-2.2%	-1.5%
-						
Aldi, Birkenhead	-28.1%	-27.7%	-27.4%	-28.8%	-26.0%	-24.8%
Other Stores, Birkenhead Town Centre	-3.4%	-3.3%	-2.9%	-2.7%	-1.7%	-1.3%
-						
Sainsbury's, Prenton	-9.9%	-9.6%	-9.4%	-8.9%	-8.3%	-7.3%
Tesco Metro, Rock Ferry	-8.6%	-8.6%	-8.5%	-8.5%	-8.4%	-8.2%
-						
Tesco Extra, Bidston	-28.8%	-28.6%	-28.4%	-28.1%	-27.7%	-27%
-						
Asda, Croft Business Park	-12.0%	-11.9%	-11.8%	-11.6%	-11.4%	-11.0%
Aldi, New Ferry	-7.8%	-7.7%	-7.6%	-7.5%	-7.3%	-6.9%
Somerfield, Bromborough	-7.5%	-7.4%	-7.3%	-7.1%	-6.8%	-6.4%
Other Stores, New Ferry Town Centre	-8.5%	-8.4%	-8.4%	-8.2%	-8.0%	-7.7%
Other Stores, Bromborough Village Town Centre	-10.9%	-10.8%	-10.7%	-10.4%	-10.1%	-9.7%
-						
Somerfield, Bebington	-6.1%	-5.8%	-5.5%	-5.1%	-4.5%	-3.6%
Other Stores, Bebington (Cross Lane)	-5.9%	-5.7%	-5.5%	-5.2%	-4.8%	-4.1%
-						
Tesco, Heswall	-8.8%	-8.7%	-8.7%	-8.5%	-8.3%	-8.0%
Aldi, Heswall	-10.9%	-10.8%	-10.7%	-10.5%	-10.3%	-9.9%
Other Stores, Heswall Town Centre	-7.8%	-7.7%	-7.7%	-7.5%	-7.3%	-7.0%
-						
Morrisons, New Brighton	-0.6%	-0.4%	-1.0%	-0.7%	-1.7%	-1.1%
Asda, Birkenhead	-0.6%	-0.2%	-0.9%	-0.4%	-1.5%	-0.4%
Northbank East	-4.4%	-3.1%	-7.0%	-4.9%	-12.1%	-7.8%

4.93 Officers have indicated that the analysis should focus on the implications of the proposals for established centres in the shopping hierarchy, including local centres. Our analysis confirms that cumulative impacts are not significantly adverse, and represent no threat to the trading function and performance of existing defined centres; maximum assessed impacts in 2022 are 24.8% on Seacombe, with allowance for expenditure outflow. This impact, however has resulted from other committed development and not from the East Float proposals. The highest cumulative impact at 2022 on a store or centre that will be effected by East Float is 13.7% on the Asda Store at Arrow Park which is an out of centre store and therefore not protected by PPS4.

- 4.94 The impact analysis has been undertaken on a conventional basis. The development is assumed to divert trade from existing centres having regard to factors outlined above (distance, function, trading overlap, etc). In practice, the convenience floorspace at East Float is likely to comprise a combination of high quality foodstore(s) (such as has been recently permitted at Salford Quays) and smaller, specialist outlets catering for the day-to-day needs of worker and resident populations, day and staying visitors etc. The nature of the convenience floorspace is unlikely to replicate the existing offer in the WMBC area, in particular the bulk/weekly shop emphasis of existing large foodstores (such as Tesco, Asda and Morrisons).
- 4.95 Taking these factors into account, it is unlikely in our view that the scheme will draw main food or secondary food trips into the development to any major extent; existing shopping patterns which sustain local centres and foodstores are unlikely to be significantly impacted for this reason.
- 4.96 The cumulative impacts that we have calculated mostly arise from the implementation of the commitments, rather than from the convenience element of the East Float proposals. For the reason indicated above relating to the nature of the floorspace and the way in which it is likely to function, the cumulative impacts are considered to represent the maximum levels of diversion associated with the proposals.

### **Plan Making Policies**

- 4.97 Following the publication of PPS4, there is a requirement to consider the East Float application in relation to the development management policies reviewed above. There is no formal requirement to consider the proposals against the plan making policies (EC1-8), which provide a framework for the plan formulation process.
- 4.98 The Wirral LDF is emerging, and the RTP study reviewed above forms part of the evidence base for the Core Strategy and other DPDs. Having regard to PPS4 policies EC1-8 and drawing on our review of the RTP report, we highlight the following:
- Policy EC3.1b (i) – indicates that, as part of their strategy for local areas, LPAs should consider the identification of new centres (in response to need), giving priority to deprived areas. Wirral Waters/East Float has the clear potential to fulfil this role in an area of multiple deprivation, a matter recognised by RTP through two of the strategic options presented to WMBC in its recent report, which have since underpinned the Spatial Options of the Core Strategy.

- Policy EC5.2 and EC5.3 – emphasises the need to apply the sequential approach in response to need, and to give preference to sites that best serve the needs of deprived areas. East Float has the potential to achieve these objectives through the emergence of the Development Plan.

4.99 Our overall conclusion based on our revised and updated analysis is that the proposal conforms with all of the key policies in PPS4.

## 5. Conclusions and Control Mechanisms

- 5.1 This Addendum has considered the East Float application in relation to new policies in PPS4. Additional impact analysis has been undertaken drawing on the recently published RTP report.
- 5.2 On the basis of this additional analysis, we draw the following conclusions:
1. We continue to conclude that the proposed development conforms with the sequential approach to site selection. There are no in or edge-of-centre sites capable of accommodating the scale of development proposed at East Float. The regenerative benefits of the proposal would not be delivered in an alternative location. In this context, the need for the proposal is both location and site specific (sequential 'checklist', paragraph 6.52 of the Practice Guidance).
  2. The proposal would not lead to significant adverse impacts in relation to any of the criteria in policies EC10 and EC16. These conclusions are drawn having regard to a re-working of our impact model to accommodate more recent empirical analysis undertaken by RTP. In the comparison sector, 80% of expenditure generated by residents and 95% generated by workers is assumed to be drawn to other centres. This outflow will benefit other centres/facilities and further mitigate impacts; this has been examined in our revised analysis and net effects quantified. In relation to existing centres, impacts on turnover and vitality and viability indicators are assessed to be negligible.
  3. The proposal conforms with the 'gateway' element of Policy EC17 in that it complies with the sequential approach and would not lead to 'significant adverse impacts'. A refusal on the basis of policy conflict would not be appropriate. Moreover, in relation to the latter elements of the policy, there are significant positive impacts including major urban regeneration, and the creation of significant economic activity in a location in need of an investment and enhancement. Cumulative impacts are not adverse; the levels of impact identified are considered to represent the maximum effects of the development.
  4. Liverpool Waters is assessed to enhance the trading performance of Liverpool city centre. The combined impact of East Float and Liverpool Waters is not considered to result in a significant adverse impact on the Regional Centre (Liverpool city centre), Birkenhead or any other centres.

5. The proposal accords with emerging planning policies at a local and regional level and is potentially supported by policies EC3-5 of PPS4 through plan formulation (RTP Strategic Growth Options).

5.3 It is concluded that the East Float proposals are in full accordance with PPS4.

### **Retail Control Mechanisms**

5.4 The proposals have been assessed on the basis of an assured floorspace and trading profile drawing on comparable examples (RLOS, Section 2). The key assumptions are:

- Phased/incremental growth based on the indicative trajectory.
- 50% of A-class floorspace in retail service use: A2-A5 (30,000 sq m).
- 18,000 sq m gross of floorspace devoted to comparison sales.
- 12,000 sq m gross in devoted to convenience sales.
- Development based on defined quarters, with no more than half of the retail in any single quarter.
- Maximum unit size of 500 sq m with an allowance for two larger units of up to 2,500 sq m.

5.5 Policy EC19 of PPS4 requires local authorities to make effective use of planning conditions to implement their policies and 'proactively manage the impacts of development'. The suggested control mechanisms include: specifying unit size and sub-division; limiting internal alterations; limits on goods sold and the mix of convenience and comparison floorspace; ensuring ancillary elements remain ancillary, etc.

5.6 Planning conditions for the retail element have been discussed and are agreed informally with officers. In relation to proposed retail conditions, a position has been agreed informally between Peel and WMBC. The suggested conditions are set out below:

### **Overall quantum**

5.7 Unless agreed otherwise in writing by the Local Planning Authority, the total gross floorspace for uses other than those falling within Use Class C3 shall not exceed 620,757 sq m, of which:

- i) Not more than 60,000 sq m gross internal area shall fall within Use Classes A1 to A5,

- ii) Not more than 422,757 sq m shall fall within Use Class B1.
  - iii) Not more than 38,000 sq m shall fall within Use Class C1 (hotel and conference facilities).
  - iv) Not more than 100,000 sq m shall fall within Use Classes D1 and D2 (culture, education, leisure, community and amenity uses).
  - v) Within the total maximum floorspace and subject to the limits set out in clauses (i) to (iv) of this condition, a maximum of 48,500 sq m shall be subject to Class E of Part 3 of the GDPO, for the following uses: Class B1 (office, research and development), Class A1 (retail), Class A2 (financial and professional services), Class A3 (restaurants and cafes), Class A4 (bars), Class A5 (hot food takeaways), Class C1 (hotel and conference facilities), Classes D1 and D2 (culture, education, leisure, community and amenity floorspace).
- 5.8 Notwithstanding the provisions of Class A1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or any subsequent re-enactment), no more than 30,000 sq m gross internal area shall be used for uses falling within Class A1.
- 5.9 Notwithstanding the provisions of Class A1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or any subsequent re-enactment), no more than 12,000 sq m gross internal area shall be used for the sale of convenience goods without prior written consent of the local planning authority.
- 5.10 Notwithstanding the provisions of Class A1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or any subsequent re-enactment), no more than 18,000 sq m gross internal area shall be used for the sale of non-food (comparison goods) without prior written consent of the local planning authority
- 5.11 Notwithstanding the provisions of Classes A2-A5 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or any subsequent re-enactment), no more than 30,000 sq m gross internal area shall be used for food and drink uses without prior written consent of the local planning authority

***Phasing of retail***

- 5.12 No more than 3,000 sq m of A1 convenience and 1,500 sq m of A1 comparison shall be brought forward for occupation within the first plot to be developed (see first reserved matters condition below). If the convenience retail provision which has been approved as part of the Northbank East plot 1 development (Ref No.....) has already been developed or is under construction at the time that a Reserved Matters application is lodged in respect to the first phase of development under this

planning permission no more than 1,000 sq m of convenience retail provision shall be included in that reserved matters application. This provision relating to phasing shall not affect the overall convenience floorspace (it is the subject of other conditions).

