
From: Hannah Bizoumis <hannah@chromaplanning.com>
Sent: 14 July 2022 14:47
To: Quinn, Mark
Subject: RE: External Mail: 22/00163/FUL - Villiers Road - Drainage/UU and highway conditions
Attachments: 220712 Consultee comments responses.docx

Hi Mark,

Apologies I thought I'd attached my tracker (It's one I have prepared to keep track of comments/responses etc). If you scroll to no 7 and 8 there were some statements from the EHO which we were not sure on and wanted to check what the condition wording was they wanted to propose?

No 9 – Again a statement on groundwater monitoring – our consultant has suggested further monitoring and we wanted to check that the EHO isn't suggesting a condition on this.

No 11 - UU have asked for a condition on the drainage systems, but we are unsure whether all parts of the condition are necessary - the submitted drainage strategy proposals and the UU pre-applications advice was included in the FRA submitted for planning, providing justification to how we have considered the SUDs hierarchy and restricting discharge to 10l/s, which is slightly better than the UU requirement of 11l/s. Refer to UU email dated 2nd February 2022. Our understanding is that the submissions made should be sufficient to address UU comments and omit this condition wording on the bases UU will only be providing confirmation of discharge rates?

No 13 – UU state that they would need confirmation of metering arrangements but again I think this was all agreed through the pre-app with them and is included in the FRA. There may not be anything to do here as it is just a statement from UU.

No 14. There are statements regarding further investigation of water pipelines – the FRA confirms that there are no sewers etc and so we do not think this statement is relevant. I attached the topo survey plan and UU letter.

Most of this is just statements and perhaps nothing further needs to be done but if you could check on the conditions that would be useful.

Thanks
H

Hannah Bizoumis MRTPI MRICS
Director
Chroma Planning & Development

Email: hannah@chromaplanning.com

Phone: 07557742364

Web: www.chromaplanning.com

Social:

[@chroma_planninganddevelopment](#)

[@chromaplanning](#)

Please note I am not available Fridays between 9am – 3pm





This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: Quinn, Mark <mark.quinn@knowsley.gov.uk>

Sent: 14 July 2022 09:31

To: Hannah Bizoumis <hannah@chromaplanning.com>

Subject: RE: External Mail: 22/00163/FUL - Villiers Road - Drainage/UU and highway conditions

Hi Hannah

Thanks for your E mail.

There is no consultation tracker attached. I am unsure what comments you want me to re-consult EH on ?

With regards to the UU information , I am unsure what comments you are responding to as they have requested a pre commencement planning condition. UU will have copies of their own correspondence so again I am unsure what I am consulting them on.

Thanks

Mark Quinn
Principal Planner
Planning

Telephone: 0151 443 2223

Knowsley Council, Nutgrove Building - Second Floor, Westmorland Road, Huyton, Knowsley, L36 9FB



From: Hannah Bizoumis <hannah@chromaplanning.com>

Sent: 12 July 2022 16:10

To: Quinn, Mark <mark.quinn@knowsley.gov.uk>

Cc: 'James Wright' <james@pemburyrealestate.co.uk>; 'Roque Menezes' <roquemenezes@burrowsgraham.com>;

'Sam Palmer' <sam@chromaplanning.com>

Subject: External Mail: 22/00163/FUL - Villiers Road - Drainage/UU and highway conditions

CAUTION: This email originated from an external source. If you suspect a potential phishing email, report it via the IT Self Service Portal which can be found within the Quick Links section on Bertha

Hi Mark,

I note on the file there were minor comments from EHO and united utilities which we have now responded to (attached their original comments for ease).

I've attached:

1. our consultation tracker with our responses in green
2. UU searches letter
3. topographical survey plans
4. UU pre-application email

Could you relay our response to UU and the EHO for them to review?

Also attached is a slight track change proposed to the highway conditions you circulated earlier today. Let me know if these are okay?

