



# Have your say

## Scotts Quay Neighbourhood Framework Survey Report



Consultation: 17 July 2023 – 03 October 2023

Report: 06 October 2023

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# 1.0 Executive Summary

Wirral Council is developing a framework for future development of the Scotts Quay area. The Scotts Quay Neighbourhood Framework aims to create a new high-density mixed use sustainable living area maximising the potential of its setting, combining existing and new homes to create a thriving waterside community. This will include affordable and retirement properties, as well as housing for young professionals. There will also be opportunities for further commercial premises to be developed in the area, with the potential for new jobs and places of business.

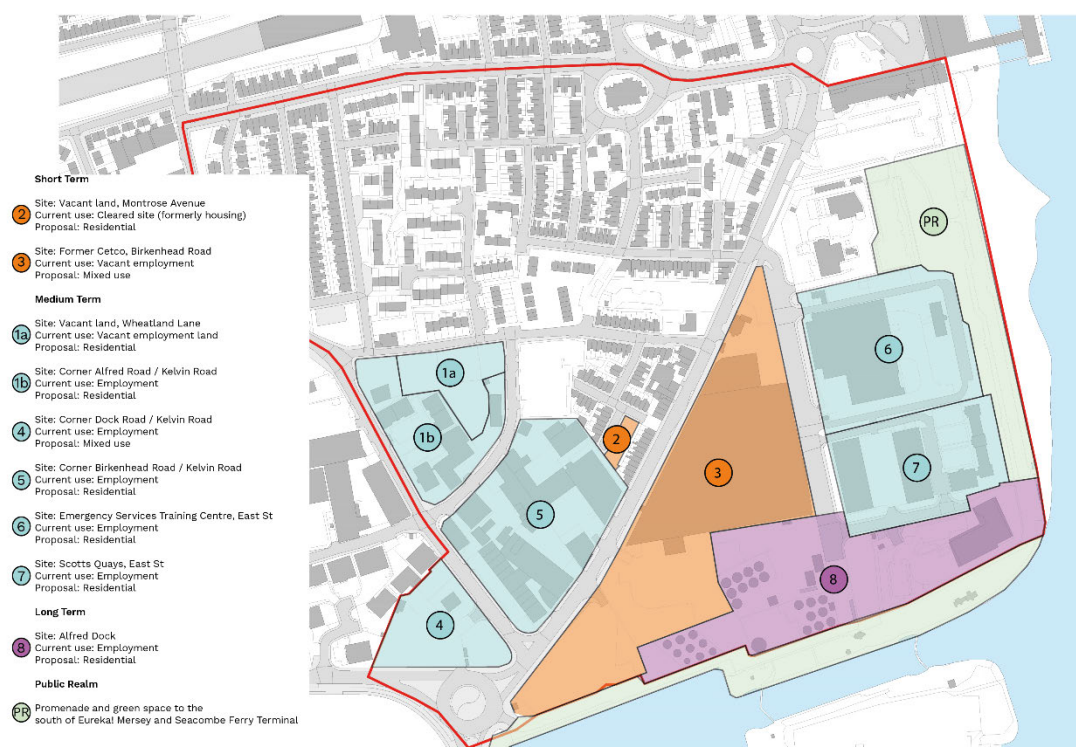


Figure 1: A map of the Scotts Quay area with proposed options.

This consultation wanted to hear the public's opinion on the plans for Scotts Quay to make the most of local knowledge and make sure the final masterplan is based on the views of people who care about the future of Birkenhead.

An online public consultation was conducted through the 'Have your say' consultation portal at [www.haveyoursay.wirral.gov.uk](http://www.haveyoursay.wirral.gov.uk) between 17 July 2023 – 03 October 2023, with a page dedicated to the Scotts Quay Neighbourhood Framework Consultation.

A set of information provided on the site included a map of the area, the Scotts Quay Neighbourhood Framework document and an Executive Summary of the framework. The webpage also included details of in person engagement events at BirkenEd's place.

Alongside the online engagement work, in person consultation aligned with the online survey was carried out in Birkenhead between 12 – 22 July 2023. This in person engagement is reported separately.

The findings from the engagement work will be used to finalise the Scotts Quay Neighbourhood Framework and the development of the local plan.



## 1.1 Key Findings

- The questionnaire was responded to by 78 people.
- 41.4% of the responses said they were wider Wirral residents, 39.1% said they were local residents to the Scotts Quay area. 8.0% of responses came from local businesses. (Question 1).
- The most common answer when asked 'Overall, do you support this Neighbourhood Framework project?' was 'Strongly agree', supported by 32.0%. In total, 60% of respondents were in agreement with the statement, and 24% were in disagreement. (Question 2.)
- People believed that the greatest benefit / opportunity that this scheme could bring is 'Provide a neighbourhood where local people may choose to stay and live,' supported by 10.3% of responses. The second most common response was 'Offer a better mix of housing (including family and affordable homes),' selected by 9.3% of responses (Question 3).
- When asked for concerns regarding the project, the most common response was 'other,' selected by 26 people, these respondents were asked to provide further detail and a list can be found in section 3.1.4. The second most common response was 'There is a lack of capacity / resources to deliver it,' selected by 24.7% of respondents. (Question 4).
- The most common perceived benefit to the community of the scheme is 'Removal of empty / underutilised existing buildings,' selected by 16.3% of responses. (Question 5).
- The most common responses to "What do you think are the key elements that are needed to ensure the Neighbourhood Framework is a success?" were: (Question 6).
  - Local buy in (15.3%): For the project to be a success, the framework must meet the needs of current local residents.
  - Good public transport links (13.6%): The Neighbourhood framework must incorporate public transport to ensure travel is possible both on and off-peak times.
  - Financially Viable (11.9%): Respondents said the project should be financially viable, with funding reliably secured and costs controlled to ensure the project does not exceed the planned budget.
- When asked to provide additional thoughts regarding the schemes, the top themes that emerged were: (Question 7).
  - Support existing businesses to remain (19.6%): The neighbourhood framework should support businesses currently in the area, thus creating and retaining employment opportunities.
  - Infrastructure (8.7%): Schools, Leisure, Roads/parking, health, and retail should be built to ensure the neighbourhood is a success.
  - Sports Facilities (8.7%): The neighbourhood framework should ensure there are sports facilities in the area.

## 2.0 Methodology

Wirral Council is developing a framework for future development of the Scotts Quay area. The Scotts Quay Neighbourhood Framework aims to create a new high-density mixed use sustainable living area maximising the potential of its setting, combining existing and new homes to create a thriving waterside community.

Scotts Quay forms a crucial part in the Birkenhead 2040 Framework. The area has great potential with excellent transport links and a prominent location next to the River Mersey. The site is only 1.5 miles from Birkenhead Town Centre and neighbours the Twelve Quays Ferry Terminal and the Wirral Waters development. Homes and businesses such as United Molasses are already located in the area and there is also some derelict land.

The proposed development aims to create new residential developments including affordable and retirement properties, as well as housing for young professionals. There will also be opportunities for further commercial premises to be developed in the area, with the potential for new jobs and places of business. Current proposals for the area include:

- Family, professional and retirement properties, including up to 300 houses, 3,200 apartments, 15.7 hectares of green space and 13,000 square metres of office space, depending on land availability, and environmental and time constraints.
- Opportunities for new modern employment premises to support local economic growth, ensuring the continued positive economic contribution of this neighbourhood in the future.
- Improvements to the existing housing area within the neighbourhood alongside the delivery of new waterfront living opportunities.

This consultation wanted to hear the public's opinion on the plans for Scotts Quay to make the most of local knowledge and make sure the final masterplan is based on the views of people who care about the future of Birkenhead.

The consultation was carried out between 17 July 2023 – 03 October 2023. The approach used was an online public consultation through the 'Have your say' consultation portal at <http://www.haveyoursay.wirral.gov.uk> with a page dedicated to the Scotts Quay Neighbourhood Framework Consultation. Useful information provided on the site included a map of the area, the Scotts Quay Neighbourhood Framework document, and an Executive Summary of the framework. The webpage also included details of in person engagement events at BirkenEd's place.

Alongside the online engagement work, in person consultation aligned with the online survey was carried out in Birkenhead between 12 – 22 July 2023. This in person engagement is reported separately.

## 2.1 Questionnaire

The consultation questionnaire was developed around understanding stakeholder views on the frameworks ability to address the following key areas:

- Respond to the needs of local residents and business to create a high-quality residential area that can coexist with the businesses in the local area.
- To ensure that development is sensitive to its context and improves the character and quality of the local area, maximising the sustainable links to the Mersey Ferry at Seacombe, the cycling routes like SUstrans route 56 and the Wirral Circular Trail, as well as public transport routes to Birkenhead Road.
- To create development that is well connected to the surrounding area and is inclusive and accessible.
- To enhance the sense of safety and security for residents.
- To enhance place-marketing and inward investment potential.
- To create more energy efficient and less polluting development.

To enable further understanding, and in-depth analysis, respondents were invited to provide free-text comments to expand on their ideas or concerns. Following closure of the consultation, the responses to each of the direct questions were collated and the responses included in this report. For the free-text comment questions, a text coding approach was used based on the reoccurring themes. This data was then collated and summarised in the report.

## 2.2 Analysis of Respondents

Respondents to the online tools were provided with the option to provide demographic information about themselves. It must be noted that this is an option and that not all respondents included this information. This data allows the demographic results to be included in this report to enable analysis of the scope of responses and representation from different demographic groups.

## 2.3 Interpretation of Results

In terms of the results, it is important to note that:

- The public consultation is not representative of the overall population but provides information the opinion of those residents who engaged.
- Free-text questions that offered respondents the option to provide written feedback could have covered multiple themes. Therefore, with free-text responses were categorised using a coding system. The percentages given, reflect the percentage of respondents who made the comment. As they may have made more than one comment, the total percentage may exceed 100%.

- For some questions, respondents were asked to select one or more options. The percentages given, reflect the percentage of responses each option received in total.

## 2.4 Direct Representations

Contact details were provided to enable organisations, groups, or special interest groups to directly submit their responses to the draft options.

## 2.5 Communication

The consultation was promoted through the council’s corporate digital communication channels. This included:

- Consultation on Have Your Say website.
- Organic social media post on council’s corporate accounts - Twitter Impressions/Posts - 5th July (1,275), 19th July (2,740 impressions), 27th September (1,744 impressions).
- Facebook Impressions/Posts - 27th September.
- Media releases issued to local print and digital media, covered in Wirral Globe both paper and online editions (395.k monthly visitors). Four editions of Globe:
  - <https://www.wirralglobe.co.uk/news/23792905.birkenheads-regeneration-update-september/>
  - <https://www.wirralglobe.co.uk/news/23671392.consultations-launched-scotts-quay-northside/>
  - <https://www.wirralglobe.co.uk/news/23625646.wirral-council-faces-significant-risks-regeneration-plans/>
  - <https://www.wirralglobe.co.uk/news/23674095.new-seacombe-regeneration-plans-unveiled/>
- Three Wirral View news articles:
  - <https://wirralview.com/inclusive-economy/consultations-launched-scotts-quay-and-northside>
  - <https://wirralview.com/inclusive-economy/wirral-summer-consultations-continues>
  - <https://wirralview.com/inclusive-economy/birkenhead-regeneration-update-september-2023>
- Resident email to over 21,000 email addresses – with an average open rate of 49%: 21st July, 28th July, 4th August, 11th August, 18th August, 25th August, 1st September, 8th September, 15th September, 22nd September, 2nd October.
- Internal news shared with council staff through Exec View (internal staff e-newsletter) and staff intranet.
- In person engagement events at BirkenEd’s Place.



# 3.0 Results

## 3.1 The Questionnaire

The questionnaire was responded to by 78 people. All responses came through the online portal, no paper copies were completed. No questions were mandatory so respondents could choose which questions to respond to.

### 3.1.1 Question 1: Tell us about your connection to the Scotts Quay neighbourhood.

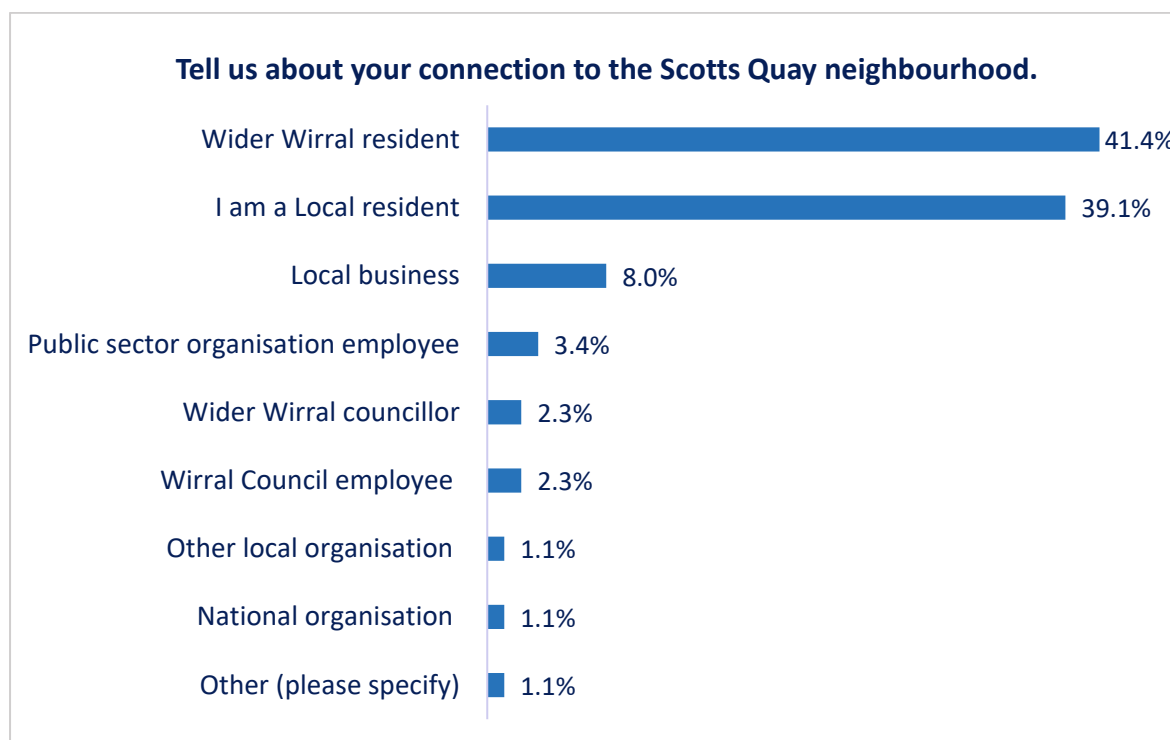


Figure 2: Connections to Scotts Quay

This was a multiselect question, respondents could select more than one option. 41.4% of the respondents said they were wider Wirral residents, 39.1% said they were local residents to the Scotts Quay area. 8.0% of responses came from local businesses.

Other response:

- I work in the area and have family who live in the surrounding area.

