

194781C – Image Business Park Knowsley Highways Response Note

194781C/N01

February 2022

Introduction

1. Vectos have been appointed by Knowsley (Image Business Park) Ltd to provide transport and highways advice on the proposed 11,461 sqm of E(g)iii/B2/B8 land uses at Image Business Park, Knowsley.
2. Comments from the highway's officers at Knowsley Metropolitan Borough Council (KMBC) have been received on the planning application (Ref: 21/00857/FUL). This note sets out the comments received in *italics* and Vectos' response in plain text.

Response to Highways Comments

Comment 1

"The proposal includes 180 car parking spaces, including 9 disabled space. Eight motorcycle spaces are proposed as well as 28 bicycle storage spaces. The site wishes to have flexible E(g)(iii), B2 and B8 usage. Class E(g)(iii) was previously referred to as B1c. When consideration of Council parking standards, the below is derived (11,461sq.m GEA):

- *B1 – 382 spaces;*
- *B2 – 255 spaces; and*
- *B8 – 115 spaces*

In this instance, given that Class E(g)(iii) refers specifically to 'Industrial Processes', it is considered more applicable to consider the site in the context of B2 and B8 parking standards. On this basis, the site would need to provide 255 parking spaces. The current provision accounts for 70% of that required which is not acceptable. Additional information could be provided for Highways to understand operationally how the site may function, i.e., the proportional split of E(g)(iii)/B2/B8. A condition could be applied to limit the proportional split of the land uses, which could in turn reduce the required amount of parking (i.e., limit the amount of E(g)(iii)/B2/B8)."

3. Policy T6 of the adopted KMBC SPD entitled Ensuring A Choice of Travel clearly states their car parking standards are maximums and the supporting text for the policy says, *"For general car parking, the standards define upper limits for new developments"*. The subsequent statement in the

supporting text that *“there may be instances where provision should be less than the maximum specified for example where a site is particularly accessible by modes of transport other than the private car, or for example where a car club is proposed”* appears at odds because it suggests that the default should be to provide at the maximum. This would mean the standards are minimums.

4. Notwithstanding this, it is clear that KMBC policy allows for car parking to be provided at less than the standard, where there is good reason to.
5. The Transport Statement submitted with the application demonstrates that the site is readily accessible by non-car modes of travel and, as such, the parking provision can be less than the standards for the uses proposed.
6. As such, the site does not *“need to provide 255 spaces”* as stated in the KMBC comment on the planning application.
7. The proposed development is speculative – no occupier has been identified. This is the reason why permission is sought for either 100% of one of the proposed uses or a mix of all. Specifying a mix or restricting the amount of a particular use would reduce the pool of potential occupiers.
8. This always gives challenges when it comes to determining the appropriate amount of car parking. The approach that has been taken is to provide for the likely demand that would be generated by the highest generating use without massively over-providing for the lowest generating use.
9. In this context, it is considered unlikely that there will be overspill parking on the streets surrounding the site which would be the consequence of not providing enough car parking on site. At the same time, the Travel Plan forming part of the development will encourage people to use non-car modes.
10. It is worth highlighting that the same approach that was taken, and agreed, on the adjacent Plot B site (Ref: 19/00520/FUL).

Comment 2

“A Traffic Regulation Order (TRO) will be required in the form of double yellow lines along the western edge of Acornfield Road carriageway. These waiting restrictions will help to restrict any overflow of parking from the development site to ensure the free flow of traffic along the adopted highway. The TRO will sum to the cost of £6,500, with the road markings to be completed as part of S278 by the developer. The monies can be secured via S106.”

11. As stated above, it is considered unlikely that there will be overspill car parking from site as a result of the proposed development.
12. Notwithstanding this, since there are currently no parking restrictions on the west side of Acornfield Road is acknowledged that if there were overspill it could occur there.

13. On this basis, the applicant is willing to make a S106 contribution of £6,500 to KMBC such that they could introduce parking restrictions in this location, via a TRO, in the event that overspill car parking occurs following the occupation of the proposed development.

Comment 3

“With reference to the transport assessment undertaken, the highways officer has stated that he cannot support it. The TRICs assessment parameters are not accepted. This exercise will need to be undertaken again.”

E(g)(iii)/B2:

- *‘Industrial Estate 02 D’ has been selected as the land use. This is not acceptable to the site in question. This selection results in an average GFA of circa 57,000sqm, attempting to apply a singular industrial unit to a trip rate which should be applied to entire industrial estates is going to result in a low trip outcome. This will need to be amended to include the land use ‘Industrial Unit – 02 C’. Through highways own assessment a much larger trip rate and trip generation was derived.*

B8:

- *A date range of 10 years will need to be selected*
- *A ‘suburban area’ location has been selected and this should be removed*
- *The GFA parameter range should be altered the start of the survey to avoid having to remove sites at a later stage. It is easy for bias in site selection to be applied when this occurs. The GFA average is circa 21,000sqm, this is not reflective of the actual site floor area*

It should be noted that the only highest trip rate will be considered.