5.13 The following controls will ensure that the retail elements of the scheme remain ancillary to housing and commercial development:

- No more than 6,000 sq m of A1 convenience shall be completed and occupied unless and until the total amount of floorspace completed for residential (C3) and business (B1) uses exceeds 250,000 sq m.
- No more than 12,000 sq m of A1 convenience shall be completed and occupied unless and until the total amount of floorspace completed for residential (C3) and business (B1) uses exceeds 500,000 sq m.
- No more than 12,000 sq m of A1 convenience shall be completed and occupied unless and until the total amount of floorspace completed for residential (C3) and business (B1) uses exceeds 750,000 sq m.
- No more than 6,000 sq m of A1 comparison shall be completed and occupied unless and until the total amount of floorspace completed for residential (C3) and business (B1) uses exceeds 250,000 sq m.
- No more than 12,000 sq m of A1 comparison shall be completed and occupied unless and until the total amount of floorspace completed for residential (C3) and business (B1) uses exceeds 500,000 sq m.
- No more than 15,000 sq m of A1 comparison shall be completed and occupied unless and until the total amount of floorspace completed for residential (C3) and business (B1) uses exceeds 750,000 sq m.

***Size of retail units***

5.14 The gross internal area (including any mezzanine floorspace) of any unit proposed to be occupied by use classes A1 to A5 shall not exceed 500 sq m except that a maximum of two units of up to 2,500 sq m gross internal area shall also be permitted (subject to phasing).

***Distribution of retail***

5.15 No more than 6,000 sq m of A1 convenience shall be developed in any single quarter as defined by the planning permission.

5.16 No more than 9,000 sq m of A1 comparison shall be developed in any single quarter as defined by the planning permission.

### ***Full particulars of Retail***

- 5.17 Prior to the occupation of any retail units, full particulars (including but not limited to use, location, shop fronts, operating hours, sizes) shall be submitted to and agreed in writing by the Local Planning Authority. No part of the retail floorspace approved under this application shall be occupied other than in accordance with the particulars so approved.

### **Leisure control mechanisms**

- 5.18 The maximum amount of hotel/conference space is capped at 38,000 sq m. The remaining leisure uses are grouped together with education, community and culture under the D1/D2 uses, with a defined floorspace of 100,000 sq m. It is anticipated that the delivery of an educational hub within the East Float scheme will mean that a substantial part of that total will not be available for leisure uses. Within the leisure component there is the opportunity for a range of different uses, including a cultural hub at The Point, 'active leisure' such as health and fitness development, 'passive leisure' and entertainment uses,
- 5.19 The leisure element largely remains ancillary to the office and residential development; where it may not, this is because the leisure element will form part of a unique draw to East Float, such as The Point. In this case, the leisure use will be site-specific (indeed it will be in a defined part of the Masterplan at The Point).
- 5.20 Peel has considered whether the leisure element requires further control beyond the overall amount and the parameters/principles and design quality commitments. However, at this stage it is not considered that any further control is necessary.

### **Office Control Mechanisms**

- 5.21 The Economic Impact Assessment by Regeneris Consulting considers the potential for this element of the scheme to affect investment in, and the viability/vitality of, existing centres. It specifically considers East Float in the context of Birkenhead and Liverpool city centre. Discussion is ongoing with Wirral Council following consultation undertaken on the application over the extent to which it is necessary to control the rate or delivery and type of office development. The envisaged control mechanisms are set out in the Regeneris report.
- 5.22 It is considered that these controls will ensure that the office element does not result in any significant adverse impacts, thus ensuring that the PPS4 policy tests as identified above can be met.

## Appendix I: Revised Impact Tables

**TABLE 4: POTENTIAL IMPACT ANALYSIS - COMPARISON**

Scenario 1	Baseline Turnovers from OCA (£m)			Residual Turnover After Trade Draw to East Float (£m)			% Impact of East Float Trade Draw			Turnover Inc Outflow from East Float (£m)			Difference from Baseline (£m)			Net % Impact				
	2015	2017	2022	% Trade Draw	2015	2017	2022	2015	2017	2022	% Inflow	2015	2017	2022	2015	2017	2022	2015	2017	2022
Inflow to EF Required					3.93	6.23	11.36					6.85	11.55	31.10						
Outflow from EF																				
Birkenhead Town Centre	236.52	243.37	269.75	15.0%	235.94	242.44	268.05	-0.2%	-0.4%	-0.6%	15.0%	236.96	244.17	272.71	0.44	0.80	2.96	0.2%	0.3%	1.1%
Birkenhead (Grange Road West and Oxton Road)	27.08	27.86	30.88	3.0%	26.96	27.68	30.54	-0.4%	-0.7%	-1.1%	3.0%	27.17	28.02	31.48	0.09	0.16	0.59	0.3%	0.6%	1.9%
Liscard Town Centre	53.87	55.43	61.43	10.0%	53.47	54.80	60.30	-0.7%	-1.1%	-1.8%	10.0%	54.16	55.96	63.41	0.29	0.53	1.97	0.5%	1.0%	3.2%
Bromborough Village	20.33	20.92	23.19	0.5%	20.31	20.89	23.13	-0.1%	-0.1%	-0.2%	0.5%	20.34	20.95	23.28	0.01	0.03	0.10	0.1%	0.1%	0.4%
West Kirby Town Centre	15.97	16.43	18.21	1.0%	15.93	16.37	18.10	-0.2%	-0.4%	-0.6%	1.0%	16.00	16.48	18.41	0.03	0.05	0.20	0.2%	0.3%	1.1%
Heswall Town Centre	15.87	16.33	18.10	0.5%	15.85	16.30	18.05	-0.1%	-0.2%	-0.3%	0.5%	15.89	16.36	18.20	0.01	0.03	0.10	0.1%	0.2%	0.5%
Moreton Town Centre	9.77	10.05	11.14	1.0%	9.73	9.99	11.03	-0.4%	-0.6%	-1.0%	1.0%	9.80	10.11	11.34	0.03	0.05	0.20	0.3%	0.5%	1.8%
Wallasey Village	9.77	10.05	11.14	2.0%	9.69	9.93	10.91	-0.8%	-1.2%	-2.0%	2.0%	9.83	10.16	11.54	0.06	0.11	0.39	0.6%	1.1%	3.5%
Upton Village	6.85	7.05	7.82	0.3%	6.84	7.04	7.79	-0.1%	-0.2%	-0.4%	0.3%	6.86	7.06	7.87	0.01	0.01	0.05	0.1%	0.2%	0.6%
Hoylake Town Centre	4.00	4.12	4.56	0.5%	3.98	4.08	4.50	-0.5%	-0.8%	-1.2%	0.5%	4.01	4.14	4.66	0.01	0.03	0.10	0.4%	0.6%	2.2%
New Ferry Town Centre	3.66	3.76	4.17	0.5%	3.64	3.73	4.11	-0.5%	-0.8%	-1.4%	0.5%	3.67	3.79	4.27	0.01	0.03	0.10	0.4%	0.7%	2.4%
Prenton (Woodchurch Road) Town Centre	1.44	1.48	1.64	0.3%	1.43	1.46	1.61	-0.7%	-1.1%	-1.7%	0.3%	1.44	1.49	1.69	0.01	0.01	0.05	0.5%	0.9%	3.0%
Croft Retail and Leisure Park (inc. Homebase)	125.97	129.62	143.67	2.0%	125.89	129.49	143.44	-0.1%	-0.1%	-0.2%	2.0%	126.03	129.72	144.06	0.06	0.11	0.39	0.0%	0.1%	0.3%
Junction One Retail Park (inc B&Q), Bidston Link Road	77.27	79.51	88.12	2.0%	77.19	79.38	87.90	-0.1%	-0.2%	-0.3%	2.0%	77.33	79.61	88.52	0.06	0.11	0.39	0.1%	0.1%	0.4%
The Rock Retail Park, Wirral	8.90	9.16	10.16	1.0%	8.87	9.10	10.04	-0.4%	-0.7%	-1.1%	1.0%	8.93	9.22	10.35	0.03	0.05	0.20	0.3%	0.6%	1.9%
Liverpool	783.60	806.29	893.69	25.0%	782.62	804.73	890.85	-0.1%	-0.2%	-0.3%	25.0%	784.33	807.62	898.63	0.73	1.33	4.93	0.1%	0.2%	0.6%
Chester	306.93	315.81	350.05	15.0%	306.34	314.88	348.35	-0.2%	-0.3%	-0.5%	15.0%	307.37	316.61	353.01	0.44	0.80	2.96	0.1%	0.3%	0.8%

TABLE 4: POTENTIAL IMPACT ANALYSIS - COMPARISON Cont.

