



Wirral Waters

East Float Outline Planning Application

Regeneration & Planning Supplementary Statement

June 2010

PEEL LAND & PROPERTY (PORTS) LTD

EAST FLOAT PLANNING APPLICATION

**REGENERATION & PLANNING
SUPPLEMENTARY STATEMENT**

JUNE 2010

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1. Introduction

- 1.1 This Regeneration and Planning Supplementary Statement (RPSS) has been prepared by Turley Associates on behalf of Peel Land & Property (Ports) Ltd (hereafter 'Peel') as additional information to be considered in respect of the current outline planning application for the redevelopment of East Float, Wirral Waters (application ref. W/OUT/2009/06509), hereafter referred to as 'the application'.
- 1.2 The RPSS follows the submission of the application in December 2009 and the receipt of feedback from Wirral Council (hereafter 'the Council') and a number of other parties, including neighbouring local authorities who have been consulted on the application and with whom the Council and Peel and/or their advisors have held meetings and exchanged additional information with since the submission of the application.
- 1.3 The two core objectives of the RPSS are as follows:
- To bring together and to summarise the key planning and regeneration issues (set out in the December submission in the Guiding Principles documents, the Regeneration Statement and Planning Statement) relating to the proposals in a single place so as to allow the Council and others to see the overall position in a single document.
 - To provide additional information in respect of:
 - how the scheme is envisaged to come forward;
 - what markets will be attracted and how; and
 - the economic and social case for, and potential impacts of, the proposals.
- 1.4 The latter is principally contained in three other reports and is summarised in this RPSS, as follows:
- **Retail, Leisure & Office Statement Addendum** (May 2010) by Turley Associates. This document addresses the government's new policy on sustainable economic development, PPS4, sets out the findings and implications of the Wirral Council Retail and Leisure Study 2009 (by Roger Tyme & Partners) and responds to queries and requests by Wirral Council in respect of retail and town centre policy issues.

- Office Market Report by CBRE (May 2010) (this to be read in conjunction with the 'Markets & Futures' and 'Enterprise' Guiding Principles documents); and
 - Economic Impact Assessment (May 2010) by Regeneris Consulting.
- 1.5 The **RPSS and should be read in conjunction with these documents** by parties seeking to understand why the East Float proposals have been submitted in the form they have, why it is imperative that they are progressed in a timely manner and how concerns relating to potential economic, social, spatial and procedural impacts have been or can be addressed.
- 1.6 The RPSS and its appendices also need to be read alongside the key documents which have informed them. These are cross-referenced within this statement and relevant extracts are drawn out where necessary. These key documents are:
- *East Float Regeneration Statement*, by Turley Associates and Regeneris Consulting, December 2009;
 - *East Float Planning Statement*, by Turley Associates, December 2009;
 - *East Float Retail, Leisure and Office Statement*, by Turley Associates, December 2009;
 - *Wirral Waters Vision Statement by Turley Associates and Martin Stockley Associates, May 2010*
 - *Wirral Waters Guiding Principles for Markets & Futures*, by Turley Associates, Regeneris Consulting & CBRE, December 2009;
 - *Wirral Waters Guiding Principles for Enterprise*, by Regeneris Consulting, December 2009;
 - *'Development Markets' and 'Catalysts for Change' sections of the Wirral Waters Baseline Study*, prepared by Turley Associates and Regeneris Consulting, July 2008.
- 1.7 In addition to the above, it is pertinent that the East Float proposals have been the subject of ongoing consultation between Peel, the Council and a range of local and regional partners for over 3 years. During this time, considerable progress has been made in engendering support for Peel's aspirations, including the designation of Wirral Waters as a Growth Point and Strategic Regional Site. The extent of consultation undertaken by Peel is reflected in the *Wirral Waters Guiding Principles for Consultation & Engagement*.

- 1.8 The RPSS brings into play a consideration of cumulative issues relating to the East Float / Wirral Waters proposals combined with Peel's proposals across the River Mersey for 'Liverpool Waters', a major mixed-use proposal of similar scale and ambition to East Float.
- 1.9 A number of comments have been received from the Council in relation to supporting documents submitted with the East Float planning application. The RPSS seeks to address these comments, which have been the subject of recent meetings between the applicant, the Council and other parties.
- 1.10 The remaining sections of the RPSS are structured around four key questions:
- Section 2 considers **why 'East Float'?** - addressing questions about the location, scale and manner in which the proposals are being brought forward;
 - Section 3 outlines **how the development will be brought forward** and how different markets will be attracted via Peel's lead role and its partnership working with the public sector and local community;
 - Section 4 provides an **analysis of potential social, economic, spatial and procedural impacts** of the East Float proposals;
 - Section 5 draws upon the preceding sections to consider the **implications for managing delivery**, to ensure that the proposals are brought forward in a holistic, sustainable manner that avoids unintended impacts and consequences.

2. Why 'East Float'?

2.1 Owing to the scale and ambition of the East Float proposals, the question "why?" has been raised from a number of different perspectives:

- Why here; what is the economic regeneration case for major private sector led investment in this location?
- Why are the proposals so strategic in their presentation and why do they not contain a detailed first phase or a firm commitment to a detailed phasing programme?
- Why this scale of development of the different land uses, and why over a 30-40 year time horizon?
- Why now and why via a planning application?

2.2 These questions form the structure of the remainder of section 2.

Why here?

Strategic policy fit – at all levels, across all agendas

PPS1 and PPS3

2.3 Creating sustainable, mixed communities where people want to and can afford to live and prioritising the reuse of previously developed land in accessible areas are key objectives of PPS1 and PPS3. The proposed development at East Float promotes a highly sustainable pattern of development as it is located within the inner urban area of the Liverpool City Region and entirely on previously developed land in accordance with these objectives.

2.4 The development has an important role to play in growing a more balanced and sustainable community in Inner Wirral by increasing economic activity rates amongst the existing local communities, attracting economically active in- migration and creating a better balance of housing types to encourage and support these changes, so providing the ingredients required for a successful sustainable community. Wirral Waters will grow and sustain a housing and community offer that people want to live in, that works effectively, and that integrates with existing communities, providing leisure and employment opportunities for all.

PPS4

- 2.5 PPS4 sets out the government's key objectives for prosperous economies which include improving the economic performance of cities, towns, regions, sub-regions and local areas; reducing the gap in economic growth rates between regions; promoting regeneration; and tackling deprivation. East Float will play a key role in meeting these objectives in the context of Inner Wirral, the Liverpool City Region and the wider North West.
- 2.6 This will be achieved by means of Wirral Waters delivering a step change in the economic performance of Inner Wirral and the Liverpool City Region, by providing a wide variety of economic growth-generating development and employment opportunities for all and raising the economic profile of this deprived area of Inner Wirral. Thus the proposals will embrace the principle of marrying opportunity with need. A full assessment of the proposals against PPS4, in particular policies relating to main town centre uses, is included in the Retail, Leisure & Office Addendum.

RSS

- 2.7 At the regional level, East Float lies within the Inner Area of the Liverpool City Region as defined by RSS. Policy LCR2 of RSS gives the Inner Area the highest priority for the development of new housing to provide for a significant increase in housing where it can support the regeneration and the growth of the Liverpool Regional Centre. A key aim of this strategy is to reverse past decades of declining population within and the 'hollowing out' of the inner urban area of the City Region; East Float will make a significant contribution to achieving these objectives.
- 2.8 The annual housing requirement for the Borough as established by RSS has been progressively and significantly increased. The previous RSS (RPG13) required an average of 160 dwellings per annum (dpa). The final version of RSS adopted in September 2008 requires the provision of 500 dpa net of clearance within Wirral. Subsequently the inner areas of Liverpool and Wirral have been designated as Growth Point areas. The 'Mersey Heartlands New Growth Point' initiative, which was predicated on the Wirral Waters opportunity, means that both Liverpool and Wirral Councils are required to plan for an additional 20% housing growth, over and above the RSS requirement, from 2008/09 to 2016/17. This equates to a revised requirement for an average of 600 dwellings per annum in Wirral over this period.

- 2.9 RSS therefore requires the Inner Area of the City Region, within which East Float lies, to deliver significant levels of housing growth to 2021 and as such provides significant strategic support to the East Float proposals.
- 2.10 RSS Policy RDF1 also confers second priority in the region for development generally, including economic development, to the inner areas and HMRI. This means that Wirral Waters is secondary only to the Regional Centres of Manchester and Liverpool in regional terms in respect of priority for economic investment and development. Hence it is important that East Float does not undermine the primacy of the Regional Centres in terms of economic development. This requirement is achieved through the market positioning of East Float and will be managed through the delivery and implementation process, to allow East Float to complement and, ultimately, serve as a long term expansion of the Regional Centre, in the same way that Salford Quays has now been recognised in RSS and other policy as a functional part of an expanded Regional Centre for the Manchester City Region.
- 2.11 Although the new Coalition Government has confirmed that RSS is to be abolished, it is an important policy consideration and part of the statutory development plan until its abolition. It is important to bear in mind that the housing provision and spatial priorities of RSS were supported by Wirral Council and City Region partners through the RSS process; i.e. these were not imposed upon them by central Government.

Birkenhead Docks Strategic Regional Site

- 2.12 In consultation with 4NW, GONW, sub-regional and local partners, the NWDA has undertaken a review of Strategic Regional Sites resulting in the designation of 35 such sites. The overriding purpose of Strategic Regional Sites is to give a clear sense of strategic priorities and direction to all public and private sector partners.
- 2.13 Sites are designated as Strategic Regional Sites (SRS) on the basis of their ability to support economic growth and economic restructuring across the region, to provide attractive opportunities for future investment, to encourage the development of knowledge based industry within areas of regeneration, and to build on the region's existing cluster of knowledge based activity.
- 2.14 Birkenhead Docks, incorporating East Float, has been designated as one of the 35 strategic regional sites, reflecting the scale of opportunity it provides to achieve the above objectives. The SRS "pen portrait" for Birkenhead Docks (East Float) states that the opportunity here is to:

- Promote a mix of uses including housing, knowledge-based and port related development in a highly accessible and exceptional waterside environment;
- Provide for significant inward investment opportunities;
- Restructure areas adjacent to the dock estate;
- Assist in facilitating the economic restructuring of parts of the inner area surrounding Merseyside's regional centre; and
- Bring back into use derelict and under-used land.

2.15 The scale and significance of the opportunity that the vacant and underused land at Birkenhead Docks provides and the important role that its development can play in meeting regional priorities for economic development and new housing provision to support this, are both fully reflected in this strategic site designation. The East Float proposals which are put forward in the application will ensure the area's full potential in respect of the above opportunities is realised.

Mersey Heartlands New Growth Point

2.16 As set out above, Wirral and Liverpool Council, alongside Peel Holdings, have entered into a partnership with the Government to deliver additional levels of housing growth between 2008/09 and 2016/17 through the Mersey Heartlands New Growth Point initiative. This requires Wirral to plan for the provision of 600 dwellings per annum between these years, a 20% increase on the RSS figure.

2.17 The boundary of the Growth Point area reflects the HMRI area, namely Inner Wirral and Inner Liverpool, including East Float. The Growth Point seeks to deliver housing growth alongside regeneration. East Float is fundamental to the Growth Point initiative in Wirral. The scale and form of development reflects the priority given to Inner Wirral as the focus for economic and housing growth and the additional emphasis the area is afforded in this regard through the Mersey Heartlands New Growth Point.

New Heartlands Housing Market Renewal Initiative (HMRI)

2.18 East Float is wholly contained within the New Heartlands Housing Market Renewal Initiative (HMRI) area which is characterised by low cost/low value, small terraced housing in Council Tax Bands A and B. Key priorities of the HMRI include:

- Improving the economic performance of the area and increasing local incomes;

- Widening housing choice;
- Reducing the proportion of properties in the lower Council Tax Bands (A and B) and increasing that in Tax Bands C & D; and
- Reducing the level and proportion of social and private rented accommodation, and promoting greater owner occupation under different tenure models and housing types

2.19 These objectives are entirely consistent with the East Float proposals which will complement other HMRI activities in the area. There are significant funding limitations in delivering these objectives within Inner Wirral and it is clear that additional major public and private sector funding will be required, with the majority of HMRI funding being directed towards Tranmere and Rock Ferry.

2.20 East Float represents a significant opportunity to meet the above objectives through the provision of a range of high quality new housing providing housing opportunities for all, with associated employment provision. East Float will deliver transformational changes to the local housing market, raising the quality and value of the area's housing stock and paving the way for further private investment in surrounding areas.

RS2010 and Atlantic Gateway

2.21 Draft Part 1 of RS2010, the new Integrated Regional Strategy for the Northwest, was published for consultation in January 2010. Whilst at an early stage of production, this sets out some of the key principles and objectives which will underpin RS2010 as it is advanced.

2.22 East Float embraces the early development and growth principles set out within Draft Part 1 of RS2010. These include several of its key strands, namely:

- Build on our sources of international competitive advantage and regional distinctiveness
- Release the potential of our people and tackle poverty
- Ensure the right housing and infrastructure

2.23 East Float will provide an integrated, mixed use development opportunity which will help stimulate and diversify the local and sub-regional economy. It will involve the creation of a new business quarter which will attract major commercial occupiers, using its unique and attractive waterside setting to provide high quality and diverse

business space to support the City Region's key growth sectors. It will secure a range of employment opportunities for surrounding communities in an area of high deprivation and provide high quality housing required to support and underpin the City Region's economic growth.

- 2.24 East Float also forms an important part of the Atlantic Gateway proposals which Draft Part 1 of RS2010 identifies as a major opportunity. In view of its location at the mouth of the Mersey, Wirral Waters is of strategic importance to the realisation of the Atlantic Gateway opportunity and is central to the proposals to create an economic corridor of international significance between Liverpool and Manchester.
- 2.25 The recently published Atlantic Gateway Framework, endorsed by Wirral Council, GONW, NWDA and others, including Liverpool City Council and other City Region partners, identifies Wirral Waters as a key priority for action. It is recognised within the Framework that local partners need to work in partnership across boundaries to achieve sustainable patterns of growth and investment.
- 2.26 Although the Coalition Government does not intend to continue with 'statutory planning' at the regional level, it is important to recognise that partners in the North West have committed to the further development of RS2010 (4NW/NWDA, 2010). As such it is likely that both Atlantic Gateway and RS2010 will continue to provide an informal policy framework for Wirral Waters.

Liverpool City Region

- 2.27 The Liverpool City Region is one of eight city-regions identified across the Northern Way area as the most appropriate economic entities on which Northern Way policy should be implemented. The Vision set out in the *Liverpool City Region Development Programme* (CRDP) is to:

'regain our status as a premier European City Region. By 2025 we will secure an internationally competitive economy and cultural offer and outstanding quality of life; with vibrant communities contributing to and sharing in sustainable wealth creation'.

- 2.28 In order to achieve this Vision, five strategic priorities have been identified including a creative and competitive region, a talented and able City Region, a well-connected City Region, sustainable communities and a premier destination centre.
- 2.29 Wirral Waters is one of the few major development opportunities at the heart of the City Region that is capable of satisfying a number of the aspirations, particularly in terms of securing a competitive City Region able to secure inward investment and

driving a change in the economic base of the City Region. This role is acknowledged in the 2006 update of the Liverpool CRDP, which reflects the Wirral Waters Initial Vision and clearly supports the physical business infrastructure opportunity.