Tell us about your connection to the Scotts Quay neighbourhood.		
Answer	Total	%
Wider Wirral resident	36	41.4%
I am a Local resident	34	39.1%
Local business	7	8.0%
Public sector organisation employee	3	3.4%
Wider Wirral councillor	2	2.3%
Wirral Council employee	2	2.3%
Other local organisation	1	1.1%
National organisation	1	1.1%
Other (please specify)	1	1.1%
<b>Total</b>	<b>87</b>	<b>100.0%</b>

Table 1: Connection to Scotts Quay

### 3.1.2 Question 2: Overall, do you support this Neighbourhood Framework project?

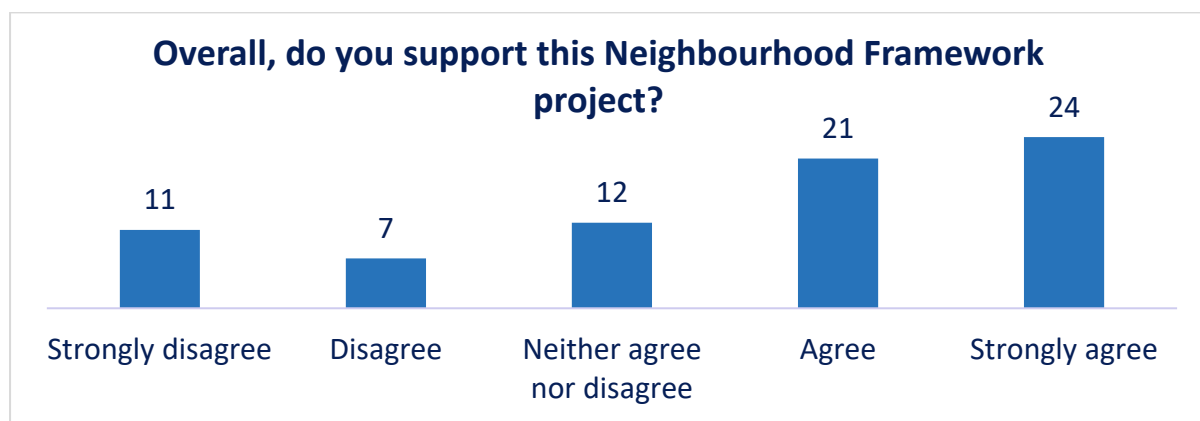


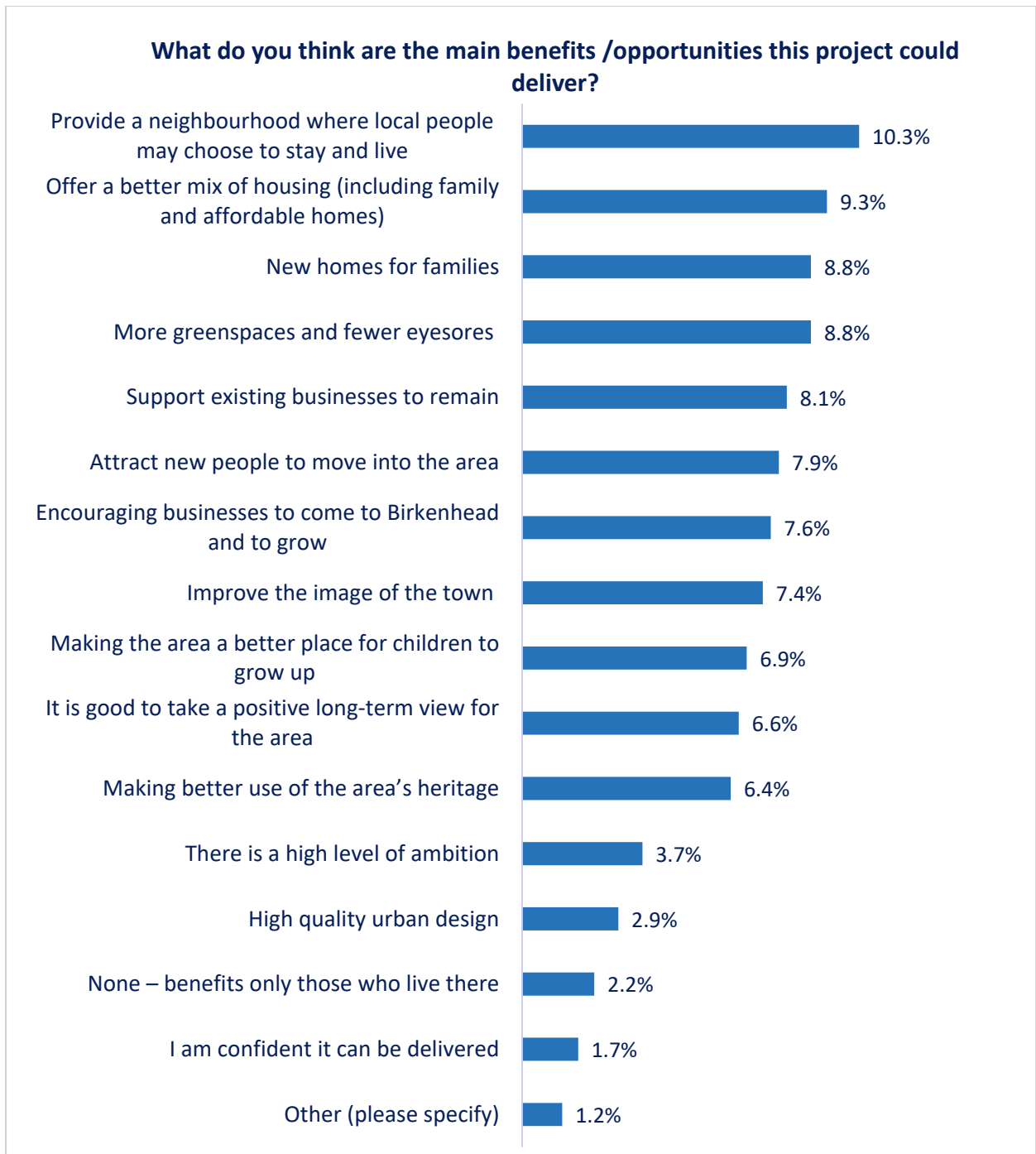
Figure 3: Support for the Scotts Quay neighbourhood framework

In response to 'Overall, do you support this Neighbourhood Framework project?', the most common answer was 'Strongly agree', supported by 32% of the 75 responses. In total, 60% of respondents were in agreement with the statement, and 24% were in disagreement.

Overall, do you support this Neighbourhood Framework project?		
Answer	Total	%
Strongly disagree	11	14.7%
Disagree	7	9.3%
Neither agree nor disagree	12	16.0%
Agree	21	28.0%
Strongly agree	24	32.0%
<b>Total</b>	<b>75</b>	<b>100.0%</b>

Table 2: Support for Scotts Quay neighbourhood framework

**3.1.3 Question 3: What do you think are the main benefits /opportunities this project could deliver?**



*Figure 4: Benefits and opportunities*

75 people answered this question regarding their opinion of the benefits that this project could deliver. The most common answer was ‘Provide a neighbourhood where local people may choose to stay and live,’ supported by 10.3% of responses.

The second most common response was ‘Offer a better mix of housing (including family and affordable homes),’ selected by 9.3% of responses.

Other response:

- Job creation.
- Profit for select people.
- This is detrimental to industry/ business. The town requires industrial areas for employment opportunities.
- Provides a much-needed boost to Birkenhead and a very good new attractive residential and mixed use area.
- Benefits to sports and physical activity in the locality.

What do you think are the main benefits /opportunities this project could deliver?		
Answer	Total	%
Provide a neighbourhood where local people may choose to stay and live	42	10.3%
Offer a better mix of housing (including family and affordable homes)	38	9.3%
New homes for families	36	8.8%
More greenspaces and fewer eyesores	36	8.8%
Support existing businesses to remain	33	8.1%
Attract new people to move into the area	32	7.9%
Encouraging businesses to come to Birkenhead and to grow	31	7.6%
Improve the image of the town	30	7.4%
Making the area a better place for children to grow up	28	6.9%
It is good to take a positive long-term view for the area	27	6.6%
Making better use of the area's heritage	26	6.4%
There is a high level of ambition	15	3.7%
High quality urban design	12	2.9%
None – benefits only those who live there	9	2.2%
I am confident it can be delivered	7	1.7%
Other (please specify)	5	1.2%
<b>Total</b>	<b>407</b>	<b>100.0%</b>

Table 3: Benefits and opportunities

### 3.1.4 Question 4: Do you have any concerns about this project?



Figure 5: Concerns

66 responded to this question with concerns regarding the project. The most common response was 'other,' selected by 26 people who had concerns that were not pre included in the survey. A list of the other responses can be found below. The second most common response was 'There is a lack of capacity / resources to deliver it,' selected by 24.7% of respondents.

Other responses:

- Lack of public transport.
- The plan seems to cut off the footpath that goes between the Orsted plant and the river so there is no access between Seacombe ferry and Alfred Dock. Similarly East Street becomes a dead end.
- Apart from the blocks on the riverfront to the scheme is horrendous. Behind the front blocks, the area looks like a 1960/70 tenement block and will encourage criminality and gangs.
- Could you please build at least one project first. The cost materials will seriously have an impact on high quality / affordable housing.
- Not enough cycle facilities.
- No concerns about the construction/delivery of the project but concerned with how high the house/apartment prices will be when built out. I know that isn't to do with the developer but thought I'd mention.

- Loss of several successful businesses including the Kelvin Garage and Soccer Dome. Soccer Dome is as close to a community that the local area has without tracking elsewhere.
- Too many suggestions of apartments. They're everywhere, and eyesores. Make houses, for families, with a little private outdoor space. Social housing at that. People can't afford to buy their own house anymore, and the rich are lapping these things up to rent out at ridiculous prices. More and more are becoming homeless and Council's can't help as there's not enough social housing, so people are being holed up in budget hotels. It's damaging to children. Start looking after your own people, Wirral Council.
- It's not on the Merseyrail.
- Risk of demolishing Soccerdrome.
- Are you going to tackle the anti-social behaviour in the area first? What about poverty? Or minimising the use of food banks? Or helping the NHS? Making changes so that public sector works don't have to strike anymore? Paying them a fair wage? I think the money would be much better spent helping people get into employment and tackling poverty in the area than lining the pockets of developers. Where have you found the money to come up with these proposals when public sector workers are massively underpaid, having to strike to get a fair wage, the NHS is on its knees and poverty/use of food banks is at an all-time high. I seriously think you need to tackle these issues first before you spend money trying to 'pretty' up the area. Also have you thought about how you're going to upkeep the area once it's developed with all the cuts in funding that have taken place over the years?
- Lack of infrastructure, going to be 3500 new homes = at least 3500 cars= 7000 journeys a day. The 4 Bridges/Dock Road/Birkenhead road won't cope with this amount of traffic, and god forbid that anyone wants to cross the roundabout with that much traffic and no crossing facilities. - no public parks for 3500 people in the area, will a new doctors/dentist, hospital, police, fire etc be provided for these 3500 people. That's not even taking into account the staff and visitors that may be coming to the area. What happens to the new building that's there already is that to be demolished?
- Great idea!
- Will this include the closure of more successful businesses in the area? Please see section 7 below
- Existing Business need to be considered.
- Not enough mention of the infrastructure to support 'active travel' (Walking & cycling) beyond the national cycle routes. More green space needed too.
- This area is steeped in maritime history, would be nice to see that recognised and some key features remain.
- Not sure. Maybe too ambitious/costly. Not sure if some of designs of buildings attractive and will 'weather' You say you don't want a lot of cars but where are the

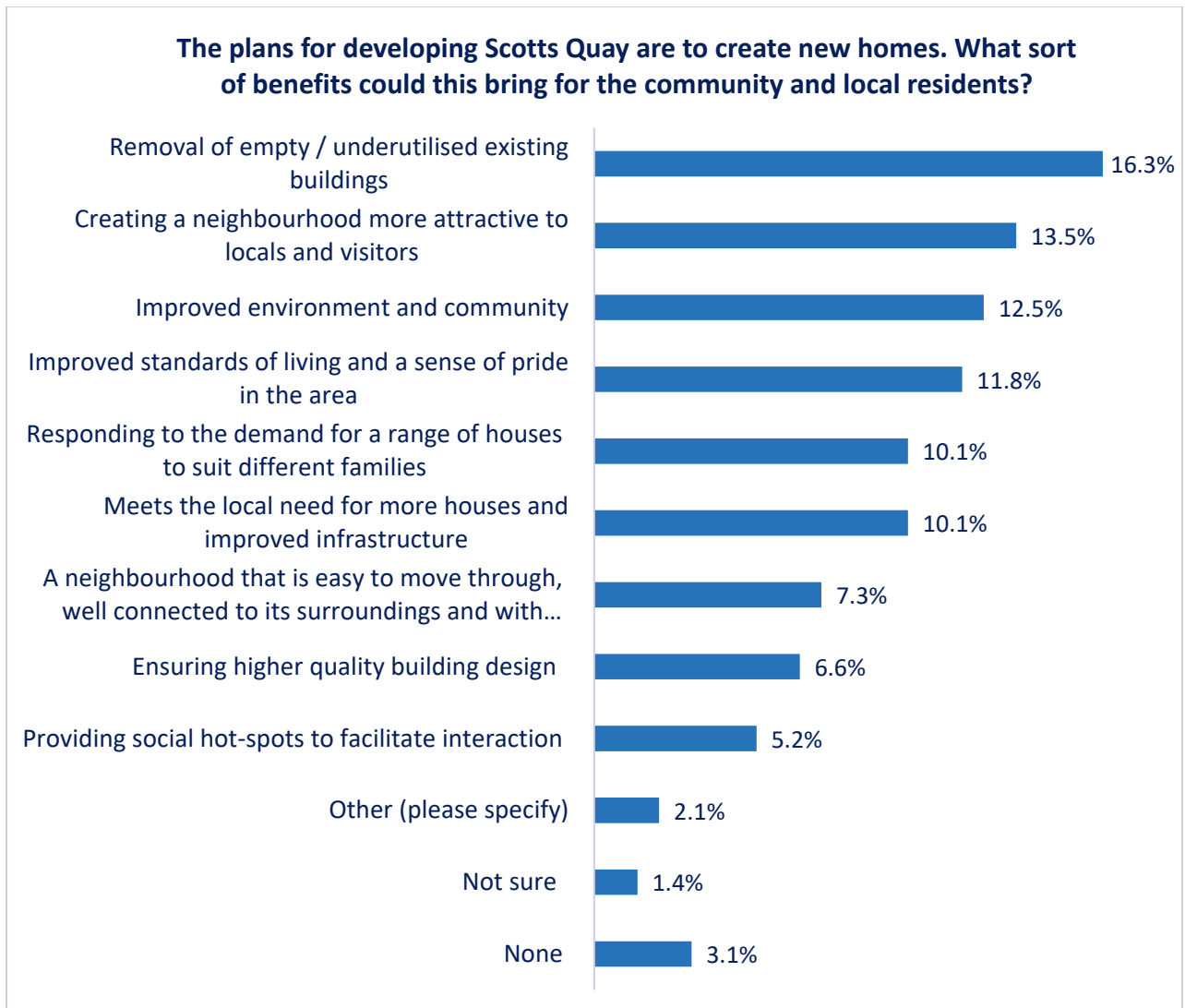
necessary buses/trains throughout the day. The weather can affect the Ferry. What about school provision?

- Don't agree with some of the chosen sites.
- I am concerned that some people might try to block it or to disparage the concept or that there might not be sufficient funds and resources to carry it through well and fully.
- Provision of social housing.
- Current residents will not get a look in on new homes as they are always unaffordable, even the so-called affordable ones. The employment market does not pay enough.
- I like the idea of workplaces being close to residential accommodation as it is good from a carbon point of view. However, for me a major issue is to what extent the dwellings created will be genuinely affordable. For property people it means that the new dwellings will be 80% of the value of existing properties in the locale. Nobody seems prepared to actually put down a number, in pound notes, as to what "affordable" really means.
- Developer consortium will fight against it and promote Green Belt release instead.
- Yes, I sent the council etc, all the companies planning to develop or are developing in these areas already about the housing issues, but they never replied to me.
- There should be a high restriction so the rest of the houses in the area can actually get the view back.

Do you have any concerns about this project?		
Answer	Total	%
Other (please specify)	26	26.8%
There is a lack of capacity / resources to deliver it	24	24.7%
The money could be better spent elsewhere	13	13.4%
Disagree with the whole approach	12	12.4%
There is something important missing	9	9.3%
It is too costly	7	7.2%
Too ambitious / unrealistic	6	6.2%
<b>Total</b>	<b>97</b>	<b>100.0%</b>

Table 4: Concerns

**3.1.5 Question 5: The plans for developing Scotts Quay are to create new homes. What sort of benefits could this bring for the community and local residents?**



*Figure 6: Benefits for local community and residents*

75 people answered this question, and they may have selected more than one option. The most common response was 'Removal of empty / underutilised existing buildings,' selected by 16.3% of the responses. The next most popular options were Creating a neighbourhood more attractive to locals and visitors (13.5%) and Improved environment and community (12.5%).

Other responses:

- Improvement of local shops.
- Higher footfall locally will support existing local and SME businesses, e.g. the retail offerings of Poulton Road, as well as the Liscard village and Birkenhead town hall offerings.
- Provide an anti-social hot spot.



