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Our ref: DPA/AIA/SPEC1136

Your ref:

21 October 2022

Dear Sir or Madam,

Town and County Planning (Environmental Impact Assessment) Regulations (2017) – Request for Screening Opinion

Deacon Business Park, Moorgate Road North, Liverpool, Knowsley, L33 7RX

This letter is submitted on behalf of Gerald Eve's client, EEIP II Arundel Propco 2 Holdings Limited ("the Applicant"), to request a Screening Opinion be adopted by Knowsley Metropolitan Borough Council ("the Council") relating to a proposed industrial warehouse development on land at Deacon Business Park, Moorgate Road North, Knowsley, L33 7RX ("the Site"), in accordance with Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations").

The Applicant proposes the following development:

"Demolition of existing accommodation and erection of warehouse (Use Class B8) with ancillary offices (Use Class E(g)), reconfigured points of access, new security gatehouses and associated works."

EIA Screening Thresholds

Whether or not a proposal constitutes EIA development is governed by the schedules within the EIA Regulations. EIA is mandatory for projects appearing in Schedule 1 and is required for projects appearing in Schedule 2 if they are likely to give rise to significant effects on the environment.

In order to assess whether a Schedule 2 project is likely to give rise to significant effects, it must be screened if (a) it is located within a “sensitive area” (defined as Areas of Special Scientific Interest, Areas of Outstanding Natural Beauty, National Parks, World Heritage Sites, Special Protection Areas and Special Areas of Conservation) or (b) if it exceeds the applicable thresholds specified in the Schedule (which primarily relate to the scale of the proposed development).

The proposed development does not appear within the list of developments falling within Schedule 1 and the Site is not located within a ‘sensitive area’ as defined by Schedule 2(a). The proposed development does however fall under the definition of ‘Industrial Estate Development’, as set out under Class 10(a) of Schedule 2, and exceeds the applicable threshold (i.e. 5 hectare of industrial estate development). Subsequently, the proposed development needs to be screened to assess whether it is likely to give rise to significant effects on the environment.

National Planning Practice Guidance (PPG) also provides helpful advice to applicants and local planning authorities when considering whether a development proposal requires EIA. PPG states at paragraph 4-002-20140306 that:

“Environmental Impact Assessment should not be a barrier to growth and will only apply to a small proportion of projects considered within the town and country planning regime. Local planning authorities have a well-established general responsibility to consider the environmental implications of developments which are subject to planning control. The 2017 Regulations integrate Environmental Impact Assessment procedures into this framework and should only apply to those projects which are likely to have significant effects on the environment. Local planning authorities and developers should carefully consider if a project should be subject to an Environmental Impact Assessment. If required, they should limit the scope of assessment to those aspects of the environment that are likely to be significantly affected. Pre-application engagement can also play a role in identifying when a proposal should be subject to environmental impact assessment.” [emphasis added]

The PPG goes on to state at paragraph 4-018-20170728 that (emphasis added):

“Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment... To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced.”

The table of indicative thresholds is provided at paragraph 4-058-20150326 and indicates that where development proposals exceed the relevant threshold for Screening purposes, EIA is only likely to be required where the “*Site area of the new development is more than 20 hectares*” due to the “*potential increase in traffic, emissions and noise*.” The Site area in this case is less than 9 hectares and the redevelopment relates to the erection of a smaller building than currently exists on site.

As required by EIA Regulation 6(2), this Screening Request includes:

- a) A plan sufficient to identify the land

- b) *A description of the development, including in particular:*
 - I. *A description of the physical characteristics of the development and, where relevant, of demolition works*
 - II. *A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected*
- c) *A description of the aspects of the environment likely to be significantly affected by the development*
- d) *To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:*
 - I. *The expected residues and emissions and the production of waste, where relevant; and*
 - II. *The use of natural resources, in particular soil, land, water and biodiversity; and*
- e) *Such other information or representations as the person making the request may wish to provide or make.*

Site Description

In accordance with Regulation 6(2) a Site Location Plan is enclosed at **Appendix A**, which identifies the extent of the proposed application Site (red line).

The Site measures approximately 8.85ha and is located within the Knowsley Business Park South, a well-established industrial and commercial estate. The Site lies to the west of the A5207 Moorgate Road North. Existing industrial premises neighbour the Site to the east, north and south, whilst an existing residential area lies to the west on the opposite side of Moorgate Road North. Dwellings to the west are separated from the existing building's western elevation by more than 100 metres.

The existing building comprises approximately 47,596 sq m of floorspace and is divided internally to serve numerous occupiers. Car parking provision exists to the front of the Site and commercial vehicle access/loading areas are provided to the northern, eastern and southern elevations. A number of trees exist around the Site's northern, western and southern boundaries.