Scenario 2	Baseline Turnovers from OCA (£m)			Residual Turnover After Trade Draw to East Float (£m)			% Impact of East Float Trade Draw			Turnover Inc Outflow from East Float (£m)			Difference from Baseline (£m)			Net % Impact				
	2015	2017	2022	% Trade Draw	2015	2017	2022	2015	2017	2022	% Inflow	2015	2017	2022	2015	2017	2022	2015	2017	2022
Inflow to EF required					6.9	11	21.4					6.85	11.55	31.10						
Outflow from EF																				
Birkenhead Town Centre	236.52	243.37	269.75	15.0%	235.49	241.72	266.54	-0.4%	-0.7%	-1.2%	15.0%	236.52	243.45	271.21	-0.01	0.08	1.45	0.0%	0.0%	0.5%
Birkenhead (Grange Road West and Oxton Road)	27.08	27.86	30.88	3.0%	26.87	27.53	30.24	-0.8%	-1.2%	-2.1%	3.0%	27.08	27.88	31.17	0.00	0.02	0.29	0.0%	0.1%	0.9%
Liscard Town Centre	53.87	55.43	61.43	10.0%	53.18	54.33	59.29	-1.3%	-2.0%	-3.5%	10.0%	53.86	55.48	62.40	-0.01	0.05	0.97	0.0%	0.1%	1.6%
Bromborough Village	20.33	20.92	23.19	0.5%	20.30	20.86	23.08	-0.2%	-0.3%	-0.5%	0.5%	20.33	20.92	23.23	0.00	0.00	0.05	0.0%	0.0%	0.2%
West Kirby Town Centre	15.97	16.43	18.21	1.0%	15.90	16.32	18.00	-0.4%	-0.7%	-1.2%	1.0%	15.97	16.43	18.31	0.00	0.01	0.10	0.0%	0.0%	0.5%
Heswall Town Centre	15.87	16.33	18.10	0.5%	15.84	16.28	18.00	-0.2%	-0.3%	-0.6%	0.5%	15.87	16.33	18.15	0.00	0.00	0.05	0.0%	0.0%	0.3%
Moreton Town Centre	9.77	10.05	11.14	1.0%	9.70	9.94	10.93	-0.7%	-1.1%	-1.9%	1.0%	9.77	10.06	11.24	0.00	0.01	0.10	0.0%	0.1%	0.9%
Wallasey Village	9.77	10.05	11.14	2.0%	9.63	9.83	10.71	-1.4%	-2.2%	-3.8%	2.0%	9.77	10.06	11.34	0.00	0.01	0.19	0.0%	0.1%	1.7%
Upton Village	6.85	7.05	7.82	0.3%	6.84	7.02	7.76	-0.3%	-0.4%	-0.7%	0.3%	6.85	7.05	7.84	0.00	0.00	0.02	0.0%	0.0%	0.3%
Hoylake Town Centre	4.00	4.12	4.56	0.5%	3.96	4.06	4.45	-0.9%	-1.3%	-2.3%	0.5%	4.00	4.12	4.61	0.00	0.00	0.05	0.0%	0.1%	1.1%
New Ferry Town Centre	3.66	3.76	4.17	0.5%	3.62	3.71	4.06	-0.9%	-1.5%	-2.6%	0.5%	3.66	3.76	4.22	0.00	0.00	0.05	0.0%	0.1%	1.2%
Prenton (Woodchurch Road) Town Centre	1.44	1.48	1.64	0.3%	1.42	1.45	1.59	-1.2%	-1.9%	-3.3%	0.3%	1.44	1.48	1.66	0.00	0.00	0.02	0.0%	0.1%	1.5%
Croft Retail and Leisure Park (inc. Homebase)	125.97	129.62	143.67	2.0%	125.83	129.40	143.24	-0.1%	-0.2%	-0.3%	2.0%	125.97	129.63	143.86	0.00	0.01	0.19	0.0%	0.0%	0.1%
Junction One Retail Park (inc B&Q), Bidston Link Road	77.27	79.51	88.12	2.0%	77.13	79.29	87.70	-0.2%	-0.3%	-0.5%	2.0%	77.27	79.52	88.32	0.00	0.01	0.19	0.0%	0.0%	0.2%
The Rock Retail Park, Wirral	8.90	9.16	10.16	1.0%	8.84	9.05	9.94	-0.8%	-1.2%	-2.1%	1.0%	8.90	9.17	10.25	0.00	0.01	0.10	0.0%	0.1%	1.0%
Liverpool	783.60	806.29	893.69	25.0%	781.88	803.54	888.34	-0.2%	-0.3%	-0.6%	25.0%	783.59	806.42	896.12	-0.01	0.14	2.42	0.0%	0.0%	0.3%
Chester	306.93	315.81	350.05	15.0%	305.89	314.16	346.84	-0.3%	-0.5%	-0.9%	15.0%	306.92	315.90	351.50	-0.01	0.08	1.45	0.0%	0.0%	0.4%