- 2.30 A series of research and policy papers which assess the potential positive impact of developing stronger and more complementary economic relationships between towns and cities in the north of England were published in November 2009. The *City Relationships* series includes a paper on the Liverpool City Region.
- 2.31 The paper identifies that Wirral currently has to rely on Liverpool for employment and wealth creation. Within this context, the paper identifies that Wirral is pursuing a strategy for its future which seeks to reduce this reliance and to develop Wirral as an economic destination in its own right, based around developing east Wirral as an extension of Liverpool City Centre, principally through the proposals at Wirral Waters.
- 2.32 City Relationships identifies that without such transformational change, Wirral will continue to be dependent on Liverpool, with west Wirral providing affluent commuter suburbs to serve Liverpool and with east Wirral devoid of a clear role and sustainable economy.
- 2.33 The paper supports a policy approach based around developing the role of Liverpool's neighbouring authorities which complements the City Centre and accommodates industries which are not suited to a City Centre setting. In this context, the paper identifies that Wirral should work with Liverpool to focus on strategic sites for investment and development.
- 2.34 The policy conclusions of the paper provide clear strategic support to the Wirral Waters proposals in delivering a step-change in the role of Wirral from one of dependency on Liverpool, and specifically the City Centre and ensuring the growth of East Wirral complements the continued growth of Liverpool and its City Centre.

Wirral Unitary Development Plan and Local Development Framework

- 2.35 The Wirral Unitary Development Plan was adopted in 2000 and, along with RSS, remains the statutory development plan for the East Float area. The UDP predates the Wirral Waters proposals and was adopted at a time when the application site was in operational dock use. It also predates current RSS, the Mersey Heartlands New Growth Point Initiative and the HMRI initiative, all of which have altered the spatial strategy for the Borough.

- 2.36 Notwithstanding this, policy URN1 sets out the guiding principles which underpin the UDP and these fully support the East Float proposals. These principles include prioritising the effective use of neglected, unused or derelict land and buildings within the urban area; the East Float proposals are consistent with these principles. Indeed, the alternative to Wirral Waters is that Wirral's housing and employment requirements will need to be located elsewhere, in a less sustainable and lower priority location. Hence Wirral Waters is key to delivering the UDP's spatial approach to urban regeneration and resisting a less sustainable pattern of development which the UDP does not allow.
- 2.37 The LDF remains at an early stage of production but consultation on the Core Strategy Spatial Options has recently been carried out. This confirms, in draft Policy BS01, 'Focused Regeneration', which seeks to direct the majority of new development to the defined inner area and generally resist development outside of this area, as the likely Preferred Option for the Borough. The East Float proposals are entirely consistent with this emerging option as they are located entirely within the inner area. The consultation document references Wirral Waters, East Float and Birkenhead Docks as a major development opportunity within the Borough; again these references in the emerging Core Strategy are fully consistent with the application proposals.

Conclusion on planning policy & the development plan

- 2.38 Overall, the broad principle of the proposals is considered to be fully supported by existing and emerging planning policy and the development plan strategy for the area. Two main issues identified in the Planning Statement are addressed through the package of proposals put forward; namely dealing with the port safeguarding policy (RT6 of RSS, addressed in the Planning Statement and Guiding Principles – Port) and the likely impact on existing centres (addressed in this Statement, its Appendices, the Planning Statement and the Retail, Leisure & Office Statement).
- 2.39 A comprehensive review of planning policy can be found in the East Float Planning Statement (December 2009).

Responding to deep rooted, widespread and worsening social, economic and environmental conditions

Economic and Social Conditions

- 2.40 The Economic Impact Assessment by Regeneris Consulting identifies a range of social and economic indicators that demonstrate the scale of the challenge facing inner Wirral. In very broad terms, Wirral as a Borough is highly polarised, with the west exhibiting affluent and attractive suburbs, whilst in the east there are structural and deep rooted economic and social problems. The East Float site sits within the heart of the most deprived part of east/inner Wirral.
- 2.41 A vast range of analysis and studies have been undertaken by Wirral Council and other public sector organisations charting the challenges facing inner Wirral. Peel Holdings captured its understanding of the position in the Wirral Waters Baseline Study (July 2008). The East Float Economic Impact Assessment builds upon this work and is informed by a number of other studies undertaken by Peel.
- 2.42 The overall position is that inner Wirral is currently an ‘unsustainable’ place. It has been losing both population and economic activity for many decades. In social terms there are high levels of multiple deprivation and a major dependency on welfare and benefits. In economic terms there is a major GVA gap, an enterprise and entrepreneurial gap, a low business base and density and a poor investment profile. Although other parts of the North West and Merseyside have been regenerated and seen major public and private investment in recent years, such activity has largely not occurred in inner Wirral. This combination of factors makes inner Wirral one of the most extreme areas of social and economic failure in the UK.
- 2.43 The scale of the challenge facing inner Wirral is immense, particularly in the context of reduced public funding and challenging economic times. The need for major private investment could not be more striking.

Environmental and Physical Conditions

- 2.44 The Peel team has undertaken comprehensive urban design and environmental analysis of the Wirral Waters area. This was initially through the Wirral Waters Baseline Study (July 2008) and more recently through the Vision Statement, Guiding Principles documents (in particular Landscape, Waterfront & Public Realm) and the East Float planning application documents. Two Environmental Impact Assessments have been undertaken at Wirral Waters to date, firstly for the

Northbank East proposals and more recently for the East Float planning application. Key conclusions relating to the local environment and physical characteristics are set out below.

- 2.45 East Float is set within extensive weak character areas, with little or no 'sense of place'. Long-held, embedded perceptions of Inner Wirral are grounded in the poor quality employment neighbourhoods forming the 'central industrial belt' running along the Birkenhead Dock system from Bidston Moss to the River Mersey City Reaches. Beyond the immediate surrounds, the more established neighbourhoods and landscape features define stronger, more consistent character areas, each with their own special qualities and 'sense of place'.
- 2.46 The singularity of uses creates an employment land use 'zone', with little integration, response and transition into adjacent neighbourhoods and hubs. This dominance of this land use patterns is accentuated by the fragmented and interrupted street and building patterns, and the lack of any significant distinctive, high quality landscape or building elements and/or features.
- 2.47 Within the wider area however there are stronger assets, including Birkenhead Park, Hamilton Square and the coast and countryside setting of the Wirral Peninsula.
- 2.48 Wirral Waters will respond positively to these environmental and physical challenges by creating a new urban fabric to transform the local environment and knit the industrial belt back into the wider, more stable and attractive Wirral setting. This will be achieved by creating a new, ambitious character and positive identity as a focus for the regeneration of Inner Wirral. The degree of change will need to be transformational – on a scale capable of shifting embedded perceptions of the locality as a poor quality, low value, and deprived environment. The inherent nature and scale of the Great Floats as an 'inland waterway' provides the opportunity to establish a stunning landscape setting, capable of 'filling the void' between the West Wirral peninsula' and River Mersey City Reaches and changing perceptions of the quality and consistency of the east Wirral landscape.
- 2.49 East Float in particular is ideally placed to redress the dominance and separation caused by the extensive 'central industrial belt' neighbourhoods across Inner Wirral. The scale, central location and continuity of the 'Great Floats' provides a focus for the creation of a greater diversity of uses, development patterns and forms, new character areas, activities and identities. Any opportunities considered will need to be of a scale and impact capable of overcoming long-held perceptions of the industrial neighbourhoods, and counterbalancing the dominance of the industrial belt.

2.50 In addressing the current fragmentation of the urban area, Wirral Waters is ideally placed to strengthen strategic connections between the northern neighbourhoods and Birkenhead Town Centre, Hamilton Square and Woodside. The existing crossing points and routes provide the appropriate framework to develop clearer, safer and more active connections through a more diverse range of uses and higher quality building and public realm environment. More locally, the central gridiron of the Laird Town Plan is well placed to provide connections between Birkenhead Town Centre and the Great Floats. Europa Boulevard provides the starting point for creating a choice of clear, safe, attractive north-south connections.

Delivering regeneration through private sector led investment

2.51 During the 1980s and early 1990s, Inner Wirral, along with most urban areas in Merseyside and the North of England, experienced a sustained decline in traditional industries. The urban decay that had begun to appear in the post-war period manifested itself in well documented structural economic, social and environmental problems.

2.52 As the need for urban regeneration climbed the political agenda in the early 1990s, change started to occur through the Inner Area Programme and the designation of the Merseyside Urban Development Area which was later extended in 1988. The City Challenge programme, which introduced the City Lands project to Inner Wirral, also ran from 1992 to 1997 and started the process of revitalising Wirral Docklands, Central Birkenhead and parts of Wallasey. New investment in offices, retail and leisure developments was supported by major environmental improvements, and new bus and rail stations. The Europa Boulevard area and Conway Park railway station were the key schemes delivered. City Challenge invested £37.5 million, which attracted private investment of £101 million and further public sector investment of £80 million. The Merseyside UDC was instrumental in securing the regeneration of the Egerton dock area and MDHC's multi million pound investment in the Twelve Quays ferry terminal. The UDC was wound up in 1998.

2.53 Through the 1990s, a number of other initiatives followed under the Single Regeneration Budget (SRB), to further aid the recovery of Inner Wirral. This culminated when the extent of structural economic problems in Merseyside, (calculated as producing less than 75% average GDP), provided entitlement to the European Union's highest level of funding for urban areas, the Objective One Programme.

2.54 The first Objective One Programme for Merseyside ran from 1994-2000. Although some initial improvements in the economy were delivered, Merseyside qualified for a further stage of Objective One funding for 2000-2007. The final period 2007-2013 is now underway and funding commitments are required to be front loaded.

2.55 Table 1 below provides a summary of programmes and initiatives which, in approximate chronological order, have taken place in Wirral over the past 10-12 years.

Table 1: Major Regeneration Initiatives and Projects in Wirral to Date

Initiative	Description
Hamilton Quarter (SRB1)	A seven year programme to regenerate the historic area of Birkenhead. It began in 1995 and, through a Single Regeneration Budget (SRB) award of £15million, a further £67million of public and private sector funding was levered. The programme aimed to diversify the economy of the Hamilton Quarter, attract residents and visitors, and improve the image and perception of the area.
Regeneration Through People (SRB)	Another funded programme, launched in 1995 with an emphasis on people rather than infrastructure. The programme concerned the whole of the Wirral and offered opportunities to encourage the development of people into work. Funded by an initial award of £3.5million, at completion it was estimated that a further £9.9million had been levered.
Pathways Communities (Objective 1)	<p>Launched in 1995 under the first Objective One Programme, the Pathways focussed on thirteen communities in Wirral, identified through need by exhibiting levels of unemployment significantly higher than ward-level information. The programme encouraged locally determined activities and community economic development. During the course of funding, areas within the Wirral benefited from over £5 million of EU financial support.</p> <p>Areas in Wirral included Birkenhead Pathways, Seacombe/Poulton and Egremont, which are located around the Wirral Waters opportunity area. These broad areas then went on to become HMRI Neighbourhood Masterplan areas, highlighting that the problems in those areas are not new and have been in need of regeneration for some time.</p>
New Wallasey Regeneration (SRB3)	A six year project ended in 2003. The project was awarded £9.6 million of SRB funding, to encourage the regeneration of communities in New Wallasey. The focus was upon community involvement/benefit, the regeneration of New Brighton, the regeneration of Wallasey, Docklands, and the Twelve Quays site, business support, lifelong learning and environmental improvements, especially to Public Open Spaces. The SRB budget was estimated to lever in almost £60 million of public and private investment
NWDA Twelve Quays	The North West Development Agency designated the Twelve Quays site as a Strategic Regional Sites in 2001. Twelve Quays has benefited from a number of investments in recent years, most notably the Roll-on Roll-off Ferry Terminal. In 2004 NWDA commenced a study to consider further development/redevelopment of the remaining area around Scott's Quay. However the study was not taken forward and the RDA has subsequently scaled back its interest in the Scott's Quay.
Birkenhead Town Centre 20:20 Vision and Strategy	The 20:20 Vision and Strategy was drawn up as a succession strategy to ensure the continued regeneration of the area post SRB funding. Key themes were shopping, transport, leisure and tourist economy, cultural development and town centre environment. These themes concentrated on a "core area" plan for the town centre and four development zones. The four development zones were Woodside/Rose Brae/Shore Road, Railway Corridor/Conway Park, Hind Street and Claughton Road/Oliver Street.
New Wallasey Docklands Corridor	This Study was produced in August 2000 to focus delivery under one of the key themes of the New Wallasey SRB programme. Key objectives included creating a positive climate for investment and defining strategic investment opportunities; building upon the strength of the traditional dockland economy and the new opportunities related to the Ro-Ro ferry and

Regeneration Study	<p>development of Twelve Quays; attracting new commercial investment to the area to generate significant employment opportunities; and improving the environment to develop a distinctive character for this key corridor based upon its existing and potential commercial base.</p> <p>A number of key projects are set out in the Study, alongside a proposed funding strategy, although lack of major investment has limited the extent to which objectives have been delivered.</p>
Wirral Waterfront Strategic Investment Area (Objective 1 and SRB6)	<p>This funding programme is one of seven Strategic Investment Areas in Merseyside. It began in 2000 and is timetabled to run to 2008, by which time the Objective 1 monies must be allocated. The aim is to implement a comprehensive regeneration strategy for the Wirral Waterfront Strategic Investment Area (SIA) – see Figure 2.11 below. This incorporates 7 strategic objectives, which include community involvement, learning opportunities/employability and access to employment, encouraging entrepreneurship, healthier and safer environments, enhancing economic opportunities in strategic sites and promoting sustainable environmental renewal.</p> <p>Three programmes form the strategy, one of which is Programme C – The Wirral Employment Corridor. This stretches along the Mersey Waterfront from New Brighton to Eastham, and is identified as the economic heart of Wirral, representing the greatest opportunity for strengthening the local economy and increasing employment. A number of projects have been undertaken or are underway from the initial award of £20 million of SRB funding. This is expected to have levered investment of £125 million on completion in March 2008.</p> <p>One of the key beneficiaries of the Wirral Waterfront SIA is the successful project in the Seacombe Spaceport, which cost £8 million. It opened in 2005 adjacent to the new bus interchange at Seacombe ferry terminal.</p>
Housing Market Renewal Initiative	<p>The Government's initiative to improve areas of low housing demand operates across the inner areas of Liverpool, Wirral and Sefton.</p> <p>See commentary on HMRI Masterplann areas above and on "NewHeartlands" below under "Partners".</p>
Wirral International Business Park	<p>Wirral International Business Park (WIBP) is Wirral's major out of centre employment park. It is acknowledged by NWDA as being of regional scale and has created significant employment opportunities for the people of Wirral. It has a well established location and has benefited from public subsidies and significant private sector investments.</p> <p>it is of critical value to the Wirral economy. Located in the south of the Wirral Peninsula, its location and scale has meant that it has not been directly able to transform the inner areas of Birkenhead and Wallasey and will not be able to address the scale and nature of the challenge faced by these areas in the longer term.</p>
<p><i>Source: Wirral Waters Baseline Study, approved July 2008</i></p>	

- 2.56 Significant levels of investment and regeneration activity have also taken place or are committed within the wider Liverpool City Region. This includes the Mersey Waterfront Regional Park and Mersey Maritime Initiatives, the Port of Liverpool, the Mersey Gateway project, the development and expansion of Liverpool John Lennon Airport and the development of the Liverpool SuperPort concept, the Liverpool Waters proposals (which are part of a shared vision alongside Wirral Waters), Liverpool Kings Waterfront, Liverpool One, Lime Street Gateway, Pier Head/Mann Island and the Liverpool Commercial District.
- 2.57 Clearly much has been achieved through a mix of private and public sector funding over the last two decades. However, the amount of public funding available in the region is reducing and some funding streams are coming to an end. Public sector

finances are increasingly constrained at the EU, national and regional level. The ability to fund regeneration after the recent recession is severely constrained, although some limited opportunities remain. Wirral has not been immune to this pressure and as a Borough is expected to be required to deliver its key objectives, including regeneration initiatives, with a significantly reduced public sector budget.

