

Land to the West of Faraday Road and East of Alchemy Way

Planning Statement
April 2026
Our Ref: 24-00179



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Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

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1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Rapleys LLP (Rapleys), on behalf of NW1 IOS 3 Unit Trust (the 'Applicant') and is submitted in support of a full planning application for the proposed use of the Site for open storage (Class B8), together with associated works at Land to the West of Faraday Road and East of Alchemy Way, Knowsley Industrial Park, Kirkby, Knowsley (the 'Site').
- 1.2 The formal description of development being applied for is:
- "Proposed use of the Site for open storage (Class B8), provision of new hardstanding, and all other associated works."* (the 'Proposed Development').
- 1.3 The Proposed Development has been informed through pre-application engagement with Knowsley Metropolitan Borough Council (the 'Council' or 'LPA') and a clear understanding of the Site and its surroundings. The Site comprises undeveloped land within an established industrial estate and is enclosed by existing commercial and industrial operations. The Proposed Development has been shaped to reflect the Site's industrial setting, making effective use of an underutilised parcel of land while integrating appropriately with the wider estate.
- 1.4 The Proposed Development comprises Class B8 employment use within a 'Principal Regeneration Area' and 'Primarily Industrial Area', consistent with Policies CS4 and CS11 of the Core Strategy (2016) and Policies EC2 and EC3 of the Unitary Development Plan (UDP) (2006). The Proposed Development is considered to align directly with the intended role of this allocated employment land and represents an appropriate and compatible form of development from a land-use and design perspective.
- 1.5 The other main benefits of the Proposed Development include:
- Promoting the effective use of employment land, facilitating development of the right type in the right location, without having adverse impacts on neighbouring uses or the surrounding environment.
 - Bringing forward an undeveloped site within Knowsley Industrial Park, where additional development is encouraged to support economic performance.
 - Delivering a 10% Biodiversity Net Gain (BNG), primarily through off-site habitat enhancements, providing a measurable environmental benefit, together with the provision of 7 no. new trees and landscaping to support the delivery of green infrastructure at the Site.
 - Responding to established market demand for this form of employment development and supporting wider economic growth and productivity.
- 1.6 The various planning, environmental, and economic benefits of the Proposed Development are addressed in full in Section 6 of this Planning Statement.
- 1.7 This Planning Statement evaluates the key planning considerations relevant to the Site by assessing the Proposed Development against applicable national and local policies, as well as other material considerations.

Accompanying Documents

- 1.8 To accompany this full planning application – which has been submitted via the Planning Portal (Ref: PP-14715007) – the following documents and technical studies are submitted:
- Full suite of drawings/plans, prepared by Ashton Smith Associates.
 - MAR2-ASA-00-EX.SI-D-A-0001_(S0-P06) - Site Location Plan.
 - MAR2-ASA-00-EX.SI-D-A-0002_(S0-P06) - Existing Site Plan.
 - MAR2-ASA-00-EX.SI-D-A-0003_(S0-P06) - Proposed Site Plan.
 - MAR2-ASA-00-EX.SI-D-A-0004_(S0-P05) - Existing Site Sections.
 - MAR2-ASA-00-EX.SI-D-A-0005_(S0-P05) - Proposed Site Sections.
 - MAR2-ASA-00-EX.SI-D-A-0006_(S0-P04) - Existing and Proposed Gates and Fence.
 - MAR2-ASA-00-EX.SI-D-A-0007_(S0-P03) - Proposed Cycle Shelter and Sub-Station.
 - MAR2-ASA-00-EX.SI-D-A-0008_(S0-P03) - Proposed Gatehouse-Welfare.
 - Design and Access Statement (DAS), prepared by Ashton Smith Associates.
 - Proposed Planting Plan, prepared by Bea Landscape Design Ltd.
 - Planning Statement (this document).

- Ecological Assessment, prepared by Ecology Solutions.
- Biodiversity Net Gain Assessment, prepared by Ecology Solutions.
- BNG Statutory Metric, prepared by Ecology Solutions.
- Phase 1 Environmental Assessment, prepared by Hollis.
- Flood Risk and Drainage Assessment (including Proforma), prepared by Burrows Graham.
- Proposed Drainage Layout, prepared by Burrows Graham.
- Proposed Cut & Fill, prepared by Burrows Graham.
- Proposed Finished Levels, prepared by Burrows Graham.
- External Lighting Plan, prepared by KGA.
- Topographical Plan, prepared by Survey Operations.
- Noise Impact Assessment, prepared by ACA Acoustics.
- Social Value Strategy, prepared in collaboration with Fusion 21.
- Transport Statement, prepared by Pulsar.
- Travel Plan prepared, by Pulsar.
- Arboricultural Implications Assessment (inc. Tree Survey), prepared by SEED Arboricultural Ltd.

1.9 The submission concludes that the Proposed Development is compliant and acceptable in planning terms. It is, therefore, respectfully requested that planning permission is approved without delay.

Structure of Planning Statement

1.10 The content of this Statement is set out as follows:

- **Section 2** – provides a summary of the Site and surroundings and provides a brief summary of the relevant planning history.
- **Section 3** – summarises the pre-application engagement with Knowsley Metropolitan Borough Council (KMBC) and Merseyside Environmental Advisory Service (MEAS).
- **Section 4** – provides a description of the Proposed Development.
- **Section 5** – outlines the planning policy context that informs the assessment of the application.
- **Section 6** – evaluates the Proposed Development's compliance with national and local planning policy and other relevant material considerations.
- **Section 7** – provides a summary and the conclusions.

2 SITE AND SURROUNDINGS

The Site

- 2.1 The Site, which is outlined in red below, extends to approximately 1.04 ha and is located to the west of Faraday Road and to the east of Alchemy Way. It comprises undeveloped, vacant land, which includes areas of grass, scrub, shrubs and trees.
- 2.2 The Site has been subject to fly tipping around both of its entrances, with commercial waste in rubble bags, along with general litter and discarded materials being observed.
- 2.3 Additionally, the Site is enclosed by trees and shrubland, including hedgerows. However, no trees within or adjacent to the Site are subject to a TPO.



Figure 1 - Aerial view of the Site

- 2.4 Environment Agency mapping shows the Site lies predominantly within Flood Zone 1, indicating the lowest risk of fluvial and tidal flooding.
- 2.5 The Site is not within a Conservation Area, has no statutory or locally listed buildings, and is not designated as Green Belt, SSSI, Local Green Space, AONB, or National Park. Although land to the west is a Local Wildlife Site, the application Site has no such designation.

Surroundings

- 2.6 The Site lies within the established Knowsley Business Park and Industrial Estate, the largest business park in the Liverpool City Region, and is designated within the Knowsley Industrial Park South Primarily Industrial Area. The Business Park accommodates approximately 800 businesses, including major occupiers such as Matalan, QVC and Amazon, supporting around 15,100 jobs and contributing approximately £214 million in GVA annually to the regional economy.
- 2.7 To the west of the Site is an area which comprises an undeveloped parcel of land comprising grassland, scrub and areas of disturbed land, which is designated as a Local Wildlife / Geological Site (Otis Meadow). This land is subject to a live planning application (Ref: 25/00464/FUL) for two employment units totalling 18,384 sqm (197,880 sqft) of industrial and logistics floorspace. It should be noted that this application proposes the de-designation of Otis Meadow – a decision is expected soon.
- 2.8 Briton Plantation (TPO 06/00006/TPO) is located approximately 230m to the east of the Site; it lies well outside the application boundary and will not be affected by the Proposed Development.
- 2.9 The Site is bounded to the east by a vehicle storage facility which is presently occupied by Amazon, after planning permission was approved in 2023 by virtue of (Ref: 23/00064/FUL), see planning history sub-section below for further information.
- 2.10 To the south, an open parcel benefits from outline permission (Ref: 23/00456/FUL, granted April 2024) for two units (Use Classes E(g)(ii)(iii), B2 or B8) with ancillary offices, parking and access from Alchemy Way.