The Site is currently accessed via Junction 4 of the M57 motorway from the south west, or by Moorgate Road from the north. Two existing points of access currently serve the existing property, with the Site's ingress at the northern end of the western boundary and egress from the southern end of the Site. The Site is well positioned in terms of access to public transport. Britonside Avenue bus stop is in front of the Site and provides bus services to Woolfall Heath and Liverpool.

The Site has good access to Knowsley's cycle network with a signed route (ref. 862) accessed directly from the Site. All cycle, vehicular and pedestrian access methods are directly off Moorgate Road.

Planning Policy Position

Whilst this request is submitted in accordance with the EIA Regulations and is not directly influenced by planning policy, it is considered relevant to note the Site's allocation and development plan policy.

The relevant documents of the statutory development plan currently comprise:

- Local Plan Core Strategy (adopted January 2016);
- Knowsley Replacement Unitary Development Plan (adopted June 2006); and
- Merseyside and Halton Joint Waste Local Plan (adopted July 2013).

The Site forms part of Knowsley Business Park and is allocated as a Primarily Industrial Area under Core Strategy Policy CS4 and Saved UDP Policy EC3. It also forms part of a Principal Regeneration Area for Knowsley Industrial and Business Parks under Core Strategy Policy CS11.

The Site's planning status indicates that the principle of a storage and distribution development with ancillary office space (Use Classes B8 and E(g)(i)) is acceptable in this location, particularly given the Site's existing use as a mixed industrial and logistics warehouse.

Proposed Development

The development to which this request for a Screening Opinion relates includes a full planning proposal for approximately 42,850 sq m (GEA) of storage and distribution floorspace (Use Class B8), and ancillary office space (Use Class E(g)(i)) with associated landscaping, works and site infrastructure.

An indicative site masterplan is included at **Appendix B** to assist the Council in adopting its Screening Opinion. The masterplan shows that the proposed unit is situated centrally within the Site, with the two existing access points being upgraded to provide two-way access at both locations (northern and southern ends of the western boundary) to provide improved access to and from Moorgate Road North.

In accordance with Regulation 6(2b), a detailed description of the physical characteristics of the development and its location in the context of areas of environmental sensitivity is provided below.

Physical Characteristics of Development

The planning application will be submitted in full. The current proposed total floor area comprises 42,850 sqm sq m although minor adjustments may be made in advance of a planning application being submitted. The intention is to retain the existing car parking to the front of the Site, and to deliver a new service yard area to the rear of the building on the eastern side. Associated infrastructure and landscaping will also be provided (e.g. electrical sub-station, new planting etc).

The proposed development's characteristics are detailed below:

- Total floor area – 42,850 sqm (GEA)
- Warehouse – approximately 38,812 sq m (GIA) with a height of 18m to underside of haunch and ridge height of approximately 21m
- Offices – 2,275 sq m (GIA)
- Gatehouse – 28 sq m (GIA)
- Loading docks – capacity for 40 loading doors
- Level access doors – capacity for 3 level access doors
- Improved / reconfigured points of access to provide two-way movements
- Approx. 430 car parking spaces (as existing)
- 68 HGV parking spaces

On-Site Environmental Sensitivities

An initial desktop review of the Site's likely on-site environmental sensitivities has been carried out with no significant constraints identified.

The Site lies within Flood Zone 1 as identified on the Environment Agency's Flood Map for Planning, indicating a low risk of flood.

There are no designated heritage assets within the Site, such as listed buildings or scheduled monuments, and the Site does not lie within a Conservation Area.

There are no watercourses within the Site, nor are there any designated biological or wildlife sites, and the Site does not lie within a designated area of visual sensitivity, such as an Area of Outstanding Natural Beauty.

The Site is not located within a Coal Mining Reporting Area as confirmed by The Coal Authority's interactive mapping service.

At this stage, the Applicant is not aware of any other environmental constraints on site that could be sensitive to the proposed demolition of the existing building and development of a new warehouse.

Ecology

Given the previously developed status of the Site, the ecological value of the Site is low. DEFRA's interactive mapping system notes that the wider area has evidence of Lapwing priority species, and species of Arable Assemblage Farmland.

Potential for ecological value is limited only to the existing trees around the Site's western and northern boundaries, which are expected to be retained.

There is a designated local wildlife site (LWS) situated approximately 60 metres to the south east of the Site's southern-most boundary. The LWS lies in the middle of the long-established industrial estate, and it is unlikely that the proposed redevelopment of the Site would result in any significant effects over and above the existing situation. Construction processes can be adequately managed to minimise any potential short-term effects (e.g. dust and lighting management).