- 2.58 The commitment to Wirral Waters by Peel is significant and Peel remains determined to deliver its vision despite challenging economic times. At the launch of the Vision (2006), Peel made 2 key points: that they would submit a planning application in 3 years time. They have followed this commitment up with an investment in resource to achieve that milestone. They also stated that they anticipated 3 recessions during the delivery of the project. In view of the changing economic context and the resultant impact on other regeneration proposals within Inner Wirral, Wirral Waters is more important than ever to the area's regeneration. Funding challenges will continue to limit what can be achieved in Inner Wirral without Wirral Waters and such funding will not provide an opportunity of this scale and significance to deliver the transformational change the area requires.
- 2.59 Whilst much good has been achieved, regeneration schemes delivered in Wirral have been on a relatively small scale compared to those elsewhere, reflecting the historic and continued public sector funding challenges the Borough faces. Wirral Waters represents the Borough's best (and potentially only) major transformational opportunity to deliver a regenerative step change for Wirral and one which has grown in importance and significance in the context of current and predicted future economic climate.
- 2.60 Peel has a long and proud history of investment in key regeneration projects within the region and sub-region. It is experienced in delivering important schemes and overcoming potential barriers to development projects to ensure that they are able to realise their economic and regeneration potential. Peel's key assets include the Port of Liverpool, Liverpool John Lennon Airport, Durham Tees Valley Airport, Robin Hood Airport Doncaster Sheffield, the Trafford Centre, the Manchester Ship Canal and substantial land holdings at Salford Quays into which it has continued to invest over a 25 year period.
- 2.61 Peel has a long term interest and stake in Wirral Waters and the Birkenhead Docks. It has a development division as well as its Port division. Both are key components within the Peel Group. Due to its extensive land holdings in the area it is important to Peel that Wirral Waters realises its true potential whilst ensuring growth of the port activity into the Mersey. Peel Land & Property is a property investor rather than a trader developer and, as with its other major schemes,

proposes to retain ownership and control in Wirral Waters throughout and beyond the long term build out period. Hence the value of that investment will be affected by what is happening in the surrounding area.

- 2.62 The commercial success of the scheme and its success as a catalyst for the regeneration of the wider inner Wirral area are inextricably linked: an improved physical environment and labour / skills infrastructure in the surrounding areas will increase the attractiveness of the area to inward investors and new employers. It is therefore mutually beneficial for stakeholders to use the 'catalyst' projects as vehicles for change and to ensure benefits are harnessed by the 'neighbourhood' quarters. Peel is therefore fully committed both to delivering its own proposals and in working with other partners to ensure that Wirral Waters is fully integrated with other programmes and projects in the surrounding area.

Why are the proposals not in detailed form?

Overview of the need for outline flexibility

- 2.63 The property markets (commercial and residential) have broadly collapsed in this part of Inner East Wirral. There is no 'market confidence' in any sectors of any significance. The local economy is in 'low-level equilibrium / decline' with a high dependency culture. Minor interventions, generally public sector driven, have not worked in stemming this decline. The 'do nothing option' will result in an acceleration of this decline, whilst 'the competition' gets better. There is therefore a need to start to rebuild, in a long term strategic manner, market confidence in the area. Peel recognised this need from the outset and this is why the strategic decision was taken to be very open from the start with Wirral Waters and to show with a high level of transparency about what it felt it could achieve (with help from stakeholders) during the launch of the Vision.
- 2.64 The East Float proposals will have a long term delivery period (estimated at 30-40 years). New markets need to be created which will be capable of attracting international and national occupiers to a holistic, highly sustainable destination which provides new forms of high density economic and residential development in Wirral. New occupiers, especially those 'early adopters', need the commitment and understanding that they will be part of something with critical mass, that will happen, that will be delivered by a competent developer, that has a robust delivery plan and has been designed in a truly integrated way. A 'piecemeal' approach does not fulfil these requirements and will not engender the scale of confidence needed to change the fortunes of Inner East Wirral.

- 2.65 The purpose of the East Float planning application is therefore to establish the planning basis for making that vision a reality. The consent is a major and critical step forward in creating that 'market confidence'. Working with regional bodies, it will lead to the 'branding and marketing' phase of the project (see the Office Market Report – May 2010).
- 2.66 It is not possible or appropriate to design aspects of the development in full detail at this outline stage given that neither the occupiers nor their specific needs are known. Furthermore, building design, architecture, engineering and technology will change many times during the delivery of the development. Designing in detail, individual buildings at this stage, is inappropriate and a waste of financial resource, especially currently, given financial constraints. Design quality is absolutely key however in creating 'a place of many places'. This is important to Peel, who recognise the need for quality, but also to the local authority and key stakeholders. Mechanisms for controlling design quality form part of the application conditions being discussed with the Council and others including CABE and ATLAS.
- 2.67 Wirral Waters therefore requires a long term and flexible planning approach to be taken if the scheme is to be as successful as it can possibly be in addressing the significant deprivation issues facing the area. However, the need to secure a planning permission for a substantial quantum of development which is predicted to take 30-40 years to implement raises a number of procedural issues in respect of the form and content of the planning application and of the level and extent of information that is necessary for the Local Planning Authority to consider and determine the application.
- 2.68 The key to a successful planning permission will lie in its ability to manage the overall parameters and principles of development whilst responding to evolving circumstances that influence the timing and format of detailed delivery. This will require that legal agreements and conditions are in place to cover a range of issues over the longer term, including environmental performance, affordable/special housing provision, and the delivery of the requisite infrastructure in line with the rate of built development.
- 2.69 Commercial investment decisions, particularly for those businesses or occupiers seeking newly built space, will be strongly influenced by the degree of certainty that the product they want will be delivered on time. Investors will normally accept that a bespoke building will take some time to deliver. Shortening this timetable helps certainty and improves competitiveness. For Wirral Waters it is vital that investment is not deterred and that the planning system operates with as much certainty and as little risk and delay as possible.

- 2.70 It is for this reason that relaxed planning regulation such as Enterprise Zones have been features of major regeneration areas over the past two decades. Under the changes made to the planning system in recent years, 'Local Development Orders' were proposed as a means of allowing certain forms of pre-approved development to occur. These are however untried on this scale and complexity of project and are considered high risk. The only real option is therefore to work with the existing system of outline planning and reserved matters, as best as possible.
- 2.71 A number of major projects, similar in scale to Wirral Waters, have been progressed through the planning application system elsewhere, mainly in London. Hence the application route offers a suitable option for creating the planning certainty which is required if the Wirral Waters proposals are to be brought to fruition as early as possible in order to start to address the severe and pressing problems of deprivation that exist in inner Wirral.
- 2.72 In light of the above Peel is seeking to minimise planning risk/delays, to maximise certainty and flexibility, and to create the necessary level of confidence in prospective funders, investors and occupiers by establishing an outline planning permission for the quantum and scale of development that will underpin the creation of a new business and residential location. This level of planning certainty will be necessary not only to reassure investors and occupiers but also, and most crucially, to unlock public and private finance, and allow both speculative and occupier-led investment to occur.
- 2.73 The submitted phasing proposals are shown as indicative at this stage and represent Peel's best estimate of the likely trajectory of development at Wirral Waters. This sets out how Peel envisages that the quantum of space will be brought forward given current understanding of the economic climate and the need to create confidence in a wholly new location for investment by business and residents. It does not however suggest a spatial phasing plan across the East Float site as there are several options for phasing (due to the specific nature of the site) and variables which can influence how and in what order the development will come forward, including issues of vacant possession, viability and occupier preference. This requires a flexible planning approach in response, with a commitment from Peel to provide a rolling and regularly updated phasing plan to reflect how it envisages the scheme will be delivered as and when the pattern of development emerges following the start of early wins. As set out above, in view of the scale and timescales associated with the development, it would be impossible and inappropriate to specify the phasing at this stage. However it is recognised that there is a need to include some performance milestones within the scope of the planning permission; these are discussed in section 5 below.

- 2.74 One of the key differences between Wirral Waters and most other comparable situations in the UK and abroad is that Wirral Waters is at a 'standing start'. It was conceived in 2005 and launched in 2006, long after identified comparable schemes had been taken forward through the various processes of planning, partnership/funding and delivery commencement. The 10 year period of buoyant economic conditions which preceded Wirral Waters had brought forward a great many major regeneration (including waterfront) schemes in the UK and Europe. This was during a period of Objective One funding for Merseyside. However, the opportunity to use Birkenhead Docklands as a transformational investment was not available at that time and only came about as a consequence of Peel's acquisition of the Mersey Docks and Harbour Company and its landholdings. As a privately-led regeneration initiative, arriving on the scene after most similar opportunities had not only been commenced but also had established some momentum and secured major public funding before the recession hit, Wirral Waters is a completely new and potentially unique proposition. Peel have taken time to learn lessons from other regeneration projects and these are borne out in both the process and design of Wirral Waters.
- 2.75 It is in part a reflection of Wirral Waters' status as a private-led investment that it is so dependent on achieving a flexible planning framework for a major quantum of development. The private sector must rely on certainty to inform funding commitments. Planning is a particular area of risk for the private sector.
- 2.76 Many public sector led initiatives on a similar scale tend to provide upfront investment in infrastructure and public realm, provide a policy and masterplanning framework but then allow individual projects to emerge on individual sites through a planning application, brought forward by public and/or private sector developers (or partnerships including both). In these cases the investment risk and development costs for the private sector is significantly reduced and a head start has already been made on the creation of the "new location" before the private sector partners come on board.
- 2.77 For these reasons the need for a strategic, facilitative, outline planning permission often does not exist in circumstances where the public sector is leading and funding the site preparation works. An example of this would be the way in which Liverpool Vision established its Strategic Regeneration Framework for the City Centre and then co-ordinated a number of individual projects. It is also the way that Central Salford URC has acted, albeit that the URC and its partners have recently secured outline permission for a major mixed-use expansion of part of the regional centre (the Salford Central scheme, which equates to about half the commercial content of East Float).

2.78 However these circumstances do not exist at Wirral Waters and the position here is that it is Peel, its funders and prospective occupiers who shoulder all the risk. Hence the need for planning certainty in order to create the necessary level of confidence in all of these parties to initiate that investment is all the greater. Also the fact that East Float is a single, relatively unconstrained site, held in single ownership, means that a major outline permission is the optimum route to secure that planning certainty whilst at the same time identifying the need for and putting in place the means to secure and 'flesh out' infrastructure requirements, planning obligations and other commitments.

Meeting the requirements of legislation and policy

2.79 In view of the above factors, the approach to the planning application has therefore been to achieve the maximum degree of flexibility possible, in order to use a flexible planning framework to attract and deliver private investment. Peel has at all stages been mindful of the requirements of planning and environmental legislation and policy in forming its approach to the East Float application. The proposals have specifically been designed to meet the following:

- Circular 01/06 and Statutory Instrument 2006-1062: in particular the information required for submission with outline planning applications.
- Environmental Impact Assessment Regulations: in particular the 'Rochdale' case law in respect of assessment the maximum/worst case and the recently amended regulations in respect of Reserved Matters submissions.

2.80 The proposals accord with the relevant legislation. Indeed, in many areas the proposals go considerably further than the basic level of information required. This is particularly so in terms of design parameters/principles where many aspects of the scheme have become fixed or committed where they might only be required to be indicated in legal terms.

2.81 Additionally, the Guiding Principles established for a wide range of regeneration and planning commitments have been the subject of considerable work over the past 3 years. This is explored more fully in section 5 below in terms of how these commitments and obligations can be tied to the permission. This work has been progressed as bespoke analysis for Wirral Waters informed by ongoing consultation and dialogue with the Council and others.

2.82 There is no legal requirement for the outline application to contain any more information than has been provided. It is therefore a planning judgement on

whether sufficient information exists to provide the legal framework for guiding and controlling the development over the course of its implementation.

Learning from planning precedents

2.83 In this regard there are a number of useful precedents from elsewhere in the UK. These include strategic outline planning applications for the following schemes:

- Brent Cross Cricklewood, London
- Barking Riverside, London
- Greenwich Peninsula, London
- Leith Docks, Edinburgh (note the requirements of the planning system are slightly different in Scotland)

2.84 Each has different aspects that are relevant to East Float. Further work is being done with ATLAS to consider the conditions and mechanisms for East Float and what approaches have been taken to managing similar issues. Some interesting general observations can be made from the analysis to date:

- Leith Docks is the most similar in terms of the scale, nature and purpose of the proposals, namely to facilitate a major private-led dockland redevelopment project that will shape areas around it and link them back to the existing (city) centre. It is a 25 year permission.
- Brent Cross appears the most similar in terms of the strategic approach taken to infrastructure, sustainability and environmental assessment, requiring feasibility studies to be undertaken for various types of infrastructure (transport, energy, waste, community) once the detailed phasing is further understood. Interestingly this scheme is more detailed than East Float due to the finer grain, more constrained, town centre/edge location. The approval also requires 'Explanatory Reports' to be undertaken at each reserved matters relating to a number of issues.
- Barking Riverside and Greenwich Peninsula are 19 and 20 year permissions respectively, and have similarly strategic approaches to many issues
- All of the precedents are in areas where there is less deep rooted social and economic failure than inner Wirral. They all have a stronger economic and social starting point. They have all benefitted from

significant public investment, albeit that the projects are principally private-led. It is therefore less challenging in these cases to know from the outset, with more precision, what type of investment will occur and when. The investment is less dependent on the flexibility of the permission.

- The sites are all regarded as being more constrained than East Float, be it in terms of infrastructure, heritage, land ownership, ecology, proximity to sensitive receptors (such as existing residents) or other factors. They are all much less of a 'blank canvass' than East Float (within the parameters/principles and commitments provided).

The outline approach required at East Float

- 2.85 The principle of a 20 -25 year planning permission is therefore already established in the examples considered above. The East Float proposals are such a scale and the likely timescale for build out of the proposals of such a long period that a similar timescale for bringing forward reserved matters and commencing all phases of development is entirely appropriate here. Building on the points that East Float is less constrained than some of these other examples and that the development will be wholly private sector led, it is appropriate also that a flexible approach be taken with regard to the East Float application. The application submission does not need to nor should it, be required to be more precise and definitive at the outset. Indeed to require a detailed masterplan or more detailed phasing proposals to form part of what is being approved at this stage would risk undermining the investment potential, would certainly require abortive work which would later need changing and would form an inaccurate and potentially misleading basis on which to make a decision at outline stage.
- 2.86 Providing detailed solutions and committing to them, for aspects of the scheme that are clearly going to be affected by changes in circumstance over the next 25 years (in the context of a 22 year period for phased Reserved Matters plus 3 years to commence the last phases or implementation), is felt to be the wrong basis for decision making. Instead, a strategic approach, which outlines parameters, principles, commitments, obligations and the mechanics of how detailed issues will be resolved through the implementation process, is considered to be more appropriate.
- 2.87 East Float is an exceptional opportunity. It is perhaps unique in the North West region, in terms of the scale and unconstrained nature of the site, the scale of the vision, the single ownership, the commitment of the developer, the deep rooted

regeneration need, the approach to delivery and the need for flexibility. It therefore requires an exceptional approach, within the framework of the planning system.