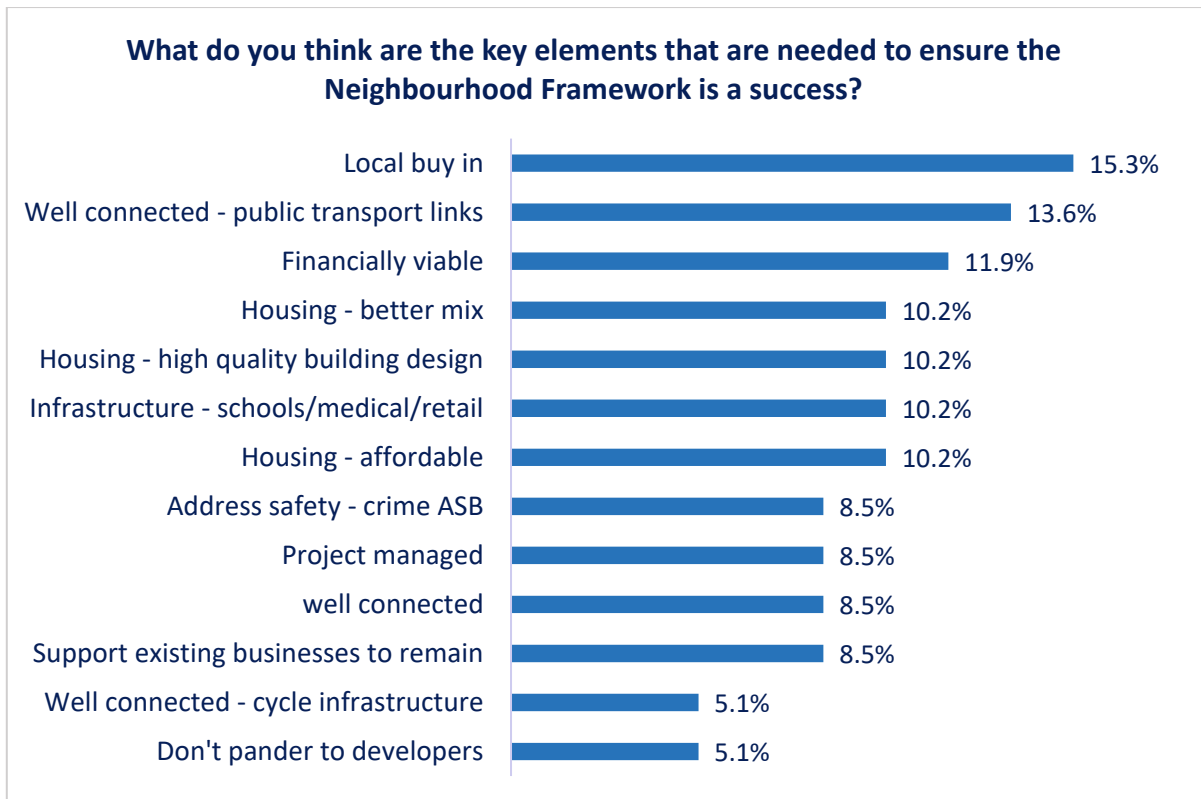
- None of them are anything like this red box by spillers.
- Doesn't meet the need for local employment.
- The houses will not be affordable to locals.

<b>The plans for developing Scotts Quay are to create new homes. What sort of benefits could this bring for the community and local residents?</b>		
<b>Answer</b>	<b>Total</b>	<b>%</b>
Removal of empty / underutilised existing buildings	47	16.3%
Creating a neighbourhood more attractive to locals and visitors	39	13.5%
Improved environment and community	36	12.5%
Improved standards of living and a sense of pride in the area	34	11.8%
Responding to the demand for a range of houses to suit different families	29	10.1%
Meets the local need for more houses and improved infrastructure	29	10.1%
A neighbourhood that is easy to move through, well connected to its surroundings and with accessible streets.	21	7.3%
Ensuring higher quality building design	19	6.6%
Providing social hot-spots to facilitate interaction	15	5.2%
Other (please specify)	6	2.1%
Not sure	4	1.4%
None	9	3.1%
<b>Total</b>	<b>288</b>	<b>100.0%</b>

*Table 5: Benefits for community and local residents*

### **3.1.6 Question 6: What do you think are the key elements that are needed to ensure the Neighbourhood Framework is a success?**

59 people answered this free text question. Below are the top themes (3 or more mentions) that emerged from the free-text comments as a percentage of the number of people who provided an answer to the question. As the percentage reflects the proportion of respondents who made the comment and that respondents may have made more than one comment in their answer, the total percentages may exceed 100%.



*Figure 7: elements required for the project to be a success*

**Local buy in (15.3%)**

This was the most common theme, mentioned in 15.3% of comments. Respondents believe that those who currently live in or around the Scotts Quay area should be listened too as the framework will impact them the most. Therefore, for the project to be a success, the framework must meet the needs of current local residents.

**Good public transport links (13.6%)**

The Neighbourhood framework must incorporate public transport to ensure travel is possible both on and off-peak times. Respondents said this proposal should be connected to Bus, Rail and Ferry transport infrastructure.

**Financially Viable (11.9%)**

For the Scotts Quay neighbourhood framework to be a successful project, respondents said the project should be financially viable, with funding reliably secured and costs controlled to ensure the project does not exceed the planned budget.

What do you think are the key elements that are needed to ensure the Neighbourhood Framework is a success?		
Answer	Total	%
Local buy in	9	15.3%
Well connected - public transport links	8	13.6%
Financially viable	7	11.9%
Housing - better mix	6	10.2%
Housing - high quality building design	6	10.2%
Infrastructure - schools/medical/retail	6	10.2%
Housing - affordable	6	10.2%
Address safety - crime ASB	5	8.5%
Project managed	5	8.5%
well connected	5	8.5%
Support existing businesses to remain	5	8.5%
Well connected - cycle infrastructure	3	5.1%
Don't pander to developers	3	5.1%

Table 6: elements required for the project to be a success

### 3.1.7 Question 7: Do you have any other comments or suggestions you would like to make about the Scotts Quay Draft Neighbourhood Framework?

46 people answered this free text question. Below are the top themes (3 or more mentions) that emerged from the free-text comments as a percentage of the number of people who provided an answer to the question. As the percentage reflects the proportion of respondents who made the comment and that respondents may have made more than one comment in their answer, the total percentages may exceed 100%.

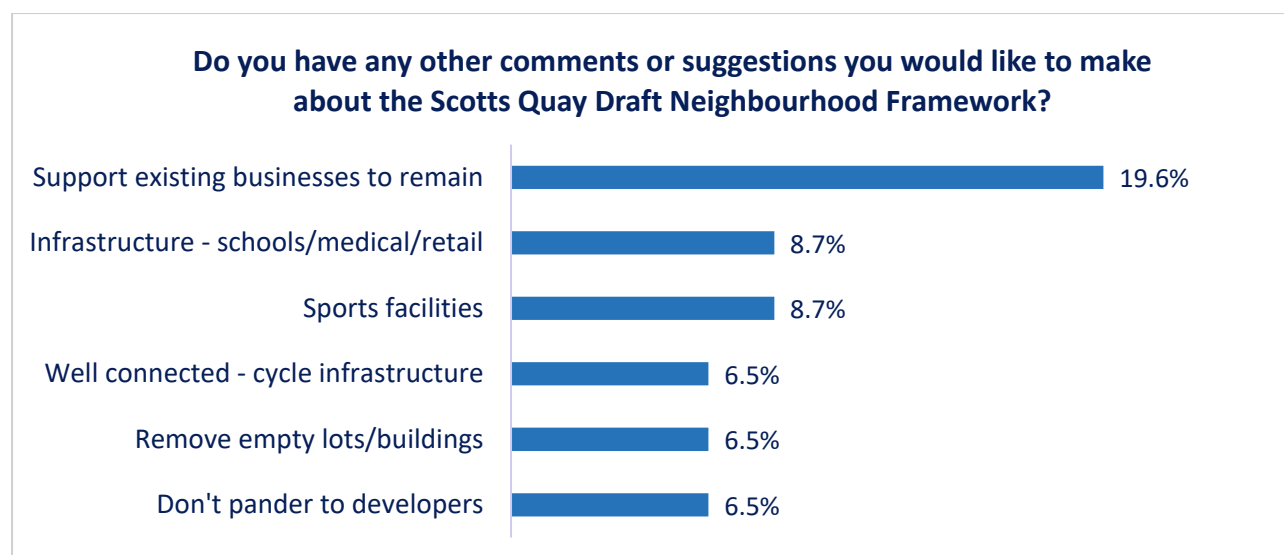


Table 7: Additional comments and suggestions

### Support existing businesses to remain (19.6%)

The most common response was that the neighbourhood framework should support businesses currently in the area, thus creating and retaining employment opportunities. As the Scotts Quay area is home to many businesses, who have invested in facilities in the area, respondents believe that the framework should be designed to allow them to thrive.

### Infrastructure (8.7%)

Respondents believe that infrastructure should be prioritised in this framework. Schools, Leisure, Roads/parking, health and retail should be built to ensure the neighbourhood is a success.

### Sports Facilities (8.7%)

The neighbourhood framework should ensure there are sports facilities in the area. Respondents mentioned the current facilities in the area such as the Soccer Dome.

Do you have any other comments or suggestions you would like to make about the Scotts Quay Draft Neighbourhood Framework?		
Answer	Total	%
Support existing businesses to remain	9	19.6%
Infrastructure - schools/medical/retail	4	8.7%
Sports facilities	4	8.7%
Well connected - cycle infrastructure	3	6.5%
Remove empty lots/buildings	3	6.5%
Don't pander to developers	3	6.5%

Table 8: Additional comments and suggestions

## 3.2 Direct Representations

Four direct representations from the organisations below were provided. These can be found in Appendix 1.

- The Merseyside Civic Society (MCS)
- Ørsted Power Limited
- Stantec
- Mersey Docks and Harbour Company (Part of Peel Ports Group).

# 4.0 Demographics and Site Traffic

## 4.1 Demographics

Registration was required to engage in the online Scotts Quay Neighbourhood Framework consultation. The registration form included questions regarding demographics including gender, age group, ethnicity, and sexual orientation, however not all questions in the registration form were compulsory and respondents could choose to select 'prefer not to say' or skip the question. The demographics results are summarised below. The same questions were included on the paper-copy questionnaires.

Most respondents (81.3%) classed themselves as a Local Resident.



Figure 8: Chart displaying registration

The age group profile is illustrated below with the most common age groups being 55-64 years (31.5%), followed by both 35-44 and 45-54 age groups, 19.2% respectively. No responses were received from people aged under 25.

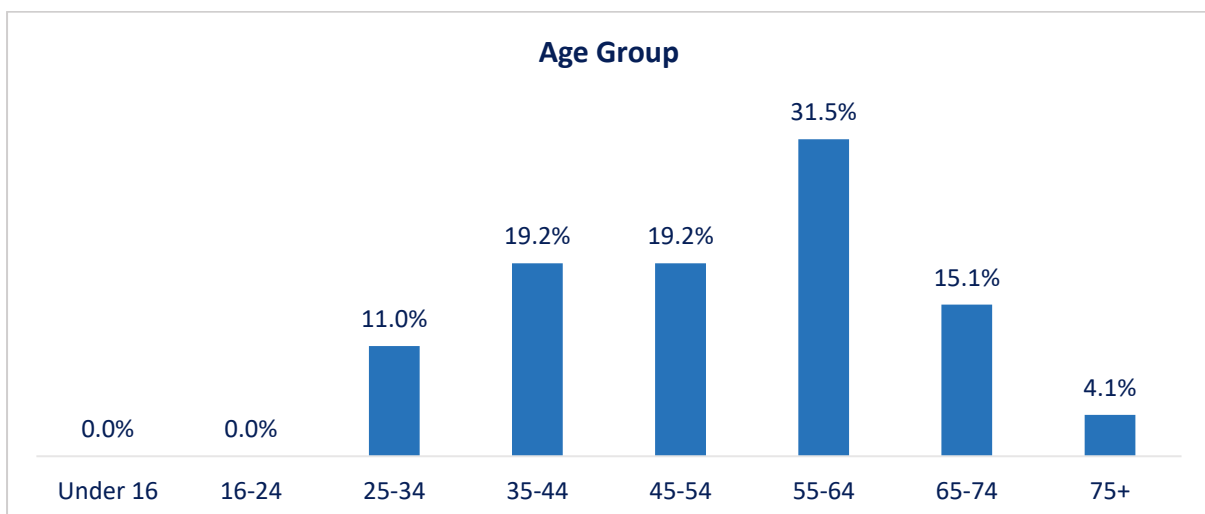


Figure 9: Chart displaying age groups

61.3% of respondents identified as Male and 29.3% Female. 9.3% preferring not to say.

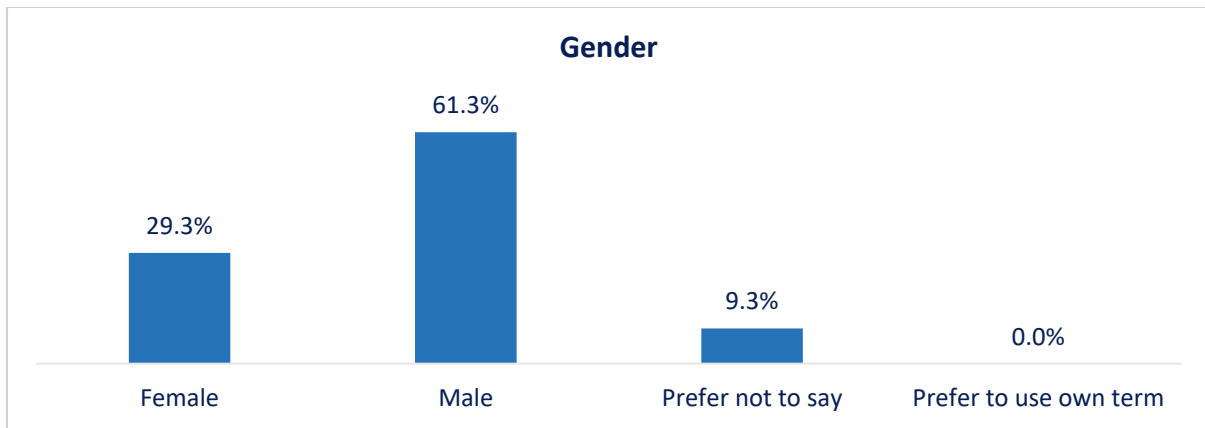


Figure 10: Chart displaying gender

71.8% of respondents were heterosexual, 7.0% were gay/ lesbian and 21.1% preferred not to say.

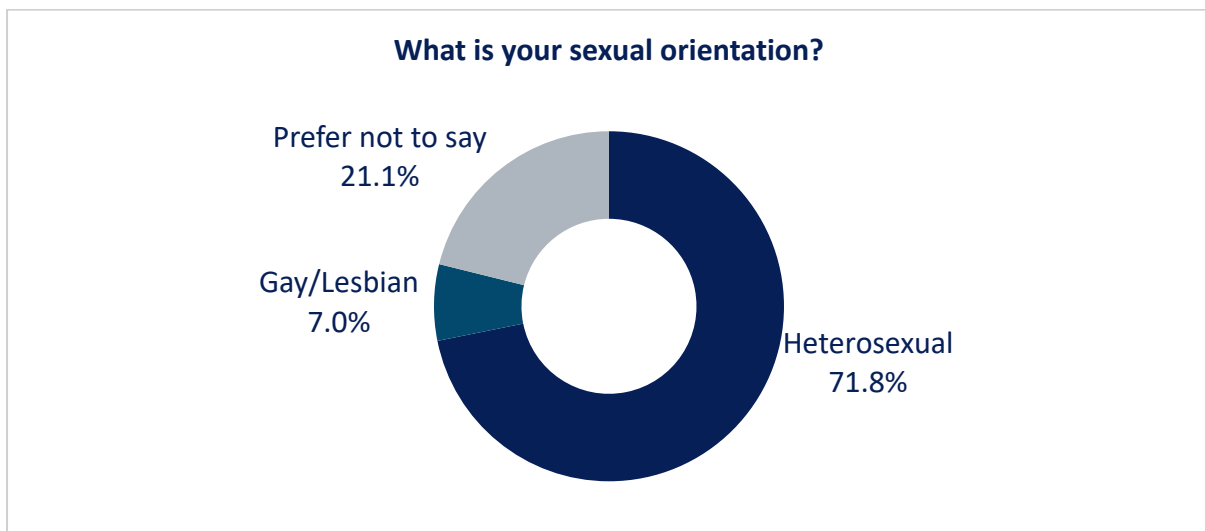


Figure 11: Chart displaying sexual orientation

79.4% said they did not have a disability whilst 8.8% of respondents said that they had a disability. 11.8% preferred not to say.