Thanks

H

Hannah Bizoumis MRTPI MRICS

Director

Chroma Planning & Development

Email: hannah@chromaplanning.com

Phone: 07557742364

Web: www.chromaplanning.com

Social:

[@chroma_planninganddevelopment](#)

[@chromaplanning](#)

Please note I am not available Fridays between 9am – 3pm



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
1.	Highways			
2.	Highways would require more car parking within the site to cater for the potential staff demand which could be generated by a B2 and, following the amended description an E (g) iii use. Although the TA states that the site will predominantly be used for B8, if granted with unrestricted use, the alternative categories sought could be employed across the entire site unfettered and therefore the use with the greatest parking demand should be the determinant for the provision of parking spaces. In similar applications, applicants have noted that a substantial reduction in HGV servicing would take place in those circumstances when B2, and E uses are predominant, which would free up a large part of the servicing area to provide additional staff car parking if it were required. It is possible that by providing alternative additional proposed parking arrangements, which could be enforced via planning condition, should certain circumstances be met, a highway objection could be dropped. The TA argues that the car park demand can be based upon the census MTW data for a specified number of areas within Knowsley. Given that this is a commercial/industrial proposal, it is fair to assume that the staff will be drawn from a far wider area than just those areas selected, particularly from Liverpool, given the proximity, and which tend to have a higher car ownership level than the areas of Knowsley selected. Furthermore, these types of developments tend to run on a shift pattern which require many staff to travel at antisocial times of the day when public transport options are far more restricted. For these reasons, the car mode share is likely to be higher than that predicted by the data within the TA. The trip generation exercise has been carried out based upon the same split of likely B2/B8 use, and using the MTW census data as discussed above. A sensitivity check should be carried out to check that should the site be used solely for the more intensive uses and a more robust mode split is employed, that trip generation levels do not reach the level where off site highway capacity assessment would be necessary. It is also noted that for the B2 interrogation, the selection criteria employed sites which are up to ten times that of the proposed site, which could affect the rates returned. The criteria should be restricted, so that ideally no sites of more than double the proposed size are used. For the B8 use, only 2 sites have been included, and ways should be investigated to expand the number of sites included, which may require a longer time horizon to be specified. Cycle parking has been set at 20 spaces, which the TA states is well in excess of the KMBC standards set out in the SPD Ensuring a Choice of Travel. The rates set out in the SPD are 1:450m² for B8 and 1:300 m² for B2, which at 9941 m² equate to 22 and 33 space respectively. Further cycle parking will therefore be required. Secure motorcycle parking will also be required at the appropriate rates.	24 May 2022	Steer	Submitted to the council an updated transport note and updated Indicative Swept Path drawings prepared by Steer on the 6 June 22. 6982 – 025 Rev A - Illustrative Alternative Parking Layout – B2 User 24158402-STR-HGN-100-DR-D-00101 to 0113 - Supporting Tracking Drawings
3.	The previous highway consultation response outlined the fact that a sensitivity test would be required to examine the impacts of the development if it were to be used exclusively for B2. It is noted that the applicant and transport consultant think this situation to be unlikely, however, they also state that the end user is not known and therefore it is quite reasonable to	21 June 22	Steer	Updated Response note submitted on 22 June 22