- 2.11 In summary, the surrounding context is considered to be primarily commercial and industrial in nature, reflecting the Site's location within the established Knowsley Business Park and Industrial Estate.

Access

- 2.12 The Site is served by two vehicular access points: the primary access is from the north via Faraday Road, with a secondary access via Alchemy Way. Alchemy Way provides direct access to the A580 East Lancashire Road, which connects to the M57. The M57 links the Site to Liverpool, Manchester and the wider motorway network.

- 2.13 Accordingly, the Site benefits from excellent access to the Strategic Road Network (SRN).

Planning History and relevant background

- 2.14 A planning history search has been undertaken for the Site using the LPA's online system.

- 2.15 There is no planning history associated with the Site.

- 2.16 There is one relevant record relating to land east of the Site, forming part of a wider planning application for operational vehicle storage, including resurfacing, access modifications, associated parking, and ancillary infrastructure (Ref: 20/00433/FUL). The LPA was understood to accept the principle of the development; however, the application was withdrawn by the applicant in November 2021 for unspecified reasons.

- 2.17 A subsequent application was submitted for a similar scheme, broadly comparable in land use, scale, and design, but on a smaller site with fewer van storage spaces proposed (359 spaces compared to 501 in the previous scheme). The scheme included a new access arm from the T-junction off Faraday Road and was granted planning permission on 1 March 2023 (Ref: 23/00064/FUL). In approving the scheme, the LPA confirmed that the vehicle storage use and associated development were acceptable in principle.

- 2.18 The approved vehicle storage facility immediately to the east (Ref: 23/00064/FUL) provides a clear precedent for B8 open-storage activity in this location, which is considered to set a helpful precedent for the Proposed Development at the Site.

3 PRE-APPLICATION CONSULTATION

Pre-application enquiry No. 1

- 3.1 Pre-application advice was sought from Knowsley Metropolitan Borough Council (KMBC) in connection with the Proposed Development. The Case Officer provided a formal response on 18 September 2024 (ref: 24/00013/PREAPP), based on information submitted on 31 May 2024, including a site location plan, existing site plan, proposed site plan, and covering letter.
- 3.2 The pre-application submission related to a larger site of approximately 1.9 hectares, comprising two parcels: (i) land to the south and west of Faraday Road, and (ii) land to the east of Alchemy Way. The current planning application relates solely to the western portion of the Site, representing a materially smaller and more contained development than previously considered.
- 3.3 The pre-application proposals comprised the use of the Site for B8 open storage, together with associated infrastructure including hardstanding, security gates and fencing, welfare facilities, car parking (including EV charge points), cycle parking, and automated vehicle barriers. The Proposed Development now reflects the same broad form of development, refined to optimise operational efficiency, landscape integration, and ecological outcomes.
- 3.4 The Case Officer confirmed that the Site is allocated as Land for Employment Development (recognised as E(g)(iii), B2 and B8 uses) on the Knowsley Local Plan Policies Map. The response confirmed that, as open storage falls within Class B8, the principle of the Proposed Development is acceptable in land use terms and consistent with the Site's employment allocation.
- 3.5 On the basis of the pre-application submission, the Case Officer advised that any future planning application should be supported by a comprehensive suite of technical assessments and supporting documentation to enable proper consideration of the proposals. This included.
- Plans and Layout – Existing and proposed plans and elevations showing the Site layout, development footprint and surrounding land uses, supported by a Design and Access Statement explaining the layout, access arrangements and operational design.
 - Ecology and Biodiversity – A Preliminary Ecological Appraisal (PEA) in accordance with BS 42020:2013 and CIEEM (2017), including desk study data, an Extended Phase 1 / UKHab habitat survey, and an assessment of protected species potential. The assessment should identify ecological impacts, invasive species, further survey requirements, and opportunities for Biodiversity Net Gain (BNG). Supporting information should demonstrate a minimum 10% net gain, including a UKHab baseline survey, Defra Biodiversity Metric 4.0, habitat condition assessments, GIS data, and a draft Habitat Management and Monitoring Plan where appropriate.
 - Highways and Access – Details of access, parking, delivery and servicing arrangements, supported by a Transport Statement addressing accessibility, trip generation and potential highway impacts in accordance with KMBC guidance.
 - Drainage and Flood Risk – A Flood Risk Assessment and Drainage Strategy, supported by a levels survey and cross-sections illustrating site topography and proposed grading.
 - Trees and Landscaping – A Tree Survey, Arboricultural Impact Assessment and Method Statement, identifying existing trees, impacts, mitigation and replacement planting where required.
 - Environmental and Operational Considerations – A Noise Assessment covering B8 operations (including HGV movements and plant), and External Lighting Scheme.
 - Land Contamination – A Phase 1 Desk Study to identify potential contamination associated with historic railway use, with further investigation or remediation where necessary.
 - Utilities and Safety – Consultation with SP Energy Networks regarding safe working distances from overhead lines, potential diversion works, and maintenance access requirements.
- 3.6 This advice provided a clear framework for the technical information required to support the planning application and ensure that all relevant environmental, operational, and safety matters are addressed.

Pre-application enquiry No. 2

- 3.7 Following the initial pre-application enquiry, a smaller-scale design was developed for the Proposed Development, reducing the red line boundary to focus on the western portion of the Site. This reduction responded to ecological and biodiversity net gain (BNG) considerations identified during the ecological assessment.

- 3.8 A further pre-application consultation was held on 07/01/2026, which principally included discussion with the Pamela Swallow (MEAS), regarding the proposed reduction in Site size and the ecological baseline. During this discussion, MEAS confirmed that the Site should not be regarded as Open Mosaic Habitat on Previously Developed Land (OMHPDL) owing to it not satisfying all qualifying criteria and supported the overall approach to biodiversity net gain. The revised proposal was therefore considered to strike an appropriate balance between delivering open storage land (Class B8) within an allocated Employment Area while maximising opportunities to achieve a 10% biodiversity net gain.
- 3.9 The consultation also helped establish the expected approach to meeting BNG requirements, including the process for securing off-site biodiversity credits where necessary. In summary, the pre-application advice confirms that the principle of B8 open storage is acceptable, subject to the submission of appropriate technical assessments and mitigation measures. The Proposed Development reflects these recommendations through a reduced Site footprint and design measures incorporated to address ecological, biodiversity, highways and environmental considerations.

4 PROPOSED DEVELOPMENT

- 4.1 The Proposed Development comprises the use of the Site for open storage (Class B8) together with associated works, including hardstanding, a substation, and supporting operational infrastructure.
- 4.2 The development is being progressed on a speculative basis, and, at this stage, a prospective occupier has not been identified.
- 4.3 A Proposed Site Plan has been prepared illustrating the layout of the development, including the open storage areas, vehicular access points, parking provision, and the location of the substation and other operational infrastructure.
- 4.4 The Proposed Development includes the following key elements.
- Hardstanding: Provision of a level, durable surface across the majority of the Site to create an efficient and functional open storage area.
 - Soft landscaping: A landscaped buffer is proposed along the majority of the site's perimeter, with planting incorporated around the boundaries while retaining the main central area as hardstanding to maximise usable storage space.
 - Gatehouse / welfare buildings: Two buildings to facilitate secure and controlled access together with staff welfare components.
 - Perimeter fencing: 2.3 m high fencing to secure the Site and define the storage area.
 - Car parking: Provision for 11 cars, including 2 disabled bays and 2 dedicated EV charging points.
 - Cycle parking: Provision for 4 no. bicycles to encourage sustainable travel.
 - External lighting: Designed to enable safe operational use across the Site.
 - Substation: A small on-site electrical substation to provide power for the Site's operational requirements.
 - Vehicular access: Entry and exit points from Alchemy Way and Faraday Road, providing efficient connections to the surrounding highway network.
- 4.5 The Site is intended for storage and ancillary activities consistent with Class B8 uses.
- 4.6 The layout is designed to accommodate the operational needs of vehicles, goods handling, and site management efficiently to operate on 24 hour basis.