**TABLE 7: POTENTIAL IMPACT ANALYSIS - CONVENIENCE**

Scenario 1	Baseline Turnovers from OCA (£m)			Residual Turnover After Trade Draw to East Float (£m)			% Impact of East Float Trade Draw			Turnover Inc Outflow from East Float (£m)			Difference from Baseline (£m)			Net % Impact					
	2015	2017	2022	% Trade Draw	2015	2017	2022	2015	2017	2022	% Inflow	2015	2017	2022	2015	2017	2022	2015	2017	2022	
<b>Inflow to EB required</b>																					
<b>Outflow from EB</b>					9.6	15.3	28.8					1.29	2.04	4.36							
<b>Zone 1</b>																					
Morrisons, Dee Lane, West Kirby	25.95	26.15	26.86	4.0%	25.56	25.53	25.71	-1.5%	-2.3%	-4.3%	4.0%	25.62	25.61	25.89	-0.33	-0.53	-0.98	-1.28%	-2.03%	-3.64%	
Other Stores, Hoylake Town Centre	5.18	5.22	5.36	0.5%	5.13	5.14	5.22	-0.9%	-1.5%	-2.7%	0.5%	5.14	5.15	5.24	-0.04	-0.07	-0.12	-0.80%	-1.27%	-2.28%	
Other Stores, West Kirby Town Centre	3.95	3.98	4.09	0.5%	3.90	3.90	3.94	-1.2%	-1.9%	-3.5%	0.5%	3.91	3.91	3.96	-0.04	-0.07	-0.12	-1.05%	-1.67%	-2.99%	
<b>Zone 2a</b>																					
Somerfield, 268 Hoylake Road, Moreton	5.97	6.01	6.18	1.0%	5.87	5.86	5.89	-1.6%	-2.5%	-4.7%	1.0%	5.88	5.88	5.93	-0.08	-0.13	-0.24	-1.39%	-2.21%	-3.96%	
Island, 303 Hoylake Road, Moreton	4.07	4.10	4.21	0.5%	4.02	4.02	4.07	-1.2%	-1.9%	-3.4%	0.5%	4.03	4.03	4.09	-0.04	-0.07	-0.12	-1.02%	-1.62%	-2.90%	
Other Stores, Moreton Town Centre	8.62	8.69	8.93	1.0%	8.53	8.53	8.64	-1.1%	-1.8%	-3.2%	1.0%	8.54	8.56	8.68	-0.08	-0.13	-0.24	-0.96%	-1.53%	-2.74%	
<b>Zone 2b</b>																					
Sainsbury's, Upton Bypass, Upton	41.60	41.91	43.07	5.0%	41.12	41.15	41.63	-1.2%	-1.8%	-3.3%	5.0%	41.18	41.25	41.84	-0.42	-0.66	-1.22	-1.00%	-1.58%	-2.84%	
Asda, Woodchurch Road, Arrow Park	37.86	38.15	39.20	5.0%	37.38	37.38	37.76	-1.3%	-2.0%	-3.7%	5.0%	37.45	37.49	37.98	-0.42	-0.66	-1.22	-1.10%	-1.74%	-3.12%	
Other Stores, Greasby	3.40	3.43	3.52	0.5%	3.35	3.35	3.38	-1.4%	-2.2%	-4.1%	0.5%	3.36	3.36	3.40	-0.04	-0.07	-0.12	-1.22%	-1.93%	-3.47%	
<b>Zone 3a</b>																					
Other Stores, Seacombe (Borough Road/Poulton Road)	0.86	0.86	0.89	0.0%	0.86	0.86	0.89	0.0%	0.0%	0.0%	0.0%	0.86	0.86	0.89	0.00	0.00	0.00	0.00%	0.00%	0.00%	
<b>Zone 3b</b>																					
Asda, Seaview Road, Liscard	59.16	59.62	61.25	10.0%	58.20	58.09	58.37	-1.6%	-2.6%	-4.7%	10.0%	58.33	58.29	58.81	-0.83	-1.33	-2.44	-1.40%	-2.22%	-3.99%	
Island, Unit 1, 24-30 Liscard Way, Wallasey	5.96	6.00	6.17	1.0%	5.86	5.85	5.88	-1.6%	-2.5%	-4.7%	1.0%	5.87	5.87	5.92	-0.08	-0.13	-0.24	-1.40%	-2.21%	-3.96%	
Other Stores, Liscard Town Centre	8.27	8.33	8.56	1.0%	8.17	8.18	8.27	-1.2%	-1.8%	-3.4%	1.0%	8.19	8.20	8.32	-0.08	-0.13	-0.24	-1.01%	-1.59%	-2.86%	
Other Stores, Wallasey Village Centre	6.63	6.68	6.87	1.0%	6.54	6.53	6.58	-1.4%	-2.3%	-4.2%	1.0%	6.55	6.55	6.62	-0.08	-0.13	-0.24	-1.25%	-1.98%	-3.56%	
Other Stores, New Brighton (Victoria Road)	2.12	2.14	2.20	0.0%	2.12	2.14	2.20	0.0%	0.0%	0.0%	0.0%	2.12	2.14	2.20	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Other Stores, New Brighton (Seabank Road)	0.19	0.19	0.20	0.0%	0.19	0.19	0.20	0.0%	0.0%	0.0%	0.0%	0.19	0.19	0.20	0.00	0.00	0.00	0.00%	0.00%	0.00%	
<b>Zone 4a</b>																					
Aldi, Laird Street, Birkenhead	8.96	9.02	9.27	2.5%	8.72	8.64	8.55	-2.7%	-4.2%	-7.8%	2.5%	8.75	8.69	8.66	-0.21	-0.33	-0.61	-2.32%	-3.67%	-6.59%	
Other Stores, Birkenhead Town Centre	56.29	56.44	57.33	9.5%	55.38	54.98	54.60	-1.6%	-2.6%	-4.8%	9.5%	55.50	55.18	55.01	-0.79	-1.26	-2.32	-1.40%	-2.23%	-4.05%	
<b>Zone 4b</b>																					
Sainsbury's, Woodchurch Road, Prenton	22.72	22.89	23.52	3.0%	22.43	22.43	22.66	-1.3%	-2.0%	-3.7%	3.0%	22.47	22.49	22.79	-0.25	-0.40	-0.73	-1.10%	-1.74%	-3.12%	
Tesco Metro, 212a Bebington Road, Rook Ferry	14.13	14.24	14.63	1.0%	14.04	14.09	14.35	-0.7%	-1.1%	-2.0%	1.0%	14.05	14.11	14.39	-0.08	-0.13	-0.24	-0.59%	-0.93%	-1.67%	
Other Stores, Prenton (Woodchurch Road) Town Centre	4.46	4.50	4.62	0.0%	4.46	4.50	4.62	0.0%	0.0%	0.0%	0.0%	4.46	4.50	4.62	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Other Stores, Tranmere (Old Chester Road)	3.05	3.07	3.16	0.0%	3.05	3.07	3.16	0.0%	0.0%	0.0%	0.0%	3.05	3.07	3.16	0.00	0.00	0.00	0.00%	0.00%	0.00%	
<b>Zone 4c</b>																					
Tesco Extra, Bidston Link Road, Bidston	44.63	44.97	46.20	10.0%	43.67	43.44	43.32	-2.2%	-3.4%	-6.2%	10.0%	43.79	43.64	43.76	-0.83	-1.33	-2.44	-1.86%	-2.95%	-5.29%	
<b>Zone 5a</b>																					
Asda, Welton Road, Croft Business Park	58.86	59.31	60.94	5.0%	58.38	58.54	59.50	-0.8%	-1.3%	-2.4%	5.0%	58.45	58.65	59.72	-0.42	-0.66	-1.22	-0.71%	-1.12%	-2.01%	
Aldi, Bebington Road, New Ferry	6.41	6.46	6.64	0.5%	6.36	6.38	6.49	-0.7%	-1.2%	-2.2%	0.5%	6.37	6.39	6.52	-0.04	-0.07	-0.12	-0.65%	-1.03%	-1.84%	
Somerfield, 30 Allport Lane, Bromborough	5.40	5.44	5.59	0.5%	5.35	5.37	5.45	-0.9%	-1.4%	-2.6%	0.5%	5.36	5.38	5.47	-0.04	-0.07	-0.12	-0.77%	-1.22%	-2.19%	
Other Stores, New Ferry Town Centre	7.01	7.06	7.25	0.5%	6.96	6.98	7.11	-0.7%	-1.1%	-2.0%	0.5%	6.97	6.99	7.13	-0.04	-0.07	-0.12	-0.59%	-0.94%	-1.69%	
Other Stores, Bromborough Village Town Centre	4.58	4.62	4.75	0.5%	4.54	4.54	4.60	-1.0%	-1.7%	-3.0%	0.5%	4.54	4.55	4.62	-0.04	-0.07	-0.12	-0.91%	-1.44%	-2.58%	
<b>Zone 5b</b>																					
Somerfield, 2 Church Road, Bebington	4.76	4.79	4.92	1.0%	4.66	4.64	4.64	-2.0%	-3.2%	-5.8%	1.0%	4.67	4.66	4.68	-0.08	-0.13	-0.24	-1.75%	-2.77%	-4.96%	
Other Stores, Bebington (Cross Lane)	3.30	3.33	3.42	0.5%	3.25	3.25	3.27	-1.5%	-2.3%	-4.2%	0.5%	3.26	3.26	3.30	-0.04	-0.07	-0.12	-1.26%	-1.99%	-3.58%	
Other Stores, Lower Bebington	1.60	1.61	1.65	0.0%	1.60	1.61	1.65	0.0%	0.0%	0.0%	0.0%	1.60	1.61	1.65	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Other Stores, Bebington (Kings Road/Teahay Lane)	1.25	1.26	1.30	0.0%	1.25	1.26	1.30	0.0%	0.0%	0.0%	0.0%	1.25	1.26	1.30	0.00	0.00	0.00	0.00%	0.00%	0.00%	
<b>Zone 6</b>																					
Tesco, Telegraph Road, Heswall	29.08	29.30	30.10	5.0%	28.60	28.53	28.66	-1.7%	-2.6%	-4.8%	5.0%	28.66	28.64	28.88	-0.42	-0.66	-1.22	-1.43%	-2.26%	-4.06%	
Aldi, May Road, Heswall	5.88	5.92	6.08	1.0%	5.78	5.77	5.80	-1.6%	-2.6%	-4.7%	1.0%	5.79	5.79	5.84	-0.08	-0.13	-0.24	-1.41%	-2.24%	-4.02%	
Other Stores, Heswall Town Centre	6.95	7.00	7.19	0.5%	6.90	6.92	7.05	-0.7%	-1.1%	-2.0%	0.5%	6.90	6.93	7.07	-0.04	-0.07	-0.12	-0.60%	-0.95%	-1.70%	
<b>Commitments</b>																					
Morrisons superstore, King's Parade, New Brighton	27.78	27.99	28.76	4.0%	27.39	27.38	27.61	-1.4%	-2.2%	-4.0%	4.0%	27.44	27.46	27.78	-0.33	-0.53	-0.98	-1.20%	-1.90%	-3.40%	
Asda superstore, Cloughton Road/Oliver Street, Birkenhead	38.55	38.84	39.91	5.0%	38.07	38.07	38.47	-1.2%	-2.0%	-3.6%	5.0%	38.13	38.18	38.68	-0.42	-0.66	-1.22	-1.08%	-1.71%	-3.06%	
Northbank East	9.74	9.82	10.09	10.0%	8.78	8.29	7.21	-9.9%	-15.6%	-28.6%	10.0%	8.91	8.49	7.64	-0.83	-1.33	-2.44	-8.53%	-13.51%	-24.23%	