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
	request the impact of the potential development to be considered. The sensitivity test, for an exclusive B2 use should be presented to the highways authority for consideration. Furthermore, the Steer Highways Technical Note appears to misunderstand the implications of the MTW data used. For clarity, the mode share used, which is derived from the Census MTW data is not sufficiently robust as it uses the car ownership levels of the Knowsley MSOA in which the site is located. Kirkby has a particularly low car ownership, and therefore to use this, when in fact staff will be drawn from a much wider area, will clearly lead to a misrepresentation of the number of vehicles which will be attracted to the site. New, more representative mode splits should be used in the sensitivity test discussed in the paragraph above.			
4.	Highways have no objections to the proposed development, subject to the following conditions: No development shall take place until a scheme to permanently close off the existing vehicular and/or pedestrian access on to Villiers Road has been submitted to and agreed in writing by the Council as Local Planning Authority. The scheme shall be implemented as agreed before any part of the development has been brought into use. Reason: To limit the number of access points to, and maintain proper construction of the highway, in the interests of road safety and to comply with Policy CS19 of the Core Strategy, adopted January 2016 For a use falling exclusively within the B8 land-use category, the development shall not be brought into use, until the areas indicated on Site Plan Drawing 6982-10 Rev J, be set aside for car, cycle and motorcycle parking, servicing, vehicular manoeuvring (including provision for pedestrians/cyclists) have been surfaced, drained and permanently marked out or demarcated in accordance with the details and specifications shown. These areas shall be retained as such thereafter. For all uses not falling entirely within the B8 land-use, the development shall not be brought into use until a scheme identifying areas of car, cycle and motorcycle parking (including disabled spaces), servicing, vehicular manoeuvring (including provision for pedestrians/cyclists) in accordance with the Council's current standards, has been submitted to and approved in writing by the Council as Local Planning Authority; and have been surfaced, drained and permanently marked out or demarcated in accordance with the details and specifications shown in the approved drawing. These areas shall be retained as such thereafter unless otherwise agreed in writing by the Council. Reason: In the interests of highway and pedestrian safety and to comply with Policy CS7 of the Core Strategy, adopted January 2016. Within 3 months of the development being brought into use a Travel Plan shall be submitted to and approved in writing by the Council as Local Planning Authority. The Plan shall include immediate, continuing and long-term measures to promote and encourage alternative modes of transport to the single-occupancy car. For the avoidance of doubt, the Travel Plan shall include, but not be limited to: • Involvement of employees. • Information on existing transport policies, services and facilities, travel behaviours and attitudes. • Access for all modes of transport. • Targets for mode share. • Resource allocation including Travel Plan Co-ordinator and budget. • A parking and management strategy. • A marketing and communications strategy.	30 June 2022	Steer	Applicant responded with condition wording on 12 July. Note plan ref incorrect

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
	• Appropriate measures and actions to reduce car dependence and encourage sustainable travel. • An action plan, including a timetable for the implementation of each of the above. • Mechanisms for monitoring, reviewing and implementing the Travel Plan. • The approved Travel Plan shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied and in use. An annual report shall be submitted to the Council no later than 1 month following the anniversary of the first occupation of the development for a period of 5 years. The report shall include a review of the Travel Plan measures, monitoring data and updated action plan. Reason: To maximise opportunities for travel by modes of transport other than the private car, and to ensure that the development is sustainable. Prior to commencement of development a Construction Management Plan shall be submitted to and agreed in writing by the Local Planning Authority that details the means of mitigation of construction effects. This shall include but not be limited to the following: a. Layout of the site compound including identification of areas for the storage of plant and materials, loading/unloading and turning areas for delivery vehicles [for each phase as necessary]. b. Management of deliveries including prevention of waiting/layover of construction related traffic on the highway, measures for the control of traffic to and from the site and consideration of any temporary traffic management arrangements which may be necessary during periods of construction. Note reversing on the highway is not permitted without a Banksman. c. Construction staff parking arrangements d. Control of transfer of mud out of the site - details of wheel washing facilities including location and type. e. Methods for dust control and suppression. f. A programme of works including phasing, if applicable. g. Adequate provision for addressing any abnormal wear and tear to the highway, if applicable. All site works shall then be carried out in accordance with the approved Plan unless otherwise agreed in writing beforehand with the Local Planning Authority Reason: To ensure the satisfactory development of the site and in the interests of protecting the amenity of neighbouring occupiers and to comply with saved Policies H5, and ENV2 of the Knowsley Replacement Unitary Development Plan, adopted June 2006 and Policy CS2 of the Core Strategy, adopted January 2016.			
5.	Environmental Health			
6.	Air Quality Clarification is needed on the traffic figures they have submitted, to inform us if an air quality assessment is required. The figures used in the transport assessment are based over a 16-hour period. Will the site only operate for 16 hours a day? Given the nature of the area, 24-hour use would be expected. If this is the case, we require them to submit figures, showing the worst-case scenario, for the AADT for the vehicles using the site.	26 May 2022	Fichtner Steer	Submitted updated AQA to council for consideration on the 14 June 22 R2 09/06/22