5 PLANNING POLICY CONTEXT

- 5.1 This section provides an overview of planning policies and other material considerations against which the planning application will be assessed.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals are determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. Where there is a difference in policy, Section 38(5) requires that the most recently adopted policy takes precedence.
- 5.3 The statutory Development Plan for Knowsley Metropolitan Borough Council comprises the following:
- Knowsley Core Strategy Local Plan (adopted 2016);
 - Saved Policies from the Knowsley Replacement Unitary Development Plan (UDP) (adopted June 2006); and
 - Joint Merseyside Waste Local Plan (adopted in 2013 by Halton, Knowsley, Liverpool, Sefton, St Helens and Wirral Councils).
- 5.4 Alongside this, Knowsley Metropolitan Borough Council has a legal duty to have regard to all material considerations.
- 5.5 This includes the Government's National Planning Policy Framework ('NPPF') which was published in 2019 but recently updated in December 2024, National Planning Practice Guidance (NPPG) (February 2024), and the requirements of relevant Circulars. This also includes Supplementary Planning Guidance and Documents (SPGs and SPDs) produced by Knowsley Metropolitan Borough Council.
- 5.6 In addition to the Development Plan, the following policy documents and guidance are material considerations in the determination of this application:
- National Planning Policy Framework (NPPF) (2024)
 - National Planning Practice Guidance (NPPG) (2024)
 - Design Quality in New Development SPD (2016)
 - Developer Contributions SPD (2016)
 - Ensuring a choice of Travel SPD (2010)
 - Trees and Development SPD (2016)
 - Adding Social Value to Development: Employment and Skills SPD (2018)
 - Emerging National Policy (NPPF)
- 5.7 The Development Plan and material considerations are considered individually below.

DEVELOPMENT PLAN

Knowsley Core Strategy Local Plan (2016)

- 5.8 The Site is designated as 'Land for Employment Development' on the Local Plan Policies Map. It is specifically identified within the 'Knowsley Industrial Park South' employment allocation, as shown in the inserted extract of the Policies Map, the site identified by a red star.

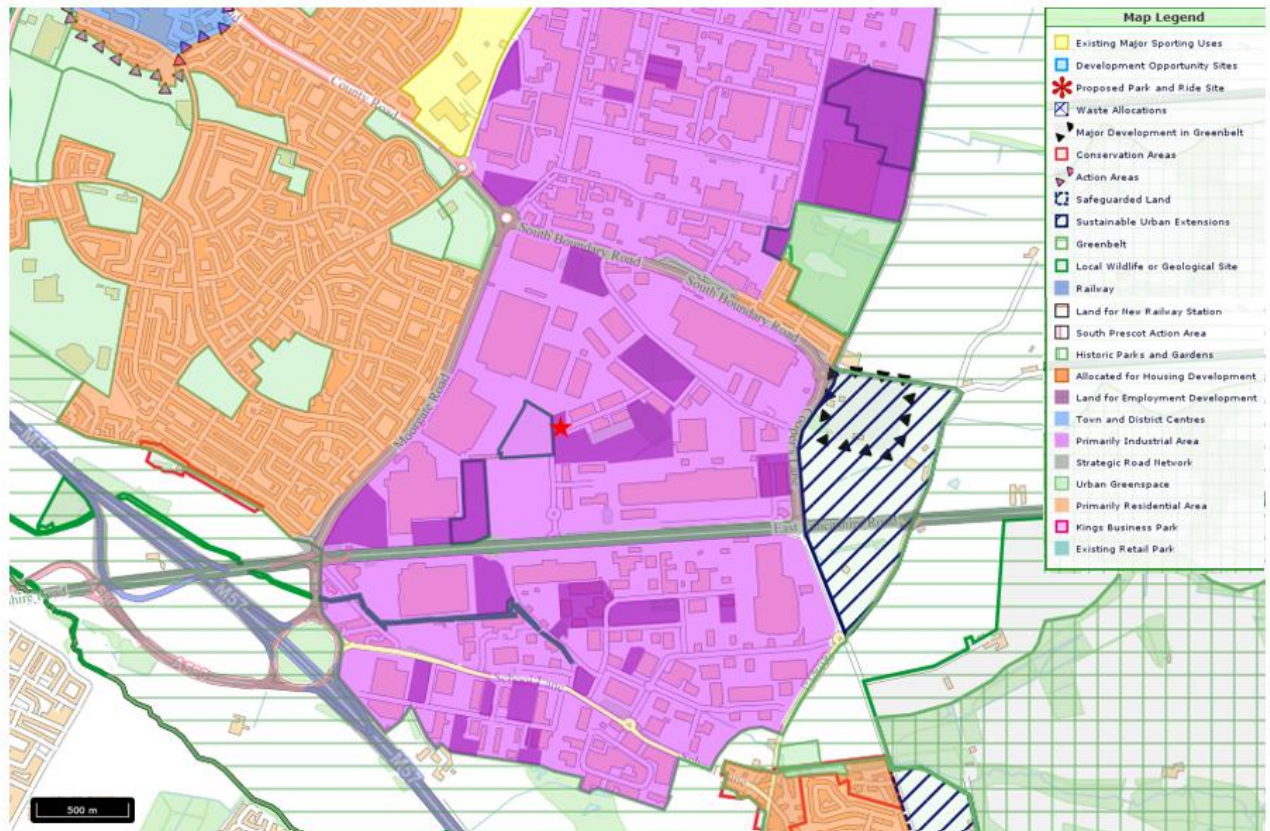


Figure 2 - Policies Map extract

Knowsley Core Strategy Local Plan (2016)

- 5.9 The Knowsley Core Strategy forms part of the statutory development plan for the Borough and sets out the strategic planning framework guiding development in Knowsley up to 2028. The following policies are considered most relevant to the Proposed Development.
- 5.10 **Policy CS11 – Principle Regeneration Area (Knowsley Industrial and Business Parks):** Policy CS11 recognises Knowsley Industrial and Business Parks as one of the Borough's key regeneration priorities. The policy indicates that the Council aims to support ongoing improvement and reinvestment within these areas by facilitating new employment-led development that strengthens their role as major employment locations.
- 5.11 Within the policy, Part 1(c) identifies land to the south of Boundary Road as an area where additional employment activity, within the former B1 use class and the B8 sector, is expected to be a focus. This reflects the intention to encourage development that complements the existing employment offer and supports the continued economic function of the wider Parks.
- 5.12 **Policy CS1 – Spatial Strategy for Knowsley:** Policy CS1 establishes the overarching spatial priorities for the Borough up to 2028. Among the priorities identified within the policy is the strengthening and enhancement of existing employment areas together with the provision of an appropriate range of sites and premises capable of accommodating new employment development across Knowsley.
- 5.13 **Policy CS2 – Development Principles:** Policy CS2 establishes a set of overarching principles intended to guide the quality and sustainability of development across the Borough. These principles are focused on ensuring that new proposals contribute positively to the creation of well-functioning places and support both environmental resilience and community well-being.
- 5.14 Within these principles, Criterion 4(j) is particularly relevant. It requires development to be planned and designed in a way that limits its environmental effects, including those relating to flood risk, air and water environments, ground conditions, soil resources, and potential noise or vibration. The policy also

makes clear that where effects cannot be fully avoided, appropriate mitigation should be incorporated so that any remaining impacts are managed carefully and kept to acceptable levels.