**TABLE 7: POTENTIAL IMPACT ANALYSIS - CONVENIENCE**

Scenario 2	Baseline Turnovers from OCA (£m)			Residual Turnover After Trade Draw to East Float (£m)			% Impact of East Float Trade Draw			Turnover Inc Outflow from East Float (£m)			Difference from Baseline (£m)			Net % Impact					
	2015	2017	2022	% Trade Draw	2015	2017	2022	2015	2017	2022	% Inflow	2015	2017	2022	2015	2017	2022	2015	2017	2022	
Inflow to EF Required					4.30	6.90	12.20														
Outflow from EF												1.29	2.04	4.36							
Zone 1																					
Morrisons, Dee Lane, West Kirby	25.95	26.15	26.86	4.0%	25.78	25.87	26.38	-0.7%	-1.1%	-1.8%	4.0%	25.83	25.95	26.55	-0.12	-0.19	-0.31	-0.46%	-0.74%	-1.17%	
Other Stores, Hoylake Town Centre	5.18	5.22	5.36	0.5%	5.16	5.18	5.30	-0.4%	-0.7%	-1.1%	0.5%	5.16	5.19	5.32	-0.02	-0.02	-0.04	-0.29%	-0.47%	-0.73%	
Other Stores, West Kirby Town Centre	3.95	3.98	4.09	0.5%	3.93	3.94	4.03	-0.5%	-0.9%	-1.5%	0.5%	3.93	3.95	4.05	-0.02	-0.02	-0.04	-0.38%	-0.61%	-0.96%	
Zone 2a																					
Somerfield, 268 Hoylake Road, Moreton	5.97	6.01	6.18	1.0%	5.92	5.94	6.06	-0.7%	-1.1%	-2.0%	1.0%	5.94	5.96	6.10	-0.03	-0.05	-0.08	-0.50%	-0.81%	-1.27%	
Iceland, 303 Hoylake Road, Moreton	4.07	4.10	4.21	0.5%	4.05	4.07	4.15	-0.5%	-0.8%	-1.4%	0.5%	4.05	4.08	4.17	-0.02	-0.02	-0.04	-0.37%	-0.59%	-0.93%	
Other Stores, Moreton Town Centre	8.62	8.69	8.93	1.0%	8.58	8.62	8.80	-0.5%	-0.8%	-1.4%	1.0%	8.59	8.64	8.85	-0.03	-0.05	-0.08	-0.35%	-0.56%	-0.88%	
Zone 2b																					
Sainsbury's, Upton Bypass, Upton	41.60	41.91	43.07	7.0%	41.30	41.43	42.21	-0.7%	-1.2%	-2.0%	7.0%	41.38	41.57	42.52	-0.21	-0.34	-0.55	-0.51%	-0.81%	-1.27%	
Asda, Woodchurch Road, Arrowe Park	37.86	38.15	39.20	2.0%	37.78	38.01	38.95	-0.2%	-0.4%	-0.6%	2.0%	37.80	38.05	39.04	-0.06	-0.10	-0.16	-0.16%	-0.25%	-0.40%	
Other Stores, Greasby	3.40	3.43	3.52	0.5%	3.38	3.39	3.46	-0.6%	-1.0%	-1.7%	0.5%	3.39	3.40	3.48	-0.02	-0.02	-0.04	-0.44%	-0.71%	-1.11%	
Zone 3a																					
Other Stores, Seacombe (Borough Road/Poulton Road)	0.86	0.86	0.89	0.0%	0.86	0.86	0.89	0.0%	0.0%	0.0%	0.0%	0.86	0.86	0.89	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Zone 3b																					
Asda, Seaview Road, Liscard	59.16	59.62	61.25	5.0%	58.95	59.27	60.64	-0.4%	-0.6%	-1.0%	5.0%	59.01	59.37	60.86	-0.15	-0.24	-0.39	-0.25%	-0.41%	-0.64%	
Iceland, Unit 1, 24-30 Liscard Way, Wallasey	5.96	6.00	6.17	1.0%	5.91	5.93	6.05	-0.7%	-1.1%	-2.0%	1.0%	5.93	5.95	6.09	-0.03	-0.05	-0.08	-0.51%	-0.81%	-1.27%	
Other Stores, Liscard Town Centre	8.27	8.33	8.56	1.0%	8.23	8.26	8.44	-0.5%	-0.8%	-1.4%	1.0%	8.24	8.28	8.48	-0.03	-0.05	-0.08	-0.36%	-0.58%	-0.92%	
Other Stores, Wallasey Village Centre	6.63	6.68	6.87	1.0%	6.59	6.61	6.75	-0.6%	-1.0%	-1.8%	1.0%	6.60	6.64	6.79	-0.03	-0.05	-0.08	-0.45%	-0.73%	-1.14%	
Other Stores, New Brighton (Victoria Road)	2.12	2.14	2.20	0.0%	2.12	2.14	2.20	0.0%	0.0%	0.0%	0.0%	2.12	2.14	2.20	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Other Stores, New Brighton (Seabank Road)	0.19	0.19	0.20	0.0%	0.19	0.19	0.20	0.0%	0.0%	0.0%	0.0%	0.19	0.19	0.20	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Zone 4a																					
Aldi, Laird Street, Birkenhead	8.96	9.02	9.27	2.5%	8.85	8.85	8.97	-1.2%	-1.9%	-3.3%	2.5%	8.88	8.90	9.08	-0.08	-0.12	-0.20	-0.84%	-1.35%	-2.12%	
Other Stores, Birkenhead Town Centre	56.29	56.44	57.33	5.5%	56.05	56.06	56.66	-0.4%	-0.7%	-1.2%	5.5%	56.12	56.17	56.90	-0.17	-0.27	-0.43	-0.29%	-0.47%	-0.75%	
Zone 4b																					
Sainsbury's, Woodchurch Road, Prenton	22.72	22.89	23.52	5.0%	22.50	22.54	22.91	-0.9%	-1.5%	-2.6%	5.0%	22.57	22.65	23.13	-0.15	-0.24	-0.39	-0.66%	-1.06%	-1.67%	
Tesco Metro, 212a Bebbington Road, Rock Ferry	14.13	14.24	14.63	0.5%	14.11	14.21	14.57	-0.2%	-0.2%	-0.4%	0.5%	14.12	14.22	14.59	-0.02	-0.02	-0.04	-0.11%	-0.17%	-0.27%	
Other Stores, Prenton (Woodchurch Road) Town Centre	4.46	4.50	4.62	0.0%	4.46	4.50	4.62	0.0%	0.0%	0.0%	0.0%	4.46	4.50	4.62	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Other Stores, Tranmere (Old Chester Road)	3.05	3.07	3.16	0.0%	3.05	3.07	3.16	0.0%	0.0%	0.0%	0.0%	3.05	3.07	3.16	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Zone 4c																					
Tesco Extra, Bidston Link Road, Bidston	44.63	44.97	46.20	7.0%	44.33	44.48	45.35	-0.7%	-1.1%	-1.8%	7.0%	44.42	44.63	45.65	-0.21	-0.34	-0.55	-0.47%	-0.76%	-1.19%	
Zone 5a																					
Asda, Welton Road, Croft Business Park	58.86	59.31	60.94	5.0%	58.65	58.96	60.33	-0.4%	-0.6%	-1.0%	5.0%	58.71	59.07	60.55	-0.15	-0.24	-0.39	-0.26%	-0.41%	-0.64%	
Aldi, Bebbington Road, New Ferry	6.41	6.46	6.64	0.5%	6.39	6.43	6.58	-0.3%	-0.5%	-0.9%	0.5%	6.40	6.44	6.60	-0.02	-0.02	-0.04	-0.23%	-0.38%	-0.59%	
Somerfield, 30 Alport Lane, Bromborough	5.40	5.44	5.59	0.5%	5.38	5.41	5.53	-0.4%	-0.6%	-1.1%	0.5%	5.39	5.42	5.55	-0.02	-0.02	-0.04	-0.28%	-0.45%	-0.70%	
Other Stores, New Ferry Town Centre	7.01	7.06	7.25	0.5%	6.99	7.03	7.19	-0.3%	-0.5%	-0.8%	0.5%	6.99	7.04	7.22	-0.02	-0.02	-0.04	-0.21%	-0.34%	-0.54%	
Other Stores, Bromborough Village Town Centre	4.58	4.62	4.75	0.5%	4.56	4.58	4.68	-0.5%	-0.7%	-1.3%	0.5%	4.57	4.59	4.71	-0.02	-0.02	-0.04	-0.33%	-0.53%	-0.83%	
Zone 5b																					
Somerfield, 2 Church Road, Bebbington	4.76	4.79	4.92	1.0%	4.71	4.72	4.80	-0.9%	-1.4%	-2.5%	1.0%	4.73	4.74	4.84	-0.03	-0.05	-0.08	-0.63%	-1.01%	-1.59%	
Other Stores, Bebbington (Cross Lane)	3.30	3.33	3.42	0.5%	3.28	3.29	3.36	-0.7%	-1.0%	-1.8%	0.5%	3.29	3.30	3.38	-0.02	-0.02	-0.04	-0.46%	-0.73%	-1.15%	
Other Stores, Lower Bebbington	1.60	1.61	1.65	0.0%	1.60	1.61	1.65	0.0%	0.0%	0.0%	0.0%	1.60	1.61	1.65	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Other Stores, Bebbington (Kings Road/Teehay Lane)	1.25	1.26	1.30	0.0%	1.25	1.26	1.30	0.0%	0.0%	0.0%	0.0%	1.25	1.26	1.30	0.00	0.00	0.00	0.00%	0.00%	0.00%	
Zone 6																					
Tesco, Telegraph Road, Heswall	29.08	29.30	30.10	2.0%	28.99	29.16	29.86	-0.3%	-0.5%	-0.8%	2.0%	29.02	29.20	29.95	-0.06	-0.10	-0.16	-0.21%	-0.33%	-0.52%	
Aldi, May Road, Heswall	5.88	5.92	6.08	0.5%	5.85	5.89	6.02	-0.4%	-0.6%	-1.0%	0.5%	5.86	5.90	6.04	-0.02	-0.02	-0.04	-0.26%	-0.41%	-0.64%	
Other Stores, Heswall Town Centre	6.95	7.00	7.19	0.5%	6.92	6.96	7.13	-0.3%	-0.5%	-0.8%	0.5%	6.93	6.97	7.15	-0.02	-0.02	-0.04	-0.22%	-0.35%	-0.55%	
Commitments																					
Morrisons superstore, King's Parade, New Brighton	27.78	27.99	28.76	4.0%	27.61	27.71	28.27	-0.6%	-1.0%	-1.7%	4.0%	27.66	27.79	28.44	-0.12	-0.19	-0.31	-0.43%	-0.69%	-1.09%	
Asda superstore, Cloughton Road/Oliver Street, Birkenhead	38.55	38.84	39.91	10.0%	38.12	38.15	38.69	-1.1%	-1.8%	-3.1%	10.0%	38.24	38.35	39.12	-0.30	-0.49	-0.78	-0.78%	-1.25%	-1.97%	
Northbank East	9.74	9.82	10.09	10.0%	9.31	9.13	8.87	-4.4%	-7.0%	-12.1%	10.0%	9.44	9.33	9.30	-0.30	-0.49	-0.78	-3.09%	-4.95%	-7.78%	