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
	In any case, given the B8 use proposed, and with the warehouse having 10 unloading docks, we require the predicted trips to be reviewed, as we do not believe that there will be an average of 1.4 HGV's per hour over a 16 hour period (Based on 22 arriving – Table 5.9 of the TA) Depending on the traffic data, an air quality assessment may then need to be submitted. I would like to refer them to the relevant criteria in the following document, "Land-Use Planning & Development Control: Planning For Air Quality."			
7.	<u>Contaminated Land</u> Contaminated land reports were also submitted with the application and Merseyside Environmental Advisory Service (MEAS) has reviewed them on our behalf. The Phase II report concluded that no specific mitigation measures are required in relation to soils or groundwater. Gas protection measures consistent with a Characteristic Situation 2 classification are required at the proposed development. Further details will be required, and this could be secured by a suitably worded condition once we are satisfied that the air quality point above has been answered satisfactorily.		Burrows Graham	Not too sure where gas assessment is linked to AQ – could officers confirm? Could EHO provide wording of the proposed condition?
8.	<u>Ground Gas</u> On the basis of the ground gas risk assessment, TRC recommend that ground gas protection measures consistent Characteristic Situation 2 requirements are required. Subject to the agreement of the Approved Building Control inspector, this recommendation is accepted. TRC note that the CS2 Classification may possibly be reduced to CS1 with further monitoring. Details of the additional gas monitoring undertaken, and associated gas risk assessment, should be submitted for approval by the LPA to support any proposal to remove the requirement for gas protection measures. I advise that details of the proposed measures and how they are to be validated should be submitted to the Local Planning Authority for review. Foundation solutions must take into consideration the detailed design of the required gas protection measures.		Burrows Graham	As above
9.	<u>Importation of Soil Material</u> It is understood no areas of soft landscaping are proposed. However, should areas of soft landscaping be incorporated, validation testing will be required to demonstrate the suitability of any imported subsoil and topsoil (site won and imported) to be used in such areas. <u>Groundwater</u> TRC recommend further groundwater monitoring/levelling is undertaken. This is understood to be required to provide further information on groundwater occurrence and is not associated with consideration of land contamination matters.			Correct, so hopefully this wording does not need to be included in the final conditions, please can officers confirm?
10.	<u>United Utilities</u>			

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
11.	<u>DRAINAGE</u> We request the following drainage condition is attached to any subsequent approval: CONDITION <i>Prior to the commencement of development, details of a sustainable surface water drainage scheme and a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The drainage schemes must include:</i> <i>(i) An investigation of the hierarchy of drainage options in the National Planning Practice Guidance (or any subsequent amendment thereof). This investigation shall include evidence of an assessment of ground conditions and the potential for infiltration of surface water in accordance with BRE365;</i> <i>(ii) A restricted rate of discharge of surface water agreed with the local planning authority (if it is agreed that infiltration is discounted by the investigations);</i> <i>(iii) Levels of the proposed drainage systems including proposed ground and finished floor levels in AOD;</i> <i>(iv) Incorporate mitigation measures to manage the risk of sewer surcharge where applicable; and</i> <i>(v) Foul and surface water shall drain on separate systems.</i> <i>The approved schemes shall also be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards. Prior to occupation of the proposed development, the drainage schemes shall be completed in accordance with the approved details and retained thereafter for the lifetime of the development.</i> <i>Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution.</i> The applicant can discuss any of the above with Developer Engineer, Graham Perry, by email at wastewaterdeveloperservices@uuplc.co.uk. Please note, United Utilities is not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river). If the applicant intends to offer wastewater assets forward for adoption by United Utilities, their proposed detailed design will be subject to a technical appraisal by our Developer Services team and must meet the requirements outlined in 'Sewers for Adoption and United Utilities' Asset Standards'. This is important as drainage design can be a key determining factor of site levels and layout. Acceptance of a drainage strategy does not infer that a detailed drainage design will meet the requirements for a successful adoption application. We strongly recommend that no construction commences until the detailed drainage design, has been assessed and accepted in writing by United Utilities. Any work carried out prior to the technical assessment being approved is done entirely at the developer's own risk and could be subject to change.	31 May 2022	Burrows Graham	Drainage strategy proposals and even UU pre-applications advice was included in the FRA submitted for planning, providing justification to how we have considered the SUDs hierarchy and restricting discharge to 10l/s, which is slightly better than UU requesting 11l/s Refer to UU email dated 2nd February 2022 Assume UU have seen sight of this along with attached pro-forma sheet, which summaries the same strategy? Our understanding is that the submissions made should be sufficient to address UU comments and omit this condition wording on the bases UU will only be providing confirmation of discharge rates?
12.	<u>Management and Maintenance of Sustainable Drainage Systems</u> Without effective management and maintenance, sustainable drainage systems can fail or become ineffective. As a provider of wastewater services, we believe we have a duty to advise the Local Planning Authority of this potential risk to ensure the longevity of the surface water drainage system and the service it provides to people. We also wish to minimise the		Burrows Graham	No response needed – applicant to note drafted condition.

