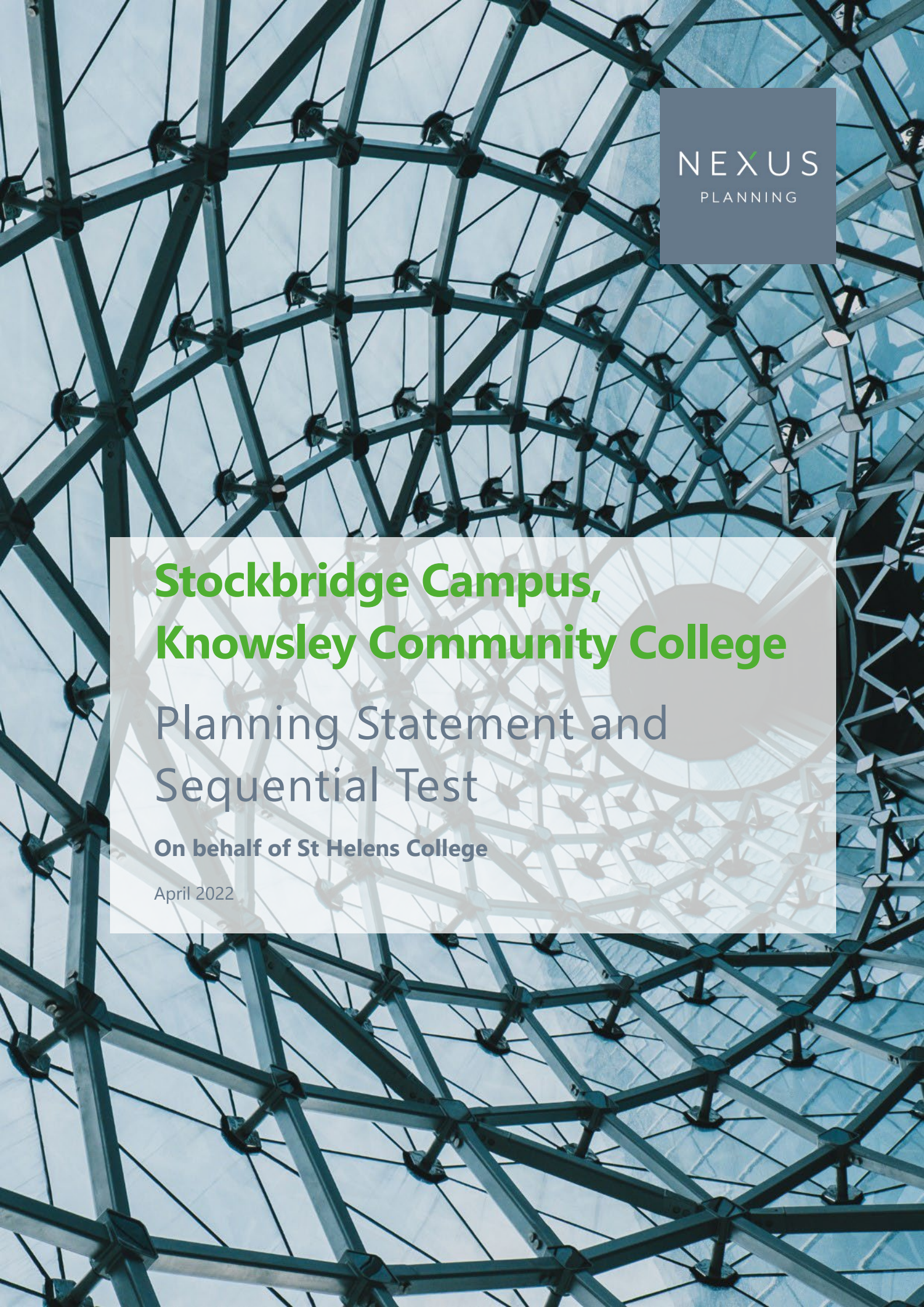




NEXUS
PLANNING

Stockbridge Campus, Knowsley Community College

Planning Statement and Sequential Test

On behalf of St Helens College

April 2022

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1 Introduction

- 1.1 This planning application seeks the change of use of floorspace at the Stockbridge Centre in Huyton, which was formerly occupied by Knowsley Community College and is located within its wider campus. The application is submitted on behalf of St Helens College¹ and provides for the change of use of the first floor of the Stockbridge Centre from an educational use (Use Class F1(a)) to offices (Use Class E(g(i))). The applicant is working with the St Helens and Knowsley Teaching Hospitals NHS Foundation Trust (hereafter referred to as 'the NHS' or 'the NHS Trust'), which has been identified as an appropriate incoming tenant.
- 1.2 The first floor of St Helens College comprises 844 sq.m, which equates to approximately half of the floorplate of the first floor of the Stockbridge Centre. The application supports the re-use of existing office accommodation which is ascribed to a different Use Class by virtue of its ancillary role in supporting the wider College function. Notwithstanding this, it is important to recognise that the application allows the floorspace to continue to operate in the same broad manner as existing, i.e. to support an office/administration function related to a public sector organisation.
- 1.3 The description of development is as follows:

'Change of use of part of the first floor of the Stockbridge Centre from educational administrative use associated with Knowsley Community College (Use Class F1(a)) to office use (Use Class E(g(i))).'

Background

- 1.4 The building was built in 2007 as part of a Private Finance Initiative by the Council to be a secondary school, which opened in January 2009. The College moved into the building in 2015 following the school's closure and building remodelling. The building is known as the Stockbridge Lane Campus and is Knowsley Community College's main campus.
- 1.5 The Council owns the land on which the centre sits, and the College are in the process of signing a long lease.
- 1.6 The St Helens and Knowsley Teaching Hospitals NHS Trust is in need of new premises. As part of its wider Estates strategy, the Trust had sought to identify alternative office accommodation within the Knowsley locality in collaboration with the Knowsley Strategic Estates Group (SEG) which consists of

¹ Which is in partnership with Knowsley Community College.

members from the local council, clinical commissioning groups, community health partners, and neighbouring Hospital Trusts and health care providers.

- 1.7 A number of office locations were identified as potentially suitable by this group, albeit only one of these was sequentially preferable. We consider this site and all other relevant sequentially preferable alternatives in the assessment which follows at Section 4 of this Statement.
- 1.8 St Helens College is very supportive of the NHS Trust occupying floorspace in the Stockbridge Campus, which will also assist in respect of wider collaboration between the organisations within the healthcare and education fields. The arrangement will also provide an important revenue stream to support the site's wider education use.

Submission Information

- 1.9 The applicant submission requirements were clarified through pre-application discussions in February 2022 with Alan Kilroe, Head of Development Management at Knowsley Council. At this stage, it was confirmed that a Planning Statement – including a sequential site search and justification of the co-location of the NHS – should accompany the application proposal in order to demonstrate its compliance with relevant policies.
- 1.10 In this context, the following information has also been submitted to support the planning application:
 - Site Location Plan 35450-SV1-A-DR-90-010;
 - Site Plan 35450-SV1-A-DR-90-001;
 - Existing Floorplan (Main Building First Floor Proposed Layout Rev. F) by Knowsley Community College; and
 - Proposed First Floor Floorplan 35450-05-A-03-000 rev B by Broadway Malyan.

Structure of Report

- 1.11 The report is structured as follows:
 - Section 2 confirms the site, the surrounding campus, and the planning history of the site;
 - Section 3 identifies the relevant local and national planning policy context;

- Section 4 provides an appraisal of the change of use proposal in respect of its compliance with relevant policy considerations, including the sequential approach to development; and
- Section 5 provides our conclusions in respect of the Council's determination of the application.

2 The Application Site and Proposal

The Application Site

- 2.1 The change of use application relates to the first floor of the main building of the Knowsley Community College's Stockbridge Lane Campus. The size of the first floor area to be occupied by the NHS is approximately 844sq.m. The building is principally used for teaching and learning in association with the wider Knowsley Community College use.
- 2.2 The first floor area is currently occupied by staff associated with the College. The existing uses as illustrated on the existing floorplan include: an open plan office for administrative and finance staff; meeting rooms; offices for the principal, leadership team and departmental heads; and store rooms.
- 2.3 The building was opened in January 2009 as a secondary school known as the Christ the King Centre for Learning. The school closed in August 2013, and the College moved into the building in September 2015. Additional planning applications were submitted following the College taking possession of the site and are consider below.

Planning History

- 2.4 The building was constructed pursuant to planning application reference 07/00154/KMBC1, which was approved in in April 2007. The planning permission provides for the erection of a learning, community and resource centre, together with associated access and landscaping.
- 2.5 In February 2010, planning application reference 09/00445/KMBC1 was approved for the retention of a learning, community and resource centre with associated access and landscaping, and to take account of amendments to the school boundary and external layout.
- 2.6 There have been a number of applications submitted in the area immediately surrounding the site, including the creation of an access road across the River Alt and associated culverting, at the north to Waterpark Drive, which was approved in July 2015 (planning permission reference 15/00359/KMBC1). This access road and associated works has now been built out.
- 2.7 Planning permission reference 14/00721, which provides for the erection of a three storey annex building, was approved in December 2014. This application increased classroom provision and created new facilities for the College. It also allowed for the reconfiguration of the car park, additional cycle storage and a new bin store. The annex has been built out and is used for teaching.

