



15 July 2016

Local Plan Team
Magdalen House
Trinity Road
Bootle
L20 3NJ

Matthew Williams

E: [REDACTED]
DL: [REDACTED]
F: +44 (0)

Innovation Court
121 Edmund Street
Birmingham B3 2HJ

T: [REDACTED]
savills.com

Dear Sir / Madam

SEFTON CIL – PRELIMINARY DRAFT CHARGING SCHEDULE
Representation on behalf of GL Europe Bootle S.À.R.L (c/o Ellandi LLP)

Savills (UK) Limited (Savills) act on behalf of GL Europe Bootle S.À.R.L (c/o Ellandi LLP), owners of The Strand Shopping Centre in Bootle Town Centre. This letter is submitted to provide observations in connection with the Sefton Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule (PDCS) which is being consulted upon until 15 July 2016.

The objective of this representation is not to oppose CIL; it merely seeks clarity in regard to the proposed rates, based on the evidence and a collective interest to deliver well planned, viable and feasible development in the Borough.

In submitting this representation, comments are made in respect to particular key areas only. The lack of reference to other parts of the evidence base and the PDCS cannot be taken as agreement with them and GL Europe Bootle S.À.R.L reserves the right to make further comments at future stages of consultation and at Examination.

Key Observations

Our client's key observation in relation to the PDCS concerns the proposed rate for food and drink uses which is to be set at £106 per sqm across the whole of the Borough.

A review of the viability evidence prepared by Keppie Massie and WYG (Economic Viability Study, February 2016) reveals that the viability testing of food and drink uses is very high level (particularly when compared to the testing undertaken in respect of residential development) and is also undertaken at a Borough-wide level. Moreover, the viability study gives very little indication as to how the food and drink scenario at Table 5.9 is representative of the type of food and drink development that is to come forward in the Borough.

Further clarity is required to establish whether or not this rate can be sustained in areas such as Bootle which, by Keppie Massie and WYG's own admission, is currently struggling, with decreasing rental levels and increasing vacancy rates due to changing consumer habits and increased competition from other centres. The apparent lack of clear supporting viability evidence to support a proposed rate of £106 psm is concerning and, in our view, has the potential to undermine future redevelopment in Bootle Town Centre which is identified as a regeneration priority in the emerging Local Plan. The Draft Bootle Town Centre Investment Strategy (December 2015) also identifies restaurant / mixed use opportunities within the Town Centre with a view to diversifying the Town Centre offer and enhancing its appeal as a destination for employees, local residents and students. We are concerned that the proposed CIL rate for food and drink uses has the potential to undermine the deliverability of such mixed use schemes which will in turn undermine a key objective of the emerging Local Plan.

More detailed, scenario-based testing is required for food and drink uses before this rate is adopted to ensure it will not undermine the deliverability of the emerging Local Plan and the Borough's aspirations to regenerate Bootle Town Centre.

We trust these comments are helpful. To assist, our client is open to a meeting with Sefton Council and its advisors to discuss our observations in connection with the PDCS. We reserve the right to provide comment in connection with a Draft Charging Schedule (DCS) and to be notified when:

- the DCS is submitted to the Examiner in accordance with Section 212 of the PA 2008;
- the recommendations of the Examiner and the reasons for these recommendations are published; and
- the Charging Schedule is approved by the charging authority.

Yours faithfully

A solid black rectangular box used to redact the signature of Matthew Williams.

Matthew Williams
Director