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
	risk of a sustainable drainage system having a detrimental impact on the public sewer network should the two systems interact. We therefore recommend the Local Planning Authority include a condition in their Decision Notice regarding a management and maintenance regime for any sustainable drainage system that is included as part of the proposed development. You may find the condition below a useful example. CONDITION <i>Prior to occupation of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:</i> <i>a. Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and</i> <i>b. Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime.</i> <i>The development shall subsequently be completed, maintained and managed in accordance with the approved plan.</i> <i>Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development.</i> Please note United Utilities cannot provide comment on the management and maintenance of an asset that is owned by a third party management and maintenance company. We would not be involved in the discharge of the management and maintenance condition in these circumstances.			
13.	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. This includes seeking confirmation of the required metering arrangements for the proposed development. If the proposed development site benefits from existing water and wastewater connections, the applicant should not assume that the arrangements will be suitable for the new proposal. 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. 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. To avoid any unnecessary costs and delays being incurred by the applicant or any subsequent developer, we strongly recommend the applicant seeks advice regarding water and wastewater services, and metering arrangements, at the earliest opportunity. Please see 'Contacts' section below.		Burrows Graham	As per note above item 9, pre-application advice with United Utilities was included in the FRA and confirms FW can discharge into their network Refer to UU email dated 2nd February 2022
14.	UNITED UTILITIES PROPERTY, ASSETS AND INFRASTRUCTURE United Utilities will not allow building over or in close proximity to a water main.		Burrows Graham	There are no UU sewers or water main infrastructure within the boundary of the site and proposed development works are located away to avoid build over requirements.

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
	It is the applicant's responsibility to demonstrate the exact relationship between any United Utilities' assets and the proposed development. Developer's 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. Where United Utilities' assets cross the proposed red line boundary, developers must contact our Developer Services team prior to commencing any works on site, including trial holes, groundworks or demolition. 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/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 diversion is prohibitive in the context of their development scheme. 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 earth movement and the transport and position of construction equipment and vehicles. Consideration should also be applied to United Utilities assets which may be located outside the applicant's red line boundary. Any construction activities in the vicinity of our assets must comply with our 'Standard Conditions for Works Adjacent to Pipelines' or national building standards. The applicant or developer should contact our Developer Services team for advice if their proposal is in the vicinity of water or wastewater pipelines and apparatus. It is their responsibility to ensure that United Utilities' required access is provided within their 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. See 'Contacts' section below.			Refer to UU sewer and water mapping, UG survey  Drainage and Water.PDF  42584_T_UG_REV1.pdf Contractors RAMS/CEMP will ensure existing infrastructure located outside the site will be protected from the works.
15.	Fire			
16.	The plans relating to the above application have been examined and below are the Fire Authority's observations: Access for fire appliances should comply with the requirements of Approved Document B5 of the Building Regulations. Water supplies for fire-fighting purposes should be risk assessed in accordance with the undermentioned guidance in liaison with the water undertakers (United Utilities - 0161 907 7351) with suitable and sufficient fire hydrants supplied. Industry The water supply infrastructure to any industrial estate should be as follows with the mains network on site being normally at least 150 mm nominal diameter— Up to one hectare 20 litres per second. One to two hectares 35 litres per second. Two to three hectares 50 litres per second. Over three hectares 75 litres per second.	23 May 2022	AJA	No response needed.