**TABLE 8: POTENTIAL CUMULATIVE IMPACT ANALYSIS - CONVENIENCE**

Scenario 2	Baseline Turnovers from OCA (€m)			% Trade Draw				Residual Turnover After Trade Draw (€m)			% Impact of East Float Trade Draw			Turnover Inc Outflow from East Float (€m)				Difference from Baseline (€m)			Net % Impact			
	2015	2017	2022	Morrisons	Asda	North Bank	East Float	2015	2017	2022	2015	2017	2022	% Inflow	2015	2017	2022	2015	2017	2022	2015	2017	2022	
<b>Inflow to EF required</b>								4.3	6.9	12.2														
<b>Outflow from EF</b>															1.29	2.04	4.36							
<b>Zone 1</b>																								
Morrisons, Dee Lane, West Kirby	25.95	26.15	26.86	5.0%	4.0%	0.0%	4.0%	23.19	23.47	24.32	-10.6%	-10.2%	-9.5%	4.0%	23.24	23.55	24.49	2.71	2.60	2.37	-10.4%	-9.9%	-8.8%	
Other Stores, Hoylake Town Centre	5.18	5.22	5.36	0.5%	0.3%	1.0%	0.5%	4.77	4.82	4.98	-7.8%	-7.6%	-7.1%	0.5%	4.76	4.83	5.00	0.40	0.39	0.36	-7.7%	-7.4%	-6.7%	
Other Stores, West Kirby Town Centre	3.95	3.98	4.05	0.3%	0.5%	1.0%	0.5%	3.61	3.65	3.78	-8.5%	-8.2%	-7.6%	0.5%	3.62	3.66	3.80	0.33	0.32	0.29	-8.3%	-7.9%	-7.0%	
<b>Zone 2a</b>																								
Somerfield, 268 Hoylake Road, Moreton	5.97	6.01	6.10	0.8%	0.8%	0.0%	1.0%	5.51	5.58	5.78	-7.6%	-7.2%	-6.4%	1.0%	5.53	5.60	5.83	0.44	0.41	0.35	-7.4%	-6.9%	-5.7%	
Island, 303 Hoylake Road, Moreton	4.07	4.10	4.21	0.5%	0.2%	0.0%	0.5%	3.87	3.92	4.05	-4.8%	-4.5%	-3.9%	0.5%	3.88	3.93	4.07	0.19	0.17	0.14	-4.6%	-4.2%	-3.3%	
Other Stores, Moreton Town Centre	8.62	8.69	8.93	2.0%	0.1%	1.0%	1.0%	7.98	8.06	8.34	-7.5%	-7.2%	-6.6%	1.0%	7.99	8.08	8.38	0.63	0.61	0.55	-7.3%	-7.0%	-6.1%	
<b>Zone 2b</b>																								
Sainsbury's, Upton Bypass, Upton	41.60	41.91	43.07	5.0%	10.5%	0.0%	7.0%	36.46	36.92	38.29	-12.3%	-11.9%	-11.1%	7.0%	36.55	37.06	38.60	5.05	4.85	4.47	-12.1%	-11.6%	-10.4%	
Asda, Woodchurch Road, Arrowe Park	37.86	38.15	39.20	6.0%	10.0%	0.0%	2.0%	32.43	32.72	33.73	-14.4%	-14.2%	-14.0%	2.0%	32.45	32.76	33.81	5.41	5.39	5.39	-14.3%	-14.1%	-13.7%	
Other Stores, Greasby	3.40	3.43	3.52	1.0%	0.0%	0.0%	0.5%	3.15	3.18	3.30	-7.5%	-7.2%	-6.4%	0.5%	3.15	3.19	3.32	0.25	0.24	0.20	-7.3%	-6.9%	-5.8%	
<b>Zone 3a</b>																								
Other Stores, Seacombe (Borough Road/Poulton Road)	0.86	0.86	0.89	0.1%	0.1%	1.5%	0.0%	0.65	0.65	0.67	-24.8%	-24.8%	-24.8%	0.0%	0.65	0.65	0.67	0.21	0.21	0.22	-24.8%	-24.8%	-24.8%	
<b>Zone 3b</b>																								
Asda, Seaview Road, Liscard	59.16	59.62	61.25	15.0%	6.0%	22.5%	5.0%	50.71	51.22	52.89	-14.3%	-14.1%	-13.7%	5.0%	50.77	51.32	53.10	8.39	8.29	8.15	-14.2%	-13.9%	-13.3%	
Island, Unit 1, 24-30 Liscard Way, Wallasey	5.96	6.00	6.17	0.5%	0.8%	0.0%	1.0%	5.63	5.70	5.91	-5.5%	-5.1%	-4.2%	1.0%	5.64	5.72	5.95	0.31	0.28	0.22	-5.3%	-4.7%	-3.5%	
Other Stores, Liscard Town Centre	8.27	8.33	8.56	1.0%	0.5%	1.7%	1.0%	7.68	7.76	8.02	-7.2%	-6.9%	-6.3%	1.0%	7.69	7.78	8.07	0.58	0.55	0.49	-7.0%	-6.6%	-5.8%	
Other Stores, Wallasey Village Centre	6.63	6.68	6.87	0.3%	0.3%	1.0%	1.0%	6.42	6.49	6.72	-3.3%	-2.9%	-2.2%	1.0%	6.43	6.51	6.76	0.20	0.17	0.10	-3.1%	-2.6%	-1.5%	
Other Stores, New Brighton (Victoria Road)	2.12	2.14	2.20	0.5%	0.0%	0.0%	0.0%	1.98	2.00	2.05	-6.6%	-6.6%	-6.6%	0.0%	1.98	2.00	2.05	0.14	0.14	0.14	-6.6%	-6.6%	-6.6%	
Other Stores, New Brighton (Seabank Road)	0.19	0.19	0.20	0.0%	0.0%	0.0%	0.0%	0.19	0.19	0.20	0.0%	0.0%	0.0%	0.0%	0.19	0.19	0.20	-	-	-	0.0%	0.0%	0.0%	
<b>Zone 4a</b>																								
Aldi, Laird Street, Birkenhead	8.96	9.02	9.27	2.5%	4.5%	2.0%	2.5%	6.44	6.55	6.86	-28.1%	-27.4%	-26.0%	2.5%	6.47	6.60	6.97	2.48	2.42	2.30	-27.7%	-26.8%	-24.8%	
Other Stores, Birkenhead Town Centre	56.29	56.44	57.33	2.5%	3.5%	3.8%	5.5%	54.36	54.80	56.34	-3.4%	-2.9%	-1.7%	5.5%	54.45	54.92	56.58	1.84	1.52	0.76	-3.3%	-2.7%	-1.3%	
<b>Zone 4b</b>																								
Sainsbury's, Woodchurch Road, Prenton	22.72	22.89	23.52	1.0%	5.0%	2.7%	5.0%	20.46	20.75	21.57	-9.9%	-9.4%	-8.3%	5.0%	20.53	20.85	21.79	2.19	2.04	1.73	-9.6%	-8.9%	-7.3%	
Tesco Metro, 212a Bebington Road, Rock Ferry	14.13	14.24	14.63	1.0%	2.5%	0.0%	0.5%	12.92	13.03	13.41	-8.6%	-8.5%	-8.4%	0.5%	12.92	13.04	13.43	1.21	1.21	1.20	-8.6%	-8.5%	-8.2%	
Other Stores, Prenton (Woodchurch Road) Town Centre	4.46	4.50	4.62	0.5%	0.8%	1.0%	0.0%	3.94	3.97	4.08	-11.7%	-11.7%	-11.7%	0.0%	3.94	3.97	4.08	0.52	0.53	0.54	-11.7%	-11.7%	-11.7%	
Other Stores, Tranmere (Old Chester Road)	3.05	3.07	3.16	0.3%	0.5%	0.0%	0.0%	2.79	2.81	2.89	-8.6%	-8.6%	-8.6%	0.0%	2.79	2.81	2.89	0.26	0.26	0.27	-8.6%	-8.6%	-8.6%	
<b>Zone 4c</b>																								
Tesco Extra, Bidston Link Road, Bidston	44.63	44.97	46.20	18.0%	15.0%	24.5%	7.0%	31.76	32.18	33.42	-28.8%	-28.4%	-27.7%	7.0%	31.85	32.32	33.73	12.78	12.65	12.48	-28.6%	-28.1%	-27.0%	
<b>Zone 5a</b>																								
Asda, Welton Road, Croft Business Park	58.86	59.31	60.94	11.0%	11.0%	0.0%	5.0%	51.78	52.30	54.00	-12.0%	-11.8%	-11.4%	5.0%	51.85	52.40	54.21	7.02	6.91	6.73	-11.9%	-11.6%	-11.0%	
Aldi, Bebington Road, New Ferry	6.41	6.46	6.64	0.5%	1.0%	0.0%	0.5%	5.91	5.97	6.16	-7.8%	-7.6%	-7.3%	0.5%	5.91	5.98	6.18	0.50	0.48	0.46	-7.7%	-7.5%	-6.9%	
Somerfield, 30 Allport Lane, Bromborough	5.40	5.44	5.59	0.5%	0.8%	0.0%	0.5%	5.00	5.05	5.21	-7.5%	-7.3%	-6.8%	0.5%	5.00	5.06	5.23	0.40	0.39	0.36	-7.4%	-7.1%	-6.4%	
Other Stores, New Ferry Town Centre	7.01	7.06	7.25	0.5%	1.0%	1.0%	0.5%	6.41	6.47	6.67	-8.5%	-8.4%	-8.0%	0.5%	6.42	6.48	6.70	0.59	0.58	0.56	-8.4%	-8.2%	-7.7%	
Other Stores, Bromborough Village Town Centre	4.58	4.62	4.75	0.5%	0.8%	1.0%	0.5%	4.08	4.13	4.27	-10.9%	-10.7%	-10.1%	0.5%	4.09	4.14	4.29	0.50	0.48	0.46	-10.8%	-10.4%	-9.7%	
<b>Zone 5b</b>																								
Somerfield, 2 Church Road, Bebington	4.76	4.79	4.92	0.5%	0.5%	0.0%	1.0%	4.47	4.53	4.70	-6.1%	-5.5%	-4.5%	1.0%	4.48	4.55	4.75	0.28	0.25	0.18	-5.8%	-5.1%	-3.6%	
Other Stores, Bebington (Cross Lane)	3.30	3.33	3.42	0.5%	0.2%	0.0%	0.5%	3.11	3.14	3.26	-5.9%	-5.5%	-4.8%	0.5%	3.11	3.15	3.28	0.19	0.17	0.14	-5.7%	-5.2%	-4.1%	
Other Stores, Lower Bebington	1.60	1.61	1.65	0.2%	0.2%	0.0%	0.0%	1.46	1.47	1.51	-8.3%	-8.3%	-8.3%	0.0%	1.46	1.47	1.51	0.13	0.13	0.14	-8.3%	-8.3%	-8.3%	
Other Stores, Bebington (Kings Road/Teeshay Lane)	1.25	1.26	1.30	0.2%	0.1%	0.0%	0.0%	1.16	1.17	1.20	-7.5%	-7.5%	-7.5%	0.0%	1.16	1.17	1.20	0.09	0.09	0.10	-7.5%	-7.5%	-7.5%	
<b>Zone 6</b>																								
Tesco, Telegraph Road, Heswall	29.08	29.30	30.10	4.0%	4.0%	0.0%	2.0%	26.51	26.76	27.60	-8.8%	-8.7%	-8.3%	2.0%	26.54	26.80	27.69	2.54	2.50	2.42	-8.7%	-8.5%	-8.0%	
Aldi, May Road, Heswall	5.88	5.92	6.08	1.0%	1.0%	0.0%	0.5%	5.23	5.29	5.46	-10.9%	-10.7%	-10.3%	0.5%	5.24	5.30	5.48	0.64	0.62	0.60	-10.8%	-10.5%	-9.9%	
Other Stores, Heswall Town Centre	6.95	7.00	7.19	1.0%	0.5%	1.0%	0.5%	6.40	6.46	6.67	-7.8%	-7.7%	-7.3%	0.5%	6.41	6.47	6.69	0.54	0.53	0.50	-7.7%	-7.5%	-7.0%	
<b>Commitments</b>																								
Morrisons superstore, King's Parade, New Brighton	27.78	27.99	28.76	0.0%	0.0%	0.0%	4.0%	27.61	27.71	28.27	-0.6%	-1.0%	-1.7%	4.0%	27.66	27.80	28.44	0.12	0.19	0.31	-0.4%	-0.7%	-1.1%	
Asda superstore, Cloughton Road/Oliver Street, Birkenhead	38.55	38.84	39.91	0.0%	0.0%	0.0%	10.0%	38.33	38.50	39.30	-0.6%	-0.9%	-1.5%	10.0%	38.46	38.70	39.73	0.09	0.14	0.17	-0.2%	-0.4%	-0.4%	
Northbank East	9.74	9.82	10.09	0.0%	0.0%	0.0%	10.0%	9.31	9.13	8.87	-4.4%	-7.0%	-12.1%	10.0%	9.44	9.33	9.30	0.30	0.48	0.78	-3.1%	-4.9%	-7.8%	