- 5.15 **Policy CS4 – Economy and Development:** Policy CS4 sets out the Borough’s strategic approach to guiding economic development and maintaining a strong supply of employment land over the plan period. The policy confirms that the Council will use its planning functions and related tools to help bring forward investment in appropriate locations and to support the continued operation and evolution of established employment areas.
- 5.16 A central component of CS4 is the requirement to ensure that enough land is available to meet identified employment needs up to 2028. The policy highlights that a substantial quantum of land, 164 hectares, is expected to come forward during the plan period, with growth focused predominantly within the Borough’s existing employment locations. These areas include Knowsley Industrial Park (together with Knowsley Business Park), Huyton Business Park, Kings Business Park, South Prescott and the Jaguar Land Rover site at Halewood, all of which play a significant role in accommodating business and industrial activity.
- 5.17 The policy also makes clear that retaining the Borough’s existing base of employment land is an important component of its overall strategy. Sites that are already in employment use, or formally allocated for such purposes, are generally expected to remain part of the employment land portfolio unless it can be demonstrated that they are no longer required or that alternative uses would deliver wider benefits that cannot be achieved through employment development.
- 5.18 **Policy CS19 – Design Quality and Accessibility in New Development:** Policy CS19 sets out the Council’s expectations for design quality and the creation of accessible, well-functioning places. The policy emphasises that new development should contribute positively to the character and appearance of its surroundings and support inclusive, legible environments.
- 5.19 In relation to design, the policy requires proposals to demonstrate a clear understanding of their context. This includes respecting the established characteristics of nearby buildings and spaces, such as prevailing form, layout, scale, and use of materials, and ensuring that development sits comfortably within its setting. The policy also encourages proposals to work with existing features of the site and wider landscape, including topography, green infrastructure networks, and any heritage or locally valued assets.
- 5.20 A further component of CS19 is the expectation that development should be easy to move around and accessible for all users. Proposals should provide safe and convenient routes and connections, with an emphasis on walking, cycling and public transport, and ensure that movement patterns are inclusive for people of varying levels of mobility.
- 5.21 Part 2 of the policy relates to the amenity of both current and future occupiers. Development is expected to avoid giving rise to adverse effects on neighbouring land uses and must be designed to create environments that feel safe and well-overlooked, helping to reduce opportunities for crime or anti-social behaviour. The policy also requires long-term arrangements for management and maintenance to be considered as part of the design process, to ensure that spaces and facilities remain functional and well-kept over time.
- 5.22 **Policy CS7 – Transport Networks:** Policy CS7 seeks to support a sustainable transport system and a pattern of development which reduces the need to travel, supports economic growth and reduces reliance on private vehicles.
- 5.23 **Policy CS8 – Green Infrastructure:** Policy CS8 seeks to safeguard and enhance strategically important areas of green infrastructure and natural environmental assets within the Borough. The policy recognises the important role that green infrastructure plays in protecting landscape character, supporting ecosystems and biodiversity, and delivering wider environmental and recreational benefits.
- 5.24 The Site is located adjacent to land identified on the Local Plan Policies Map as a Local Wildlife or Geological Site. This designation is located to the west of the Site and is therefore a relevant consideration in the context of Policy CS8.
- 5.25 **Policy CS21 – Greenspaces and Trees:** Policy CS21 recognises the importance of green spaces and trees in protecting the natural environment and supporting biodiversity and community wellbeing.
- 5.26 The policy encourages development proposals to incorporate:
- The retention of existing trees, woodland and vegetation where these contribute positively to visual amenity, recreational value or biodiversity;
 - Appropriate tree planting and soft landscaping within development proposals, together with habitat features to support biodiversity; and

- Replacement planting where tree loss is unavoidable, normally at a ratio of two replacement trees for every tree removed, taking into account species and size.

- 5.27 **Policy CS22 – Sustainable and Low Carbon Development:** Policy CS22 requires new development to achieve high standards of sustainable design and construction and to minimise carbon emissions.
- 5.28 The policy encourages development to incorporate measures that ensure buildings are comfortable and safe for users, manage flood risk appropriately, incorporate landscaping measures such as green roofs or walls where appropriate, and promote sustainable waste management practices.
- 5.29 **Policy CS24 – Managing Flood Risk:** Policy CS24 sets out the Borough’s approach to managing flood risk and ensuring that new development does not increase vulnerability to flooding, either within the site or in surrounding areas. The policy places an overarching requirement on applicants to demonstrate that proposals are acceptable in flood-risk terms and that they do not lead to harmful changes in surface-water behaviour.
- 5.30 The policy confirms that proposals that could lead to an unacceptable level of flood risk will not be supported. It also requires that certain types of development, specifically schemes located within identified areas of flood risk, or proposals with a site area exceeding one hectare, must be accompanied by a Flood Risk Assessment proportionate to the scale and nature of the development.
- 5.31 Policy CS24 also expects flood-risk mitigation to be clearly explained and appropriately justified. Where mitigation is necessary, it should be informed by the evidence contained within the Strategic Flood Risk Assessment, relevant site-specific assessments or applicable local flood-management strategies. Measures may include the use of sustainable drainage systems, biodiversity-led design responses where feasible, and clearly defined arrangements for future maintenance and management. Responsibility for delivering and funding these measures rests with the developer, and their implementation should be outlined as part of the planning submission.
- 5.32 **Policy SD1 – Sustainable Development:** Policy SD1 (Sustainable Development) confirms that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the National Planning Policy Framework. The policy states that the Council will work proactively with applicants to jointly find solutions that enable proposals to be approved wherever possible and to secure development that improves the economic, social and environmental conditions in the Borough.
- 5.33 Planning applications that accord with the policies in the Local Plan, and any relevant policies in Neighbourhood Plans, will be approved without delay unless material considerations indicate otherwise.
- 5.34 **Policy CS27 – Planning for and Paying for New Infrastructure:** Policy CS27 establishes the mechanisms through which developer contributions may be secured in order to ensure that infrastructure necessary to support development can be delivered.

Replacement Unitary Development Plan (Saved Policies) (2006)

- 5.35 The Core Strategy (2016) includes 39 UDP Policies from the Knowsley Replacement Unitary Development Plan which was adopted in June 2006. Table C.1 within the core strategy identifies the policies from the UDP which are saved and to applied to future development proposal alongside the Core strategy. The below are the most relevant policies for the Proposed Development:
- 5.36 **Policy EC2 – Sites Allocated for Employment Development:** Policy EC2 identifies a number of sites across the Borough that are reserved specifically for employment-related development. The Site lies within one of these allocations, designated as E12 ‘Britonwood’ on the adopted Proposals Map. This designation indicates that the land forms part of the Borough’s planned supply of employment sites.
- 5.37 Within these allocated areas, Policy EC2 anticipates that development will support the Borough’s portfolio of employment uses. This includes activities falling within the former business (B1), general industrial (B2), and storage and distribution (B8) use classes. These locations are intended to help accommodate future economic growth by directing appropriate employment-generating uses into established and sustainable employment areas.
- 5.38 The policy also makes clear that development within allocated employment sites should achieve a suitable quality of built form and associated landscaping to ensure that new proposals integrate effectively with their surroundings and contribute positively to the character and functioning of the wider employment area.
- 5.39 **Policy EC3 – Primary Industrial Area:** Policy EC3 identifies a number of established industrial areas within the Borough where employment-related activity is expected to remain the dominant land use.