Considering East Float alongside Northbank East and the Hydraulic Tower

- 2.88 Although the case for the strategic approach to the East Float outline application is clear, the above points are to some extent a distortion of the overall situation at East Float, since Peel has put forward more detailed proposals for those parts of the East Float development which perhaps are most likely to be developed first. Planning permission and listed building consent have been granted for the conversion / development of Hydraulic Tower, to create a new restaurant and hotel. Peel has also discussed plans with the Council for an alternative proposal for an office rather than a leisure use of that site. In addition Peel has secured resolutions to grant planning permission from Wirral Council for two planning applications at the Northbank East quarter of East Float, one of which is a full detailed planning permission.
- 2.89 These applications include a first detailed phase of residential development with a small supermarket, and a larger outline planning application for further residential development, commercial, leisure and retail. Both of these schemes form key parts of the wider East Float district and, hence, there is already a greater degree of certainty about what are likely to be the early phases of the East Float development in the wider sense.
- 2.90 These early and more detailed elements of the scheme fall outside of the scope of the current East Float application although the Hydraulic Tower site is within the red line of the current application to enable an alternative scheme to that which has already been approved to be brought forward if there is felt to be an operator demand for this. Had they been part of the wider East Float application, there would have been a clearer story for the 'red edge site' in terms of delivery, given that the Northbank East and Hydraulic Tower sites remain the most logical and obvious places for development to commence (due to their vacant possession, proximity to the existing grain warehouses, which has already seen the emergence of a new community, and the need to convert a listed building at risk). The approach taken to Northbank East is reflected in section 3 below, in considering how the development is likely to be brought about through a mixed-use place-making approach.
- 2.91 The reason why part of Northbank East and Hydraulic Tower were detailed in nature was, principally, due to them being adjacent to the 2 listed buildings within

East Float i.e. the East Float, Corn warehouses on Dock Road and the Hydraulic Tower itself.

- 2.92 The rationale for seeking these early permissions was that Peel could be on-site and would physically have commenced delivery of the development before the major East Float scheme was brought forward. The recession and the corresponding squeeze on cash have meant that development has not yet commenced. There remains a 'viability gap' for these early projects evidenced by the confidential financial appraisal undertaken for the detailed Northbank East plot 1 which proved that Peel would make a significant loss by building that plot in the current market conditions. Peel did recognise that the earliest phases would prove to be challenging to commence and different funding / financing routes are being explored.
- 2.93 Inevitably, the unforeseen scale of the economic challenge over the past 2 years means that Peel has not yet been able to commence construction activity. However it has meant that resources have been focussed on masterplanning design work in order to maximise the potential of the project. It also has a benefit in that Peel can use the time to secure the necessary consents, commence marketing / branding and position themselves ready for delivery once the financial and market situation improves.
- 2.94 This lack of 'delivery' has led to questions over Peel's commitment to Wirral Waters and over Peel's purpose in seeking a major outline permission for East Float at this stage. However, Peel considers that its ongoing investment in planning and design for the remainder of East Float is entirely the right approach to have taken during and emerging from the recession, to put a robust framework in place, to further engender public sector support, ready to capture investment once the recovery is underway. For evidence of Peel's local and significant delivery, Peel took senior officers and Members of the Council to MediaCity:UK to see at first hand the level of commitment that is being invested in the delivery of that major development.

Why this scale of development, and why over 30-40 years?

Vision and Starting Point

- 2.95 The starting point of the vision for East Float is that it needs to be large enough to:
- **Create a 'place'**, with sufficient amounts of different activities (living, working, playing etc) attracted to the area, contributing to a vibrant and attractive new city neighbourhood in its own right. This means that the

proposal must provide a significant quantum for both living and working, plus a range of supporting activities. Housing and economic led development is supported by planning policy and hence is an appropriate starting point. However this will only happen if the proposals are sufficiently ambitious and visionary so as to transform the deep rooted perceptions of inner Wirral as a place of economic decline and social deprivation.

- Create **sufficient critical mass** to bring significant social, economic and environmental regeneration impacts, most notably in surrounding neighbourhoods, but also across inner Wirral as a whole and the wider City Region. This should be on a scale that will have meaningful, long lasting impacts in terms of transforming the local area, to ensure that inner Wirral becomes a place where businesses and individuals invest and grow (rather than leave or decline), in a transformed physical environment.

2.96 The housing element at East Float needs to be of sufficient critical mass to support the economic regeneration and growth of the area. This means providing enough of the right quality of housing that will be attractive to skilled, economically active individuals and their families. Such housing needs to be set within a quality environment that overcomes negative perceptions and concerns about the area, hence reinforcing the need for major change rather than a small scale or piecemeal approach.

2.97 A number of potentially different strategies for taking forward the housing element of Wirral Waters have been considered. These are explored fully in the Guiding Principles for Housing, and are set out below:

- No or little housing;
- Housing-led;
- Prioritisation of affordable housing;
- Commercial, Housing and Place Making led.

2.98 The latter is the overall approach adopted, supported by a significant cultural and educational emphasis. The reasons for this relate to the need to re-establish inner Wirral as a housing growth location through attracting new economically active residents to live and work in the area, whilst at the same time providing the catalyst to achieve regeneration through economic investment in inner Wirral. Repopulating the inner area is a strategic priority for the region and for Wirral. Not only is this the

most sustainable form of development, but it will allow Wirral to meet its housing needs without having to deploy less sustainable patterns of development, for example requiring significant encroachment into the Green Belt or other greenfield areas.

2.99 Housing density, type and tenure options have also been considered in the Guiding Principles for Housing which makes clear Peel's intention to provide a range of housing typologies to ensure a mixed community. However, at this stage, it is necessary only to provide an overall commitment to achieving high density, high quality housing that is fit for occupation by a range of social groups, using a range of tenures and ownership models. The precise details of this provision in each phase of development can be the subject of more detailed assessment work at the detailed design stage for each reserved matters application package.

The overall quantum of development

2.100 In light of the preceding factors, a major scale, mixed-use approach to Wirral Waters is therefore appropriate. The key issue is the scale of development proposed, particularly at East Float and Peel recognises that the headline figures for the quantum of development included in a single outline planning application are large. They are comparable only with some of the largest projects, including some of those referred to above.

2.101 In its simplest terms, the scale of the proposals is proportionate to the scale of the need and the scale of the opportunity itself. The need and opportunity exist at three levels, as identified in the Wirral Waters Baseline Study (approved by Wirral Council in July 2008):

- LEVEL 1: A “Big Bang” transformation of Wirral's docklands;
- LEVEL 2: A leading role in the delivery of the regeneration of the local area, as the most significant opportunity within Inner Wirral; and
- LEVEL 3: A fundamental component in driving the economic growth of the Liverpool City Region and the Ocean Gateway to the North West.

2.102 At level 1, as explained above, the proposals must be of sufficient critical mass to create a new place and transform long standing and ingrained negative perception of Birkenhead as a place to live and work. Level 2 represents the opportunity to use Wirral Waters as the catalyst to encourage and attract private investment to focus regeneration where it is most needed. Level 3 provides the opportunity to create a large scale, exemplar urban regeneration project which will attract

companies and individuals to locate in the City Region and wider North West region and beyond.

2.103 The Level 3 opportunity is recognised and reflected in the NWDA decision to designate Birkenhead Docklands as one of its expanded list of Strategic Regional Sites. It is also recognised in the recent 'City Relationships' study by The Northern Way which identifies Wirral Waters as a key opportunity within the City Region for the long term expansion of the regional centre as the primary driver, and an opportunity for Wirral to become interdependent with, rather than dependent upon, Liverpool. How delivery of these key opportunities will be achieved is explored further in the following sections and reports accompanying this Statement, alongside an assessment of the economic and social impacts of seeking to achieve large scale private-led regeneration.

2.104 The opportunity is governed by the scale of the redevelopment site itself; the core principles of creating a new skyline; the opportunity to create a new, international waterfront; the opportunity presented by the underutilised infrastructure in the area; and the opportunity of the quality of life and skill levels in other parts of Wirral. Expressed at these three scales, it can also be seen as a reflection of the scale of the need. The need sits across almost every aspect of the planning and sustainability agenda and it is expressed by a vast range of social, economic and environmental evidence, as highlighted above. If the scale of the opportunity is a response to the scale of the need, then the timescales reflect the size of the challenge.

2.105 The timescales are considered further below, following an analysis of why the proposals have not been reduced in their scale since the initial vision was launched 3 years ago. Peel have also explicitly outlined that delivery is going to take 30 – 40 years. Peel has no illusions that this is anything other than a very long term, legacy project. There are no 'quick-fixes' to the challenges of the area.

Implications of diluting the amount of development

2.106 The broad scale of the vision, in terms of the quantum of development proposed through the East Float application has been thoroughly tested but remains fairly consistent since the launch of the initial vision in 2006. Since then, whenever discussions have taken place in relation to the scale of challenge and the ability to deliver, the feedback received from Wirral Council and other parties has been to ensure that the aspiration is not reduced.

2.107 Peel has considered less intensive options, particularly through the testing of masterplanning options for East Float. However at each stage it has been concluded and agreed that any significant dilution of the scale of the vision and the mixed-use approach introduces a fundamental delivery constraint or flaw. Examples of these flaws are:

- The project would become too small in scale to have an international/national profile and would thus not be marketable to investors from outside the City Region and Region;
- The ability to create a new skyline for Wirral, to complement Liverpool by creating a major investment location on the opposite side of the River Mersey, is compromised;
- The scale of investment needed to physically transform inner Wirral and open up the docklands and the industrial belt around them (particularly to the south) is lost;
- The ability to create significant levels of employment for existing residents, in economically sustainable activities/sectors in which they are qualified and able to economically contribute, is reduced. It is essential that there is enough spin-off employment associated with the scheme so that it provides major new opportunities for communities who have long suffered economic decline and, as a result, have become unskilled and/or dependent on social welfare;
- The market attractiveness of the area at present is so weak that only a 'big bang' proposal, working at the three levels identified above, stands any realistic prospect of achieving financially viable development over the medium-longer term (accepting that short-term investments are unlikely to be viable);
- The opportunity to trial an exemplar sustainable development would be compromised, in terms of:
 - Providing for significant amounts of live-working
 - Delivering flexible planning and design to allow the scheme to evolve with its community
 - Piloting high density, high quality family housing in a northern English City Region (drawing on London, Edinburgh and northern European cities as examples)

- Achieving cutting edge sustainable solutions for physical infrastructure (i.e. energy, waste and water)
- Not taking sufficient advantage of the underused capacity that exists in the urban infrastructure within Wirral and in particular in the transport network.

Quantum in relative terms

2.108 Whilst Wirral Waters does propose very substantial or major growth in Inner Wirral this needs to be considered in context. The inner area of Wirral has suffered population and economic decline for a number of decades. If a 100 year timescale is considered (roughly equating to 1950-2050), the East Float proposals will be replacing part of what has been lost, in terms of population and employment. Inner Wirral has lost considerably more population over a 40 year period than Wirral Waters seek to reintroduce over a similar period. In that sense, the proposals could be argued not to constitute new growth but to be largely achieving the economic and social regeneration of the area and allowing it to achieve the potential capacity which its infrastructure was designed to support. In sustainability terms such an approach has the major advantage over accommodating the same level or quantum of development in new, previously undeveloped places exactly because it is taking place on brownfield land and in a location where it can take advantage of the latent capacity that exists in Wirral's urban infrastructure.

2.109 There is also the tendency to consider the issues of scale and quantum only in the context of the current position and with reference to planning policies and time horizons that look 10-15 years ahead and which do little to reinforce a long term view. This is the way in which most policies are established and most decisions are taken through planning system. A long sighted perspective is not normally relevant to decisions on individual projects, but in this case such a perspective is essential. Any consideration of 'growth' here needs to be made in the context of the losses that have occurred historically, which continue to occur and which will only continue if Wirral Waters does not proceed. The ability truly to regenerate an area that has suffered long term population and employment losses sits at the heart of Government policy and is essential to any consideration of 'quantum'.

2.110 The 'counterfactual' scenarios (deadweight) and impacts of the proposals on existing centres and communities are considered further in section 4 below and by Regeneris Consulting in the Economic Impact Assessment, and also in the Retail, Leisure & Office Statement Addendum.

- 2.111 Even taking a long term perspective and considering the ‘without Wirral Waters’ scenario, it needs to be understood that the East Float proposals are within existing housing and employment growth commitments. In relation to housing, the proposals are broadly within the current RSS requirement and the potential Growth Point uplift. There is a national shortage of new, quality, sustainable, housing (both market and affordable) which has been exacerbated by the recession. Given that Wirral Waters represents a truly sustainable location and concept, bringing long term regeneration through the attraction of new markets to a deprived/declining area, any notion of trying to cap the amount of housing which Wirral Waters could deliver within its design and infrastructure parameters/capacity would seem entirely at odds with strategic policy objectives.
- 2.112 The quantum of development proposed is also within the economic projections for the Liverpool City Region (as explained by Regeneris Consulting) and are supported by the Wirral Employment Land Review (insofar as they look at the time periods under consideration). The amount/quantum per se is therefore considered to be largely within established parameters. Matters relating to the potential impacts of providing the scale/quantum proposed in one single location, through a single lead developer, are considered to be the more central issue. These are considered further in section 4 below and in the accompanying reports on Economic Impact and Retail, Leisure & Offices.
- 2.113 In relative terms, it should also be borne in mind that whilst representing a high level of density compared to a UK average, East Float is highly comparable in its density and approach with other waterfront development projects around the world, including in northern European cities such as Rotterdam and Hamburg. Projects in the Far and Middle East dwarf the East Float proposals although they are less comparable in terms of approach, policy objectives, finance/delivery, sustainability and managing social/economic/environmental impacts.
- 2.114 The scale question is partly a result of the scarcity of comparable schemes. Projects of this scale and nature only occur in major waterfront cities which have seen long term economic and social decline and which offer major investment opportunities. Salford Quays is the most comparable UK, albeit that a single planning application for the full scale of the project has not been needed in that case. Salford Quays was promoted by Salford City Council with substantial public sector investment in site clearance, site preparation and infrastructure works, and because the area benefitted at that time from Enterprise Zone status, a significant degree of planning “deregulation” . Salford Quays is the subject of a case study by Regeneris Consulting in the Economic Impact Assessment.

Delivery rate and time horizons

- 2.115 The indicative trajectory for Wirral Waters shows the rate of delivery of different amounts of different land uses over a period from 2011 to 2050. This is the averaged rate as envisaged at this stage. This trajectory has informed assessments undertaken for the application and is offered as an initial indication of how the development is expected to be delivered.
- 2.116 In broad terms, the rate of delivery of housing is within the RSS provision established for Wirral (averaged out), whilst the amount of commercial (B1) space is around 10-12,000 sq m per annum. Such a rate of delivery is within established forecasts/projections for the City Region, as set out above and explored further within section 4 below and in the reports by CBRE and Regeneris Consulting.
- 2.117 There are planning mechanisms being developed for the rate of delivery of the office and retail components of the scheme, which will effectively manage the delivery rate to ensure that unwanted consequences, for example that of sterilising investment elsewhere, do not materialise.

Why now, via a planning application?

- 2.118 It is clear from the above analysis that the starting point for East Float is an extraordinary challenge and opportunity. The area around Wirral Waters has a poor economic profile, is unattractive to the market, has not secured investment of this type/scale before, and suffers from a poor quality environment and long standing and deeply entrenched social deprivation. In this context Wirral Waters represents an unparalleled opportunity to provide an effective and, in regeneration terms, rapid response to these major challenges. However, that opportunity can only be realised by achieving a major physical and economic transformation of the area.
- 2.119 To achieve that transformation, one of the key obstacles to overcome is that of the very poor perception and image/profile of inner Wirral. This is a key theme within the Guiding Principles for Markets & Futures. There is also a significant degree of scepticism that the Wirral Waters vision can be achieved. That is due to a range of factors but it is considered that these do include a lack of understanding of where and what Wirral Waters is, particularly in respect of the scale of the dock system and its strategic setting.
- 2.120 Peel Holdings' track record goes some way to addressing perceptions and scepticism. However, until Peel has secured planning permission for what many would regard at face value to be a highly 'ambitious' vision, the opportunity to

transform those perceptions, through attracting major investment and place-making through early interventions, is very constrained. For this reason the marketing of Wirral Waters has been very limited to date. There is no case for committing major resources to attracting investment until there is certainty over what can be delivered. Indeed such an approach is likely to increase rather than reduce scepticism and make it even more difficult to get the early phases of development underway and in occupation. Too many major projects flounder due to scepticism engendered through a marketing phase adopted too early in the process. Stigma then develops.