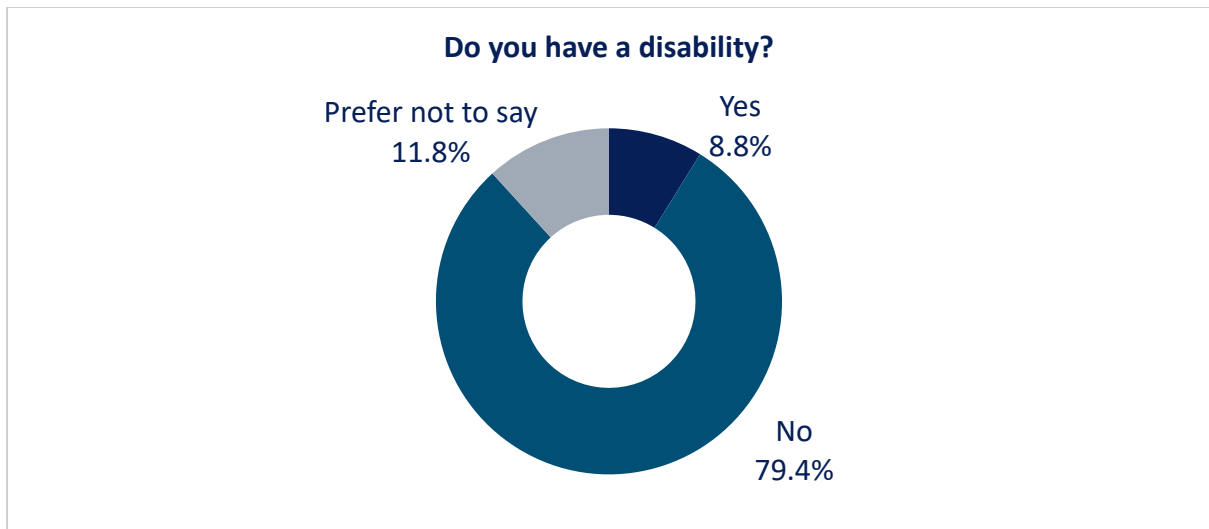


Figure 12: Chart displaying disability

The majority (89.0%) of respondents identified as White – British.

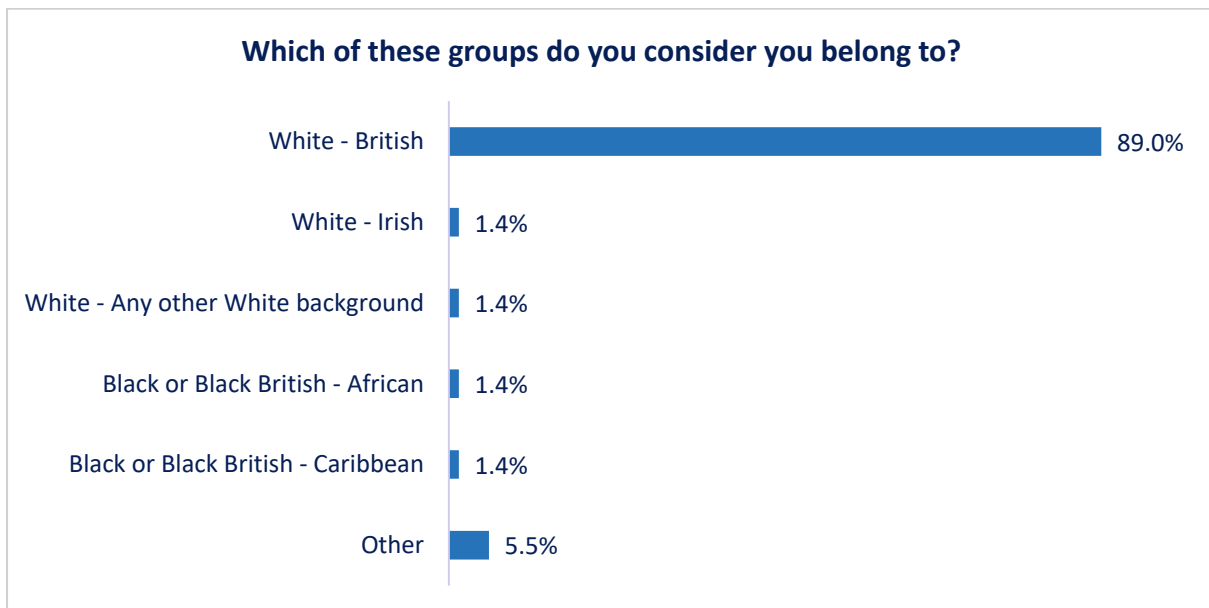


Figure 13: Chart displaying groups

The most represented ward was Seacombe (18.9%) followed by New Brighton (12.2%). The only ward not to receive representation was Upton.

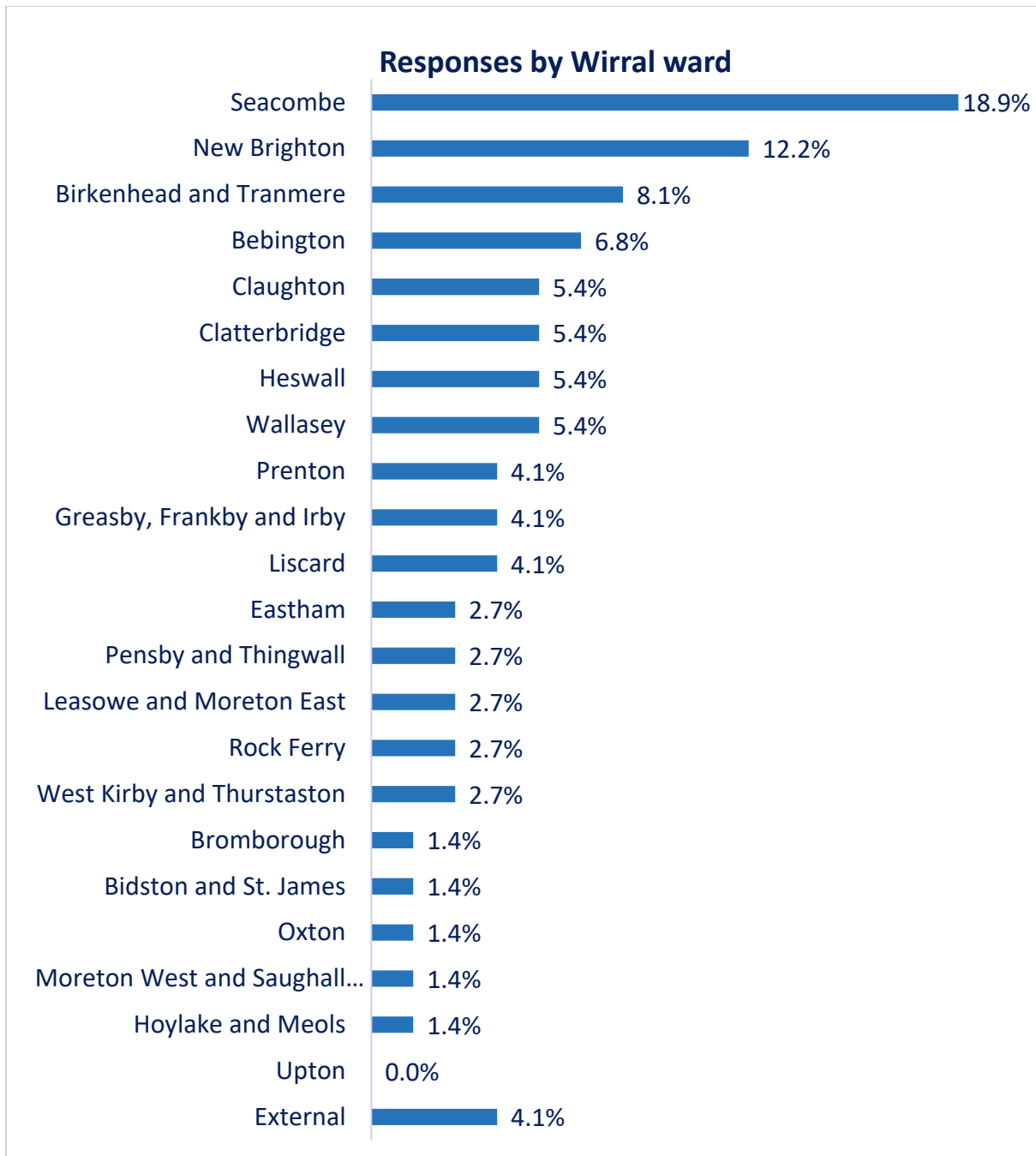


Figure 14: Chart displaying Wirral Ward representation



## 4.2 Have Your Say - Site Traffic

Reviewing the site activity, visits, and how people visit the site can be useful to evaluate if people are aware of the site, as well as to ensure engagement activities are deployed effectively, and to a wide range of different people – enhancing public engagement in the future. 1879 unique visitors viewed the Scotts Quay Neighbourhood Framework consultation of the Have Your Say site. Of these, 408 visited multiple project pages and 219 documents were downloaded. 78 people in total completed the questionnaire.

These figures cannot be viewed as definitive as they are based on site tracking through ‘cookies’ and there are a number of factors that can impact on this. These include that cookies may be disabled or deleted, individuals may access the site multiple times through different devices or different browsers. However, the figures can be used to gauge how much interest has been generated in individual projects through the rate of engaged participants.

The route that people access the site is known as the traffic source. The ‘Have your say’ portal allows analysis to be carried out on traffic source, and if they lead to engagement in the site tools such as the questionnaire. This analysis allows a greater understanding of which communication and promotional tools to use to optimise engagement.

For this project a range of traffic sources have been reviewed and summarised in the table below. Most visits to the site were either links clicked from direct visits where people typed the internet address into their web browser (1141) and links sent via Email (602). It should be noted that email produced the lowest engagement rate, of all email origin visits, only 2.3% completed the survey.

Traffic Source	Aware Visits	Informed Visits (%)	Engaged Visits (%)
DIRECT	1141	301 (26.4%)	33 (2.9%)
EMAIL	602	87 (14.5%)	14 (2.3%)
.GOV SITES	12	9 (75%)	5 (41.7%)
SEARCH ENGINE	216	85 (39.4%)	8 (3.7%)
SOCIAL	81	36 (44.4%)	5 (6.2%)
REFERRALS	288	97 (33.7%)	13 (4.5%)

Table 9: Site traffic sources

# Appendix 1: Direct Representations

Direct representation from the organisations below can be found on the following pages.

- The Merseyside Civic Society (MCS)
- Ørsted Power Limited
- Stantec
- Mersey Docks and Harbour Company (Part of Peel Ports Group)

# COLLABORATE \ CAMPAIGN \ CELEBRATE

## Scotts Quay Neighbourhood Framework Consultation – 28 July 2023

The Merseyside Civic Society (MCS) welcomes the opportunity to comment on the Scotts Quay Neighbourhood Framework by Wirral Borough Council. Founded in 1938, the MCS campaigns to preserve the best of our existing buildings and spaces and to insist on good quality design for our new ones.

MCS is generally sympathetic to the proposals and the area, with appropriate investment in public transport and active travel, lends itself to high-density, mixed-use development, benefitting from superb river views. Parts of the area are vacant or underutilised and is currently uninviting. We also welcome that the scheme aims to foster a low-car, low-carbon community.

Our key concerns and queries relate to connectivity, design standards, existing businesses, infrastructure and climate change.

One of our key concerns is accessibility, given the scale of the proposal. We do not agree with your assessment “connectivity with excellent connections to the wider borough” (p. 43). The area is served by two bus lines from Birkenhead to Wallasey (409, every 35 minutes daytime only) and New Brighton (411, every 30 mins and hourly in the evening). The ferry offers a connection to Liverpool city centre, but this is a) restricted to the morning (c. 7–10am) and evening (c. 5–6.30pm). Further bus lines from the ferry terminal (413 in the daytime and 423 in the evening) are of limited value (the journey to Birkenhead takes over an hour and even Arrowe Park is a journey of 45 mins). Whilst ferry and bus services connect to Mersey Rail stations, combination of different forms of public transport is more expensive and makes public transport less appealing. Whether the vague proposals by Peel for mass transit will ever materialise, it is certain that they won't be in place in the short and medium term.

Can the existing infrastructure and services in the area cope with the extra dwellings (potentially up to 3200 apartments and 300 homes)? There seems to be quite a lot of commercial office space being proposed (19,500m<sup>2</sup>). We are uncertain whether there is that much demand, particularly with increases in home working over recent years, but also the Council's own developments in Birkenhead town centre. Instead, there is little mention about other basic infrastructure for a neighbourhood of this size, including schools, shops and GPs. The area is currently underserved with supermarkets.

We also wonder how compatible existing businesses will be with an intensive residential zone and how the potential loss of employment land will be compensated. It would seem that some heavy industry on the site (such as the UM fuel terminal) is to remain in use alongside the redevelopment. How practicable and desirable is it to have homes close to these works? We realise some screening is proposed, but that can only go so far when it is literally next door. Furthermore, the proposals seemingly lead to a loss of employment land and industry sites, and it is not clear where they might relocate. If it goes to places which are out of the borough or will be realised on a greenfield site, this might be less than ideal. There have also already been complaints launched in the Liverpool Echo by the owner of the soccer dome.<sup>1</sup> It seems that some strategy is required how existing businesses can be integrated on site.

---

<sup>1</sup> <https://www.liverpoolecho.co.uk/news/liverpool-news/business-owners-slam-proposed-major-27386440>

# COLLABORATE \ CAMPAIGN \ CELEBRATE

Design quality matters! The masterplan obviously only provides a framework for development, but who will oversee and ensure this and be 'the guardian of the vision'? In a similar vein, will the detailed and sophisticated public realm strategy/set of development standards that has been produced for Wirral Council by Maccreanor Lavington consultants for developments in the Birkenhead areas be implemented and will developers accept its principles and standards for particular sites, or will it get watered down? Are other Council departments, e.g. highways, cleaning, landscape and green spaces, even the Council's own Planning Development Control Section prepared to buy into it? And even if they do, who will manage and maintain implemented schemes? More in general, MCS wonders whether for a development of such scale, a design competition should be held, at least for the larger plots.

Finally, we wonder whether the proposals might need to look ahead taking into account sea-level rise. How resilient is the current proposal in light of this? HafenCity Hamburg has shown how potential flooding can be taken into account in the design of a whole neighbourhood.

We would be happy to stay in touch regarding this and other projects and are happy to discuss our concerns in a meeting.

Yours sincerely

PS: There is a factual error in depicting the primary road near the ferry terminal on page 55.

Wirral Council  
PO Box 290  
Brighton Street  
Wallasey  
CH27 9FQ

**Our ref:**  
**Date:** 16-OCT-23

Dear Sir / Madam

## **SCOTTS QUAY NEIGHBOURHOOD FRAMEWORK**

Thank you for your consultation seeking the views of United Utilities as part of this consultation. Please accept our apologies for the delay in providing this response. United Utilities wishes to build a strong partnership with all local authorities and developers to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

We understand that your proposals for Scotts Quay have the potential to deliver around 2,500 new homes, mixed use development and new open space.

We would welcome the opportunity to discuss the proposals for Scotts Quay with you to understand your plans better and discuss the issues which we have raised in this submission. We would specifically like to highlight the following:

1. How water and wastewater assets, and our property interests represent a constraint to any masterplan which must be carefully considered;
2. The need to ensure that access to United Utilities wastewater pumping station and associated infrastructure is not adversely affected;

3. The need to consider the proximity issues that arise due to the proximity of the proposals to a major wastewater pumping station and overflow. Pumping stations can result in odour, noise and vibration;
4. How sustainable foul and surface water drainage can be integrated into your proposals;
5. The risk of flooding from the public sewer;
6. How water efficiency measures can be incorporated into the proposals; and
7. The need for a co-ordinated and holistic approach to infrastructure delivery across the masterplan.

Each is addressed in turn.

## **1. Water and Wastewater Assets**

It is important to outline the need for our assets to be fully considered in any proposals you bring forward. There are a range of water and wastewater assets, including some very large assets some of which are pressurised, which are located within, and in the vicinity of, your proposals and therefore it will be critical that you engage with United Utilities on the detail of your design and the proposed construction works.