These locations accommodate a concentration of industrial, business and warehousing operations and are safeguarded as important components of Knowsley's employment land supply.

- 5.40 Within these designated areas, proposals for development falling within the former Class B1 (business), Class B2 (general industrial) and Class B8 (storage and distribution) use classes are supported in principle. These uses are viewed as compatible with the prevailing character and function of Primarily Industrial Areas.
- 5.41 The policy also sets out the circumstances in which other forms of development may be considered acceptable. Such proposals must demonstrate that they would sit comfortably alongside established employment activities, are aligned with any relevant regeneration or improvement initiatives for the area and would maintain or improve the visual and operational qualities of the industrial environment. Importantly, schemes should not unreasonably erode the Borough's stock of land available for industrial and employment purposes.
- 5.42 **Policy CP3 – Development Quality:** The policy identifies the key qualities that the Council will seek to secure in new development. The policy emphasises that development should respond appropriately to its surroundings and contribute positively to the character, appearance and function of the area. Proposals should be designed and implemented in a way that integrates with the existing environment and maintains the overall quality of the built and natural environment.
- 5.43 **Policy T6 – Ensuring Choice of Travel to Serve New Developments:** Policy T6 seeks to ensure that development proposals are accessible by a range of travel modes. The policy places emphasis on encouraging sustainable travel patterns and providing appropriate connections for pedestrians, cyclists and public transport where feasible.
- 5.44 **Policy T8 – Transport Assessments:** The policy requires development proposals to consider the potential effects of traffic generation on the highway network. Development that would result in a material increase in traffic which could adversely affect the operation or safety of the transport network will need to demonstrate that the impacts can be appropriately addressed.
- 5.45 **Policy ENV2 – Noise and Vibration:** Policy ENV2 addresses how development should manage potential noise and vibration effects. The policy requires that new proposals are designed and located in a way that prevents them from giving rise to harmful noise or vibration impacts on neighbouring uses. It also places an expectation on applicants to demonstrate that future occupiers of a development would not be exposed to noise or vibration conditions that could adversely affect their amenity or operation.
- 5.46 In effect, the policy establishes a dual requirement: development must avoid generating noise or vibration at levels that would be unacceptable to surrounding sensitive uses, and it must also ensure that it is not placed in a position where existing noise sources would undermine the quality or suitability of the proposed use. Where necessary, appropriate design measures or site-specific mitigation may be required to address identified risks.
- 5.47 **Policy ENV3 – Light Pollution:** Policy ENV3 sets out the Council's expectations for how external lighting should be considered within development proposals. The policy emphasises that lighting should be purposeful and proportionate, with design solutions tailored to what is genuinely required for the functioning and security of the site.
- 5.48 The policy also requires careful consideration of the wider effects of lighting. Schemes must be designed to avoid giving rise to adverse effects on the character of surrounding areas, including undue glare or illumination that could detract from local visual amenity. Policy ENV3 further highlights the need to ensure that lighting does not compromise the safe operation of nearby highways or negatively affect ecological assets that may be sensitive to artificial light.
- 5.49 Taken together, the policy establishes a clear expectation that lighting associated with new development should be sensitively planned, appropriately justified, and managed in a way that limits potential harm to the environment and neighbouring uses.
- 5.50 **Policy ENV5 – Contaminated Land:** The policy requires development proposals to appropriately consider potential land contamination and to demonstrate, where necessary, that land can be safely developed and used. Development should not proceed where contamination could present unacceptable risks to site users, neighbouring uses, ecological systems or the water environment.
- 5.51 **Policy DQ4 – Trees and Development:** Policy DQ4 encourages development proposals to incorporate tree planting and soft landscaping as an integral part of development design. Where existing trees, woodland or vegetation contribute positively to local amenity, proposals should seek to retain them where possible.
- 5.52 Applicants may also be required to submit a detailed survey of existing trees and an assessment of the likely effects of development upon them. Where tree loss is unavoidable, replacement planting will

normally be required at a ratio of two new trees for every tree removed, taking account of species, size and location.

Material Considerations

National Planning Policy Framework (NPPF) (2024)

- 5.53 National planning policy is set out within the National Planning Policy Framework (2024) (NPPF), which is supplemented by the National Planning Practice Guidance (NPPG).
- 5.54 A core element of the NPPF is the presumption in favour of sustainable development. This principle underpins both plan-making and decision-taking. For decision-making, the presumption means that proposals which accord with an up-to-date development plan should be approved without delay. Where relevant policies are absent or out-of-date, planning permission should be granted unless policies in the Framework that relate to protected areas provide a clear basis for refusal, or the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the NPPF taken as a whole.
- 5.55 Section 4 of the NPPF (Decision-making) reaffirms that local planning authorities are expected to adopt a constructive and solutions-focused approach, working collaboratively with applicants to facilitate development that contributes positively to local economic and social objectives.
- 5.56 Section 6 (Building a strong, competitive economy) stresses that substantial weight should be afforded to proposals that support economic productivity and job creation, reflecting both the needs of local businesses and broader strategic economic ambitions.
- 5.57 Section 9 (Promoting sustainable transport) requires transport implications to be considered from the outset of the design process, enabling potential impacts to be addressed through avoidance or appropriate mitigation.
- 5.58 Paragraph 85 of the NPPF states that, *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future"*.
- 5.59 The NPPF therefore places considerable weight on supporting economic growth and productivity, ensuring that development proposals in appropriate locations are enabled to come forward where they align with identified employment needs and established industrial activity.
- 5.60 Section 11 (Making effective use of land) directs local planning authorities to encourage the efficient use of available sites, with a particular emphasis on previously developed land wherever appropriate.
- 5.61 Section 12 (Achieving well-designed places) highlights that high-quality design is central to sustainable development, ensuring that built form creates functional, visually coherent and acceptable places for people and businesses.
- 5.62 Section 14 (Meeting the challenge of climate change, flooding and coastal change) underlines the importance of reducing carbon emissions and supporting proposals that make use of renewable or low-carbon energy sources.
- 5.63 Section 15 (Conserving and enhancing the natural environment) advises that development should not give rise to unacceptable levels of air or noise pollution and, where necessary, should incorporate appropriate remediation where land is affected by contamination.

Emerging National Policy

- 5.64 The Government published a draft revised National Planning Policy Framework (NPPF) on 16 December 2025, with consultation running until 10 March 2026. The draft introduces a significant restructuring of national policy, including new National Decision-Making Policies (NDMPs). As the document remains at consultation stage and has not yet been adopted, it can only be afforded limited weight in the consideration of this application for the Proposed Development.

Other Considerations

- 5.65 Knowsley Metropolitan Borough Council's SPDs are non-statutory documents that can elaborate on specific Sites, particular issues, or general planning principles. They serve as valuable tools for ensuring that development aligns with the overall vision and objectives outlined in the Local Plan. KMBC has the following relevant SPDs which are considered relevant to the Proposed Development:
- Ensuring a Choice of Travel SPD: The main objective of the SPD is to ensure a good choice of travel modes to all new developments in Knowsley. It can be used by developers to ensure

that their proposals are accessible, promote sustainable travel patterns and minimise the congestion and pollution caused by vehicles.