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
	* The premises should comply with Section 55 of the County of Merseyside Act 1980.			
17.	Health and Safety			
18.	No objection			
19.	Mersey Side Environment Agency			
20.	<u>Ecological Information</u> 3. The applicant has submitted a preliminary ecological assessment report in accordance with Local Plan policy CS8 (<i>Ecological Assessment – Land Between Villiers Road and Penrhyn Road, Ecology Solutions, Ref: 10337.EcoAs.vf, February 2022</i>) which meets BS 42020:2013. I advise the survey/report is acceptable. <u>Designated Sites</u> 4. The development site is close to the following designated sites and Local Plan policy CS8 applies: • Knowsley Brook LWS (170m south-west) • Kraft Operational Land LWS (500m north-west) • Otis Meadow LWS (580m north-west) • Knowsley Park LWS (680 metres south-east) 5. On this occasion, the development is unlikely to harm the features for which the sites have been designated: • The application site is isolated from all of the LWS sites by main roads and/or industrial development.	18 May 2022 and 31 May 2022	Ecology Solutions	No response needed.
21.	<u>Protected/Priority Species</u> <u>Bats</u> 6. The existing trees to the west of the site, and the proposed new hedgerow and tree planting at the site boundaries as part of the landscaping proposals, could be utilised by foraging and commuting bats. New external lighting as part of the proposals could impact the use of these areas by bats. A lighting scheme can be designed so that it protects ecology and does not result in excessive light spill onto important habitats in line with NPPF (paragraph 180). This can be secured by a <u>suitably worded planning condition</u>. It would be helpful for the applicant to refer to <i>Bat Conservation Trust website</i> https://www.bats.org.uk/news/2018/09/new-guidance-on-bats-and-lighting <u>Hedgehog</u> 7. The habitats on site are suitable for hedgehog which is a Priority Species and Local Plan policy CS8 applies. The following Reasonable Avoidance Measures (RAMs) should be put in place to ensure that there are no adverse effects on them: • A pre-commencement check for hedgehog; • All trenches and excavations should have a means of escape (e.g. a ramp); • Any exposed open pipe systems should be capped to prevent mammals gaining access; and • Appropriate storage of materials to ensure that mammals do not use them.	Updated 31 May 2022	Ecology Solutions	No response required. Applicant to note conditions requested and also other items that need to be done pre commencement Point 9 no longer applies as a Reptile Survey has now been submitted to the Council- this is acknowledged in the updated consultation response dated 31 May 2022.

CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
8. These measures can be <u>secured by a suitably worded planning condition.</u> <i>Reptiles</i> 9. As a precaution, I advise that the undertaking of the following RAMs during the construction phase is <u>secured by a suitably worded planning condition.</u> - Existing vegetation on the site will be gradually cut and removed under ecological supervision to encourage any reptiles present to move away from the affected areas; - The working area, together with any storage areas, will be kept clear of debris, and any stored materials will be kept off the ground on pallets so as to prevent reptiles from seeking shelter or protection within them; and - Any open excavations (e.g. foundations / footings / service trenches etc) will be covered with plywood sheeting (or similar) at the end of each working day. The edges of these sheets will be covered with a thick layer of topsoil or similar) to prevent reptiles from seeking shelter beneath them. Any excavation must be in-filled and made good to ground level with compacted stone or similar at the earliest opportunity, so as to remove any hazard to reptiles. <i>Breeding Birds</i> 10. Built features or vegetation on site may provide nesting opportunities for breeding birds, which are protected and Local Plan policy CS8 applies. <u>The following planning condition is required.</u> <i>CONDITION</i> <i>No tree felling, scrub clearance, hedgerow removal or vegetation management, is to take place during the period 1 March to 31 August inclusive. If it is necessary to undertake works during the bird breeding season then all trees, scrub, hedgerows and vegetation are to be checked first by an appropriately experienced ecologist to ensure no breeding birds are present. If present, details of how they will be protected are required to be submitted for approval.</i> 11. The proposed development will result in the loss of bird breeding habitat and Local Plan policy CS8 applies. To mitigate for this loss, details of bird nesting boxes (e.g. number, type and location on an appropriately scaled plan) that will be erected on the site should be provided to the Local Planning Authority for agreement. <u>The following planning condition is required.</u> <i>CONDITION</i> <i>The development hereby permitted shall not be occupied until details of bird boxes to include number, type and location on an appropriately scaled plan as well as timing of installation, has been provided for approval and implemented in accordance with those details.</i>			
22. <u>Landscaping</u> 12. Landscaping proposals have been submitted for the site (<i>Detailed Soft Landscaping Layout Plan – Penrhyn Road Knowsley, Mood Landscape, Dwg. No: 22_208_L001, 4th Feb 2022</i>). These show that some of the existing trees on the western site boundary will be removed. <u>I advise that the landscaping proposals should be revised in order to retain more of the existing trees.</u> The landscaping proposals include new native tree and shrub planting, as well as native hedgerow planting at the site boundaries. This is welcomed.		Mood Landscape Lowther Trees	Updated landscape drawing issued on the 5 July 2022 and planning drawings substituted on the 12 Jul 2022.