14. Whilst Vectos might disagree with some or all of the TRICS criteria suggested by KMBC, it seems that their actual concern is that the trip rates presented in the TS underestimates the potential traffic generation of the proposed development.
15. Assuming that is the case, we have taken the (E(g)iii/B2/B8) trip rates that they previously agreed for the proposed development at Plot B within Image Business Park (Ref: 19/00520/FUL) and applied them to the proposed development at Site 3.
16. It should be noted that although the land use area for Plot B is approximately 5,346sqm, applying these trip rates to the proposed plot of 11,641sqm provides a robust assessment as smaller industrial sites generally produce a more intense number of trips per sqm and increasing the floor area does not necessarily result in an increase in trips.

E(g)iii Trip Generation

17. The agreed E(g)iii/B2 trips rates for the Plot B application (Ref: 19/00520/FUL) have been applied to the floor area (11,461 sqm) for Site 3. The resultant total vehicle trips and OGV trips are shown in **Table 1**.

Table 1: E(g)iii/B2 Total Vehicle Trips and [OGV Trips]

Period	Arrival	Departure	Two-Way
AM (08:00-09:00)	44 [4]	11 [3]	55 [8]
PM (17:00-18:00)	12 [1]	40 [0]	52 [1]
Daily	245 [40]	251 [39]	496 [80]

B8 Trip Generation

18. The B8 trip rates agreed for Plot B (Ref: 19/00520/FUL) have been applied to the floor area for Site 3 and the resultant total vehicle trips and OGV trips are summarised in **Table 2**.

Table 2: B8 Total Vehicle Trips and [OGV Trips] (11, 461sqm)

Period	Arrival	Departure	Two-Way
AM (08:00-09:00)	17 [3]	9 [3]	26 [6]
PM (17:00-18:00)	4 [2]	17 [3]	20 [5]
Daily	161 [50]	166 [51]	327 [102]

19. When comparing the total vehicles trips and OGV trips submitted within the submitted Transport Statement (contained in **Section 5**) and the results presented in **Table 1** for the proposed E(g)iii/B2 land uses, the net vehicle change is an additional 39 vehicles during the AM and PM peak. This results in one additional vehicle every 90 seconds. Therefore, despite the higher trip generation there is still no material impact during the network peaks. This is of particular note once the trips have been distributed across the access points of the wider industrial park and the surrounding road network.
20. When comparing the total vehicle trips and OGV trips submitted with the Transport Statement (contained in **Section 5**) and the results presented in **Table 2** for the proposed B8 land uses, the net vehicle change is an additional 10 vehicles during the AM and PM peak. This results in one additional vehicle every 6 minutes. Therefore, despite the higher trip generation there is still no material impact during the network peaks. The net change in OGV trips would result in no additional OGV trips during the AM and PM peak. Similarly to the above, once these vehicle movements have been distributed across the access junctions for the site and the surrounding road network there would be limited impact on the highway.
21. Overall, the trip generation review demonstrates that even with the higher trips rates which were agreed on the Plot B application the proposed development would not have an impact on the surrounding road network and therefore no further assessment is required. In addition, the trips presented above are likely to be the worst-case scenario as it often the case that larger units generate less trips for a given amount of floor area than smaller units (Plot B = 5,346 sqm Site 3 = 11,461sqm)

Summary

22. Vectos have been appointed by Knowsley (Image Business Park) Ltd to provide transport and highways advice on the proposed 11,461 sqm of E(g)iii/B2/B8 land uses at Image Business Park, Knowsley.
23. Comments from the highway's officers at KMBC have been received on the planning application (Ref: 21/00857/FUL). This note sets out the comment by the highway's officers and Vectos' response.
24. The Knowsley Local Plan Core Strategy sets out 'maximum' parking standards that developments in the area can provide. Indicating maximums allows for flexibility when considering the different transport characteristics of development sites. It is considered that providing a total amount of car parking that is circa halfway between the maximum allowable for each of the uses proposed, strikes a reasonable balance between meeting the needs of the eventual occupier (thereby minimising the potential for overspill) and encouraging future employees to travel by non-car modes.
25. A review of the trip generation has been undertaken using the agreed trip rates presented within the submitted Transport Statement for planning application (Ref: 19/00520/FUL) for the neighbouring industrial plot. The review highlights that using these trip rates the site generates a marginally higher number of total vehicles and OGVs. However, when this uplift in trips is considered within the peak hours and distributed onto the local highway network the impact is still considered to be minimal