- Design Quality in New Development SPD: The main objective of the SPD is guide and identify overarching context for design in the Borough, and highlights Borough-wide issues which should be taken into account in designing new development.
- Developer Contributions SPD: The SPD's goal is providing detailed guidance on how developer contributions will operate in Knowsley. It provides a transparent framework for how the Council's expectations with respect to developer contributions can be met in practical terms and compliance with CIL Regulations.
- Trees and Development SPD: The SPD includes guidance on Development proposals affecting existing trees, woodlands and other vegetation.
- Adding Social Value to Development: Employment and Skills SPD: This adopted SPD provides guidance on how the Council will implement the requirements of the Knowsley Local Plan, and Policy CS4 in particular. It outlines the process for creating Social Value Strategies and identifies the kind of social value outcomes which could be expected from new major development; such strategies will commit to maximising the employment and training of local people during the construction phase and in the completed development, helping to develop the resident workforce skills, and there will be a route to employment for local people.

6 PLANNING ASSESSMENT

Land Use Matters

1. Principle of Development

- 6.1 The Proposed Development seeks planning permission for the use of the Site for open storage (Class B8). It is being progressed on a speculative basis to maintain flexibility for prospective occupiers.
- 6.2 The Site is allocated as 'Land for Employment Development (Ref: E12)', a 'Principal Regeneration Area' and a 'Primarily Industrial Area' under Policies CS4 and CS11 of the Core Strategy (2016) and Policies EC2 and EC3 of the Unitary Development Plan (UDP) (2006). The Site has in fact been safeguarded for industrial and employment purposes for more than 20 years, having formed part of the same industrial designation under the previous development plan framework.
- 6.3 Policy CS4 confirms that planning and other interventions will be used to ensure sufficient land is available to meet employment needs to 2028, improve the quality and efficiency of land use within existing employment areas, and enhance access to a suitable range of employment opportunities. The Proposed Development directly supports these objectives by delivering viable and flexible employment land within a safeguarded industrial area.
- 6.4 Policy CS4 also makes provision for at least 164 hectares of land to be delivered for employment purposes between 2010 and 2028, directed primarily to key employment locations across Knowsley, including Knowsley Industrial Park. The Proposed Development lies within this key employment location and therefore contributes toward the planned employment land supply in an appropriate spatial location.
- 6.5 Part 1 of Policy CS11 states that regeneration of Knowsley Industrial and Business Parks will be supported, which encourages a mix of new high quality employment development. Indeed, Part 1 (c) confirms there will be a particular focus on the development of Class B8 uses south of Boundary Road.
- 6.6 Saved Policies EC2 and EC3 collectively establish the Site as an appropriate and protected location for employment development. Under Saved Policy EC2, the Site forms part of Employment Allocation E12 'Britonwood', which is intended to accommodate business, industrial and storage and distribution uses.
- 6.7 Furthermore, Saved Policy EC3 identifies the area as a Primarily Industrial Area and confirms its suitability for General Industry (Class B2) and Storage and Distribution (Class B8) uses. The policy safeguards such areas from inappropriate development and seeks to ensure that proposals maintain industrial character, protect operational compatibility and avoid the unjustified loss of employment land. It is considered that the Proposed Development fully accords with these requirements.
- 6.8 The Proposed Development comprises Class B8 employment use within a 'Principal Regeneration Area' and 'Primarily Industrial Area', which is consistent with Policies CS4 and CS11 of the Core Strategy (2016) and Policies EC2 and EC3 of the Unitary Development Plan (UDP) (2006). On this basis, the principle of an open storage use (within Class B8) at the Site is acceptable in land use terms.

2. Planning & Economic Benefits

- 6.9 This sub-section outlines the planning and economic benefits of the Proposed Development in terms of the Site's proposed use for open storage (within Class B8). It also sets out the identified need and demand for the proposed use at the Site.

Open Storage

- 6.10 The open storage market has grown considerably in recent years and is becoming an ever more important part of the UK's supply chain, this trend is expected to continue going forwards.
- 6.11 Industrial Outdoor Storage (IOS), otherwise referred to as open storage, has become an increasingly important sub-sector of the UK industrial market. The sector provides flexible, scalable space for the storage of vehicles, trailers, materials, and equipment, and plays a critical role in supporting logistics, last-mile delivery, and wider industrial operations.
- 6.12 Over the past decade, industrial and logistics uses have outperformed traditional retail and office sectors in terms of growth, establishing IOS as a vital component of the broader industrial market. The COVID-19 pandemic accelerated this trend, with the e-commerce boom driving demand for storage and fleet parking facilities.
- 6.13 The Carter Jonas Industrial Outdoor Storage Winter 2024/25 Update highlights the diversity and strength of demand across the sector. Fleet parking and servicing represents 48% of total IOS land enquiries, with approximately 60% dedicated to HGVs and 40% to vans, cars, and other vehicles. Other significant sectors include construction materials, renewable energy infrastructure, self-storage containers, and general industrial storage activities. The breadth of occupiers underscores IOS's role

as a flexible, multi-purpose industrial land use. The report also demonstrates strong and growing demand for IOS Sites with suitable quality, including appropriate surfacing, security, accessibility, and planning permissions. This ensures sites can efficiently accommodate a variety of occupiers while remaining operationally effective and market ready.

- 6.14 IOS sites provide important economic benefits beyond direct employment. While the sector does not typically generate high-density jobs, it facilitates broader supply chain activity, supporting the operation of regional and national logistics networks.
- 6.15 The growth of IOS as an institutional investment class demonstrates the sector's resilience and attractiveness. Investors are increasingly drawn to IOS due to its lower capital intensity, flexibility, and high occupier demand. Rental growth remains positive, reflecting strong long-term fundamentals, and well-located, fully serviced sites are particularly valued for their operational versatility and ability to accommodate diverse industrial uses.
- 6.16 There is considered to be a clear demand and need for open storage in this instance. Moreover, the Proposed Development would support ongoing economic activity, contribute to local employment opportunities and make productive use of safeguarded employment land. In doing so, it aligns with the development principles set out in Policy CS2 of the Core Strategy (2016) by supporting economic growth, ensuring that environmental considerations are appropriately managed, and promoting the efficient use of land within an established employment location.
- 6.17 The proposed use would also support economic growth and productivity, and this should be afforded significant weight in the decision-making process in accordance with Paragraph 85 of the NPPF.

Other Considerations

3. Design

- 6.18 A Design and Access Statement (DAS) has been prepared by Ashton Smith to accompany this planning application. As confirmed previously, the Proposed Development is being progressed on a speculative basis and accordingly its make-up and design has been informed in the interests of flexibility so it can appeal to a range of storage occupiers.
- 6.19 Similarly, the Proposed Development has been designed with regard to the design and environmental principles set out in Policy CS19 and Policy CS21 of the Core Strategy (2016), alongside Saved Policy CP3 of the UDP (2006), ensuring that development integrates appropriately with its surroundings and incorporates proportionate landscaping where practicable.
- 6.20 Soft landscaping is proposed along the perimeter boundaries to provide screening and enclosure, with a proportion of the southern boundary retained as soft landscaping. This balanced approach ensures operational efficiency whilst maintaining an appropriate environmental quality of the Site and reflecting the expectations of Policy CS19 of the Core Strategy and Policy CP3 of the Saved Policies of the UDP (2006) in relation to design quality.
- 6.21 The layout, access arrangements and landscaping strategy have been carefully considered to ensure the development responds positively to its context, maintains the prevailing industrial character of the area and avoids harm to adjoining employment uses. Given the compatibility of the proposed use with surrounding B2 and B8 operations, and the Site's allocation for such purposes, the development represents an appropriate and well-considered response to both the planning policy framework and the physical characteristics of the Site.
- 6.22 The Proposed Development would bring a currently undeveloped Site into productive employment use in a manner that reflects its allocation and industrial context. The scheme provides a logical and efficient layout for Class B8 open storage, supported by appropriate hardstanding, access arrangements and a considered landscaping strategy that softens boundary treatments and reinforces the established character of the wider industrial park.