**United Utilities will not allow building over or in close proximity to a water main.**

**United Utilities will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.**

**You should not assume that our assets can be diverted.**

We strongly recommend that you fully understand any site constraints as soon as possible so that the implications of our assets on development and the construction process can be fully understood and agreed. You must engage with us to discuss our assets and the implications for your proposal.

We also wish to draw to your attention the need to carefully consider landscaping proposals in the vicinity of our assets. This must include any changes in levels and proposed crossing points (access points and services crossing our assets). You should not assume that changes in levels will be acceptable and the details of any crossing points will need to be agreed. This is because changes in levels can affect the structural integrity of our assets and the hydraulic performance of our assets which can result in the increase or displacement of flood risk from the public sewer.

We request that you contact our Developer Services teams to discuss the asset protection issues which we have raised above using our **free pre-application service** by contacting:

We have also appended a note which provides '*Important Information Regarding Water and Wastewater Pipelines and Apparatus.*'

## **Planting of Trees and Landscaping**

United Utilities wishes to note the importance of any approach to planting new trees and landscaping giving due consideration to the impact on utility services noting the implications that can arise as a result of planting too close to our assets. This can result in root ingress, which in turn increases the risk of drainage system failure and increases flood risk. Further details on suitable trees for planting near our assets can be found in our '*Standard Conditions for Works Adjacent to Pipelines*' (Document Ref: 90048 Issue 3.1 July 2015). A copy of this document can be found on our website.

## **Property Interests**

United Utilities land (title number MS2223476) has been included within the masterplan. It is identified as new open space adjacent to our wastewater pumping station. This is unlikely to be acceptable and therefore we request that you remove this area of our title from the open space proposal.

According to our records there are easements and a right of way crossing the masterplan which are in addition to our statutory rights for inspection, maintenance and repair. The easements have restrictive covenants that must be adhered to. The references for the easements include:

- Z3376 dated 03 July 1930;
- W1033/1 dated 30 October 1984; and
- W1033/2 dated 22 July 1985.

There is also a right of way reference 110/00449/row.

It is the applicant's responsibility to obtain a copy of the easement / right of way, available from United Utilities Legal Services or Land Registry. The applicant must comply with the provisions stated within the document.

## **2. Access to Wastewater Pumping Station**

We note the intention to narrow the carriageway of Birkenhead Road and to widen the pavement whilst retaining adequate width to accommodate the potential Wirral Mass Transit proposals. We also note the intention for Birkenhead Road to undergo public realm improvements. Page 74 states that '*The development maintains East Street as a spine road but proposes to pedestrianize the street between the United Utilities Wastewater Pumping Station and the United Molasses Storage Facility.*' It is critical that access to our assets, the pumping station and associated infrastructure, including an overflow, are not adversely affected. We therefore request a more detailed understanding of the proposals in this area to understand the impact on the access we require.

## **3. Proximity to Wastewater Pumping Station and Associated Infrastructure**

We note that pages 32 and 33 of the consultation document is a site analysis that identifies constraints and opportunities. This includes identifying odour as a constraint arising from our wastewater pumping station. We wish to note that pumping stations can also result in noise and vibration. The pumping

station is a significant wastewater asset that operates 24 hours a day and can result in amenity issues. Paragraph 187 of the National Planning Policy Framework states:

*'Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.'*

In accordance with this principle, we are concerned at the intention to introduce more sensitive uses adjacent to the pumping station in the form of residential which will replace existing commercial uses. We therefore request that you engage with us so that we can agree the relevant impact assessments that are required to inform any necessary stand off or mitigation measures that are identified as necessary.

We also request that in preparing the detail of the design of the site, careful consideration is given to the potential for any exceedance paths from the pumping station that could arise in the event of a pumping station failure.

As a result of new provisions within the Environment Act 2021, all wastewater undertakers whose area is wholly or mainly in England must secure a progressive reduction in the adverse impacts of discharges from the undertaker's storm overflows. The wastewater pumping station at this location includes an existing overflow. United Utilities is currently preparing a programme to reduce discharges from storm overflows and this is reflected in the latest draft business plan submission to our regulator, Ofwat. National Government has set a target of reducing average spills per overflow to no more than 10 times per year by 2050. Huge investment will be required to achieve this which will occur over a number of our 5 year investment periods. In this context, we would like to liaise with you to consider whether there is any potential need for future investment at the pumping station and what this may mean for the wider masterplan.

#### **4. Sustainable Foul and Surface Water Management**

We note Section 2.16 references Sustainable Urban Drainage Systems, *'including permeable paving and bioswales within open green spaces should be promoted and become features of the development. Landscaping, public realm and dwellings are to consider this on entrances to homes and pathways to allow alternative means of access in tidal events'*. Whilst we welcome this reference, it is not clear how or if surface water management has been considered in the preparation of the masterplan. It is critical that the masterplanning of the site is intrinsically linked to the strategy for surface water management. It is not clear whether flood risk and utility constraints or surface water management opportunities have informed the preparation of the masterplan.

We recommend that your masterplan clearly outlines the aspirations and requirements for water management, in terms of sustainable foul and surface water drainage and water efficiency. The masterplan should be clear how these will be incorporated into the redevelopment proposals for the area.

In accordance with national planning policy, the surface water hierarchy should be followed. This states:

*'Where possible, preference should be given to multi-functional sustainable drainage systems, and to solutions that allow surface water to be discharged according to the following hierarchy of drainage options:*



1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.'

At the current time the area is largely dominated by combined sewers. We request that your masterplan gives early consideration to a drainage strategy for the area which reflects the hierarchy for managing surface water. Given the availability of water bodies immediately adjacent to the regeneration area, we would expect surface water to discharge to an alternative to the combined sewer for any redevelopment proposals.

It is critical that the baseline evidence that is used to inform the masterplan determines whether there is a tidal influence on existing and proposed drainage systems. It is important that both existing and proposed drainage systems are resilient to future tidal ranges. This is because the tide can result in the hydraulic locking of existing and proposed outfalls, which in turn can result in an increase in on-site flood risk, especially during a storm event. This flood risk could be material to the design of the masterplan and the location of development. For example, it may be necessary to identify specific areas of the masterplan to accommodate exceedance flows from overwhelmed drainage systems.

We wish to highlight that application of the hierarchy for managing surface water and a sustainable approach to surface water management is critical to reducing the impact on our wastewater assets (both our sewers and wastewater treatment works) which helps reduce the risk of flooding and the impact on our watercourses and the environment. Consistent with the surface water hierarchy and the obligations of the Environment Act 2021, every effort should be made to reduce the discharge of surface water to the public sewer. Surface water should instead discharge to more sustainable alternatives wherever possible. This will ensure the impact of any proposals on public wastewater infrastructure, both in terms of the wastewater network and wastewater treatment works, is minimised. This reflects the fact that surface water flows are very large when compared with foul flows.

There is currently limited information in the masterplan relating to sustainable drainage and how this will be integrated with the on-site landscaping. It is clear, however, that the public realm improvements represent an opportunity to improve surface water management. United Utilities requests that you consider how any proposals for the public realm that is to be created on the site can be linked to opportunities for surface water management. We request that any landscaping and public realm improvements evaluate opportunities for surface water management to include opportunities for source control and slowing the flow of surface water through the incorporation of blue and green Infrastructure. It is preferable that the evaluation of surface water and flood risk management opportunities are undertaken at the outset of the design process. Such an approach has added benefits associated with the quality of the public realm, the enhancement of biodiversity and urban cooling.

As outlined in *'Building for a Healthy Life'*, we request that the landscaping of the site is linked to the proposals for surface water management in accordance with the *'four pillars'* of sustainable drainage systems, i.e., water quantity, water quality, amenity, and biodiversity. National policy is clear that priority should be given to multi-functional Sustainable Drainage Systems (SuDS) over traditional underground, tanked and piped storage systems. Sustainable water management, especially in the form of multi-functional SuDS, helps us adapt and respond to the challenges posed by climate change and the impact of urbanising our environment. SuDS also have wider benefits and represent an opportunity to improve the quality of urban environments by changing *'grey'* to *'green and blue'*. They can help to create more attractive and usable spaces which help with social cohesion by connecting people, improving amenity and wellbeing, and offering opportunities for nature. In our urban environments there are often areas that can be better used to manage rainfall runoff through surface levels SuDS which can transform

grey and impermeable spaces to greener, more attractive and resilient spaces appreciated by the community.

The design of the site should be intrinsically linked to opportunities for surface water management improvements and that opportunities for source control, slowing the flow and filtration of surface water are considered early. This could be achieved through a variety of features including:

- permeable surfacing;
- bioretention tree pits and bioretention landscaping;
- rain gardens;
- soakaways and filter drainage;
- retrofitted swales; and
- blue/green roofs.

We recommend that you refer to the Susdrain website which includes a range of [case studies](#) that show examples of how SuDS have been implemented in the urban environment. We also request that you also consider the resilience of any planting to drought.

## 5. Risk of Flooding

It is critical that you understand the current drainage patterns and existing flood risks within and across the site and that you ensure that any existing flood risks / flows are not constricted, displaced or increased. We note that page 61 includes extracts of flood risk maps relating to surface water and rivers / the sea. Whilst we welcome this assessment, it is not clear if the masterplan has been informed by a flood risk assessment of the area which considers the risk of flooding from all sources including any combination of flood risks.

We note that page 60 references the need to allow for alternative means of access in tidal events. We wish to highlight that a full understanding of the impacts of tidal events on this location is a critical piece of baseline evidence to inform the masterplan.

As noted above, you should ensure that the baseline evidence that is used to inform the masterplan establishes whether there is a tidal influence on existing and proposed drainage systems. It is important that both existing and proposed drainage systems are resilient to future tidal ranges. This is because the tide can result in the hydraulic locking of existing and proposed outfalls, which in turn can result in an increase in on-site flood risk, especially during a storm event. This flood risk could be material to the design of the masterplan and the location of development. For example, it may be necessary to identify specific areas of the masterplan to accommodate exceedance flows from overwhelmed drainage systems.

We wish to highlight that there is a range of water supply and wastewater network assets that pass through this area. They include large combined sewers which carry both foul and surface water. Some of the sewers that pass through and near to this site are modelled to flood. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the area. The risk of sewer flooding could affect the developable areas and the detail of the design of any proposed development. We request that you engage with United Utilities prior to any further masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. The masterplan will need to consider site topography, any exceedance flow paths. Resultant layouts and levels must take account of existing sewer flood risk. The masterplan and future applications must demonstrate that the proposed development would be safe and not lead to increased flood risk.

The masterplan / future applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to incorporate mitigating measures subject to the detail of the development proposal. As noted above, careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Also, any assessment of flood risk from the public sewer may need to take account of other flood risk sources, and how these may result in a combined flood risk. As noted above, it is critical that you understand whether there is a tidal influence on any existing and proposed drainage systems.

You will need to give careful consideration to any changes in levels when bringing forward the development proposals for this site. Any changes in levels could have implications for the protection of our assets. In addition, changes in levels could also alter overland flow and exceedance paths. It is important that you ensure that any changes to levels do not increase flood risk to existing properties by negatively changing the overland paths that arise in heavy rainfall or the exceedance paths from existing drainage systems. For example, careful consideration must be given to any underground parking that you may propose. You must not assume that any changes to levels of land above our manholes will be acceptable as this could increase / move the risk of flooding from the public sewer. Any such approaches should be first discussed and agreed with United Utilities.

In addition you should not assume that a sewer can be diverted or altered. This can affect the hydraulic performance of the sewer and result in the increase and / or displacement of flood risk. Any diversion should not reduce the volumetric capacity of the network and should not significantly increase our future sewer operational maintenance liabilities.

## **6. Water Efficiency**

We request that the masterplan sets out clear expectations for how water efficiency measures will be incorporated into the future detailed design of the site. There are opportunities such as rainwater recycling and water butts and we would encourage the LPA to embrace all water efficiency measures. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.

Water efficiency should be a fundamental component of any approach to carbon neutrality and we request that you clearly set out your water efficiency and sustainable drainage expectations in the delivery of new development at this site. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of your journey to carbon neutrality.

At the current time, Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015 an *'optional'* requirement was introduced which is currently set at 110 l/p/d for new residential development. This can be implemented through local planning policy where there is a clear need based on evidence. We have presented evidence to justify this approach in the local plan review for Wirral. We believe that the optional standard can be achieved at minimal cost.

To promote sustainable development, we wish to highlight that United Utilities also offers a reduction in infrastructure charges for applicant's delivering water efficient homes and draining surface water sustainably. More information on this can be found [here](#).

We therefore request that (as a minimum):

- All new residential developments must achieve the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.
- All major non-residential development must incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard.

## **7. A Co-ordinated and Holistic Approach to Infrastructure Delivery across the Masterplan**

We note that you have identified an approach to phasing and timescales. Within this, your approach to infrastructure delivery to service the development is not clear. It is critical that the delivery of new development and phasing is undertaken in accordance with a site-wide strategy for new infrastructure (including foul drainage, surface water drainage and water supply). This should consider how the infrastructure for each phase interacts with the infrastructure required for other phases. You will need a strategy for foul and surface water and the supply of clean water.

At the current stage, it is not clear to us how you propose to develop / deliver the site and whether this will be done by one developer or by multiple developers. It is critical that your approach to delivery / development is reflective of a holistic infrastructure delivery. We request that any disposal of land is linked to the delivery of your holistic infrastructure strategy.

We request the opportunity to liaise with you on the strategy for new infrastructure so that a holistic approach can be achieved which avoids a piecemeal approach to infrastructure delivery and to ensure that the most sustainable and cost effective approach to infrastructure is achieved.

We would be grateful for the opportunity to meet with you to discuss the above matters further.

Yours faithfully

## ***Important Information Regarding Water and Wastewater Pipelines and Apparatus***

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It is the applicant's responsibility to investigate and demonstrate the exact relationship between United Utilities' assets and the proposed development.

A number of providers offer a paid for mapping service, including United Utilities (see 'Contacts' section below). The position of the underground apparatus shown on water and wastewater asset maps is approximate only and is given in accordance with the best information currently available. Therefore, we strongly recommend that the applicant, or any future developer, does not rely solely on the asset maps to inform decisions relating to the detail of their site and instead investigates the precise location of any underground pipelines and apparatus. Where additional information is requested to enable an assessment of the proximity of proposed development features to United Utilities assets, the proven location of pipelines should be confirmed by site survey; an extract of asset maps will not suffice. The applicant should seek advice from our Developer Services team on this matter. See 'Contacts' Section below. United Utilities Water Limited will not accept liability for any loss or damage caused by the actual position of our assets and infrastructure being different from those shown on asset maps.

Developers should investigate the existence and the precise location of water and wastewater pipelines as soon as possible as this could significantly impact the preferred site layout and/or diversion of the asset(s) may be required. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development, will be at the applicant's /developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, developers may discover the cost of a diversion is prohibitive in the context of their development scheme.

Any agreement to divert our underground assets will be subject to a diversion application, made directly to United Utilities. This is a separate matter to the determination of a planning application. We will not guarantee, or infer acceptance of, a proposed diversion through the planning process (where diversion is indicated on submitted plans). In the event that an application to divert or abandon underground assets is submitted to United Utilities and subsequently rejected (either before or after the determination of a planning application), applicants should be aware that they may need to amend their proposed layout to accommodate United Utilities' assets.

Where United Utilities' assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include sustainable drainage features, earth movement and the transport and position of construction equipment and vehicles.

Any construction activities in the vicinity of United Utilities' assets, including any assets or infrastructure that may be located outside the applicant's red line boundary, must comply with national building and construction standards and where applicable, our '*Standard Conditions for Works Adjacent to Pipelines*', a copy of which is available on our website. The applicant, and/or any subsequent developer should note that our '*Standard Conditions*' guidance applies to any design and construction activities in close proximity to water pipelines and apparatus that are no longer in service, as well as pipelines and apparatus that are currently operational.

It is the applicant's responsibility to ensure that United Utilities' required access is provided within any proposed layout and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity.

## **WATER AND WASTEWATER SERVICES**

If the applicant intends to receive water and/or wastewater services from United Utilities they should visit our website or contact the Developer Services team for advice at the earliest opportunity. This includes seeking confirmation of the required metering arrangements for the proposed development. See 'Contacts' Section below.