A Phase 1 Ecology Assessment will accompany the planning application as is expected to sufficiently assess the Site and the likely ecological impacts of the proposed development, without the need for EIA.

Highways

The Site benefits from easy access via the A5027 Moorgate Road North to the A580 East Lancashire Road and the M57 motorway to the south, providing easy access to the strategic road network. Access to sustainable travel modes also exists with existing bus service provision along Moorgate Road North, ease of cycle access and with close proximity to an established residential area, which could promote walking to work. Therefore, connectivity is excellent to and from the Site for the type of development proposed.

Given the size of the existing accommodation on site and the slight reduction in floorspace proposed by the redevelopment, it is expected that the impact on the road network as a result of traffic movements and vehicle types is unlikely to change significantly. Construction traffic will be managed using industry-standard practices and is unlikely to result in any significant disruption to the local highway network.

A Transport Statement will be submitted with the planning application (subject to the Council's pre-application advice) and will consider the baseline position and potential implications of the development in full.

Air Quality

The Site is not located within, or near, an Air Quality Management Area. An Air Quality Assessment will accompany the planning application to assess existing air quality conditions and to ensure that no adverse air quality impacts will result from the proposed development or the construction phases. The AQA will consider the nearest sensitive receptors, including residential dwellings to the west and the LWS to the south east.

Noise

The noise environment is characterised by the existing Knowsley Business and Industrial Park, along with the noise associated with traffic using the Moorgate Road North and the nearby M57 motorway. The Site would operate on a 24-hour basis and has been designed to locate all loading activities to the rear of the warehouse, furthest from the residential dwellings to the west.

A noise impact assessment would accompany the planning application to ensure that no adverse effects on human and environmental health would occur as a result of the proposal.

Archaeology and Heritage

There are no designated heritage assets within the Site boundary such as listed buildings, conservation areas or scheduled monuments. There are no designated heritage assets (e.g. conservation areas, listed buildings, historic parks and gardens etc.) within close proximity to the Site boundary, or that would be affected by the proposed development. The nearest listed buildings are the Grade II listed buildings within a Conservation Area on Ribblers Lane approximately 1km to the south west of the Site, which would not be affected by the Site's redevelopment.

An archaeological desk-based assessment would accompany the planning application but it is not considered to be necessary to include a built heritage assessment, given the distance from the nearest listed buildings and conservation area (this is subject to the Council's pre-application advice)..

Flood Risk

The Site is located within Flood Zone 1 (the lowest risk of flooding) and does not contain any water courses. It is not considered that the development proposal would significantly increase the risk of flooding on the Site, or elsewhere, particularly given the currently developed nature of the site. Given the size of the Site exceeds 1ha, the planning application will be accompanied by a Flood Risk Assessment to fully assess the Site's impact on the risk of flood. It will also include the development's drainage strategy.

Ground Conditions

The proposed development will not require any significant excavation or earthworks and the intention is to retain existing levels as far as possible across the Site. A geo-environmental assessment will be carried out to include an assessment of potential contamination on site; however, the development will not result in any significant export of soils.

Socio-Economics and Health

By the nature of the proposed use, the redevelopment of the Site would not place any additional or undue pressure on local services, including health, care and education or emergency service provision when compared to the previous use of the Site. The new accommodation is expected to generate new jobs and would represent a significant investment into the borough.

Scope of Planning Application

In order to provide the Council, statutory consultees and other interested parties with the necessary planning and environmental information to fully assess any potential effects on the environment at the

planning application stage, the Applicant intends to submit a full suite of technical documents including the following:

- Air Quality Assessment
- Archaeological Desk Based Assessment
- Design and Access Statement
- Ecological Assessment
- Energy & Sustainability Assessment
- Flood Risk Assessment & Drainage Strategy
- Geo-Environmental Assessment (including assessment of land contamination)
- Lighting assessment
- Noise & Vibration Impact Assessment
- Planning Statement
- Social Value Strategy
- Socio-economic assessment
- Statement of Community Engagement
- SUDS Pro Forma and Management Plan
- Transport Assessment with Travel Plan
- Tree Survey (including Arboriculture Impact Assessment if required)
- Utility Desk Based Report
- Visual Impact Assessment

The precise scope of the application documents will be agreed through formal pre-application discussions with the Council.