The Application Proposal

- 2.8 The proposal seeks the change of use of existing floorspace to allow for its continued use. The description of development is as follows:

‘Change of use of part of the first floor of the Stockbridge Centre from educational administrative use associated with Knowsley Community College (Use Class F1(a)) to office use (Use Class E(g(i))).’

- 2.9 The College proposes to sub-let the first floor office and staff space to the NHS Trust over a five year lease period.
- 2.10 This change of use is reflective of the College working closely with the NHS on larger projects across both the Knowsley and St Helens sites. Collaborative working will link into the College’s educational provision going forward and, as such, bringing aspects of the NHS Trust’s administration is a ‘complementary fit’ both in terms of the nature of the use and in respect of the College’s wider objectives.
- 2.11 No external alterations to the building are proposed. There are no alterations to the internal layout either, except in respect of furniture and interior design which are not governed by planning.
- 2.12 The floorspace is surplus to the College’s requirements as it has consolidated its administrative functions into alternative existing premises across the campus. This has not resulted in any additional building work or alterations; instead, existing floorspace has simply been used in a more efficient manner. As a consequence of these improvements, the first floor of the main building of the Stockbridge Lane Campus is surplus to requirements and in need of a new, productive use.
- 2.13 A total of 116 desk spaces are proposed for NHS staff as part of the proposal. It is likely that these desk spaces will not be 100% occupied every day, due to the Trust’s flexible working policy. However, this figure is indicative of the number of NHS staff that will be based in the office.

3 Planning Policy Context

- 3.1 This section considers the adopted and emerging planning policies, together with other material considerations of relevance to the application's determination.

Development Plan

- 3.2 The adopted Development Plan comprises the Knowsley Local Plan: Core Strategy (adopted 6 January 2016), read together with the 'saved' policies of the Knowsley Replacement Unitary Development Plan ('UDP') (adopted June 2006).
- 3.3 The site is covered by two designations.
- 3.4 The first of these relates to Urban Greenspace. Whilst Core Strategy Policy CS21 'Greenspace and Trees' would be of some relevance to new build development, in this instance the application relates to the change of use of an existing development without any external alteration. As such, there is no conflict with any aspect of Core Strategy Policy CS21.
- 3.5 In addition, the site is designated as Education Land by saved Policy OS7 of the UDP (site reference 'E' and referred to as the 'Former Christ the King Centre for Learning'). Policy OS7 principally relates to the alteration and extension of existing educational facilities, and is considered to be of limited relevance to this application proposal.
- 3.6 The site is also located within the North Huyton Action Area. The North Huyton Action Area was designated under the New Deal for Communities, and was awarded £56m of Government funds over the period 2001 to 2010. The programme focused on tackling unemployment, poor examination results, ill health, poor housing, and crime and disorder. The key objectives for North Huyton were to deliver comprehensive development, redevelopment and improvement, including achieving a wider choice of housing and supporting essential community facilities, services and infrastructure. Due to its age and status, the SPD carries limited weight but it does illustrate the degree of change that was envisaged in this locality, and the key objectives for the area. The use of the floorspace to support jobs is considered compatible with the wider aspirations for North Huyton.
- 3.7 Stockbridge district centre is located circa 900 metres to the north of the application site, and Page Moss district centre is located circa 900 metres to the south of the site.

Relevant Policies

- 3.8 Policy CS4 of the Core Strategy states that new retail and other main town centre uses will be primarily located within existing town centres in accordance with the provisions of Policy CS6 'Town Centres and Retail Strategy'. A sequential approach to site selection shall be applied with locations in existing town, district and local centres of an appropriate scale being considered first, then edge of centre locations, and then only if suitable sites are not available should out of centre sites be considered.
- 3.9 Policy CS4 goes on to state that office uses may be located within accessible locations in a number of defined employment areas, provided that town centre and edge of centre sites have been considered first in accordance with the sequential approach.
- 3.10 Policy CS6 'Town Centres and Retail Strategy' sets Knowsley's hierarchy of centres. Huyton, Kirkby and Prescot are identified as town centres, Halewood, Liverpool Road/Page Moss and Stockbridge Village are district centres, and there are a number of local centres at the lower tier of the retail hierarchy. Proposals for other main town centre uses outside these centres will only be permitted if they would complement regeneration opportunities, avoid significant impact upon the viability and vitality of the town, district and local centres, and comply with the sequential test set out in Policy CS4 'Economy and Employment'.