If the proposed development site benefits from existing water and wastewater connections, the applicant should not assume that the connection(s) will be suitable for the new proposal or that any existing metering arrangements will suffice. In addition, if reinforcement of the water network is required to meet potential demand, this could be a significant project and the design and construction period should be accounted for.

In some circumstances we may require a compulsory meter is fitted. For detailed guidance on whether the development will require a compulsory meter please visit <https://www.unitedutilities.com/my-account/your-bill/our-household-charges-20212022/> and go to section 7.7 for compulsory metering.

To promote sustainable development United Utilities offers a reduction in infrastructure charges for applicants delivering water efficient homes and draining surface water sustainably (criteria applies). For further information, we strongly recommend the applicant visits our website when considering any water or wastewater design <https://www.unitedutilities.com/builders-developers/your-development/planning/building-sustainable-homes/>

Business customers can find additional information on our sustainable drainage incentive scheme at <https://www.unitedutilities.com/Business-services/retailers/incentive-schemes/>

To avoid any unnecessary costs and delays being incurred by the applicant or any subsequent developer, we strongly recommend that the applicant seeks advice regarding water and wastewater services, and metering arrangements, at the earliest opportunity. Please see 'Contacts' Section below.

## **CONTACTS**

**Property Searches (for asset maps):**

A number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit <https://www.unitedutilities.com/property-searches/>

Water and sewer records can be viewed for free at our Warrington Head Office by calling 0370 751 0101. Appointments must be made in advance. Public sewer records can be viewed at local authority offices. Arrangements should be made directly with the local authority.

# Scotts Quay Neighbourhood Framework

## Draft Consultation Response

On behalf of Mersey Docks and Harbour Company

(Part of Peel Ports Group)

Date: September 2023 | Pegasus Ref: P23-1818\_RO01v2\_PL\_LIV\_DM\_HY

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## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	18/09/2023	DM	HY	
2	25/09/2023	DM	HY	Client comments



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# 1. Introduction

- 1.1. Wirral Council has published the Scotts Quay Neighbourhood Framework (SQNF) for consultation. The purpose of the Framework is to guide future development of the Scotts Quay area, with the vision of creating a new high-density mixed-use area. Scotts Quay is described as a crucial part of the Birkenhead 2040 Framework. Neighbourhood Framework are primarily regeneration strategy documents. The SQNF builds upon the Birkenhead 2040 Framework and informs the development of Masterplan Area RA 2 (Scotts Quay Regeneration Area) referenced in the emerging Local Plan.
- 1.2. Pegasus Group has been instructed to respond to the consultation on behalf of the Mersey Docks and Harbour Company (MDHC), part of Peel Ports Group and the Statutory Harbour Authority. The company has substantial land and port assets within Wirral which are of strategic importance, including operational land within the Scotts Quay Neighbourhood Framework area.
- 1.3. The MDHC assets are located at Birkenhead Docks, which forms part of wider Port of Liverpool, which is classified as a “major” port – the threshold for which is 1 million tonnes or more of cargo handled per annum.
- 1.4. The operational facilities of the Port of Liverpool within Wirral Borough Council handle 15.9 million tonnes per annum. Set against the combined total port tonnages for the Mersey Ports (2022) of 39.8 tonnes, port activity within Wirral accounts for circa. 40% of all Mersey Ports annual throughput.
- 1.5. The southern boundary of the Scotts Quay area forms the Mersey River entrance and lay-berth at Alfred Dock, providing vessel access to East Float, West Float and Vittoria Dock.,

## **National Policy Statement for Ports (January 2012)**

- 1.6. The National Policy Statement for Ports (DfT 2012) (NPS) is part of the planning system established under the 2008 Act to deal with nationally significant infrastructure proposals. It provides the framework for decisions on proposals for new port development.
- 1.7. It emphasises the essential role of ports in the UK economy. It notes that for an island economy, there are limited alternatives available to the use of sea transport for the movement of freight and bulk commodities and that shipping will continue to provide the only effective way to move the vast majority of freight in and out of the UK, and the provision of sufficient seaport capacity will remain an essential element in ensuring sustainable growth in the UK economy.
- 1.8. The strategic importance of port facilities is recognised at a national and regional level. This strategic importance must also be recognised at a local level through the protection of port facilities and operations.

## **Previous Representations**

- 1.9. Pegasus Group provided responses to previous consultations relating to the emerging development plan, including the Local Plan and related evidence documents. These can be summarised as follows:



- **Wirral Local Plan Issues and Options Consultation (April 2020)** – The response concluded that the emerging Local Plan does not adequately reflect the importance of safeguarding land within the ownership of Peel Ports Group to allow for future expansion of port interests. The consultation response identified a requirement for a specific port policy (as per the currently adopted Wirral UDP and the Local Plans in Sefton and Liverpool). Importantly, it also noted that any port policy must link with allocation of port land within any future Proposals Map – such as the Dock Estate within the UDP Proposals Map.
- **Wirral Local Plan Employment Land and Premises Study (March 2021)** – These representations focused on seven sites listed within the WELPS document which are port interests. The response concluded that none of the seven sites referenced in the report were available to contribute towards Wirral's wider unmet employment land supply as part of the emerging Local Plan.
- **Wirral Local Plan Regulation 19 Consultation (July 2022)** – These representations included reference to the proposed residential development at Scotts Quay and highlighted the potential conflict with operational port activity and the agents of change principle. This culminated in a Statement of Common Ground being agreed between Peel Ports Group and Wirral Council which included for the proposed removal of residential allocation RES-RA2.2 at Scotts Quay and for the area to be re-designated as Primarily Employment Area within policy WS4.2 for B2, B8 and port-related uses.

1.10. Pegasus Group is also representing Peel Ports Group at the upcoming Wirral Local Plan Examination in Public hearing sessions regarding Matter 4, Issue 1 due to take place on the 3rd of October 2023.

#### **Purpose of these Representations**

1.11. The purpose of these representations is to continue the positive engagement with Wirral Council and to ensure that any future development of the area does not conflict with ongoing port operations or future port expansion plans within the Port and Maritime Zone.

## 2. Response

- 2.1. Peels Ports Group is generally supportive of Wirral Council's regeneration plans and acknowledges the work that has gone into producing the draft Scotts Quay Neighbourhood Framework (SQNF). However, there are some matters that require further consideration or amendment.
- 2.2. The SQNF consultation website (<https://haveyoursay.wirral.gov.uk/scotts-quay-neighbourhood-framework-consultation>) states that "Other strategic partners and stakeholders, such as Peel Ports and Homes England, will work closely with Wirral Council colleagues to maximise the potential of the area." It was therefore disappointing to learn of the document and consultation for the first time when it was published, and the consultation had begun. As Statutory Harbour Authority and major landowner for the area, it is considered that Wirral Council could have worked closely with Peel Ports during the preparation of the draft SQNF to discuss how future regeneration can align with existing and future port facilities and operations. This is considered a missed opportunity and would likely have led to a more supportive response to the consultation. Our client would suggest that it is Peel Land & Property that Wirral Council were meant to be referring to rather than Peel Ports.
- 2.3. In summary, there are three fundamental matters that need to be addressed prior to the adoption of the SQNF. In no particular order, these are:
1. **Environment and Amenity** – The Framework guidance and masterplans should align with the technical reports and evidence documents submitted as part of the Wirral Local Plan examination – specifically those relating to residential amenity and environmental impacts at the interface of the Scotts Quay Regeneration Area and operational port activities.
  2. **Alignment with the Local Plan** – Presenting a strategic vision for residential development within site RA 2.2 at Scotts Quay directly contradicts the Statement of Common Ground agreed between Peel Ports Group and Wirral Council as part of the emerging Wirral Local Plan Regulation 19 consultation.
  3. **Undermining Port Operations** – Proposing long-term future residential development of operational port land undermines the strategic plans for port investment and expansion, creating unnecessary uncertainty on future investment decisions.

### Environment and Amenity

- 2.4. As noted above, the SQNF area includes operational port land and port/marine related activity being undertaken by United Molasses and Orsted. Stena Line also operate a ro-ro ferry terminal on the opposite side of Alfred Dock. United Molasses' operations adjacent to Scotts Quay include liquid storage terminals for inbound shipping before goods are further distributed by tanker via the UK road network. The facilities also act as a point of export for outbound bulk liquids. Storage solutions at their facilities include heated and non-heated tanks, as well as nitrogen blanketing to ensure minimal moisture content as well as preventing evaporation of stored liquids.



- 2.5. Alongside the storage of bulk liquids, United Molasses has a standalone processing facility that operates as a manufacturing process, separate to the bulk liquid storage. There is also a water treatment plant designed to capture and segregate any oils and solids before leaving site to maintain a high level of environmental compliance.
- 2.6. United Molasses has operated a facility in Birkenhead for around 100 years. It is an established business which is a specialist in its field. By the very nature of the operations, they require dockside access with pipe extraction services and road access for HGVs. Operations are unfettered 24 hours a day, 365 days per year, with continual shift patterns when ships are berthed to ensure quick turnaround. Activities at the site create vehicle movements, noise and sometimes odours associated with the industrial site operations and products.
- 2.7. United Molasses benefits from a number of licences and permits associated with their operations, including dock water extraction, effluent discharge, APHA (animal products), waste licence, environmental permits, and hazardous substance consents.
- 2.8. Locating a high-density residential neighbourhood adjacent to the operational port activities of United Molasses conflicts with the National Planning Policy Framework (NPPF) paragraph 187, which states that "*Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses...*". The SQNF will complement the Wirral Local Plan and be considered a development plan document, i.e., planning policy.
- 2.9. The SQNF suggests a 60m exclusion zone as mitigation for air quality impacts from operational port activities at the lay-by berth at Alfred Dock. An Initial Odour & Air Quality Constraints Assessment was carried out by RSK in April 2022 (report reference 444664-01 (OO)). This concluded that, on the basis of software modelling from an indicative ship birthed at Scotts Quay, that concentrations of NO<sub>2</sub> and SO<sub>2</sub> are predicted to exceed acceptable limits within approximately 60m of the dockside. The report recommended further work including air quality monitoring of ship emissions, additional sniff surveys, and investigation of odour mitigation options. However, based on the assessment done at the time, a 100m buffer zone was suggested.
- 2.10. In August 2022, a Further Odour & Air Quality Constraints Assessment was conducted by RSK (report reference 4444664-02 (OO)). It referenced guidance that states a risk of exceedance of acceptable concentrations of NO<sub>2</sub>, PM<sub>10</sub> and SO<sub>2</sub> within 250m of berthed ships 'hot ironing', which it acknowledges puts the Scotts Quay regeneration area well within the Scotts Quay layover berth. As a result, it recommends further air quality monitoring to determine the impacts of ships 'hot ironing'. The SQNF makes no reference to any further monitoring of air quality to inform the proposed strategic vision.
- 2.11. The RSK reports also recommended a 100m buffer from the storage tank facility at Scotts Quay as mitigation for odour impacts. The report goes on to state that odour abatement to treat emissions from the tank storage facility could be considered as a means of reducing odour impacts. It is acknowledged in the report that the adoption of such mitigation would rely on negotiation and agreement from the tank storage facility operations. It states that "*In consultation with an abatement plant manufacturer, it was determined that a potentially feasible approach may be install an odour control system...*".

The SQNF states that "*The framework is assuming that the odour issues identified by the odour report undertaken from United Molasses site requires no exclusion zone, and that a*

*treatment at source will be implemented as has been detailed.*" Peel Ports Group has consulted with United Molasses and confirms that neither company has negotiated such mitigation measures to be implemented at source. The SQNF should make no such assumption. Paragraph 187 of the NPPF is clear that *"Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.*

- 2.12. Accordingly, further assessment of odour and air quality impacts is required to inform the strategic vision of the SQNF as recommended in the RSK reports. It must also be made clear that any mitigation must be provided by the agent of change, not existing port operators. In the absence of appropriate mitigation or further assessment, a buffer of between 100m – 250m should be applied in the interest of protecting residential amenity and to protect port operators from complaints.
- 2.13. The lay-by berth to the southern boundary of the SQNF not only serves as the vessel import/export point for United Molasses but from an MDHC Statutory Harbour Authority perspective it is regularly utilised for temporary berthing of vessels either inbound or outbound. Given Alfred Lock is tidally dependent, vessel maneuvering and berthing can take place during unsocial hours with noise and vessel emissions being the main sources of potential environmental nuisance.

#### **Alignment with the Local Plan**

- 2.14. The SQNF states that the identified air quality issues *"have led to the decision to withdraw RES-RA2.2 as an allocation."* However, site RES-RA2.2 is still shown as being developed for residential purposes within many of the indicative masterplans within the consultation document. It may be that the text was updated following removal of the allocation, but the masterplans were not revised accordingly. Nonetheless, the removal of any residential development within the former RES-RA2.2 allocation site should be made clear within the final SQNF document.
- 2.15. The emerging Local Plan period runs to 2037, and therefore accompanying development plan documents, such as the proposed SQNF, should also cover the Plan period. It is therefore contradictory for the SQNF to show future residential development of operational port land in direct conflict with Policy WS4.2 of the emerging Local Plan, which allocates the area for continued and intensified employment (including port and maritime) uses.
- 2.16. Significant areas of land included within the SQNF are designated for employment use until at least 2037. It is therefore misleading for the SQNF not to mention these employment allocations. It is considered that the SQNF, in its current form, fails to align with the strategic vision for the area set out in the emerging Local Plan.

#### **Undermining Port Operations**

- 2.17. The SQNF promotes both short and long-term visions to see the operational port land currently occupied by United Molasses and Orsted developed for residential use. The vision includes public open space at the quayside next to the lay-by berth at Alfred Dock, which would render the operational port facilities unworkable due to the loss of berthing. The vision also erroneously includes MDHC operational port land which supports the operation



of the Alfred Locks by incorporating it into a riverside walkway/public realm. A further practical point is the provision of a vehicular route for MDHC employees to get access (from the North) to the Alfred Locks for operational and maintenance purposes. The current unencumbered vehicular access is taken from East Street leading onto Birkenhead Road.

- 2.18. This contradiction with the strategic objective for economic growth set out within the emerging Local Plan and policies WS4.2 and WS4.3 risks jeopardising investment in the area and undermining growth potential of the port and maritime industry at Birkenhead Docks and wider Port of Liverpool.
- 2.19. The proposed Strategic Vision (Further Potential) at section 2.12 of the SQNF refers to a scenario where existing port operators "look to relocate". By the very nature of their operations, this is considered wholly unrealistic. The very suggestion that businesses in these areas may look to relocate can have a significant adverse impact on confidence in the area.



### 3. Conclusions

3.1. Peel Ports Group considers the following modifications to the SQNF are necessary:

- The SQNF period should align with the Wirral Local Plan up to 2037 and should not extend beyond this period. The reason is for the avoidance of ambiguity and to avoid undermining existing port operations and expansion plans.
- Reference should be made to the significant amount of the land within the Scotts Quay area being designated as Primarily Employment Areas and in the Port and Maritime Zone at section 1.4 of the SQNF. The purpose for this is to avoid ambiguity and confusion, as currently it only references residential mixed use and residential led emerging allocations.
- The strategic plans should increase the air quality buffer zones to align with the recommendations of the RSK reports. Alternatively, the additional further assessments recommended in the reports should be conducted to inform a different approach. The reason is to comply with the required technical standards and to avoid conflict with the agents of change principle set out in the NPPF.
- The illustrative masterplan within the framework vision should be amended to remove the quayside public open space. The reason for this is that it undermines the emerging Wirral Local Plan policies WS4.2 and WS4.3 which allocate this land for employment (including port and maritime) uses up to at least 2037, and because it would render existing business operations unworkable.
- The strategic vision should remove the assumption that odour issues will be mitigated at source and the residential development should be moved to account for at least a 100m offset. The reason for this is that no such mitigation measures have been agreed and as a result the SQNF, in its current form, conflicts with the NPPF agents of change principle.
- The SQNF should remove any reference to existing port businesses looking to relocate at any point in the future. The reason for this is that it is entirely improbable due to the need for specific quayside location and associated port infrastructure, and because it undermines the economic growth of businesses in the area and confidence in investment.