Screening of the Proposed Development

This section considers the main technical matters for the development in the context of the Site's existing state, its policy designation for industrial/commercial development and the proposed works that will retain many of the Site's existing features. The main issues include:

- Air quality
- Flood risk
- Socio-economics
- Traffic and transport
- Arboriculture and biodiversity
- Visual impact

Each of the issues is considered in the context of baseline conditions (i.e. as existing), the construction phase (i.e. temporary effects) and the development's operational phase (i.e. permanent effects). In considering the likely effects on the environment, the selection criteria in Schedule 3 of the EIA Regulations have been taken into account. The selection criteria fall into three broad categories: the characteristics of

the development; the location of the development; and the characteristics of the potential impacts, with each category containing a number of sub-categories.

Air Quality

- **Baseline** – the existing building on sites is slightly larger in scale than the proposed warehouse and forms part of a much wider and long-established industrial estate that has been operational since the 1980s and 1990s. The warehouse is primarily used for storage and distribution purposes with some light industrial uses but excludes heavy industrial and manufacturing uses. Airborne emissions are therefore generally limited to vehicle exhausts associated with staff, visitor and commercial vehicle movements. The Site is not located within an Air Quality Management Area (AQMA).
- **Construction** – as with all major construction projects, there is an increased likelihood of air pollution borne out of typical construction activities, including excavation works and management of materials, HGV and other vehicular movements, delivery and use of materials and the collection and disposal of waste materials. Industry standard mitigation would be used throughout construction to ensure air pollutants and dust emissions were minimised (e.g. dust suppressor sprays).
- **Operation** – Given the type and scale of development proposed, which is smaller than the existing building on site, and all of the surrounding industrial estate, it is not considered that a significant increase in vehicular movements will result from the proposed development. Generally, commercial vehicle fleets are becoming cleaner by moving away from traditional diesel vehicles, and the proposals would include provision of electric vehicle charging points for staff and visitors. An Air Quality Assessment would be submitted with the planning application to fully assess the long-term impacts of development.

Flood Risk and Drainage

- **Baseline** – The Site is previously developed land which lies within Flood Zone 1 as defined by the Environment Agency's Flood Map for Planning. This means the land is at low risk of flooding.
- **Construction** – the construction phase of the project would not have any impact on the Site's Flood Zone status. Subject to discussions with the Council, it may be necessary to implement temporary drainage arrangements during construction to ensure soils or other materials are not washed away from the Site, although risk is very low given the proposals do not include significant earthworks or excavations.
- **Operation** – the scheme would include the implementation of permanent drainage solutions that would be agreed with the Council to ensure sustainable flow rates (with sufficient allowances for climate change) can be achieved. The development of the Site would not change the Flood Zone.

status and the drainage scheme would ensure that the risk of flooding would not increase elsewhere as a result of the proposal.

Socio-Economics

- Baseline – existing site provides a reasonable level of employment; However, a significant portion of the building is now vacant and remaining tenants have a relatively short period remaining before they too will vacate. the existing building falls below the market expectations of modern logistics occupiers and is in need of significant upgrade by way of redevelopment to attract new occupiers. as such, the existing site is considered to perform significantly below its market potential.
- Construction – the construction phase of the development would contribute to the local and sub-regional economy. Primarily, the creation of construction jobs would be the main socio-economic benefit during the construction phase. This would include training and apprenticeship opportunities for people entering the construction industry. However, numerous socio-economic benefits would also be realised through the construction supply chain including, materials suppliers, specialist contractors, plant/machinery and vehicle leases and professional fees.
- Operation – the proposal would be expected to generate an uplift in full time equivalent jobs and represents a significant capital investment. Training and apprenticeship opportunities would be available, and implementation of a sustainable travel plan would promote the use of alternative travel modes to the private car including encouragement of walking and cycling to improve healthy living. The development would also generate improved business rates receipts for the Council that would have knock-on benefits to front line and local services in the area.

Traffic and Transport

- Baseline – the Site benefits from two existing points of access (one ingress and one egress) directly with Moorgate Road North, which serve the existing occupiers of the Site. In terms of the surrounding road network, the Site is easily accessible from South Boundary Road from the north and the East Lancashire Road and M57 motorway to the south. Traffic associated with the existing wider industrial estate utilises the surrounding road network.
- Construction – construction traffic would access the Site directly off Moorgate Road North. Standard measures could be implemented such as wheel-washing facilities to ensure that the surrounding highway network was not affected by the works; and entrance staff could monitor and direct arrivals and departures as necessary and a vehicle compound could be established on Site. Whilst there would be an increase in heavy goods vehicles (HGV's) and construction vehicles in the area, the effects would be temporary during the construction period and would not lead to any significant or long-term effects on the local environment.