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
23.	<u>Waste Local Plan</u> <u>Loss of Consented Waste Capacity</u> 13. The Planning Statement (<i>Chroma Planning and Development Ref: P0144/HB February 2022</i>) acknowledges that the site has extant planning permission for a waste gasification plant (08/00474/FUL and 13/00362/FUL). This energy from waste capacity was included as consented capacity in the adopted Waste Local Plan, although the capacity has, to date, not been built out. However, I can confirm through monitoring of the Waste Local Plan that the energy capacity that this facility would have generated has been made up for at other existing energy from waste facilities or new capacity that has been granted since the Waste Local Plan was adopted. <u>Construction Waste Management</u> 14. The proposal is major development and involves excavation and construction activities which are likely to generate significant volumes of waste. Policy WM8 of the Merseyside and Halton Waste Joint Local Plan (WLP), the National Planning Policy for Waste (paragraph 8) and Planning Practice Guidance (paragraph 49) apply. These policies require the minimisation of waste production and implementation of measures to achieve efficient use of resources, including designing out waste and minimisation of off-site disposal. 15. In accordance with policy WM8, evidence through a waste audit or a similar mechanism (e.g. a site waste management plan) demonstrating how this will be achieved must be submitted and can be <u>secured by a suitably worded planning condition</u>. The details required within the waste audit or similar mechanism is provided in Part Two. <u>Waste Storage and Collection</u> 16. The Planning Statement (<i>Chroma Planning and Development, February 2022</i>) states that adequate waste and recycling facilities will be provided in accordance with the requirements of the future occupier of the Site. Illustrative information is provided on the Proposed Site Layout Plan (Drawing No. 6982 - 10 Rev G) to demonstrate that a suitably sized area can be accommodated. 17. Further details are required to demonstrate compliance with policy WM9 of the Merseyside and Halton Joint Waste Local Plan (WLP) and the National Planning Policy for Waste (paragraph 8). I advise that information relating to commercial and industrial waste storage and collection is required and can be secured by a suitably worded condition. <u>Low Carbon Development</u> 18. An Energy Strategy (<i>Yonder, Rev 01 March 2022</i>) has been submitted which sets out the hierarchal approach to energy management for the development. It proposes to use fabric improvements and on-site low zero carbon energy technology to reduce energy requirements beyond a baseline based on Building Regs Part 2LA. 19. The submitted Part L2A Compliance Report (<i>Yonder, Rev 01 24 February 2022</i>) demonstrates a reduction in predicted annual carbon emissions of 27.4% when improvements to fabric U values and design enhancements are considered.		Knight Webb	No response required. Applicant team to note that the Contractor is to produce a CEMP.