3.2. Subject to these proposed modifications, Peel Ports Group is satisfied that the SQNF can achieve its objectives for creating a high-quality sustainable area for future development.

3.3. Peel Ports Group would also like to encourage Wirral Council to engage with them directly, as it has indicated it is doing so publicly. Peel Ports Group and Pegasus Group welcome further dialogue on the matters set out in these representations.

# Expertly Done.

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Wirral Council  
Forward Planning Team  
Wallasey Town Hall  
Brighton Street  
Wallasey  
CH44 8ED

## Response to Scotts Quay Neighbourhood Framework Consultation

20 September 2023

Dear Sir or Madam

Our ref. BBW 20230820 DAWDI

We refer to the above Framework Consultation for which we wish to submit a representation document on behalf of Burbo Bank Windfarm Operations.

Ørsted Power (UK) Limited is responsible for the operation and maintenance of the Burbo Bank and Burbo Bank Extension situated on the Burbo Flats in Liverpool Bay at the entrance to the River Mersey, approximately 7 km (4.3 miles) north of the North Wirral coast. Together these two offshore wind farms generate over 348MW of renewable electricity, enough to power approximately 310,000 homes. Ørsted currently employs 35 full time highly skilled people to oversee operations and maintenance in this location. In addition, the workforce can increase to 85 dependant on maintenance campaigns. Ørsted have built up a very good relationship within the community by recruiting locally and supporting local needs through sponsorships such as to the RNLI and making significant investment as a founding partner of Eureka!

The operation and maintenance (O&M) of Burbo Bank and Burbo Bank Extension Offshore Wind Farms is delivered from our freehold property at Kings Wharf within the *Scott's Quay Regeneration Area*. The O&M base is spread over two parcels of land, the larger parcel containing modern warehousing, offices and parking and the smaller parcel adjoining the Mersey being used for loading and boarding Crew Transfer Vessels (CTV's). The two parcels are dissected by the publicly accessed promenade which was significantly enhanced through Ørsted's investment in 2017 when the O&M base was established.

In its current form the *Scotts Quay Neighbourhood Framework* takes into consideration Ørsted's operations at Kings Wharf, clearly identifying within the Vision and Strategy, that Ørsted's site is to be retained. However, Ørsted has three significant concerns with the plan as drafted.

**The availability of Ørsted's Site for redevelopment** - The Plan only acknowledges that the site will "*not be made available for the short or medium term future*".

**A Proposed Landmark building within Ørsted's Freehold** - the vision of repeatedly shows a landmark building on the site of Ørsted's O&M Base and,

**The life of the Neighbourhood Framework** – the life of the Scotts Quay Neighbourhood Framework differs to the emerging Wirral Local Plan which causes confusion.

### **1. The availability of Ørsted's Site for redevelopment**

Given the lifespan of Burbo Bank, Burbo Bank Extension and future energy opportunities that Ørsted may pursue, Ørsted's Facility should be identified as **"not being made available for the foreseeable future"** as opposed to the existing text that only refers to short or medium term future, this would align with the lifetime of the plan as Ørsted's commitments go beyond 2040. Furthermore Ørsted does not believe that the allocation of this additional high-density, high rise accommodation is aligned with the emerging Wirral Local Plan.

Ørsted would like to see more emphasis that as Freeholder of their Kings Wharf premises, that it is in Ørsted's gift to determine when the site is no longer required. Ørsted, as a Statutory Undertaker, needs to protect it's position, ensure continued operations and provide security of the electricity supply for the region. As such the Framework will have no influence over Ørsted's own vision of creating a world that runs entirely on green energy. Ørsted's business is dependant on having direct water access to service its assets. Including wording referring to "these business look to relocate" on page 50 of the Framework clearly does not recognise the importance of Ørsted having direct water access or acknowledge the difficulty in securing an alternative port location. As such Ørsted will continue to provide high quality employment from their Kings Wharf premises regardless of the contents of the Framework.

The Frameworks Alternative Proposal more accurately accounts for Ørsted's position in working under the assumption that the Ørsted site will not be made available for a long period of time, with the comprehensive development approach not being compromised by Ørsted's function but allows for future expansion when appropriate. Ørsted is supportive of this Alternative Proposal.

### **2. A Proposed Landmark building within Ørsted's Freehold**

Since Ørsted intends to remain in occupation beyond the life of the Framework the inclusion of the 30-storey landmark building on multiple pages of the Framework is not aligned with Ørsted's plans of continuing to provide highly skilled employment to the region. Given that Ørsted intends to operate from Scotts Quay for the foreseeable future, all images suggesting residential use within Ørsted's Freehold should be removed.

### **3. The life of the Neighbourhood Framework**

With respect to the proposed lifetime of the framework, Ørsted would like it to be aligned with the emerging Local Plan going up to 2037. Having differing lifetimes creates confusion.

**Proposals**

In reading the Framework, Ørsted would like to see the following changes to the Framework as drafted affording more clarity to the future of their premises at Kings Wharf and removing any ambiguity from the document.

**Proposal 1 – Page 25 – 2.1 Vision Illustration**

Ørsted requests that the extent of Ørsted’s Premises is removed from the area coloured amber and referenced “New Mixed Use Waterfront Living” along with the yellow circular representation of a potential Landmark building that sits within the amber area. Please see below illustration for reference.



Image 1 – 2.1 Vision found on page 25

**Proposal 2 - 2.3 Framework Plan, Vision and Strategy**

Ørsted would like the yellow star, indicating a landmark building, removed from within their premises. Please see image below for reference.

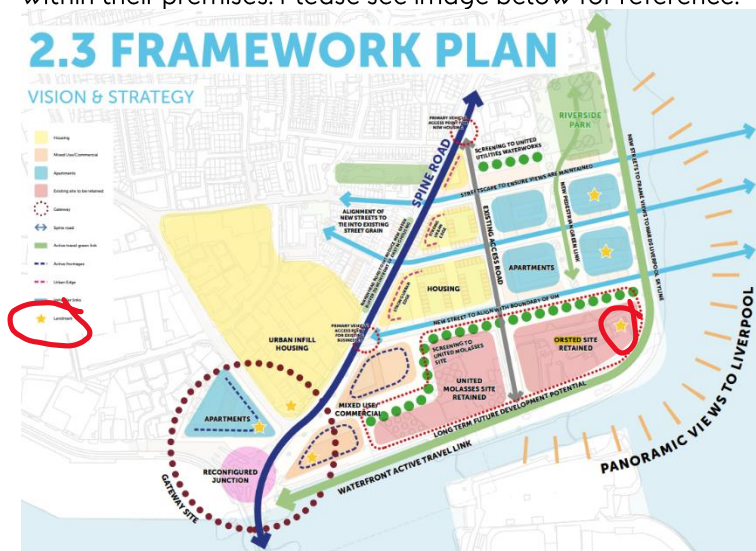


Image 2 - 2.3 Framework Plan found on page 29

**Proposal 3 – 2.4 Framework Vision, Illustrative Masterplan.**

Ørsted appreciates that this is an illustrative masterplan only however the inclusion of the proposed landmark building shown within Ørsted's site gives the impression that this will be delivered. Ørsted asks for the extent of their premises to be removed from the illustration below.



Page 31 – 2.4 Framework Vision, Illustrative Masterplan (indication of landmark building on Ørsted Site)

**Proposal 4 – 2.10 Design Strategies, Waterfront Living**

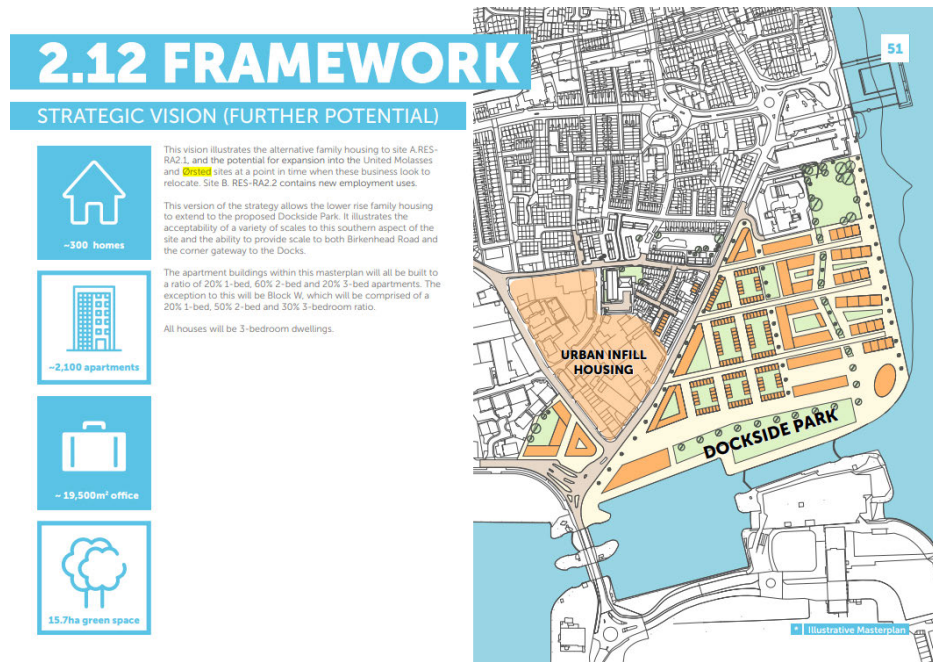
Ørsted would like the visual updating to remove the image of new buildings located within their site.



Page 45 – Design Strategies (indication of landmark building on Ørsted Site)

**Proposal 5 – 2.12 Framework, Strategic Vision (Further Potential)**

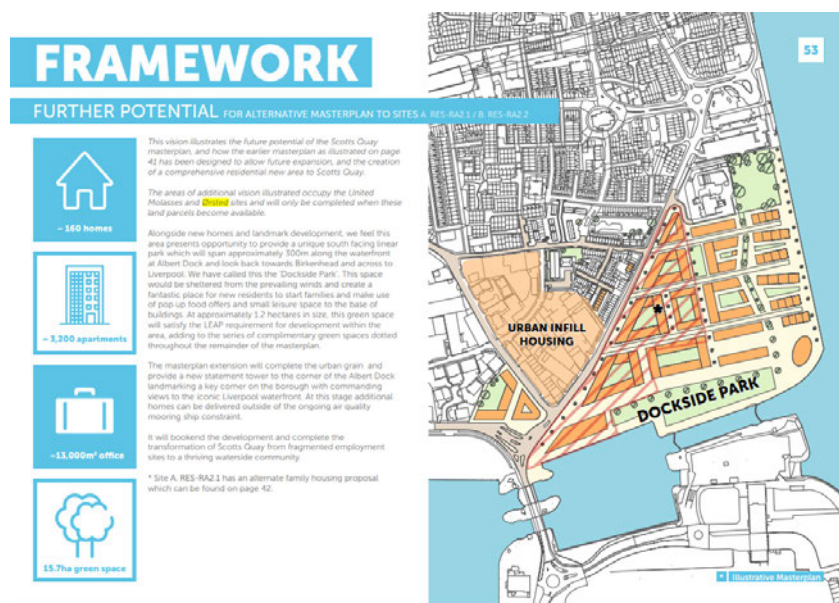
Ørsted would like the drawing updating to remove the extent of their premises from the illustration and in particular the removal of the image of a landmark building being located within their site.



Page 51 – Strategic Vision (Further Potential)

**Proposal 6 – Framework, further Potential**

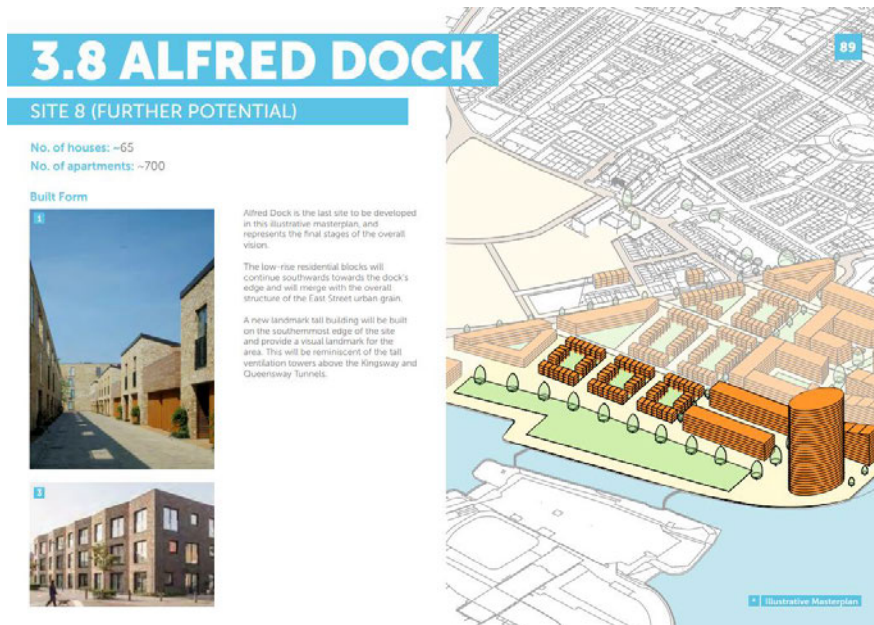
Ørsted would like the drawing updating to remove the extent of their premises from the illustration and in particular the removal of the image of a landmark building being located within their site.



Page 53 – Further Potential

**Proposal 7 – 3.8 Alfred Dock**

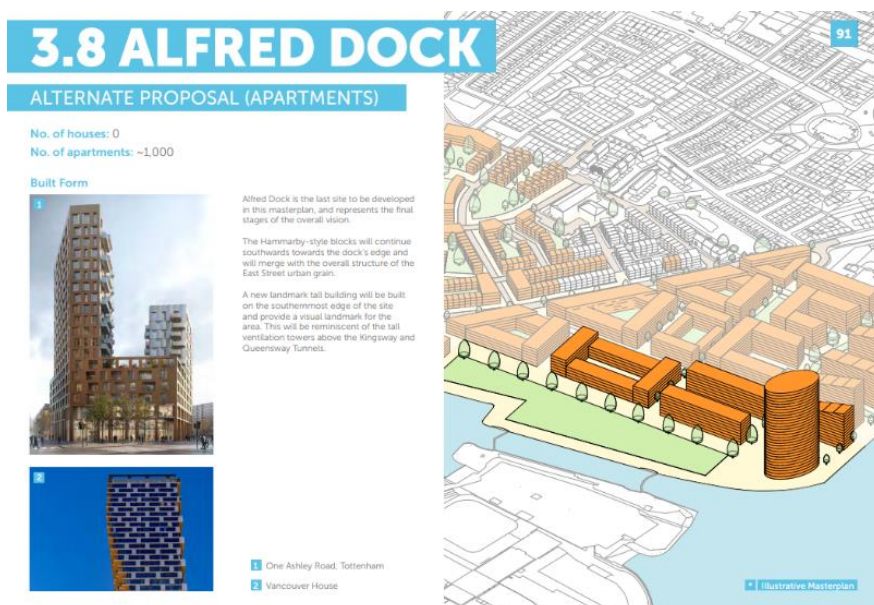
Ørsted would like the visual updating to remove the extent of their premises from the illustration and in particular the removal of the image of a landmark building being located within their site.



Page 89 – Alfred Dock Further Potential

**Proposal 8 – 3.8 Alfred Dock (alternative proposal)**

Ørsted would like the visual updating to remove the extent of their premises from the illustration and in particular the removal of the image and the text reference to a landmark building being located within their site.



Page 91 – Alfred Dock Alternative Proposals (Apartments)



**Proposal 9 – Alfred Dock (Site 8)**

Ørsted would like the drawing updating to remove the extent of their premises from the illustration and in particular the removal of the image and the text reference to a landmark building being located within their site.