## Appendix 2: Response to Objections

## CONTENTS

1.	Introduction	1
2.	Warner Estate Objection	2
3.	Grosvenor	7
4.	Universities Superannuation Scheme Ltd	9

TA Ref:

LPA Ref:

Office Address: 1 New York Street  
Manchester  
M1 4HD

Telephone 0161 233 7676

Date of Issue: June 2010

## 1. Introduction

- 1.1 Since the submission of the outline planning application in December 2009, the Council has published the Wirral Retail and Leisure Study (December 2009) and national policy with regard to town centres and retail planning has been updated with the issue of the new PPS4, "Planning for Sustainable Growth" which has replaced PPS6. As a consequence, Turley Associates have produced a Supplementary Retail, Office and Leisure Statement to complement that which was submitted with the planning application.
- 1.2 This supplementary statement considers the implications of PPS4 and the updated Wirral Study and addresses the new policy tests and other matters arising from this new context. It also seeks to respond to officers' comments on the application submission and requests for further information and clarification of the proposals and the assessment undertaken by Turley Associates.
- 1.3 The supplementary Retail, Office and Leisure Statement also takes account of the objections which have been made in respect of the retail and leisure components of the proposals by:
  - Warner Estates: Jones Lang LaSalle submission of March 2010.
  - Grosvenor: Drivas Jonas letter of 10 February 2010, and
  - Universities Superannuation Scheme Ltd: letter dated 25<sup>th</sup> March 2010.
- 1.4 In discussions with officers, it was agreed that Turley Associates would provide a more direct response to these objections. This note fulfils that purpose and should be read in the context of both the original (December 2009) Retail, Office and Leisure Statement and the supplementary statement that has now been submitted to the Council as well as the draft planning conditions which have been discussed and agreed with officers.

## **2. Warner Estate Objection**

- 2.1 As an overview, it is apparent that much of the Warner Estate objection is based on a fear of what might be developed at East Float rather than an understanding and acknowledgement of what is actually proposed. In Peel's view this fear is unfounded and has resulted in many of the comments made in the objection being either misinformed or misdirected. We do not propose to respond to the objection line by line but to deal with the main points set out below:

### **Understanding the Proposal**

- 2.2 Warner Estate's central point in section 2 is that the retail element of East Float is of substantial scale and is, de facto, highly significant in the context of the existing shopping centres in the Wirral. This would be true if the retail component was to be developed as a single block of accommodation in one location and over a relatively short period of time but that is not what is proposed. The application submission explains in great detail the nature of proposals and the intention that the retail and leisure elements are both ancillary and subsidiary to the major office and residential content of the development, and outlines the measures and controls which are proposed to ensure that this is the case. Work on fleshing out these measure and controls has progressed considerably in post application discussions with officers and a set of draft conditions has been agreed which Turley Associates believe will provide robust controls on the nature, phasing and distribution of the retail and leisure components to ensure that these remain at all times, ancillary and subsidiary to the main elements of the East Float development.
- 2.3 Warner Estates and its advisors appear to have formed their comments with a belief that Peel has some ulterior motive with regard to the retail and leisure components and that, even if the application is approved with appropriate controls, pressure will subsequently be put on the Council to water these controls down to enable a different set of proposals to be implemented (paragraph 2.3.3 plus 2.3.6 of the Warner Estates submission). Ignoring the questioning of Peel's integrity in these comments, we would suggest that appropriate approach is to consider and assess what has actually been applied for and to work on the assumption that the Council will act responsibly in the discharge of its statutory powers. We would also assert that, if Warner Estates unfounded fears and conspiracy theories are put to one side, the majority of their concerns are dealt with by the control mechanisms as discussed and agreed with officers.
- 2.4 With these controls in place, the quantum, phasing and distribution of retail and leisure components is such that what is proposed does not constitute a new

shopping centre and does not raise issues with regards to the hierarchy of centres and, hence, does not conflict with RSS or PPS4 of the emerging LDF as Warner Estates seek to suggest. We note that Warner Estates make reference to Bidston Dock to support these arguments but Bidston Dock does not form part of this application and is not relevant to its determination.

- 2.5 At paragraph 2.3.4 of the submission, Warner Estates seek to suggest that, because there is a need for flexibility with regards to phasing of the East Float development, this implies that all of the retail floorspace could be developed out in one phase. However, what the planning submission seeks to convey is that, whilst an indicative trajectory has been used for the purposes of assessing the potential impacts of the development, this can only be indicative at this stage. It is not possible to be definitive as to the rate at which offices and residential accommodation might be built out and Peel does not wish to have unnecessary restrictions placed on these rates which might hold development back when there is market demand for it. However, that flexibility does not change the fact that the quantum of retail and leisure developments brought forward would, by means of the planning conditions, be kept in proportion to the quantum of commercial and residential developments that has been completed. This is a necessary part of ensuring that these elements remain an ancillary and subsidiary component of the scheme.
- 2.6 Taking these factors and controls into account, Turley Associates maintain that the retail component of 60,000sqm, spread across all of the A class uses and representing only 4.3% of the total floorspace proposed at East Float, is wholly appropriate in scale and our assessment as set out in the supplementary statement demonstrates that no significant impacts on existing centres are predicted.
- 2.7 Turley Associates considered that the catchment area used in the study is entirely appropriate given the nature of the proposal. Whilst there will inevitably be expenditure generated in retail units at East Float from people who live outside of area the primary purpose of visits by such people to East Float is expected mainly to be for work, business, education or leisure purposes. This scheme is simply not planned or envisaged as a retail destination which seeks to attract visitors solely for shopping purposes and, again, the phasing and distribution of floorspace conditions will ensure that this is the case.
- 2.8 Finally, in this section, Warner Estates comments on accessibility are misinformed. The site is already accessible by public transport and the enhancement of public transport access and the encouragement of walking and cycling is a fundamental

component of the East Float master planning proposals. The comments on the level of parking proposed (at paragraph 2.5.3) are puzzling since they seem either to ignore the existence of the 422,757sqm of offices and 13,500 residential units proposed or to assume that these major components of the development will have no parking need.

### **Planning Policy Context**

- 2.9 Warner Estates criticisms with regard to PPS4 are answered by the production of the supplementary statement that deals explicitly with the new policy tests in that document.
- 2.10 The references to RSS policy is not relevant as Peel are not seeking permission for a new centre and, with a maximum of 18,000sqm of A1 comparison retail use, the retail component does not constitute a regional or sub-regional scale facility. Similarly, the UDP Policies which are referred to are of limited relevant or the application does not seek consent for a new centre. Again, Warner Estates choose to ignore the ancillary nature of these components and to treat this one element of a considerably larger mixed use development as a stand alone retail proposal when seeking to identify these conflicts. This is not a correct approach.

### **The LDF Evidence Base**

- 2.11 Most of the comments made in section 4 of the submission are for the Council rather than Peel to consider. However we would comment that it is entirely reasonable that, in preparing their report and advice to the Council (paragraph 4.1.13 of the Warner Estates submission) it was appropriate that RTP should have full regard to a serious proposal for major new development which a developer with a proven track record for delivery of major development projects intends to progress. Indeed it would have been very strange had they not considered this as one of the options to be assessed.
- 2.12 We note the criticism (at paragraph 4.1.22) that the Council's study has not assessed the ability and desire of developers and investors to bring forward development in the town centre. Whilst it is for the Council/RPT to respond to this, it is instructive to note that the objection statement makes no reference whatsoever to Warner Estates having any such plans that might possibly be affected by the East Float proposals.