- 2.121 Even once Peel has secured outline planning permission, the market perception and willingness to invest in Wirral Waters will need to be prompted through physical change on the ground and the delivery. The process of 'cumulative causation' will be the main driving force behind the delivery of Wirral Waters i.e. once development has commenced, that development will attract more investment and the virtuous cycle will continue over time. From the precedents that have been studied by the Peel team, it is clear that this process has occurred successfully with key early interventions in comparable locations, of sufficient quality, having proved to be vital to the success of creating a new place.
- 2.122 Often such interventions are made by the public sector and whilst Peel is in dialogue with a number of public sector partners in relation to potential early investments, no firmly committed early triggers have agreed. The achievement of an outline planning permission will assist in providing public and private sector investors with greater certainty about what will happen in the future on the remainder of the scheme, just as it will provide Peel with that certainty and ability to invest in development and infrastructure.
- 2.123 When considering a number of potential locations, one of the key factors affecting investors (particularly commercial/business investors) is whether they can be certain that the developer can provide what that business requires, in the timescale available. This is not just in respect of the business accommodation itself but also in respect of the related infrastructure and services necessary to support the business effectively and to attract and retain the right quality of staff.
- 2.124 Planning certainty and flexibility sit alongside other considerations such as occupation costs, accessibility, skills/labour pool, facilities/amenities and other factors in the investment decisions that businesses (and individuals) make. It is essential that all the components are in place. The existence of a planning permission underpinned by a policy designation or masterplan helps provide certainty in the decision making.

2.125 This has been Peel's starting point from the initial inception of Wirral Waters. Indeed a number of alternatives were appraised by Peel in the early stages of Wirral Waters. These are:

- **Simplified Planning Zone:** SPZ has not to our knowledge been used for a project of this scale/complexity during its 15 year life. Although conceptually an SPZ could have been promoted, the system was largely designed and used for business/industrial parks rather than projects of the scale and complexity of Wirral Waters.
- **Local Development Order:** LDOs had only recently been introduced at the launch of Wirral Waters. Peel were anxious about using an untried/untested planning vehicle on a scheme of this scale and complexity. To date, LDOs have not been used on anything nearly as large and complicated as Wirral Waters. Additionally owing to the requirements for EIA, consultation, design coding etc there would in fact have been little difference in the process required for Wirral Waters. It is considered that the main difference is that it would have been more difficult for consultees, decision makers and potential investors to understand the process and outcome.
- **Area Action Plan or Strategic Site Allocation:** in practice Peel has been promoting Wirral Waters through the Wirral LDF and considers that a Strategic Site Allocation for East Float is the best way for East Float to be contained in the LDF. Unfortunately there have been several years of delay with the LDF for a number of reasons, resulting in the Core Strategy having only reached the Spatial Options stage. When Wirral Waters was launched, the Local Development Scheme for Wirral identified a target adoption date of October 2008. Nonetheless, as is explained above, the strategic fit with RSS, the UDP strategy, the emerging LDF and other policies shows that Wirral Waters is in accordance with the development plan strategy for the area, provided key impacts are mitigated/managed. Issues relating to prematurity and the call-in policy are examined in full in the East Float Planning Statement. In any event, it is also now apparent that the planning system is to be overhauled again by the new Coalition Government, such that there is presently little firm clarity or certainty about how the 'plan-led system' can actually assist in the delivery of Wirral Waters.
- **Informal Masterplan with Phased Outline/Full Applications:** this is the route used on many development schemes. However it often undermines

the ability to create investment confidence and to provide partners, stakeholders and communities with precision over the proposals. This approach is essentially the difference between East Float as it presently stands (with an informal masterplan and early phase planning permissions) and East Float with the strategic outline permission that this Statement is submitted in support of. This route is not without its advantages, but in overall terms Peel consider that the certainty created by having been through the planning application process for the entirety of East Float, is in the best interests of providing Peel, the Council, investors and the community with more certainty and commitment to the proposals.

2.126 The East Float outline application process was agreed as being acceptable by WMBC at the outset. It is more 'strategic' in nature than most outline applications yet will remain a legally binding contract against which funds can be drawn down for development. In today's challenging times for lending and finance, the existence of a legally robust permission as opposed to a policy designation and/or informal masterplan is highly important. This not only applies to Peel's financiers, but to those of potential investors.

3. How East Float will be brought forward

Starting point

- 3.1 Achieving the long term economic and transformational benefits of Wirral Waters requires first that the area establishes itself as a commercial and residential location that businesses and households aspire to be a part of.
- 3.2 As with other comparator projects, the first important step in this process is in changing perceptions. This, in broad terms, is through branding and marketing, raising ambition and aspiration, and commencement of physical activity on site. (further information is contained in the Markets & Futures Guiding Principles).
- 3.3 The key is to attract new early familiarity and access, both businesses and residents, to the area. Initially, these interventions maybe modest in scale. Physical activity, whether through events or investment in 'art' or public realm / green infrastructure and the presence of occupiers can help start to change the image of Inner Wirral, from a deprived residential area with limited choice, a poor profile and a depressed local economy, to one which is associated with economic opportunity and 'aspirational living' in a high quality, city environment.
- 3.4 For major, catalytic occupiers and inward investors of scale, creating the right 'business' environment is key. This involves addressing all the main search criteria and ensuring that we can provide a high-score for each element. This includes skills, quantum of labour, quality of life and other considerations.
- 3.5 Changing perceptions also includes the residential offer: Growing a housing market that appeals to professional and managerial households is an essential first step in this process, for example by bringing some of the affluence from West Wirral into Inner East Wirral. This, in turn, will have spin-off benefits in helping to attract new commercial activity, development and investment with links and benefits to the wider HMRI area and partnership neighbourhoods. Early investment in public realm, infrastructure, retail or other facilities, and community uses such as education, can all help start this process.
- 3.6 The scale of Wirral Waters is larger than most major mixed-use projects in the UK. The most comparable projects, particularly in terms of scale of housing, are schemes in London, such as Greenwich Peninsula and Barking Riverside. However, these projects are in locations which have a stronger underlying market that has either been assisted through heavy public subsidy or exists due to a stronger strategic, locational advantage.

- 3.7 Wirral Waters represents a unique challenge due to its scale, breadth of vision and stated time horizons. But it is the genuinely mixed use nature of the proposals and the context within which they are being brought forward that has the most significant bearing on how a new mixed-use community can be developed and grown.
- 3.8 Whilst this starting point represents a significant challenge, Peel as the lead developer has substantial experience in delivering key regeneration projects within such contexts. For example Peel has been heavily involved in the development of Salford Quays over the last 25 years and continues to remain so. During this time Salford Quays has evolved from a redundant dock area, devoid of economic function, to a vibrant mixed use area, supporting a wide variety of employment, home to several thousand residents and containing some of the North West's most recognised leisure and tourism attractions.
- 3.9 Its development continues apace with phase 1 of MediaCityUK, which will be home to five relocated BBC departments from 2011 and a new campus for Salford University nearing completion, having been developed by Peel over the last few years. Peel is able to draw on this vast experience and understanding of the issues involved in delivering development of the scale and nature proposed at Wirral Waters and within the same context to ensure the overall vision is achievable.

Who is it for?

- 3.10 The following list of commercial sectors is not exclusive or exhaustive but represents a starting point for Wirral Waters. (See also Markets & Futures and Enterprise: Guiding Principles plus the Appendices). The list is relatively long but reflects the suitability of Wirral Waters to a wide range of economic opportunities and scales:

Internationally Competitive Sectors

- Business and Professional Services: despite the recession it is expected that this sector will continue to grow and generate office demand in sustainable and accessible locations such as Wirral Waters. The particular opportunity includes a back-office or 'service point' location as well as for company headquarters.
- Digital and Creative Industries: the opportunity exists to develop the existing market within the City Region and to capitalise on wider sector growth and regional opportunities arising through MediaCityUK;

- Food and Drink: Wirral Waters will generate a significant demand for catering, which allied to the wider food and drink offer of the Wirral peninsula provides an opportunity to bring quality provision into the urban area; and
- Energy and Environmental Technologies: through inherent growth in the sector, existing industries, onsite opportunities and sub-regional initiatives such as the Tidal Power project, there is a clear opportunity to develop a focus in this sector.

International Markets

- 3.11 Expanding economies in the far and middle east represent significant opportunities for investment at Wirral Waters. China and India are the two largest economies currently investing in the UK. The UK Government and private sector are seeking to develop these opportunities into real foreign investment. In the Liverpool City Region, public and private partners, including Peel Holdings and Wirral Council, are actively seeking investment from these economies.
- 3.12 The Shanghai Expo which commenced in May 2010 is a key event for international investment. Wirral Waters is being showcased at the Expo, building on the potential twinning of Wirral with Suzhou. It is hoped that foreign direct investment (FDI) will be attracted from Chinese companies by the combined position of planning certainty and strong civic leadership. Again, the 'deliverability' of the project through a planning permission is highly pertinent.

Existing Local Employment Sectors

- 3.13 The six sectors below are key drivers in the local economy. Wirral Waters will seek to build on this employment base.
- 3.14 Maritime: The existing maritime sector in Merseyside is strong and likely to continue to grow. Wirral Waters, with its dockside location, is ideally placed to capitalise on Maritime support services
- 3.15 Public Sector: The relocation of public sector organisations from London and the South East, and elsewhere, represents a key opportunity for Wirral Waters. The future of the public sector in the area is also evolving through City Region working and efficiency drives. This may result in opportunities to locate public sector organisations at Wirral Waters. Indeed Wirral Waters is well positioned to become a Merseyside flagship location for public sector relocations, for Non-Governmental Public Bodies and Executive Agencies, in addition to Government departments and local public sector bodies. Wirral Waters can offer a quality of life, alongside a low

cost base, that many areas competing for relocations cannot offer. Charities and the third or not-for-profit sector represent a related opportunity for Wirral Waters

- 3.16 Visitor economy: A key part of the Vision is to build on existing cultural employment sector and attract cultural uses to Wirral Waters, including major set-piece cultural destinations. Being located in the core area of the City Region and with a dramatic waterside setting it, is clear that cultural uses are likely to be a success at Wirral Waters
- 3.17 Retail: a range of retail and leisure uses can be delivered through Wirral Waters in a complementary manner to other existing centres;
- 3.18 Health & care: The ageing population and ongoing innovation in the health sector represents opportunities for office uses, R&D facilities and/or care uses.
- 3.19 Construction: The amount of construction likely to be required at Wirral waters will generate its own economic activity. With several hundred workers likely to be on site at any one time, it is likely that construction companies will set up local offices and also facilitate the growth of their supply-chains locally. It is important that local companies benefit from these opportunities through a Construction Integrator model.
- 3.20 Innovation sectors: These include Higher Education and Science/R&D. Education is a key opportunity through the potential creation of a university campus at Wirral Waters using the 'University Challenge' initiative. There is the potential to create a 'super-versity' through the co-location of Wirral Metropolitan College and part of Chester University (plus others) subject to HEFCE / LSC funding.
- 3.21 The science and research & development sector is a strong and well represented in Merseyside. This is likely to continue to grow.

Sub-regionally strong sectors

- 3.22 Back office finance and administration, collections, pensions and life administration, wealth and asset management and general insurance are all strong sectors in Merseyside and the sub-region. Companies often seek non city centre space due to rental levels, but wish to be close to the main financial organisations located in the City Centre. Wirral Waters represents natural growth space for this sector.

Potential Sector Breakdown

3.23 Consideration has been given by Peel Holdings, Regeneris Consulting, CBRE and Turley Associates to the potential sectoral breakdown of the B1 elements of Wirral Waters, based on the above list of potential sectors. This has been considered in both short-medium term (up to 10 years) and for the completed development in 2050 and is set out in table 2 below.

Table 2: Potential Sector Breakdown for B1 space

Sector	Proportion of early phases (2012-2020)	FTEs (based on 95,784 sq m)	Proportion of completed development 2050	FTEs (based on 428,784 sqm)
<ul style="list-style-type: none"> • Wealth/finance • Business/professional 	25%	980	25%	4,343
<ul style="list-style-type: none"> • Digital, creative/media and technology 	10%	392	15%	1,737
<ul style="list-style-type: none"> • Energy/environment • Maritime/transport 	15%	588	15%	2,606
<ul style="list-style-type: none"> • Public sector – local, regional and national • Charities and 3rd sector 	40%	1,569	35%	6,949
<ul style="list-style-type: none"> • Workshops/R&D (B1b) 	10%	392	10%	1,737
Total	100%	3,922	100%	17,372
<p><i>Source: Guiding Principles - Markets & Futures</i></p> <p><i>Note: detailed FTE figures may have changed slightly as a result of further modelling undertaken since the completion of the Markets & Future Guiding Principles</i></p>				

- 3.24 It is anticipated that digital/creative/technology may grow as a proportion after initial phases, with public sector reducing as a proportion but still remaining the most significant employment sector.
- 3.25 The breakdown assumes that Wirral Waters will help Merseyside draw an increased share of regional (and national and international) demand. Creating the type and scale of product in an environment that allows Merseyside to compete for investment and occupiers that it would otherwise be less able to win is an important issue for the City Region and wider northern economy as a whole. Wirral Waters represents an opportunity for the City Region to redress current imbalances within the sectors it is under-represented.
- 3.26 It is difficult to predict with certainty the long term sectoral office mix at Wirral Waters. Flexibility is key, as is an ability to respond to new, emerging and growing sectors.
- 3.27 Some sectors are more likely than others to come to Wirral Waters in the short-to-medium term. It will be important to ensure that the phasing of Wirral Waters allows for markets to be developed and grow over time. The public sector represents a key early opportunity, alongside business/professional and finance, maritime and environmental sectors. Other markets, such as digital/creative, may take longer to grow.
- 3.28 A key point to bear in mind in considering the potential market for East Float is that markets operate in many different ways, not simply through sectors. The market is far more sophisticated than sectors alone. Similar businesses in the same sector may have completely different locational and office space requirements, just as businesses in completely different sectors may have almost identical requirements. For example, certain professional services firms require city centre locations because that is their particular market profile and it suits their staff and clients to be located in CBD locations with a large range of services/amenities and public transport accessibility. Whereas, other professional services, potentially operating in similar sub-sectors, but in different *bands*, may rely on lower rents and the availability of more space, car parking and road accessibility.

Markets: Residential and Community

- 3.29 The above is the overall position for commercial markets, which are the main focus of this Statement. The range of housing markets considered appropriate for Wirral Waters is set out within the Guiding Principles for Housing, whilst the potential social/community infrastructure and local enterprise markets which can be

stimulated by the East Float proposals, are contained within the respective Guiding Principles documents. The heads of terms for planning commitments and requirements for detailed assessment and reassessment of how these markets are evolving and should be supported through the development are contained within the Appendices to the Regeneration Statement and the Development Specification. Some of these documents are the subject of ongoing discussions with the Council and other parties in respect of the required commitments and level of detail at outline stage.