4. Landscaping, Trees, Green Infrastructure, and BNG

Trees

- 6.23 A comprehensive site-wide strategy has been prepared, guided by the findings of the Tree Survey (TS) and Arboricultural Impact Assessment (AIA) undertaken by SEED Arboriculture Ltd (Ref: 2136-AIA-V1-B, March 2026). These documents collectively establish the baseline arboricultural context for the Site and ensure that landscape proposals appropriately respond to existing trees and site constraints.
- 6.24 SEED has undertaken a full Tree Survey and Arboricultural Impact Assessment in accordance with BS5837:2012 – Trees in relation to design, demolition and construction. The survey recorded 9 individual trees and 4 tree groups, predominantly located at the Site boundaries. With the exception of one Category B tree, the AIA confirms that the majority of the tree stock comprises Category C (low

quality / limited retention value) trees and self-seeded groups. No Tree Preservation Orders affect the Site, and it lies outside any Conservation Area.

- 6.25 To facilitate the Proposed Development, the AIA identifies the requirement to remove two tree groups (G1 and G3) and to partially remove one group (G2). All of these groups are categorised as Category C, representing low arboricultural quality with limited future contribution. The AIA concludes that their removal would not result in a detrimental impact on the wider character or appearance of the area.
- 6.26 In line with Policy CS21 of the Core Strategy (2016), which requires two replacement trees for every tree unavoidably lost, appropriate compensatory tree planting will be delivered as part of the wider landscaping scheme. This will ensure a policy-compliant approach to green infrastructure enhancement across the Site.
- 6.27 In addition to the above removals, the AIA confirms that minor facilitation pruning is required to the eastern canopies of trees T1 and T2 to achieve adequate clearance for construction and future operation of the open storage facility. This pruning is minimal in nature and will not adversely affect the long-term health, stability, or amenity value of the retained trees.
- 6.28 All retained trees will be protected in accordance with BS5837:2012, as illustrated on the Tree Protection Plan (Ref: 2136-TTP-003-B). Protective fencing will be installed prior to commencement of any construction works to form Construction Exclusion Zones (CEZs) and will remain in place for the duration of the development in accordance with the AIA recommendations.

Landscaping

- 6.29 A landscaping strategy has been prepared by BEA which is closely linked to the Tree Survey and AIA (considered in the sub-section above). The Proposed Development seeks to provide 7 no. new trees. In addition to the tree planting, the Landscape Plan also incorporates wildflower meadow areas to be seeded with Emorsgate Seeds EM5 'Meadow Mixture for Loamy Soils', as well as scrub planting comprising native shrub species at 1-metre centres seeded with EW1 'Woodland Mixture'. Together, these elements provide a holistic and ecologically robust approach to landscape and green infrastructure across the Site.
- 6.30 The Proposed Development is considered to comply with Policies CS21, CS24 of the Core Strategy (2016) and DQ4 of the Saved Policies of the UDP (2006), which require appropriate regard to trees, green infrastructure and drainage. Given the Site's limited and predominantly boundary-based tree cover, landscaping has been incorporated in a proportionate manner that reflects the functional requirements of a B8 open-storage use. While the majority of BNG will be delivered off-site, the landscaping included within the scheme complements the surrounding industrial character and supports overall visual amenity in an appropriate and measured way.
- 6.31 Overall, the Proposed Development balances operational requirements with environmental protection and enhancement, in line with the Council's policies on trees, landscaping, and sustainable development.

Ecology and Biodiversity Net Gain (BNG)

- 6.32 Ecology Solutions has undertaken a comprehensive suite of ecology studies to support this planning application, including an updated Ecological Assessment and a Biodiversity Net Gain (BNG) Report. These assessments incorporate survey work completed between 2025 and 2026.
- 6.33 The BNG assessment confirms that the Proposed Development, would result in a net loss of -84.65% for habitats (-5.33 units) and no net change in hedgerow units. To ensure compliance with the 10% mandatory biodiversity net gain requirement and the trading rules, off-site habitat unit credits will be purchased. Discussions are ongoing with Biodiversity Units UK Ltd to secure appropriate off-site provision within the same National Character Area (NCA) and Local Planning Authority area, or adjoining areas where suitable.
- 6.34 The landscape strategy, including new native shrub planting, three species-rich hedgerows, native trees, wildflower grassland, and the retention/enhancement of scrub, will contribute positively to the local ecological baseline, but these measures alone cannot fully achieve the mandatory 10% uplift.
- 6.35 It is considered that the approach set out allows the Site to be compliant with policies CS8 and CS21 of the Core Strategy (2016).

5. Flood Risk and Drainage

- 6.36 Burrows Graham has prepared a Flood Risk and Drainage Assessment (FR&DA) to accompany this planning application. The Proforma 1 'Sustainable Drainage System' has also been completed.

- 6.37 The drainage strategy has been developed in accordance with the drainage hierarchy and ensures that the Proposed Development will not increase flood risk either on-site or elsewhere within the catchment.
- 6.38 Surface water runoff from the new impermeable areas will be collected and conveyed through an underground drainage network, discharging at a restricted rate of 2.5 l/s to an existing United Utilities surface water sewer. This controlled discharge rate ensures compliance with local and national drainage requirements and mitigates downstream impacts.
- 6.39 Foul flows will be managed separately. An independent foul drainage network will collect foul water and discharge it to the nearest foul sewer located to the south-west of the Site, adjacent to the existing surface water sewer. A Section 106 agreement will be sought and agreed with United Utilities at the detailed design stage to facilitate this connection.
- 6.40 The FR&DA has undertaken a full appraisal of flood risk from all potential sources and concludes that the risk to the Proposed Development is low, both in its current form and following construction of the proposed open-area storage facility and associated infrastructure. The mitigation and drainage measures proposed are considered appropriate and effective in ensuring the Site remains safe throughout its lifetime, in line with national and local policy requirements.

Summary

- 6.41 Matters relating to green infrastructure and ecological considerations have been reviewed in accordance with Policy CS8 of the Core Strategy (2016). Flood risk and drainage considerations have been addressed in accordance with Policy CS24, with appropriate site-specific assessment work informing the design and drainage strategy where required. Additional technical considerations including transport, contamination and environmental impacts have been assessed against relevant saved UDP policies (2006) including T6, T8, ENV2, ENV3 and ENV5, demonstrating that the development is capable of operating within the existing industrial context of the area.

6. Parking, Transport & Highways

- 6.42 A Transport Statement (TS) and Travel Plan Statement (TP) have been prepared by Pulsar Transport Planning in support of this planning application. The TS considers the sustainability of the Site and the potential impacts of the Proposed Development on the local transport network in accordance with local and national policy requirements. The TP focuses on reducing unnecessary or unsustainable staff car travel and encouraging the use of alternative travel modes through the provision of clear information on travel choices for all staff, including management.
- 6.43 Policy CS7 of the Core Strategy (2016) seeks to promote a sustainable transport network and ensure development is well connected. The Site benefits from its location within an established employment area with existing transport infrastructure capable of accommodating employment-related activity.
- 6.44 There are no adopted parking standards for open storage (Class B8) uses within Knowsley. Accordingly, the proposed provision of 11 car parking spaces has been derived using a 'first principles' approach, reflecting the nature of the operation, the low staffing levels, and the fact that the majority of site visits relate to loading and unloading rather than long-stay parking. This approach aligns with the applicant's operational experience at comparable sites.
- 6.45 A trip generation assessment has been undertaken using survey data from a comparable Muztrans open-storage site at Church Manors Way, Erith (12,990sqm). Trip rates have been scaled to reflect the 10,908sqm Proposed Development. The assessment indicates that the development is expected to generate approximately 6 two-way vehicle trips in the AM peak (08:00–09:00), 13 in the PM peak (17:00–18:00), 173 daily movements between 07:00–19:00, and 264 across a 24-hour period. These levels of activity fall comfortably within what is typical for industrial uses within this established employment location.
- 6.46 The parking strategy is therefore considered proportionate, operationally robust and responsive to the specific characteristics of the Proposed Development. Trips associated with the Site will predominantly comprise short-duration loading/unloading rather than sustained vehicle parking demand.
- 6.47 The level of vehicle activity generated by the development would not be out of character with surrounding industrial operations and is typical for B8 uses of this scale. The surrounding transport network, designed to accommodate industrial traffic, can readily support the forecast movements without adverse operational or safety impacts.
- 6.48 In transport terms, the TS demonstrates that the Proposed Development will have a minimal impact on the local highway network. The forecast trip generation is modest, and increases are well below thresholds that typically require junction modelling. The proposals therefore meet the relevant tests of