## **Retail Study Assumptions**

- 2.13 Many of the comments in this section also flow from Warner Estates' treatment of the retail component of the scheme as either a stand alone retail proposal or retail led mixed use scheme. It is neither and it is very difficult to understand how it could logically be represented as such given the balance of land uses which are proposed in the planning application. Hence all of the made at 5.1.4 are misdirected since these miss the point of the proposal. Whilst a stand alone retail scheme might require critical mass to generate footfall and activity this will be generated by virtue of the fact that the retail and leisure components are part of a much larger residential and commercial development.
- 2.14 Peel does envisage that the scheme will predominantly attract the "higher quality" retailers because these will wish to be part of a prestigious waterfront development. However it is not proposed that there should be a number of large anchor stores and the agreed conditions provide only for 2 stores of a maximum of 2500 sq m; all other units will be restricted to 500 sq m maximum size. The Retail, Office and Leisure statement makes it clear that the aspiration is to attract both national and international brands including niche and quality operators as well as independent and craft and sustainability orientated retailers (paragraph 2.11). The names referred to in Warner Estates' objection at paragraph 5.1.2 have been taken from Turley Associates' reference to retailers at Canary Wharf as the closest UK comparable but these are only an indication of the type of retailers that Peel would expect to attract.
- 2.15 Warner Estates suggestion at 5.2.2 (3) that a critical mass of floorspace will come on stream such as to cause a sudden uplift in market share is misplaced because again this ignores the controls on phasing and distribution of the floorspace. As made clear in the Retail, Office and Leisure Statement the retail development will be phased and will not all be developed out until the latter stages of the East Float phasing programme. Clearly the RTP report has had to deal with the picture over a much shorter timescale than this given its role in relation to the Core Strategy and LDF process.
- 2.16 Within paragraph 5.2.3 it is suggested that the sales density figures used by both ourselves and RTP are inaccurate. However, RTP's figure of £6,500/sqm is generated from household survey results which is a recognised retail methodology for calculating sales densities. The figure within our report, £5000/sqm has resulted from analysis of sales density figures within Retail Rankings 2009 and represents a higher end retail provision in line with Marks and Spencer, Next,

Boots etc. taking into account the small scale of retail floorspace that would be provided at East Float (smaller units commonly have reduced sales density figures). No suggestion is provided by Warner Estates as to what the sales density figure should be, nor of why those provided are inaccurate. On this basis little weight can be applied to their comments relating to sales density.

2.17 As explained above the application does not seek planning permission for a new centre and, whilst it is possible that East Float or parts of it may attain that status at some future date this is only like to occur after a substantial amount of commercial office and supporting development has been established in the new waterfront location. Accordingly Turley Associates do not accept that the implications of East Float, in retail terms, needs to be assessed via any amendment to RSS. This is, of course, even less of an issue now that the new Government has made clear its intention to remove that tier of planning policy.

2.18 The comments on sequential assessment follow directly on from Warner Estates questioning of the Catchment area which we have already responded to. As noted earlier the retail components of the development are likely to attract expenditure from person living outside of the catchment area if they are making a trip to East Float for another primary purpose. This will include people working at East Float, students in the College and University developments which are envisaged within the area, and people visiting for business purposes or to visit for leisure purposes. For example if a major cultural attraction is secured for The Point this will be likely to draw visitors from a wide area and many of these might be expected to spend money in the shops, cafes and restaurants at East Float as part of their trip. However this is very different from people travelling from long distances primarily for shopping purposes as they would at Cheshire Oaks or the Trafford Centre.

2.19 At paragraph 5.3.4 the assessment is criticised for not having disaggregated the “retail” floorspace when considering alternative sites. However this is a case of Warner Estates wanting it both ways. The controls that Peel has put forward and which have been agreed with the Council seek to ensure that the retail components are and remain ancillary to the much more dominant office and residential and components of the scheme. Warner Estates effectively say that they do not believe this will in practice be done and Peel will wish to build out one big block of retail accommodation but then wish this to be disaggregated for the purposes of the sequential assessment. Similarly to suggest that the retail element of the proposals must be decoupled from the rest of the scheme is nonsensical since this would mean that it would not and could not be ancillary and subsidiary to the other major components. Indeed, because the retail components are distributed across East Float and are controlled both with regard to unit size and

phasing they would clearly not be viable if they were not physically integrated with the office and residential development such that they derive direct benefit from the activity and footfall that these large elements of the scheme will generate.

- 2.20 In response to the key points at para 5.4.1. we would respond that this is not a retail led development; the size limits proposed would not allow the development of department stores or other major anchors; the scheme is not seeking to attract middle market retailers as these would not provide the right quality of covenant; the development does not need to create a critical mass in the same way that a stand alone or retail led scheme would need to do. The 30,000 sq m of other A uses covers other elements such as professional services offices as well as food and drink outlets; however a development of this type would, when completed, be expected to support a large number and range of food and drink outlets.
- 2.21 Warner Estates comments at 5.4.2 seem to suggest that because Wirral currently does not have retail and catering uses which have extended hours( because people are travelling to Liverpool or elsewhere for such attractions) it cannot have them. This would seem to be wholly negative approach that is contrary to PPS4 objectives of meeting quantitative and qualitative needs.

### **Impact and Regeneration**

- 2.22 The impact of the proposals has been fully assessed in the original and supplementary statements and the criticisms made are refuted. However Warner Estates main thesis in these sections appears to be that Inner Wirral can continue to wait for regeneration to come along in the hope that something may one day happen. Any assessment of the data relating to the extent and sustained nature of the multiple deprivation in this area, as set out in various places in the planning submission, will show that this is simply not an option for Wirral or its communities. The need for intervention and action is pressing and urgent and Wirral Waters and East Float provide a unique opportunity to make a transformational change in Inner Wirral. Warner Estates somewhat dramatic conclusions with regard to the threat that the East Float application poses to the plan led system is not an answer to these problems. Again in this context it is worthy of note that the objection submission says nothing about Warner Estates having plans of their own to bring new investment and employment into the area.

### 3. Grosvenor

- 3.1 Grosvenor's concerns (page 2) that the application could result in more than 60,000 sq m of retail development being developed is misplaced for a number of reasons. First the Class E component (now reduced to a total of 48,500 sq m) is not additional to the 60,000 sq m; it simply provides greater flexibility as to how the retail space is drawn down across the site. It should also be noted in relation to these comments that, following further discussions with officers Peel has agreed that the convenience component of the Class A1 floorspace should be capped at a total of 12,000 sq m rather than a maximum of 18,000 as previously proposed. The supplementary Retail, Office and Leisure Statement takes this amendment into account in the updated retail assessment.
- 3.2 Turley Associates do not agree that the scale of comparison retailing for which permission is sought (at 18,000 sq m maximum) is such that it must of necessity raise an objection with regard to planning policy. However it is important to consider the retail component in its rightful context as a minor element in a larger mixed used scheme and with a set of controls that will secure that it is and remains ancillary and subsidiary to the more dominant components of the mix. In this context the major concerns with regard to shopping hierarchy and regional policy which Grosvenor seek to raise are misplaced.
- 3.3 Grosvenor's comments with regard to RSS and the City Region seek to treat East Float as being in the outer area of the City Region. In fact East Float is in the Inner Area surrounding the Regional Centre and hence is the second priority for development and investment. The area is also a Strategic Regional Site for economic investment and part of both the HMRI and New Growth Point for housing investment, and has been identified and a priority area for regeneration for many years. There is therefore strong policy support for major new investment and development in this location and, if this is to be undertaken in a successful and sustainable way, it must include the necessary retail, leisure and service uses to support the major commercial and residential components. Again on the basis that the retail components are ancillary to the other major elements of the scheme it is not accepted that these do give rise to the policy conflicts which Grosvenor seek to suggest.
- 3.4 Whilst it is accepted that the Wirral Waters SRF is a non statutory document it should be noted that it has been the subject of very extensive consultation with stakeholders and local communities at all stages of its preparation and that it commands strong local support.

- 3.5 Grosvenor's concerns with regard to PPS4 have now been dealt with by the submission of the Supplementary Retail, Office and Leisure Statement. As stated in Section 2 above it is not a correct approach to treat the retail component as a stand alone retail scheme or to treat East Float as retail led development when dealing with the PPS4 policies and sequential test. On the specific point on Policy EC3 (page 6 of Grosvenor's letter) we do not consider that the reference made is pertinent to this case. It would clearly not be appropriate to propose the development of over 13,000 new dwellings and over 400,000 sq m of office/commercial floorspace without making provision for retail and other services. The retail is therefore an essential component of the mixed use scheme and is not being justified because some housing development is proposed. Also relevant however is that Policy EC3 also states that the designation of new centres should be prioritised in areas with significant levels of deprivation. There are very few areas with greater levels of multiple deprivation than Inner Wirral and, although Peel is not seeking the designation of a new centre, they are seeking to ensure that there is proper provision in place to make East Float a sustainable community from the outset and is very likely that this provision will also benefit local people in the existing deprived communities close to the East Float site.
- 3.6 It is acknowledged that the comparison retailing component has the potential to divert some expenditure that might otherwise have been spent in existing centres including Liverpool City Centre. However the large majority of this will be spent by people working or studying in East Float or who are visiting for another primary purpose other than shopping. For example there are 40,000 people who currently commute out of the Wirral everyday to go to work and many of these will no doubt undertake some shopping their lunch break or after work. The East Float proposals will create opportunities for many of these to work closer to home and their work related spending would then be retained in the Wirral. However the shops and stores affected by such diversion would be many in number and be widely spread (including Liverpool, Chester, Bootle, Manchester and others). As a consequence is highly unlikely that the development will have any significant effect on existing retailing patterns as Grosvenor suggests.
- 3.7 The application does not propose 60,000 sq m of comparison floorspace; this is capped at 18,000 sq m. Hence Grosvenor's fears with regard to its impact and effect on trading patterns are misinformed and unfounded.

#### **4. Universities Superannuation Scheme Ltd**

- 4.1 USS Ltd's main concern seems to be that the phasing of the retail development should be controlled and these controls should be transparent. These controls will be both in place and fully transparent by means of the conditions which have been discussed and agreed with officers. In our view there is no need for any legal agreement since adequate controls can be secured by means of conditions. Wirral Council have been independently advised by Counsel in relation to the scope and form of these conditions to ensure that they will provide the necessary level of control. Peel has no objection to USS Ltd making comment on the proposed conditions prior to the officers reporting the application to Committee.

BELFAST	028 9089 7400
BIRMINGHAM	0121 233 0902
BRISTOL	0117 989 7000
EDINBURGH	0131 557 1099
GLASGOW	0141 248 9233
LEEDS	0113 386 3800
LONDON	020 7851 4010
MANCHESTER	0161 831 1300
SOUTHAMPTON	023 8072 4888

[www.turleyassociates.co.uk](http://www.turleyassociates.co.uk)

**TURLEYASSOCIATES**