Office Market Positioning and Differentiation

- 3.30 An office market positioning report has been prepared by CBRE. This defines the market position of East Float as an office destination in relation to other locations in the Merseyside office market, experience in other cities in the development of new office locations and commercial considerations affecting the development and marketing of offices at East Float.
- 3.31 East Float will deliver an average of 11,000 sq m of office accommodation per annum over the full 40 year build period. However, based on current estimates, only 64,000 sq m will be delivered to 2020. The lower rate of development in the early phases of East Float's development reflects a realistic assessment of the challenges to be faced in creating a new office location at East Float. Commercial considerations will make it unlikely that the scheme will be initiated with office space developed in large chunks on a speculative basis and marketing efforts will be concentrated on seeking to secure significant pre-letting commitments to early phases of office development. Early phases of other uses will no doubt include site preparation and decontamination in West Float (for potential port decanting), residential led, mixed uses at Plot 1 of Northbank East and the Hydraulic Tower.
- 3.32 In terms of the target market for East Float offices, as a new out-of-centre location it will be most likely to attract occupiers of similar types and sectors to those located in other parts of the non-CBD market in Merseyside or in business park locations in Chester, Warrington and elsewhere. East Float will also be marketed to potential mobile office occupiers originating outside the North West region. However it seems likely that, in the take up of the early phases, there will be a greater proportion of exiting Wirral businesses looking for larger or better quality accommodation because they will likely take less convincing that this is the best location from which to run their businesses; i.e. they already have a business or other reason to be in the Wirral.

- 3.33 The continued programme of government relocations represents a clear target market for East Float, with Merseyside having been identified as a suitable destination for public sector relocations. East Float will add to the location options for public sector offices within Merseyside. The ability of the city-region to offer a number of location and property options would be beneficial to the prospects of securing public sector relocations to Merseyside with the employment and other benefits that this would bring to the City Region.
- 3.34 Looking to the longer term, the market positioning of East Float will evolve as the amount of office space and employment increases and it achieves greater visibility and status as a new business district with mixed uses. As East Float gains critical mass the capacity to attract a broader range of types and sizes of office occupiers is likely to expand. Ultimately East Float may therefore acquire some of the attributes and functions of a major office location although this will clearly be at a subsidiary level to the established city centre in Liverpool. If and when this is achieved there will be a close parallel with Salford Quays which, although now part of the expanded Manchester Regional Centre is still a supporting location which has not held back either investment in or the expansion of Manchester's traditional commercial core area.
- 3.35 The location and opportunity presented by Wirral Waters clearly provides the opportunity to attract a range of target sectors. In doing so, it is important that Wirral Waters differentiates itself from other office locations, particularly the city centres of Liverpool and Manchester. It achieves this by diversifying the City Region's office accommodation offer through providing a new accessible business district in its own right. In addition to the City Region's portfolio of office accommodation locations, the City Region will be better equipped and positioned to compete with other City Region's for future investment, including governmental relocations.
- 3.36 Secondly, Wirral Waters provides a 'city-campus' style environment in a sustainable city setting that is ready made for large single footloose requirements. It can also respond flexibly to such requirements. These types of occupiers often cannot be accommodated within the traditional city centre which is more physically constrained. Recent experience with MediaCityUK was that the BBC wanted a campus style environment but in a city setting, leading to the development of a media city campus at Salford Quays.
- 3.37 A further key theme for Wirral Waters is that it includes a cluster of tall buildings. This aspect of its market profile will help Wirral Waters differentiate itself from other UK locations, including established city centres. Tall buildings will help Wirral Waters reach a higher platform and attract international and national investors.

This step change is a fundamental part of the vision for Wirral Waters, alongside more regional/city region scale and local investment. The Cityscape Guiding Principles set out how this location is suited to a cluster of tall buildings, whilst the Markets & Futures Guiding Principles considers the benefits of tall buildings. As recognised by CABE and English Heritage, tall buildings can be beacons of regeneration.

- 3.38 The expectation for the long term future evolution of East Float's market position needs to be seen in the context of likely parallel developments in **Liverpool city centre** and at the proposed **Liverpool Waters** scheme. Future development capacity in Liverpool city centre shows a concentration of potential supply on the Pall Mall site. Beyond this, the city centre has comparatively restricted availability of significant sites likely to be available for major office development. Expansion capacity for the city centre will therefore be needed in the long term. Liverpool Waters will have a key role to play in this respect but East Float/Wirral Waters could provide a third component of expansion capacity for the development of the central office market in the Liverpool city region over the long term.
- 3.39 Wirral Waters will be catalysed by and therefore targeted to an extent at larger occupiers who might have historically relocated to business parks but are looking for a more sustainable and central location. Their locational criteria maybe less about 'city centre' and more about quality, sustainability, accessibility, value and amenity. East Float has a strong offer on all fronts, being a naturally more 'value' location, strategically accessible by water, rail and the motorway network, and benefitting from the creation of new amenities, facilities and the wider environmental assets of the Wirral peninsula.
- 3.40 Liverpool Waters on the other hand will be targeted to a greater extent on city centre office occupiers, as expansion space for, and an extension of the city centre. Clearly there will be the potential for some overlap, but it is important that the City Region can provide a range of suitable investment locations to compete with other City Regions.
- 3.41 As a comparison, the Manchester City Region (MCR) is more developed as a commercial office market but has not only a city centre, but a knowledge nucleus to the south and a redeveloped waterfront to the west, as well as a large number of business parks around strategic routes and interchanges. Indeed, the defined 'regional centre' of the MCR now incorporates the traditional city centre and areas of Trafford and Salford which are in close proximity to the City Centre (although arguably not as linked as Liverpool and Birkenhead). They are connected by direct public transport links, as Liverpool City Centre and East Float already are to a large

degree, to be improved through the transport proposals. However they offer a very different business location. A combination of strong leadership, joined-up thinking and healthy competition has allowed the MCR to capitalise on these assets and plan for the longer term, which has most notably resulted in the recent attraction of BBC departments from London to Salford Quays as the first major phase of MediaCityUK. It is this type of growth and opportunity that Wirral Waters can facilitate.

- 3.42 With continued investment in Liverpool city centre, the expansion of the City Centre to include Liverpool Waters, the creation of a sustainable new business (and residential) centre at Wirral Waters, and continued investment in the regeneration of deprived areas around these key assets, alongside investment in public transport to connect these places together, the central core of the Liverpool City Region has a sustainable and bright economic future.
- 3.43 If such locations are not developed within the Liverpool City Region, it is likely that it will not have the assets to compete in the future with other areas vying for investment, particularly international/European inward investment and relocations from elsewhere in the UK (including from the public sector).
- 3.44 Across the wider North West region, East Float will to some extent compete with other established and developing locations (Manchester City Centre, Warrington, Omega, Salford Quays and so on) and new emerging locations elsewhere in the region. However, it will be one of a large number of potential investment locations, many of which are of course already competing with each other, in central and non-central locations. The extent of competition to any individual centre or investment location is dispersed very widely. It is also possible that East Float will compete against other northern/midlands City Regions for outward migration from London and the South East and inward investment to the UK.
- 3.45 In addition to its strategic suitability, the scale of regeneration need and the fact that Wirral Waters is the only realistic opportunity to reverse the ongoing decline of one of the most deprived and economically weak areas in the UK provide the project with an advantage in making decisions about where investment should be prioritised. In very simple terms, where the need to tackle existing and future problems is greatest, the efforts to address those needs and the priority given to investment opportunities in those areas should also be greatest. In this sense, East Float translates itself into sustainable, regenerative development in its purist form.

How will the outline allow Peel to proceed?

3.46 Section 2 and the CBRE Office Market report set out in broad terms the reasons why a planning permission of the nature sought is required and how it will, in terms of the sequence of events after it is granted, play a crucial role in ensuring that the development is delivered in line with the vision and aspiration.

3.47 In summary, the outline permission allows the following to proceed:

- It establishes parameters and broad certainty over scale of investment and allows the debate over planning/design and infrastructure costs/contributions to be advanced and refined;
- It helps flesh out what type of product can be delivered to the market and over roughly what period;
- It stimulates a marketing process which is substantially more likely to be successful in attracting inward investment with the existence of a planning permission than without;
- It allows Peel, other private investors and public sector investors to draw down finance for capital investment.

3.48 Fundamentally the outline permission will allow Wirral Waters to take a major step closer towards delivery. During the 3-4 years since the launch of Wirral Waters, some progress has been made in aligning the proposals with planning certainty, including designation as Growth Point and Strategic Regional Site and the de-designation of the dock estate (non-saving of Policy EM10 of the Wirral UDP). However, whilst welcome, these advances will not provide the certainty needed to commence investment. As explained in section 2 and in the Planning Statement, the further development of the Wirral LDF would provide a more up to date policy framework and further policy support through a Strategic Site Allocation, but it would also not refine the discussion to provide clarity and certainty to enable investment in the way that an outline planning permission would. Additionally there is also now some uncertainty about the future of the plan-making system, in its current form, arising from the intended programme of the new Coalition Government.

3.49 The submission of the East Float application has brought a number of key issues to a head and requires their resolution. These include the scale, quantum and parameters of development, the role and relationship with existing centres (most notably Liverpool and Birkenhead), and the broad nature of planning

obligations/infrastructure required, together with the type of mechanisms needed to ensure the objectives of the scheme are met through delivery.

- 3.50 Crucially, in terms of understanding and demonstrating how the proposals can deliver the regeneration of the area, the submission of the outline application has required the progression of the Birkenhead Integrated Regeneration Study (BIRS) by the Council. The principle of this study was first discussed between Peel and Wirral Council in 2007, however the study itself did not commence until 2009. In 2009, the Council's LDF had also only reached an early stage, therefore Peel's SRF and Vision/Guiding Principles were formulated and the masterplanning process for East Float progressed somewhat in advance of the BIRS.
- 3.51 However, the findings of the Council's consultants and the steering group leading the BIRS (which includes Wirral Council, Peel, GONW, HCA, NWDA, Merseytravel and others) are consistent with the approach taken by Peel. The key issues now being resolved through the planning application are in that sense the 'final pieces of the jigsaw'. However, they are of course some of the most challenging and contentious issues.
- 3.52 Without the progression of the East Float application, it is considered that the proposals would be moving considerably more slowly towards delivery. This would result in increased costs, delayed commencement of development, greater scepticism and a greater challenge in overcoming perceptions. It also fundamentally means that Wirral Waters might miss opportunities in the economic recovery phase to attract investment, which it is well placed to do (as explained in the Guiding Principles for Markets & Futures).
- 3.53 For the same reasons, substantial delays or indeed the refusal and re-submission of the planning application would be damaging for Wirral Waters and also the surrounding area. It would lead to perceptions of an area not 'business friendly' where, despite overwhelming public support and public sector backing, combined with Peel's track record and over 3 years work, nothing has been forthcoming. It gives the message that this part of inner East Wirral is destined to continue its spiral of decline. This would undermine confidence in the project and Peel's ability to continue investing in it. This would fundamentally weaken the ability of both Peel and its partners to deliver. It is therefore essential that this planning application is progressed in a timely way and packaged in a flexible manner which provides the certainty and reassurances needed.

A 'regeneration legacy' project

- 3.54 Peel Holdings, as a privately owned major property company with diverse interests, has the ability to take a longer term and more visionary approach than many development/investment companies. Peel has already demonstrated considerable commitment to Wirral Waters by continuing to invest in planning and design work at a time when many projects across the length and breadth of the UK, including some of Peel's own projects, have been slowed down, mothballed or abandoned completely. Peel has already invested millions of pounds in Wirral Waters. This is to date an investment with little short term prospect of making any substantial return, as proven through the viability assessment for Northbank East plot 1.
- 3.55 The reason that Peel is approaching Wirral Waters in this way is that the project is regarded as a regeneration 'legacy project' for Peel. The degree to which Peel can invest in upfront infrastructure, public realm and 'early wins' without making any profit is a matter that will be decided by Peel once the broad package of planning requirements, established via the outline planning permission, is known. Only then will the finer detail of early phasing become clearer. Decisions will evidently also be informed by Peel's ability to secure investors and tenants through initial marketing following the outline permission, for example at the Shanghai Expo.

4. Summary analysis of impacts

The 'without Wirral Waters' scenario

- 4.1 The analysis of decline contained in the Economic Impact Assessment by Regeneris Consulting demonstrates that the 'do nothing' scenario (i.e. not development East Float as proposed) will bring considerably less employment and population growth impacts to Wirral and the wider City Region and North West.
- 4.2 The implications of this for inner Wirral would be profound in terms of a missed opportunity, particularly given the following factors:
- Reduced public funding availability and a continued inability to attract private investment;
 - A lack of major development opportunities in inner Wirral inhibits the ability to bring about structural economic and social change, with a continued reliance on a number of smaller and more fragmented projects within and around inner Wirral (e.g. Woodside, New Brighton);
 - Private investment in the City Region continues in other locations outside inner Wirral but on less 'transformational' projects. To a degree this will see trends from the past decade and longer continued, meaning that inner Wirral falls further behind the City Region and Region in terms of its economic and social profile;
 - Ongoing difficulties in attracting and retaining an economically active population. The analysis contained in the Guiding Principles for Social & Community Infrastructure shows how the HMRI initiative on its own will not result in any significant population growth in the area;
 - Social deprivation continues and deepens, resulting in a continued and potentially increasing reliance on welfare/benefits;
 - The negative cycle continues with inner Wirral at best keeping its current population and economic profile, and potentially falling even further behind other priority areas.
- 4.3 In very broad terms, it can be estimated that achieving physical regeneration and growth on anything like the scale proposed by the East Float application would require a public investment running to several hundred million pounds; such is the scale of the challenge.

- 4.4 Government policy very firmly prioritises the attraction of private investment to facilitate regeneration wherever possible. The limited public finance that is available will have to be focused where it is most needed. This means that inner Wirral is likely to see continued availability of some public funding, but realistically this will be a fraction of the financial investment needed to bring about a major reversal of the decline of the area and to put inner Wirral on a growth trajectory.
- 4.5 In addition to the investment needed for East Float, regeneration in inner Wirral also requires the assembly of significant areas of high quality land and infrastructure. The best assets and opportunities are within the dock estate, with other options being limited by their fragmentation of ownership, reliance on small sites and constrained infrastructure.
- 4.6 By contrast, Wirral Waters can facilitate major private investment in mixed-use regeneration in the best location in the Borough and, arguably, in the City Region. Such investment may be assisted by public funding but is not absolutely dependent upon it. Hence, regeneration can be achieved with little subsidy. This in turn brings major benefits for the public sector in terms of delivering public sector regeneration objectives and an increase in the scale of finance levered from the Wirral Waters area through Council Tax, Business Rates and other sources.
- 4.7 In terms of considering the overall cumulative effects of Liverpool Waters without Wirral Waters, the likelihood of any material adverse effects is estimated to be limited. However, in terms of providing a broad assessment, it is considered that the delivery of Liverpool Waters on its own would see the above 'without Wirral Waters' scenario played out. Without a major investment opportunity within inner Wirral, inner Wirral will not be transformed. Moreover, some of the negative aspects of the scenario could potentially become more deeply rooted, with the potential for higher levels of economic and population leakage out of (and decline within) inner Wirral, and into Liverpool and to a lesser extent parts of Cheshire. This would be as a result of it becoming a more attractive destination through the delivery of Liverpool Waters, without a counterbalance investment in inner Wirral. The inequalities of economic performance and social advancement across the Mersey would continue to increase.

What will Wirral Waters add?

- 4.8 The Economic Impact Assessment by Regeneris Consulting quantifies the additional economic benefits of Wirral Waters, by analysing the gross impacts and calculating net impacts principally through the deduction of deadweight. The additionality of Wirral Waters to different spatial areas is also assessed by

Regeneris, at the Wirral, Merseyside and North West levels. The key conclusions of this work are that the East Float proposals will add a significant economic benefit to Wirral, Merseyside and the North West, with the scale of positive change being the greatest the lower the spatial level.