**ALFRED DOCK**  
SITE 8

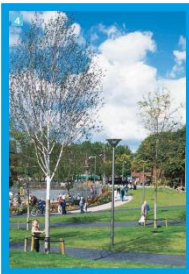
Public Realm



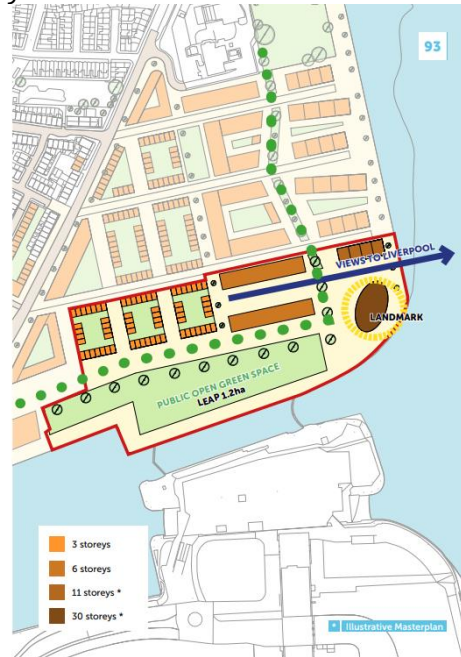
Alfred Dock will complete the riverside walk which stretches from Birkenhead all the way to New Brighton and will create a strong southern anchor.

A large public green space will occupy the former United Molasses site and will connect the linear parks together. The will be the Dock Side Park and provide a major parkland piece of public open space providing a range of facilities for the wider community with an amazing south facing aspect to the docks and Birkenhead.

\* Tall buildings must adhere to Policy WS 7.5 in the Wirral Local Plan 2021-37.



- 1 Foot of Lonsdale, Vancouver
- 4 Walthamstow Town Square



Page 93 – Alfred Dock Site 8 Public Realm

**Proposal 10 – 3.8 Alfred Dock (alternative proposal)**

Ørsted would like the visual updating to remove the extent of their premises from the illustration and in particular the removal of the image and the text reference to a landmark building being located within their site.

**ALFRED DOCK**  
ALTERNATE PROPOSAL (HOUSING)

Public Realm



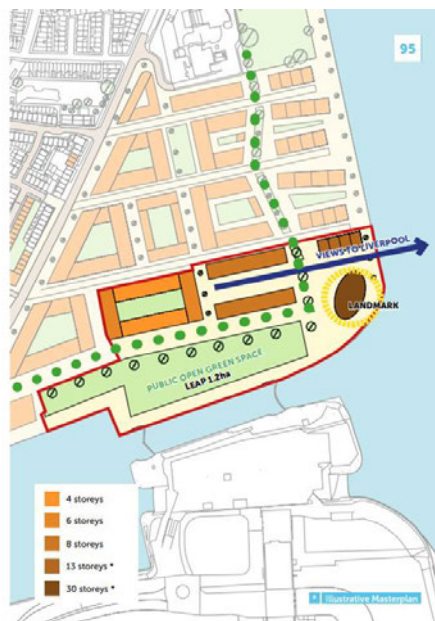
Alfred Dock will complete the riverside walk which stretches from Birkenhead all the way to New Brighton and will create a strong southern anchor.

A large public green space will occupy the former United Molasses site and will connect the linear parks together. The will be the Dock Side Park and provide a major parkland piece of public open space providing a range of facilities for the wider community with an amazing south facing aspect to the docks and Birkenhead.

\* Tall buildings must adhere to Policy WS 7.5 in the Wirral Local Plan 2021-37.



- 1 Foot of Lonsdale, Vancouver
- 4 Walthamstow Town Square



Page 95 Alfred Dock Alternative Proposal (Housing)

**Proposal 11 – 4.6 Phase 5 (50+ Year Vision)**

Ørsted are happy for the visuals to be introduced for this period but it must be heavily caveated that only if the area becomes surplus to Ørsted’s requirements and is disposed of by Ørsted.



Page 109 – 4.6 Phase Five 50+ year Vision

**Proposal 12 – 4.7 Delivery (Local Plan Comparison)**

To be consistent with Ørsted’s message, Ørsted would like the visual updating to remove the extent of their premises from the illustration and in particular the removal of the image of a landmark building being located within their site.



Page 111 - 4.7 Delivery Local Plan Comparison

**Proposal 13 – Alignment with Wirral Local Plan**

The life of the Framework should align with the Wirral Local Plan up to 2037.

Ørsted would like to be part of ongoing consultation in respect of Scott's Quay Neighbourhood Framework and encourage the inclusion of edits to the Framework to remove any ambiguity as to the potential availability of Ørsted's land for re-development.

I should be grateful to receive acknowledgement of this submission and to be included in future correspondences in relation to the Scott's Quay Neighbourhood Framework.

Yours sincerely

Ørsted

31 July 2023

Project/File: 33313280100

Wirral Council  
*Transmission Via Email*

Dear

**Reference: Representations on Scotts Quay Neighbourhood Framework - UM Terminals**

Stantec UK Ltd (Stantec) is instructed by UM Terminals (UM) to submit representations to the Metropolitan Borough of Wirral Council (the Council) regarding the Scotts Quay Neighbourhood Framework (SQNF).

UM is a landowner and employer within the docks at Birkenhead and as such have a keen interest in the emerging vision that the Council has for its regeneration.

To be clear, UM is not opposed to the regeneration of underutilised land within the dock estate. However, this needs to be done in such a way that safeguards the current, and future, occupiers of the docks area and recognises their role as part of an essential piece of national infrastructure.

These representations refer to previous representations made by Stantec on behalf of UM in relation to the emerging Wirral Local Plan 2021-2037 (eWLP). For clarity representations were made at the following stages:

- Regulation 19 – July 2022; and
- Matters Statements for the Examination in Public – March 2023.

Stantec is also representing UM at the Hearing Session on the eWLP having already attended the session on Matter 5 in May 2023 and with future sessions due to take place in September and October 2023.

Representations were also made by Stantec on behalf of UM on the Birkenhead 2040 Framework in May 2021.

It is clear therefore that UM has been actively engaged in the preparation of variously planning policy documents affecting the area and these representations continue that engagement.

However, despite this active engagement and the fact that UM is a long-term landowner and employer in Birkenhead, it has received no information on the proposals that affect its freehold land until this consultation was launched publicly. This is disappointing given that UM is a key stakeholder.

These representations focus on the following matters:

**Reference:** Representations on Scotts Quay Neighbourhood Framework - UM Terminals

- Background on UM;
- Adopted and Emerging Planning Policy Context
- Representations on SQNF;
- Summary and Conclusions.

While specific points are made in relation to elements of the SQNF, the general issues raised in this letter are as follows:

- Planning for residential development on UM's land and public realm on the existing quayside directly contradicts the eWLP;
- The masterplans produced do not account for the findings of technical reports in relation to future residential amenity;
- The SQNF adds uncertainty on the future land use of UM's site and thus adversely impacts on future investment decisions.

### **Background on UM and North Alfred Dock Site**

UM is a leader in bulk liquid storage in the UK, operating from several locations for over 100 years. It currently offers approximately 400,000 cubic metres of storage capacity at various ports in the UK, specialising in bulk liquid storage. The facilities act as the initial liquid storage terminals for inbound shipping UK liquid imports before goods are further distributed by tanker via the UK road network. The facility also acts as a point of export for outbound bulk liquids.

In Birkenhead, the company operates from two sites at North Alfred Dock (NAD) and Dock Road. Both locations benefit from dock access for large shipping vessels and road access for HGV tankers. Both sites offer multiple storage solutions including heated and non-heated tanks to ensure that individual product needs are catered for, as well as nitrogen blanketing to ensure minimal moisture content as well as preventing evaporation.

Within the Birkenhead facilities, UM offers a standalone processing capability that offers multiple tanks of varying types and capacities, with live steam sparge and coil heating systems to aid in product heating and process splitting. These tanks have the additional ability for chemical dosing for splitting purposes. This is effectively a manufacturing process, separate to the bulk liquid storage.

There is also a water treatment plant designed to capture and segregate any oils and solids before leaving site to maintain a high level of environmental compliance.

UM has operated a facility in Birkenhead for around 100 years. It is an established business which is a specialist in its field. By the very nature of the operations, UM requires dockside access with pipe extraction services and road access for HGVs. Operations are 24 hours a day with continual shift patterns when ships are berthed to ensure quick turnaround.

The NAD site is element of UM's interest that is affected by the SQNF. This is situated at the main shipping entrance to the Birkenhead dock system and provides some 16,000m<sup>3</sup> of storage for heated and non-heated liquid products. The site has a state-of-the-art tank radar and temperature monitoring system that advises on product level, product condition and operational status.

The NAD facility has recently undergone a period of major investment including installation of a new automated gas boiler with self-checking monitors and blow downs to ensure maximum efficiency and energy saving, as well as energy efficient LED lighting throughout the site. Automated security gates into and out of the one-way traffic flow of the facility allow safe driver access/egress. There is also CCTV monitoring of weighbridges, access points and loading areas to assist the security of products. Over, £4 million has been spent on projects between 2017 and 2020 to ensure enhanced storage possibilities for customers and their products. This demonstrates UM's continued commitment to the NAD site and Birkenhead generally.

Importantly, the NAD facility offers a shipping berth with dedicated product lines and pipeline clearance facilities enabling the fast turnaround of cargo. There are around 3-4 ships docking a month and 15-20 HGV movements every day.

Similar to the Dock Road site, the NAD includes 27 no. storage tanks, up to 13 high storage tanks, a 22m high chimney stack and an industrial sized boiler, housed in a purpose-built building.

Common to both sites in Birkenhead, UM facilities can store a variety of products including chemicals, food-based products and organic matter. Transfer of liquid storage is on a fast turnaround basis from ship to storage tank and then for onward distribution. Both sites therefore create vehicle movements, noise and sometimes odour associated with the industrial site operations and products.

Both sites enjoy the benefit of a number of licences and permits that relate to the operational requirements of UM. These include licences for dock water extraction, effluent discharge, APHA (Animal products), waste licence, environmental permits and Hazardous substances consents.

## **Representations on SQNF**

The headers used within the SQNF will be used to demonstrate what comments made relate to.

### 1.1 – The Purpose of This Document

One of the key objectives of the SQNF is to “Respond to the needs of local residents and business and create somewhere that creates high quality residential settings that can coexist with the businesses in the local area.”

By locating high density development in such close proximity to the existing operations at UM's site and nearby the quayside, without any details of proposed mitigation for residential amenity, the SQNF will fail to meet this objective. This is because well established businesses such as UM will come under presume to leave the area.

### 1.4 – Wirral Planning Status

The SQNF is a part of the Birkenhead 2040 Framework. This sets out the Council's vision of how the town, and areas such as Scotts Quay within it, will look in 2040.

It is important to note that the submission draft of the eWLP has a plan period running up to 2037 and therefore the policies that are within it should in theory run to that date.

It is therefore high confusing that the designation of residential development on the NAD site is included within the SQNF, when Policy WS4.2 of the eWLP allocates it for continued employment use, including intensification.

This is a direct contradiction and results in ambiguity in relation to what the use of the land will be during this period.

It is also noted that while the discussion of the planning status of the SQNF area discusses the Regeneration Area, residential allocation, and mixed-use allocations of the eWLP, there is no mention of the employment designation that covers UM's NAD site.

This is misleading in that it gives the impression that the eWLP strategy for the area is limited to residential-led regeneration. This is not the case as significant areas are designated for continued employment or port related uses up to at least 2037.

## 2.2 – Strategies Plan

The Plan is misleading as it only includes a 60m residential exclusion zone owing to air quality around the quayside.

The RSK - Further Odour & Air Quality Constraints Assessment (August 2022) submitted as an evidence base document to the eWLP examination (Examination Reference: WBC025) is clear that a 100m would be required from the quayside and NAD site to mitigate for odour issues.

This additional exclusion zone should be added to the Strategies Plan so that it is reflective of the technical evidence available. This inclusion of this area would show how the land to both the proposed residential allocations to the east and north of the NAD site are unsuited to residential development.

## 2.3 – Framework Plan

The screening provided along the northern boundary of the UM site will not mitigate for odour and noise impacts identified within the Council's own technical reports.

The location of housing so close to the northern boundary of the NAD site is therefore not appropriate and should be stepped back significantly.

While the UM site is stated to be retained, there is no mention of the operational quayside that it depends upon. It is not clear if this is also proposed for retention and the plan needs to clarify this.

## 2.4 – Framework Vision – Illustrative Masterplan

The plan shows the UM site as residential development and the operational quayside that serves it as public open space. This directly contradicts the policies of the eWLP (WS4.2 and WS4.3) which allocate them a Primarily Employment Area and Port and Maritime Zone respectively.

In addition to this, it contradicts the Strategies Plan and Framework Plan that immediately preceded it without any explanation of why.

As previously stated, the identification of the NAD site and associated quayside as residential development and associated public open space adds significant ambiguity to the medium to long term use of the land and could significantly affect investment decisions being made by UM and others.

## 2.5 – Site Analysis – Constraints & Opportunities

A "variable exclusion zone" appears on the plan which is presumably in relation to potential odour issues emanating from the NAD site. However, this is not stated explicitly. Acknowledgement of this constraint

Reference: Representations on Scotts Quay Neighbourhood Framework - UM Terminals

is welcomed, and it should also be added to the Strategies Plan which, as discussed above, which excludes this information.

The exclusion zone should, however, be greater and match the extent shown within the Initial Odour & Air Quality Assessment by RSK (eWLP Examination Document Reference: WBC024). This is shown below for clarity.



## 2.11 – Framework – Strategic Vision

The proposed residential development to the north takes no account of the odour impacts emanating from the NAD site and would be subject to adverse levels of residential amenity as a result.

Residential development should be moved further north to account for the 100m setback that is required.

In terms of the alternative proposal, the assumption that odour impact can be discounted is wholly unrealistic and renders this alternative entirely undeliverable.

## 2.12 – Framework – Strategic Vision (Further Potential)

The plan shows a scenario where operations at NAD and Orsted have ceased as the businesses “look to relocate”.



The ability of UM to relocate is constrained significantly as the operations are highly dependant on being located very close to appropriate quayside infrastructure. As such, this option is considered improbable.

The most likely reason for UM leaving the site is if they are forced to move owing to inability to obtain relevant environmental permits as there would be much greater numbers of residential receptors very close by, or if the land is subject to successful compulsory purchase.

### 3.1 – The Sites – Development Opportunities

Significant areas of Site 3, shown for short term delivery, are unsuitable for residential development as they lie within a required buffer from the NAD site and quayside owing to odour impacts.

While not included in the phasing, the inclusion of the quayside as public realm would render UM's operations at NAD unworkable as it would cease the ability for the site to be serviced by ships.

### 4.1 – Phasing Strategy – Land Availability Plan

The inclusion of UM's land within Phase 5 of the land availability plan is misleading, even in the long term. This is because UM own the freehold here and owing to considerable difficulties associated with moving operations elsewhere have no intention of making the land available for residential development in the short, medium, or long term.

The inclusion of land immediately abutting the NAD site to the north for residential development in the short term, despite it lying within the 100m buffer required for odour mitigation will serve to potentially constrain existing operations and opportunities for intensification, as there are likely to be a greater number of complaints raised which may impact on UM's ability to obtain the appropriate environmental permits.

### 4.6 – Phase 5 – 50+ Year Vision

This is the first and only time that the document mentions the fact that development is only proposed on the NAD site 50 years from now (from 2073).

If this is the case, it is not clear why the land features so prominently within a document which setting out the vision for the area up to 2040, and it is not made clearer that the NAD Site is not proposed for redevelopment within the SQNF plan period.

Again, this is confusing and adds unnecessary ambiguity when considering the future use of this land.

### 4.7 - Delivery – Local Plan Comparison

As previously stated in relation to 1.4, it is highly misleading that all mixed use and residential led emerging allocations are included within commentary and the associated figure, but there is no discussion about a significant amount of the land being designated as Primarily Employment Areas and in the Port and Maritime Zone.

In this sense the SQNF is simply ignoring the elements of the eWLP that are inconvenient to the vision that it has set out.

## **Summary and Conclusions**

**Reference: Representations on Scotts Quay Neighbourhood Framework - UM Terminals**

The many direct contradictions between the SQNF and the policies and supporting evidence base of the eWLP are very concerning. This is particularly the case as the eWLP is not even adopted yet and the Council is consulting on masterplans which on face value ignore elements of it as if they were out of date.

The identification of the NAD site as a residential site, in contrast to its employment designation in the eWLP, results in ambiguity as to the medium to long term use of the Site. This coupled with the potential for high density residential development to be located within an established odour buffer zone in the short term means that UM's decisions on investment on the site are the subject of significant risk.

UM would welcome ongoing dialogue with the Council regarding the NAD site as a key consultee and significant landowner.

Sincerely,

**STANTEC UK LIMITED**