Other Material Considerations

Emerging Development Plan

- 3.11 The Liverpool City Region Combined Authority is preparing a Spatial Development Strategy ('SDS'), which will be a strategic plan for the six local authorities, and will eventually form part of the Development Plan once adopted (anticipated in 2024). Stage 2 of the consultation ran from 10 November 2020 to 21 February 2021.
- 3.12 The emerging SDS currently deals with key themes of health, climate change and inclusive growth. However, it will not allocate housing or employment sites, or review Green Belt boundaries and will be pursuing a 'brownfield' first approach while the primary responsibility for housing requirements will remain with individual authorities. As such, it is unlikely to have an impact on the site's redevelopment.

National Planning Policy Framework (July, 2021)

- 3.13 Offices are included within main town centre uses as defined by the NPPF's Annex 2: Glossary.

- 3.14 Paragraph 87 of the NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 3.15 Paragraph 88 states that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
- 3.16 There is a requirement for town or local shopping centre sites to be considered first, then edge of centre sites and, only then, out of centre sites should be considered.
- 3.17 For edge and out of centre proposals, preference will be given to accessible sites that are well connected to the town centre. There is a need to demonstrate flexibility in respect of format and scale.
- 3.18 NPPF paragraph 119 emphasises the need to make effective use of land. Paragraph 120 then indicates that planning decisions should support the re-use of under-utilised land and buildings.

Town Centres and Retail Planning Practice Guidance

- 3.19 The Town Centres and Retail Planning Practice Guidance ('PPG') provides additional clarification in respect of the application of the NPPF sequential test.
- 3.20 In respect of decision-making, paragraph 11 of the PPG states that in determining whether a proposal complies with a sequential test, the decision maker should consider whether the suitability of more central sites to accommodate the proposal has been considered with due regard to whether the proposal's format or scale offers scope for flexibility.
- 3.21 Paragraph 12 of the PPG acknowledges that the characteristics of an application proposal and the market it would serve may act to restrict the area within which it can be accommodated. It states that:

'Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements, which mean that they may only be accommodated in specific locations.'
- 3.22 In this instance, the proposal provides for the relocation of an existing NHS administrative function. There are a significant numbers of employees associated with the proposal, who access their place

of employment in different ways. Accordingly, there will be a need for any suitable site to support employees travelling both by car and public transport, and we approach the sequential assessment on this basis.

4 Planning Appraisal

- 4.1 This section of the report considers the principle of development, with specific reference to the sequential test set out at paragraphs 87 and 88 of the NPPF.

Principle of Development

- 4.2 The site is covered by two designations, for Urban Greenspace (Policy CS21 'Greenspaces and Trees' of the Core Strategy), and Education Land (saved Policy OS7 of the UDP).
- 4.3 Policy CS21 ('Greenspaces and Trees') states that new development which would result in the loss of urban greenspace will not be permitted unless certain criteria are met. However, the development of this area of urban greenspace was accepted when the planning application for the Christ the King Centre for Learning was approved in 2007.
- 4.4 The land has been in educational use for more than a decade, and we consider that the open space policy no longer carries any relevance – nor is it relevant to the development proposed, which does not propose new floorspace being created.
- 4.5 The site is on the first floor of an established educational use, which has been in administrative use ancillary to the wider educational use of the building since its construction. The floorspace is surplus to the College's requirements and its re-use by the NHS will provide a valuable revenue stream to support the College function. As such, whilst UDP Policy OS7 is not considered to be of direct relevance to the proposal, the proposal has an important role in helping to underpin the operation of the College.
- 4.6 As such, we consider that the proposed land use is wholly acceptable in principle, subject to satisfying the sequential test for main town centre uses.

Sequential Approach to Development

- 4.7 Policy CS4 of the Knowsley Core Strategy sets out the sequential approach to development. In our view, the sequential test as set out in this policy and at paragraphs 87 and 88 of the NPPF are materially similar in respect of how they apply to this proposal. There is a requirement for sites in defined centres to be considered first, then edge of centre sites, and only then should out of centre sites be considered.
- 4.8 For edge and out of centre proposals, preference will be given to accessible sites that are well connected to the town centre.