- 4.9 East Float will crucially provide high value, high quality, high density commercial (and living) space which only exists in any vaguely comparable commercial form locally in a business park format in Wirral at the Wirral International Business Park in the south of the Borough. Hence it allows Wirral to provide for economic growth in the inner part of the City Region, whilst at the same time regenerating the heart of the area that needs it most.
- 4.10 East Float also provides the wider City Region, the North West Region and the UK as a whole with a strategic, high profile initiative to achieve major investment in a sustainable city setting, where it can make a genuinely major contribution to social, economic and environmental objectives. As a regional offer, below the primacy of the two regional centres (Manchester/Salford and Liverpool), East Float can stand out as a core priority investment location for the North West.
- 4.11 The scale and profile of Wirral Waters will allow it to compete several rungs above most major investment locations in the region. It therefore has the potential to generate not only major additional activity for Wirral and Merseyside, but also for the North West region and the UK more widely.

Summary impact of housing proposals

- 4.12 As set out in section 2, RSS confirms that within the Liverpool City Region, the Inner Area, within which East Float lies, is the first priority for housing growth. Directing growth towards this area is aimed at delivering its transformational regeneration, reversing decades of under investment, decline and population loss. The proposals are consistent with this strategic level policy and the spatial strategy set out in RSS.
- 4.13 The proposals will also make a significant contribution to delivering the Mersey Heartlands New Growth Point objectives, which increases the focus given to the Inner Area as the principal priority area for future housing growth.
- 4.14 The focus given to this area reflects its longstanding housing market weaknesses which the New Heartlands HMRI is tasked with addressing. This programme seeks to deliver the restructuring of the inner area's failed housing market through providing higher quality homes for owner occupation as part of the wider agenda of creating more sustainable and viable communities where people want to live.

- 4.15 The East Float proposals will provide a wide range of high quality housing for a mix of households. The proposals will support HMRI activity within the wider area providing housing which complements that being developed by New Heartlands and its development partners. Furthermore, the proposals will deliver the associated economic development which is required to address the regeneration and economic challenges the HMRI faces and without which the area would fail to prosper.
- 4.16 In terms of housing numbers, Wirral Waters will deliver around 15,000 dwellings in total over its lifespan. However, based on current estimations, only 4,600 dwellings are expected to come forward during the current RSS period to 2021. Whilst this represents a significant proportion of Wirral's housing target for this period, this is merely a reflection of the unique strategic opportunity provided at Wirral Waters. The proposals represent the only opportunity to deliver transformational change in the area, which rely on a critical mass of development, including housing development, to come forward. Furthermore, the proposal's consistency with RSS in terms of its spatial approach and the fact that housing numbers are not ceilings and they may be exceeded where appropriate, further justifies the quantum of development proposed.
- 4.17 In view of the long timeframe over which East Float will be delivered, it is not possible at this stage to be prescriptive about the precise type of housing mix which will come forward. Demographic changes and associated housing requirements will evolve over the life of the development such that what is most relevant and needed now will not necessarily be relevant in 20 or 30 years time.
- 4.18 This demands that the permitted development is flexible enough to allow it to evolve to changing circumstances, market demand and housing needs to ensure each phase of East Float remains relevant and able to deliver what is required at that time.
- 4.19 A tailored approach will therefore be required in approaching the detailed design of each phase having regard to the circumstances including an understanding of need and demand at the time. This flexibility is key to ensuring that East Float is deliverable and can achieve its transformational regeneration potential.
- 4.20 Within this context, Peel are committed to ensuring that East Float delivers a wide range of housing of the highest quality. The overall aim for Wirral Waters is to become a 21st century exemplar of achieving sustainable communities attracting a wide variety of households including young adults, older people, families, students and key workers. This commitment will be carried forward through the life of the development and will inform the detailed design and housing mix for each phase.

Summary of impact of 'main town centre uses'

- 4.21 The retail issues are addressed fully within the Retail, Leisure & Office Statement, and its Addendum. The overall conclusion is that, with appropriate controls, the retail aspects of the proposals are ancillary (4% of total) to the other uses proposed. They do not raise any significant policy issues and are unlikely to have any significant adverse impacts on existing centres or retail patterns. The sequential approach has been followed.
- 4.22 Similarly the leisure uses are ancillary, as a key ingredient of creating a place of sufficient diversity and critical mass. Control mechanisms are being proposed to ensure that potential adverse impacts can be avoided.
- 4.23 In relation to offices, the appended Office Market Report (CBRE) and Economic Impact Assessment (Regeneris Consulting) consider the issues in some detail. The overarching conclusion is that the proposals are unlikely to have a significant impact on Liverpool city centre as the RSS priority centre, due to the market concept of East Float, the way in which it will be brought forward, and the limited likelihood and scale of potential displacement impacts. Indeed, East Float will play a complementary role in providing a greater scale and quality of investment locations for the City Region portfolio.
- 4.24 The commercial markets of the town/city centres of Birkenhead and Chester are also afforded some priority by RSS and PPS4. However the ability to bring forward major commercial development on accessible sites identified regionally, provided it does not undermine or adversely impact existing centres, is established. Similarly, the need for major new high profile, office development in Wirral is clear, a need which can only be met on this site. The key test is to ensure that the phasing and delivery of East Float does not attract development which is either already located in, or which may have otherwise located to, an existing centre. In this regard it is important to remember that the reason inner Wirral has a highly constrained economy is that it does not capture high value economic activity. This is in no small part due to the lack of opportunity to attract such activities to the existing portfolio of sites/premises, as evidenced by the economic review in the Baseline Study. It is nonetheless important to identify appropriate phasing and delivery mechanisms to ensure that impacts are continually assessed and mitigation measures brought in as appropriate. This is explored further in section 5 below. Overall, owing to the scale and nature of the proposals, it is not considered that other local centres are likely to be negatively impacted upon by the commercial element of the East Float proposals.

- 4.25 The sequential approach has been followed in terms of offices. However the approach is one predicated on the need to secure a significant amount of employment development on a single large site which does not exist anywhere else.

Cumulative impacts of Liverpool Waters and East Float

- 4.26 In relation to the 'cumulative' aspects, the analysis within the Regeneris Economic Impact Assessment demonstrates a similar level of overall commercial investment at Liverpool Waters, over a slightly shorter timeframe. Considering the impact upon Wirral, the development of Liverpool Waters alongside East Float / Wirral Waters is part of Peel's single vision for the 'Peel Waters' schemes. The two schemes are very much intended to be delivered concurrently but are not dependent on each other. The prospect of one scheme being strategically more advantaged than the other and being delivered apace whilst the other does not progress is considered unlikely. This is because the two schemes have different constraints, opportunities, phasing and provide different products.
- 4.27 Wirral Waters (East Float) is promoted as a 'city centre plus' concept, complementary to the city centre and an alternative to business park investment and in the longer term an expansion of the regional centre, through a more sustainable 21st century model of sustainable urban regeneration. It will not compete with the city centre to any significant degree either in the short or the longer term. It is less constrained in terms of environment and heritage, and is thus able to accommodate more flexible design parameters. East Float is also somewhat a 'blank canvass' in terms of the ability to commence development on any part of the site (subject to overcoming a number of constraints) and to progress the delivery of the scheme in a many different ways. It is for these reasons that the nature of the outline planning permission sought is so flexible, as explained in section 2 above.
- 4.28 Liverpool Waters is positioned as 'city centre expansion', allowing the core CBD around the Commercial District to expand west across The Strand and north along the dock system. Located partly within a World Heritage Site and Conservation Area, Liverpool Waters is more physically constrained than East Float. The spatial phasing of the project is also more likely to follow a defined route, starting in the south around the King Edward Industrial Estate and Princes Dock, then moving north along the waterfront. Liverpool Waters will also contain the proposed Shanghai Tower, an iconic set piece structure.

- 4.29 The relative positioning and commercial displacement impacts of the two schemes are assessed in reports by CBRE and Regeneris. The overall conclusion is that East Float does not represent a significant challenge or threat to the dominance of the city centre due to its different concept, market positioning and likely delivery approach. It can be considered complementary in the sense that it will attract investment to the inner areas surrounding the existing core which might otherwise have taken place in less central parts of the City Region or not occurred in the City Region at all. Over time it will emerge as a smaller, linked business district, adding to the overall offer of the City Region and complementing the city centre. It is interesting to note here that the expansion of the 'Regional Centre' designation in Greater Manchester to cover Salford Quays as well as the traditional city centre, has been as a response to the investment in the waterfront and in recognition that this area is now functioning as a complementary part of the regional centre of the Manchester City Region.
- 4.30 The Liverpool Waters site has the same policy context in RSS terms as Wirral Waters, being located outside the regional centre, within the surrounding inner area. Precise requirements in terms of the delivery and phasing of Liverpool Waters are yet to be established owing to the early stages of the project's development.
- 4.31 However, for the purposes of considering East Float, it needs to be assumed that Liverpool city centre would continue to grow regardless of the existence of Liverpool Waters. In this sense, it is notable that the Liverpool Waters proposals are (as with Wirral Waters) identified as being within the current development forecasts and trajectory of The Mersey Partnership (as explained in the Economic Impact Assessment).
- 4.32 The fact that the city centre will grow on land owned and brought forward by the same developer under the same overall concept should not be relevant to any impartial consideration of the likely impacts. Indeed, strictly speaking, the consideration of cumulative impacts for 'committed development' as part of a planning application would only normally occur where the development has planning permission and can be considered 'committed'. Normally this is extended to include schemes 'in-planning'. In recognising the scale and importance of Liverpool Waters it was however deemed appropriate to undertake a cumulative assessment.
- 4.33 However, from the analysis above and the findings of the work undertaken by Regeneris, CBRE and Turley Associates, it can be concluded in overall terms, for

the purposes of cumulatively considering East Float both 'with and without' Liverpool Waters, that:

- Both East Float and Liverpool Waters are located in the second priority location for development in the region (as confirmed by RSS), where regional policy allows a degree of economic development and gives priority to housing. Both sites are identified as 'Strategic Regional Sites' by the RDA and are within a Housing Growth Point. The principle of mixed-use regeneration is therefore established for both. It is the question of impacts arising from the scale and rate of delivery which need to be addressed;
- Liverpool Waters is unlikely to have a significant bearing on the ability to bring forward East Float, owing to its different market profile and different challenges/constraints;
- East Float is unlikely to have a significant impact on the commercial core of Liverpool city centre, regardless of where the growth of the city centre occurs (be it predominantly at Liverpool Waters together with the completion of the existing commercial district, or not). This is due to the way in which East Float is likely to be delivered, arising from its market positioning;
- There are various indirect/induced benefits that will occur in the City Region, as identified in the Economic Impact Assessment, particularly through expenditure by resident population. Some of these benefits will occur in the city centre and thus East Float will in a number of ways be complementary to the city centre;
- East Float will help transform perceptions and the investment profile of Merseyside in general, thus reinforcing the objectives of the City Region for sustainable economic growth.

4.34 For the above reasons it is not considered that there needs to be a highly restrictive approach to the implementation of commercial development within East Float. This is expanded upon in section 5 below.

4.35 There may indeed be occasional instances where individual occupiers/tenants need to choose between either of the two Waters scheme, or indeed the city centre. In such situations, the following observations can be made.

4.36 Merseyside currently has a limited portfolio of major investment opportunities. Other than the out of centre business parks, the portfolio is largely centred on remaining schemes in the city centre. For major commercial, leisure, cultural, civic,

education and other uses, there is a need for a greater 'City Region offer' in order to place Merseyside on a more equal footing with other City Regions across the UK and beyond. It is better that the City Region partners can offer three opportunities to investors than one.

- 4.37 Within sensible proportions and the parameters of planning policy, and as a general point, it can be good for a City Region to have a degree of 'healthy competition'. This requires landowners/landlords and investors to 'up their game' in response. In recent years, Liverpool city centre has improved its commercial position through public subsidy and private investment. With decreasing public funding availability, the ability of the private sector to continue to invest in the city centre is key. This is partly why Liverpool Waters represents such a strategic fit for the city. However it will also lead private investors and landlords to act to maintain and enhance their asset value. This is a rather intangible, un-quantifiable concept but it is how commercial markets work in practice. It is a process that occurs in every commercial market and operates at present in Liverpool to a limited degree. Bringing major new economic opportunities to the wider inner core must be seen not simply as a competing threat but as a catalyst to change and improvement/renewal.
- 4.38 Clearly the scale of the 'healthy competition' needs to be kept in check and be subordinate to the dominant centre. Through the Waters schemes there is the opportunity for the public sector to both maximise investment potential and manage the delivery process through co-ordinated planning, to ensure that any unwanted impacts of displacement do not occur. It is important that the consideration of this issue is kept proportional to the potential impacts of East Float, which have been demonstrated as unlikely to be significant for the city centre. It is however also important to see that there are benefits to a degree of competition, not simply risks and threats. The success of Manchester city centre's commercial market alongside the growth of Salford Quays is evidence that both types of market can grow together and complement each other.
- 4.39 In terms of retail and leisure uses, the two schemes are largely independent of each other and the potential for combined or cumulative effects is unlikely to exist. This is assessed in the Retail, Leisure & Office Addendum.
- 4.40 In relation to housing, both Liverpool Waters and Wirral Waters are within the RSS (and Growth Point) figures for Liverpool and Wirral respectively. Both projects are located in the first priority location for new housing of RSS. Hence there is a strategic policy fit for the scale of housing sought. Both schemes are seeking long

term planning permissions which will guide and shape the housing design quality and type/tenure, along with affordable housing requirements.

- 4.41 The most readily comparable precedent, to help understand this, can be seen in Greater Manchester, where Salford Quays represents Wirral Waters and Spinningfields represents Liverpool Waters. Salford Quays was brought forward as a major urban regeneration initiative in its own right, to help tackle major deprivation and economic challenges in Salford (and Trafford/Manchester) whereas, Spinningfields has been brought forward by the private sector, with the full support of the City Council as a more natural expansion of the traditional commercial core of the city centre.
- 4.42 Evidently there is a timing difference in that Salford Quays was commenced well before Spinningfields, although it is also true that other parts of Manchester city centre have significantly expanded as office locations alongside the commercial core over recent decades, including Barbirolli Square, Piccadilly Place and the Co-operative campus (now itself being masterplanned for further expansion and redevelopment again led by the private sector but in partnership with the Council). Spinningfields is also contributing as a catalytic factor in bringing forward the Salford Central (not to be confused with Salford Quays) project immediately across the River Irwell, demonstrating how the success of one area then leads to the opening up of the next opportunity by building investor and occupier confidence in the location.

5. Implications for managing delivery

- 5.1 Peel's proposed approach to planning conditions and legal agreements, with particular reference to phasing, is set out below in relation to a range of issues. This supplements the position within the Development Specification which will also be updated prior to the issue of any planning permission.

Regeneration and planning conditions/obligations

- 5.2 It is important to recognise that the existing section 106 regime locally does not take account of the potential regeneration and growth occurring through Wirral Waters. There are intentions to develop a section 106 strategy through the LDF, subject to the outcome of how Community Infrastructure Levy (CIL), if continued, or any replacement, is taken forward within Wirral, which is currently the subject of considerable uncertainty.
- 5.3 Hence it is considered appropriate to develop a solution that responds directly to local policy objectives and the guidance set out in Circular 05/05, whilst having regard to the potential introduction of CIL or indeed a local tariff approach.
- 5.4 Peel's team has concluded that there is no single catch-all approach, due to the fact that different elements of the 'obligations' will require different approaches, depending on the nature of the requirements. Some are on-site, some are off-site. Some are required to mitigate an impact or provide sufficient infrastructure capacity, whereas others are concerned with improving the quality of infrastructure to help create the place. Some are aspects that the private sector would provide as part of a comprehensive approach to the development (because their provision is in the commercial interests of adding long term value to the scheme), whilst others are less in the developer's interest and would be regarded more as 'planning gain' which are needed or desirable for addressing wider social, economic and environmental objectives (such as the costs of subsidising affordable housing).
- 5.5 As such, it is appropriate to consider a range of mechanisms that respond to the range of issues on a bespoke basis. The mechanisms would be legally binding through the planning permission. In order to ensure that the mechanism responds to evolving policy requirements, market conditions and other contextual factors, the legal agreement also needs to have written into it a requirement to take account of new policy targets/requirements and economic viability (the ability to pay) at future stages of the development process.