- Operation – the permanent effects of the development on the highways network are expected to be similar to the existing accommodation on site (i.e. no significant change) and would be adequately assessed within a Transport Statement submitted with the planning application. A Travel Plan would also be prepared to encourage the use of sustainable transport modes and car sharing throughout the lifetime of the development. Given that the Site will be accessed via improved points of access off Moorgate Road North to allow two-way traffic at both points, it is expected that any change in traffic movements is likely to result in a negligible impact on the operation and safety of the local road network. Given the surrounding context and the industrial and employment uses surrounding the Site there are no other significant environmental impacts which would warrant EIA on transport and highways grounds.

Arboriculture and Biodiversity

- Baseline – there are some existing trees and shrubs around the northern, western and southern boundaries, that offer modest areas of habitat. These areas will be surveyed as part of the planning application process but are not expected to be affected by the development as they will be retained.
- Construction – the current proposals exclude any plans to remove any significant number of trees or shrubs. Tree protection and biodiversity mitigation measures will be used during the construction period where necessary to ensure no unnecessary harm is caused.
- Operation – the scheme will include appropriate provision of landscaping and new planting to compensate for any losses required during the redevelopment process. It is anticipated that all replacement planting will be provided on site and would include an appropriate mix of native species to the area.

Visual Impact

- Baseline – the Site comprises an existing warehouse of approximately 512,000 sq ft and larger areas of car parking and associated development. The existing property may date back to the 1980s and forms part of a well-established industrial estate. The existing building is positioned approximately 100m away from the nearest residential dwellings to the west.
- Construction – the proposed development comprises demolition of the existing building the erection of a new warehouse. There will be temporary effects on visual amenity during construction including the presence of cranes and other large construction vehicles / machinery, however these effects will be temporary in nature. The distance between the Site and the nearest residential receptor to the west will also limit the level of impact.
- Operation – the new warehouse is proposed to be slightly smaller in floor area to facilitate inclusion of a new loading yard to the rear of the warehouse (eastern boundary). The new warehouse will measure approximately 18metres to underside of haunch with a maximum ridge

height of 23 metres. It will be taller than the existing building by approximately 5-7 metres (the existing building includes a variety of heights). A visual impact assessment will support the planning application to demonstrate that the development will not harm the visual amenity afforded by the nearest residential dwellings to the west of the Site.

Cumulative Effects

The EIA Regulations require that, in Screening a development proposal that falls under Schedule 2, consideration is given to the likely cumulative effects of the proposal when combined with other major developments in the local area. This includes likely effects that may occur both during construction and operation.

Schedule 3(1b) notes that Screening must consider the effects of a proposal in “cumulation with other existing and/or approved development”. This provision clearly excludes future development proposals that may (or may not) come forward, whether allocated or windfall development sites.

In this instance, the Site’s surround industrial and commercial context is the leading consideration in terms of cumulative development; however, as the proposed warehouse is a direct replacement for an existing warehouse rather than additional, it is not anticipated that the proposal would result in a significant increased impact on the local environment when combined with the wider industrial estate.

Moreover, a search of the Council’s online planning register has been carried out using the following criteria to consider whether other major developments exist that may need further consideration:

- A review of the Council’s online planning register has been carried out to assess any development proposals with an extant planning permission (regardless of whether they have been implemented)
- A review of Google mapping data has been carried out to assess existing developments
- Sites to be assessed (both existing and with planning permission) must lie within 1km of the Site boundary
- Developments must either be Schedule 1 development or Schedule 2 developments that exceed 10,000sqm of non-residential floorspace.

The search revealed a number of minor planning applications primarily relating to the wider industrial estate, but there were no results for other major developments that satisfy the above criteria.

As such, in considering the EIA Regulations’ intention of assessing only “existing and/or approved development” in cumulation with a development proposal, the Applicant’s proposed industrial and logistics development is not considered to result in significant effects on the environment as a result of combined impacts with other sites in the surrounding area.

Summary

Having regard to the EIA Regulations, the Site's context, its employment allocation and the initial technical advice of the Applicant's specialist advisors, it is considered that whilst the development is major in planning terms, the proposed logistics warehouse would not result in significant effects on the environment that would warrant EIA. The development's impacts will be local in nature and can be adequately assessed through a suite of technical reports as indicated within this letter with any requisite mitigation identified.

It is therefore considered that the development does not require EIA and an Environmental Statement is not required to support a full planning application.

I trust that the enclosed information is sufficient to assist the Council in adopting a Screening Opinion in this instance; however, please do not hesitate to contact Dominic Page (dpage@geraldev.com) of this office should you wish to discuss matters in further detail.

Yours faithfully,



Gerald Eve LLP

Encls. Site Location Plan
 Proposed Site Layout Plan