the NPPF, ensuring safe and suitable access for all users and avoiding any severe residual cumulative impacts. The TP supports national and local sustainable transport objectives by encouraging staff to consider alternative travel modes where practicable and by seeking to minimise unnecessary car journeys associated with staff travel.

- 6.49 Overall, the Proposed Development is expected to have a minimal impact on the public highway network and complies with Policy CS7 of the Core Strategy (2016), Policy T8 of the Saved UDP (2006) and the transport tests of the NPPF. There are no transport or highway grounds on which the application should be resisted.

7. Energy

- 6.50 SP Energy Networks have identified overhead electricity lines crossing the site, and this has been appropriately acknowledged in the development parameters for this speculative B8 open storage proposal. At this stage, and in the absence of a confirmed end user or fixed operational layout, the scheme has been prepared with sufficient flexibility to ensure that any future arrangement can be designed to respect the necessary safety clearances, or alternatively, to explore diversion options with SPEN should this be required.
- 6.51 Matters relating to safe working practices, compliance with relevant health and safety guidance, and the need to maintain access to SPEN's infrastructure are standard procedural requirements that can be addressed at the detailed design and implementation stages through conditions and informatives.
- 6.52 On this basis, it is considered the presence of the overhead lines does not pose a constraint to the principle or deliverability of the proposed development.

8. Amenity

- 6.53 This sub-section relates to noise, disturbance, and light.

Noise

- 6.54 A Noise Impact Assessment (NIA), incorporating an on-site noise survey, has been prepared by ACA Acoustics in support of this planning application. The assessment has been undertaken in accordance with the methodologies set out in BS 4142:2014+A1:2019 for evaluating industrial and commercial sound and BS 8233:2014 for assessing internal sound levels within noise-sensitive receptors. These documents together provide the recognised framework for assessing potential noise effects arising from industrial operations, including open storage uses and associated vehicle activity.
- 6.55 The assessment considers sound generated from the proposed Class B8 open storage use, including vehicle movements within the Site and loading operations. ACA Acoustics has also assessed noise from any future mechanical services equipment, establishing appropriate maximum permissible noise criteria to ensure compliance with relevant standards. The results indicated that noise from the proposed development will result in a low impact at nearby noise-sensitive residential properties and will not be detrimental to local amenity.
- 6.56 In summary, the Noise Impact Assessment concludes that the Proposed Development complies with local and national noise policy requirements, including the NPPF, the Noise Policy Statement for England (NPSE), and the Planning Practice Guidance on Noise (PPG-Noise), and is unlikely to result in adverse impacts at nearby receptors

External Lighting

- 6.57 An External Lighting Report has been prepared by KGA in support of the Proposed Development. The report details the lighting strategy for the Site.
- 6.58 The lighting scheme has been designed to achieve an average illumination level of 20 lux with approximately 30% uniformity across operational areas, with actual lighting levels varying in response to activity within different parts of the Site. Lighting columns are positioned primarily around the Site perimeter, with a single centrally located column to ensure appropriate coverage across the open storage areas. The layout has been carefully coordinated to avoid existing overhead powerlines and to limit potential impacts on nearby ecological receptors, including the pond to the north of the Site.
- 6.59 A warm 2700K colour temperature has been specified to reduce ecological disturbance and minimise unnecessary light spill. The scheme comprises a combination of 8-metre and 10-metre columns, as detailed on submitted Drawing Ref: D95290PY/A.
- 6.60 Overall, the lighting strategy provides safe and effective operational illumination whilst responding sensitively to the Site's context and environmental considerations.

9. Waste

- 6.61 Given the speculative nature of the proposals and the limited operational waste expected from a B8 open-storage use, waste matters will be addressed at a proportionate level in line with Policy WM9 of the Merseyside and Halton Joint Waste Local Plan (2013) and paragraph 8 of the National Planning Policy for Waste. Operational waste storage and collection arrangements can be secured via condition, reflecting the simple and low-intensity characteristics of the use.
- 6.62 In respect of construction activities, the volume and nature of waste arisings are not yet known; however, the Applicant will be expected to apply the principles of WLP Policy WM8 and relevant national guidance by adopting construction methods that minimise waste generation and maximise opportunities for re-use and recycling on site. A waste audit or similar mechanism can be secured to ensure that waste minimisation and responsible materials management are appropriately monitored throughout the build phase.

10. Ground Conditions

- 6.63 Hollis has undertaken a Phase 1 Environmental Assessment to accompany the planning application.
- 6.64 This includes an evaluation of the potential for soil or groundwater contamination both at and in the vicinity of the Site. The Assessment confirms that the Site, in its current use, represents a Low/Medium risk with regards to contaminated land liability issues. The Assessment also provides some recommendations which, if implemented, would mean the Proposed Development is considered suitable.

7 SUMMARY AND CONCLUSIONS

- 7.1 This Planning Statement has been prepared by Rapleys LLP ('Rapleys'), on behalf of NW1 IOS 3 Unit Trust and is submitted in support of a full planning application for the proposed use of the Site for Proposed use of the Site for open storage (Class B8), provision of new hardstanding, and all other associated works. The formal description of development being applied for is:
- "Proposed use of the Site for open storage (Class B8), provision of new hardstanding, and all other associated works."* (the 'Proposed Development').
- 7.2 Section 4 of this Planning Statement provides a comprehensive description of the Proposed Development, including its operational characteristics, proposed layout and design rationale. The scheme has been shaped through pre-application engagement with both KMBC and MEAS, as summarised in Section 3, ensuring that the Proposed Development responds positively to officer feedback and the relevant policy framework from the outset.
- 7.3 Section 6 provides a detailed assessment of the Proposed Development against the Development Plan and material considerations identified in Section 5. The Proposed Development comprises Class B8 employment use within a 'Principal Regeneration Area' and 'Primarily Industrial Area', consistent with Policies CS4 and CS11 of the Core Strategy (2016) and Policies EC2 and EC3 of the Unitary Development Plan (UDP) (2006). The Proposed Development is considered to align directly with the intended role of this allocated employment land and represents an appropriate and compatible form of development from a land-use and design perspective.
- 7.4 As well as demonstrating compliance in land use terms, Section 6 also confirms that the Proposed Development is appropriate with regard to design and layout, highways and transport, visual considerations, ecology, flood risk and ground conditions. The supporting technical assessments conclude that the development would not result in material adverse effects and would operate comfortably within its established industrial context.
- 7.5 In conclusion, Rapleys considers that the Proposed Development represents a policy-compliant form of employment development on land specifically allocated for such purposes. The scheme would deliver meaningful investment within Knowsley Industrial Park, make effective use of safeguarded employment land and support continued economic activity within the Borough.
- 7.6 On this basis, it is considered planning permission should be granted without delay.



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