5.6 The main proposed areas to which conditions and legal agreements will be applied are set out below:

- Sustainability and physical infrastructure
- Construction and waste transport
- Flood risk management and mitigation
- Public realm and green infrastructure
- Off site infrastructure
- Green travel plan framework
- Enterprise and local economy
- Skills and employability
- Social and community infrastructure
- Port relocations
- Affordable housing

5.7 Given the range of potential areas of planning obligations, there is clearly a need for a priority based approach, where phases of development are unable to fund all of the above. This particularly applies to early, less viable phases. In moving towards delivery, after the grant of planning permission, there will therefore be a clear need to prioritise where limited funding is spent and decisions will inevitably need to be made in balancing competing objectives,

5.8 Unless a major funding package such as Tax Increment Finance / Accelerated Development Zone can be put in place, it is clear that not all of the normal suite of planning obligations expected on a scheme of this scale will be achievable until the development has developed a certain critical mass and become self-reinforcing and catalytic in itself, as part of a sustainable economy.

5.9 Establishing a legal framework for competing objectives and the obligations associated with them to be prioritised and balanced against each other, is a key challenge for the planning system to deliver for East Float. This will involve a legal agreement and use of planning conditions. These are explored further below. The first key issue to consider is however the regeneration vehicle for Wirral Waters.

Regeneration vehicle

- 5.10 The Vision Statement for Wirral Waters sets out how within the Strategic Regeneration Framework area, there are catalyst neighbourhoods, within the control and principal remit of Peel, and a number of partnership neighbourhoods, where a joint public-private partnership approach, co-ordinated by the public sector, will be required. Peel has articulated its ideas and suggestions for these partnership areas through the SRF. These have been examined through the Birkenhead Integrated Regeneration Study which has moved the debate forward considerably over recent months.
- 5.11 Alongside the national debate on the future of regeneration, it is understood that Wirral Council will consider the appropriateness of various forms of regeneration vehicle. Typically, these vehicles look to the role that the resources of the local community, Council, regional/local agencies and organisations and the private sector (including Peel) can have in a co-ordinated approach to sustainable regeneration.
- 5.12 In relation to Wirral Waters, Peel wish to have a role (if appropriate) as part of the vehicle's group of partners and it would be expected that the delivery of Wirral Waters could be identified as a core aim of the vehicle. This will involve promoting inner Wirral (including Wirral Waters) to investment markets and acting as a conduit and co-ordinator to regeneration activity related to Wirral Waters.
- 5.13 The vehicle could work alongside Peel and Wirral Council to inform the future decisions of the Council, in terms of identifying funding and development priorities and expenditure of committed sums/tariffs. The vehicle could also have a role in the wider City Region, alongside other regeneration vehicles such as Liverpool Vision.
- 5.14 Ideally Peel would wish to see the broad 'heads of terms' for the regeneration vehicle, building on the above, being in place prior to the East Float planning application being considered at committee. Peel is reviewing existing examples of regeneration vehicles, including their legal structure, independence, members and funding/resources. The South Kilburn Neighbourhood Trust model is one example suggested by CBRE which may be suitable for inner Wirral. It is a partnership of public, private and other groups, with its own board, chaired by an independent professional alongside other representatives, with a number of trustees and a supporting team/secretariat. However, it is recognised that the exact function and role of any potential vehicle is a matter for the Council to consider formally.

- 5.15 Establishing the broad terms for the vehicle will allow the Council and others to see that the partnership mechanism is being put in place to deliver the East Float proposals in a regenerative manner, alongside the controls and mechanisms of the planning permission itself. Peel is aware that this is very much in hand and is encouraged by recent progress by the Council and its partners. It is vital that the momentum is continued and built upon.
- 5.16 In terms of linking the East Float planning permission, if granted, to the regeneration vehicle, the approach to planning obligations will provide the tools for the vehicle to achieve the stated aims of the East Float proposals. This will be through a combination of tariff payments, direction provisions/requirements and as a result of the catalytic ripple effects of East Float generally. In addition, Peel will consider making an appropriate contribution to the set up and/or running of the vehicle and is happy to discuss this further with the Council.

Phasing and delivery controls in the outline planning permission

General approach

- 5.17 The approach to planning conditions and legal agreements for an outline planning permission at East Float will need to be wide ranging, legally robust and implementable. The planning obligations referred to above will all need to be built into the permission, alongside standard 'development management' requirements on a phased basis. As a general principle, where it is not necessary to have a legal agreement to bind the requirement to the permission, the preference should be for the use of planning conditions.
- 5.18 Planning conditions for major, strategic outline planning permissions are normally considerably more comprehensive and wide ranging than conditions attached to most other types of planning permission. Hence it is envisaged that a set of bespoke conditions will be prepared for East Float. Discussions with the Council to date have touched on this approach and the broad scope/nature of the requirements. Refining these requirements into a clear set of requirements is the immediate task. This will provide Wirral Council's Planning Committee and, if the application receives a resolution to grant, the Secretary of State, with a full scope of the requirements to be tied into the outline permission.
- 5.19 Translating the heads of terms and requirements of conditions/agreements into a legally robust planning permission and legal agreements will require the input of

suitably qualified legal advisors. Peel has a retained advisor to assist the Council's solicitor with this.

Phasing mechanisms

- 5.20 The matter of phasing is one of the key challenges for the outline planning application, given the 22 year period proposed for submission of Reserved Matters (RM) applications (with a 3 year period for commencement of each phase).
- 5.21 The draft trajectory is the best estimate indication of how the scheme will be brought forward. It allows for early delivery of certain types of development, and anticipates that major office development is likely to follow on after a meaningful start on the housing component, which is a particular priority during the Growth Point period. The trajectory was provided for the purposes of modelling potential impacts and infrastructure requirements (such as transport, energy and community infrastructure) and provides a useful framework for managing the delivery process.
- 5.22 The trajectory provides a year on year approach. For the purposes of considering phasing, it is appropriate to develop an approach which considers longer time periods due to the 'lumpiness' of construction and single tenant investments (e.g. MediaCityUK adds over 1m sq ft of space to Salford Quays in a single year, but has been under construction for 3 years). This also allows for activity to be averaged taking account of economic cycles.
- 5.23 Peel does not wish to be restricted in absolute terms to the rate and type of delivery set out within the trajectory (i.e. the rate could not be exceeded), either year on year or over a longer time period, but recognises the need for a degree of control to prevent major departures from the trajectory that could result in significant adverse impacts.
- 5.24 As such, it is proposed that the trajectory become part of the planning permission and will be updated as the scheme evolves. This will require the submission and approval of phasing plans and trajectories with each detailed submission.
- 5.25 In terms of ensuring that the development is commenced, it is intended that there will be a requirement to submit reserved matters for a first phase within 5 years, the broad content of which is being discussed. Evidently Peel would hope to bring forward a major phase well before that, so the commitment is provided as a safety net for the planning permission. Minimum amounts of development actually commenced on site, to keep the outline permission alive, are also being discussed.

- 5.26 The trajectory allows for development to be 'drawn down' and managed/monitored in a holistic manner which keeps track of approvals, development on site and changes of use (particularly under the Class E provisions).
- 5.27 In terms of the rate of delivery, retail space is addressed in the Retail, Leisure & Office Addendum. It is not considered necessary to impose restrictions at the outset on the community/education/leisure uses associated with the proposals, although any specific use concerns can be discussed. It is not considered necessary to limit or control the rate of housing delivery, given that the area needs to deliver as much of the proposed housing as possible to reverse population decline. The process of considering the design and market tenure/type of housing will occur through RM application, alongside affordable housing viability assessments/statements.
- 5.28 The principal phasing issue relates to commercial space (B1 use). As analysed in section 4 above and in further detail in the Economic Impact Assessment and Office Market Report, it is not considered likely that the delivery of East Float will have adverse consequences for existing centres. There are a great many factors and variables affecting how the office component may come forward, which will need to be assessed and managed as the project evolves.
- 5.29 If for example a condition was imposed limiting B1 delivery to the trajectory rate, this may cause significant delivery issues. However, it might be that in year 3 a major footloose investor, which would otherwise have not located in Wirral, or indeed in Merseyside (or the North West), requires a major phase open within 5 years. Such space might be additional to other more localised, enterprise related B1 space having been delivered or achievable over the same time. Having a major restriction in the outline planning permission to prevent such an investment could lead the tenant to look elsewhere. Investment decisions are quickly made and the flexibility and certainty to respond positively and prove to investors that their needs can be met, is vital. Hence an arbitrary restriction is not appropriate or necessary and could undermine investment potential.
- 5.30 However, the impacts have been considered at outline stage based on the assumed rate of delivery. Clearly if the entire B1 element were built speculatively in the first 5 years (which would not happen in any event) then there would be the prospect of significant impacts arising. Hence there is a need to define a degree of control. As explained, it is not considered necessary to make the restriction too tight owing to the need for flexibility to attract investment and the proportional/contextual scale and magnitude of impacts.

- 5.31 The discussion to date has focused on conditions limiting the B1 delivery rate to no more than 100,000 sq m within the first X (final figure to be agreed) years of the planning permission. It has also focused on placing a cap on the amount of 'speculative' office development which could occur. The mechanisms remain the subject of ongoing discussions but will be presented in their agreed form to Wirral Council's planning committee in due course.

Spatial phasing

- 5.32 The phasing of the development in a spatial sense will largely be market led, as described in the Planning Statement. Peel and Wirral Council have jointly explored whether there is a need to commit to where, within East Float, development could commence, where it might then need to be directed and whether there are parts of East Float that are best held for the longer term and later phases. Due to the composition and scale of East Float, it is not considered necessary to fix any of these elements at the outset. Clearly, however, once development has commenced in any quarter this will have a significant bearing and influence on where development then moves onto. This will be managed through the Reserved Matters process.
- 5.33 Each RM application will be accompanied by supporting information setting out how the phase or works fit into the overall masterplan for East Float. This will include a Design & Access Statement setting out a refreshing as appropriate of the illustrative masterplan and demonstrating how the proposals are consistent with the outline parameters and principles. Each RM application will, of course, also need to demonstrate how it contributes to design quality. The Design Panel approach being advocated will help guide this process.

Ongoing assessment, study and analysis

- 5.34 In terms of planning obligations and the various requirements of infrastructure and other issues, assessments will be undertaken using the appropriate models and methodologies at the time, taking into account changes in circumstance and the relative position of the phase within the delivery of the scheme. There will be a need for various feasibility studies, market/viability assessments, transport/infrastructure assessments and EIA on a rolling basis.

Pre-Reserved Matters consultation

- 5.35 In addition to committing to provide robust information and assessments, Peel also commits to pre-application consultation with the Council and other parties (including neighbouring Local Authorities, English Heritage, the Environment Agency and the Highways Agency) as relevant to the scale and nature of the RM application. Again, the consultation requirements for full applications will guide the RM process.

EIA

- 5.36 It is anticipated that the two-stage EIA principle will at times need to be used at East Float for individual developments which may trigger significant impacts which have not been fully assessed at the outline stage or where changes in baseline or other factors indicate the need for an updated assessment.. EIA screening will be undertaken for RM applications to manage this process. Recent amendments to the EIA regulations allow this approach to occur.

Considering scale and layout

- 5.37 All RM applications for built development will need to include the consideration of 'scale' and 'layout'. Notwithstanding that the overall use and quantum are approved, in the context of East Float it will be appropriate for the Council and key consultees to comment on whether the scale and layout of individual phases are appropriate in terms of how they implement the overall approach to use and quantum. As such any proposals brought forward for phases of development that are deemed inappropriate in terms of the scale and layout of the phase, can be resisted if the justification and mitigation proposals are not adequate. Assessments undertaken to support RM applications will aid this process.

Design fixity and quality

- 5.38 The overall design parameters/principles and commitments to the quality of design are as set out in the Development Specification, Design & Access Statement and Quarter Handbooks, alongside a number of Guiding Principles documents in terms of the aims for the wider area. The wider place-making approach for the SRF area is captured within the recently published draft Vision Statement. These documents, as submitted, capture three years of working with the Council and other stakeholders on the approach to urban design and masterplanning for the SRF area and East Float more specifically.

5.39 Having reviewed the application material, a number of meetings have been held with the Council to review and test the robustness of the approach and commitments. These have resulted in the preparation of a schedule of changes that are to be made to the design material. These changes are currently being finalised by the Peel team and will be submitted to the Council shortly. The additional areas of commitment/detail relate principally to safeguarding the integrity and quality of the masterplan and ensuring that the development comes forward in a cohesive manner that provides for the needs of different phases in a way that helps facilitate further phases and linked regeneration.

Minor proposals

5.40 Smaller RM applications for minor works will be accompanied by appropriate levels of information. The general test will be that the level of information that would have been required for a full planning application will be provided for a RM application, made under the overall framework of the outline. It will however be important to ensure that all RM applications are made within the legal framework of the outline and in accordance with the committed parameters, principles, obligations, conditions and other requirements. The outline permission will stipulate this.

Appendix 1 – Revised East Float Employment Trajectory

Appendix 2 - Revised East Float Residential Trajectory

East Float Indicative Housing Trajectory 2010-2050:
Vittoria Studios Sky City, Marina View, Northbank West
(excluding Northbank East)

Year (20..)	Housing units per annum	Cumulative units	Additional take- up each year - assumes 50% occupancy for first year, and 95% thereafter	Cumulative Take- up/ Occupancy - assumes 50% occupancy for first year, and 95% thereafter	Additional resident population added per annum	Cumulative Gross Wirral Waters resident population
10	0	0	0	0	0	0
11	200	200	100	100	205	205
12	300	500	240	340	492	697
13	400	900	335	675	687	1384
14	400	1300	380	1055	779	2163
15	400	1700	380	1435	779	2942
16	400	2100	380	1815	779	3721
17	500	2600	430	2245	882	4602
18	500	3100	475	2720	974	5576
19	500	3600	475	3195	974	6550
20	500	4100	475	3670	974	7524
21	500	4600	475	4145	974	8497
22	500	5100	475	4620	974	9471
23	400	5500	425	5045	871	10342
24	400	5900	380	5425	779	11121
25	400	6300	380	5805	779	11900
26	400	6700	380	6185	779	12679
27	400	7100	380	6565	779	13458
28	400	7500	380	6945	779	14237
29	400	7900	380	7325	779	15016
30	400	8300	380	7705	779	15795
31	350	8650	355	8060	728	16523
32	350	9000	333	8393	682	17205
33	350	9350	333	8725	682	17886
34	350	9700	333	9058	682	18568
35	350	10050	333	9390	682	19250
36	350	10400	333	9723	682	19931
37	350	10750	333	10055	682	20613
38	300	11050	308	10363	630	21243
39	300	11350	285	10648	584	21827
40	300	11650	285	10933	584	22412
41	250	11900	260	11193	533	22945
42	250	12150	238	11430	487	23432
43	250	12400	238	11668	487	23918
44	221	12621	223	11891	457	24376
45	200	12821	199	12090	409	24784
46	200	13021	190	12280	390	25174
47	200	13221	190	12470	390	25563
48	100	13321	140	12610	287	25850
49	100	13421	95	12705	195	26045
50	100	13521	95	12800	195	26240

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