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE
	20. It is noted that the development will be designed to meet the requirements of BREEAM NC Industrial 2018 and achieve a rating of Excellent. A BREEAM Pre-assessment has also been submitted (Yonder, Rev A, February 2022). 21. I consider the proposal to be compliant with Knowsley Core Strategy Policy CS22 (Sustainable and Low Carbon Development). The Energy Strategy and supporting documents should be secured as Approved Documents. <i>Construction Waste Management</i> 22. A waste audit or similar mechanism provides a mechanism for managing and monitoring construction, demolition and excavation waste. This is a requirement of WLP policy WM8 and the National Planning Policy for Waste (paragraph 8); and is advised for projects that are likely to produce significant volumes of waste (nPPG, paragraph 49). Implementation of such mechanisms may also deliver cost savings and efficiencies for the applicant. The following information could be included within the waste audit (or similar mechanism) as stated in the Planning Practice Guidance: - the anticipated nature and volumes of waste that the development will generate; - where appropriate, the steps to be taken to ensure the maximum amount of waste arising from development on previously developed land is incorporated within the new development; - the steps to be taken to ensure effective segregation of wastes at source including, as appropriate, the provision of waste sorting, storage, recovery and recycling facilities; and - any other steps to be taken to manage the waste that cannot be incorporated within the new development or that arises once development is complete. 23. Information to comply with policy WM8 could be integrated into a Construction Environment Management Plan (CEMP) if one is to be produced for the development. This would have the benefit of ensuring that the principles of sustainable waste management are integrated into the management of construction on-site to improve resource efficiency and minimise environmental impacts.			
24.	Planning Officer			
25.	Have concerns about the proximity of the building to the site boundaries. We would again raise the issue of pulling the building in to the northern and southern site boundaries in particular the Penryhn Road side. If at the very least the Penrhyn Rd side could be pulled in sufficient to incorporate some additional tree planting that would resolve some concerns.	28 June 22		Landscape consultant spoke with respective officers at the council to agree a suitable proposal. James Towers – Landscape architect Tel 07881267550 Tom Skipworth – Arboriculture Officer – 07557849401 Agreed a landscape proposal which included comments from the councils arboriculture officer. Possibly require a LEMP as a condition. Possibly provide some benches as amenity space. Landscape drawings substituted 05 July 22 Planning drawings substituted 12 July 22 with updated Appendix A and B of TA
26.	Arboriculture			

	CONSULTEE COMMENTS	DATE	RESPONSIBLE	APPLICANT RESPONSE																		
27.	I can confirm that I have assessed the submitted information for the above-mentioned planning application and would offer the following comments: - The application proposes the removal of three groups in order to facilitate the building, these are G1, G3 and G5. Along with 4 trees from G2 and 10 trees from G4. Two other groups (G1b & G5b) have been identifying for removal due to safety reasons. This is 89+ trees. Currently 57 trees are going to be replanted on site which goes to towards mitigation for the 89+ trees being removed. The normal mitigation is replacement of 2:1 at a girth of 12-14cm. As there is not enough room on site for 178 trees, it would be acceptable for a 106 payment for the remainder of trees (121). The 106 payment would be £33,051.15. This would be used in the maintenance of local woodlands within the Kirkby area. The application also needs a method statement being submitted.	11 July 2022		To be considered																		
28.	Social Values																					
29.	Payment of £12,426 Planning / Development information <table><tr><th>Planning Classes</th><th>Development Type</th><th>Area m2</th></tr><tr><td>B2 - General industrial</td><td>Industrial building</td><td>9,941</td></tr></table> Social Value Contribution <table><tr><th>EET/Social weeks forecast</th><th>End use opportunity potential</th><th>Financial Contribution</th></tr><tr><td>243</td><td>High</td><td>£12,426</td></tr><tr><td></td><td>Social Value Contribution (60%)</td><td>£7,456</td></tr><tr><td></td><td>Social Value Monitoring (40%)</td><td>£4,971</td></tr></table> Key Contacts	Planning Classes	Development Type	Area m2	B2 - General industrial	Industrial building	9,941	EET/Social weeks forecast	End use opportunity potential	Financial Contribution	243	High	£12,426		Social Value Contribution (60%)	£7,456		Social Value Monitoring (40%)	£4,971	12 July 2022		Solicitor details to be provided
Planning Classes	Development Type	Area m2																				
B2 - General industrial	Industrial building	9,941																				
EET/Social weeks forecast	End use opportunity potential	Financial Contribution																				
243	High	£12,426																				
	Social Value Contribution (60%)	£7,456																				
	Social Value Monitoring (40%)	£4,971																				