- 4.9 The Town Centres and Retail PPG provides additional clarification in respect of how the sequential test should be applied.
- 4.10 In decision-making, the PPG states at paragraph 11 that in determining whether a proposal complies with a sequential test, the determining authority should consider whether the suitability of more central sites to accommodate the proposal has been considered with due regard to the requirement to demonstrate flexibility, and whether the proposal's format or scale offers scope for flexibility.

Sequential Search Parameters

- 4.11 We set out below the sequential site search parameters, which have been informed by the NHS Trust's accommodation requirements and relate to the broad type of use proposed.

- **Size**

We have allowed for a reasonable degree of flexibility with respect to floorspace, and have searched for accommodation from 600 sq.m to 1,000 sq.m in size (applying roughly a 20% buffer to the preferred scale of office floorspace);

- **Transport and Access**

The site needs to be well positioned for suitable access to public rail and bus networks, and provide convenient access to a significant number of allocated car parking spaces. A total of 161 desk spaces are proposed. Due to the quantum of staff who will be based at the office, it is acknowledged that staff will travel to the office via a variety of means, including public transport. However, convenient car parking is a prerequisite to support an office function of this scale and nature.

- **Timescale and Condition**

There is an urgent need to locate appropriate alternative premises to support an existing NHS function. Given that the need is immediate, our search focuses on existing office space as securing a site and building a bespoke office is not an appropriate solution. The premises needs to be in suitable condition, without the presence of asbestos, which could be occupied without significant work or investment, given the pressing need for the NHS to secure alternative accommodation without delay.

- 4.12 Due to the immediate requirement to relocate, the search has been undertaken with respect to existing office units or other commercial units which could be easily converted to office

accommodation. On this basis, we discount ground floor retail accommodation as this is not well suited to accommodate the proposed use.

Sequential Alternative Site Assessments

- 4.13 We have undertaken a review of potential alternative sites with reference to our knowledge of nearby centres and by identifying sites which are being marketed for office use through online sources². Alan Kilroe identified during pre-application discussions that the potential offered by Stockbridge district centre, Huyton Village town centre and Prescott town centre should be comprehensively explored as part of this sequential assessment. In addition, we have also extended our search to Page Moss district centre due to its proximity to the application site.
- 4.14 In parallel with this search, the NHS Trust has also engaged with Knowsley Council officers, through the Knowsley Strategic Estates Group (SEG) Forum, in order to understand whether there were any other options to be explored. The SEG consists of Council members, clinical commissioning groups, community health partners, and neighbouring Hospital Trusts and health care providers. We consider the potential of sites identified through this exercise below.
- 4.15 As we set out in detail below, our research has not identified any sequentially preferable site which is both available and suitable to accommodate the application proposal.
- 4.16 No potential sites were found in the local centres of Stockbridge or Page Moss. We consider sites within Huyton and Prescott below.

Review of Sequential Alternative Sites

- 4.17 The SEG identified **Nutgrove Villa** on Westmoreland Road in Huyton as being a potentially suitable location. The site is located in the town centre and comprises a walk-in centre and GP surgery. Whilst the premises benefit from some adjacent surface car parking, this is available to the public visiting the centre and would not be available to relocated employees. On this basis, there is no available allocated car parking. We are also informed that the amount of available space is insufficient to service the occupier's requirements. As such, Nutgrove Villa is unable to meet the same broad needs as the application site.
- 4.18 A number of **vacant Huyton town centre units** have been identified. These include:

² Including EGI Property Link, Rightmove Commercial, and Estates Gazette.

- 230 sq.m at Unit 5, Cavendish Walk, Huyton³;
- 609-702 sq.m at Unit 6-8, Cavendish Walk, Huyton⁴; and
- 187 sq.m at Unit 15, Cavendish Walk, Huyton⁵.

4.19 Units 5 and 15 Cavendish Walk are far too modest in scale, even taking into account a flexible 20% buffer. Whilst Unit 6-8 Cavendish Walk would be an appropriate size, the accommodation is over ground and first floor, and is a retail unit formerly occupied by B&M Bargains. The accommodation is not suited to an office use and would fail to provide an active ground floor frontage. Furthermore, the premises also fail to accord with the identified parameters, in respect of the need for the premises to be served by adjacent car parking and available for occupation without delay.

4.20 We have identified a further site being marketed at **4-6 Eccleston Street, Prescot town centre**⁶. However, the premises provide just 45 sq.m of retail floorspace and are easily discounted from further consideration on this basis.

Conclusions in Respect of the Sequential Test

4.21 We have reviewed all identified vacant units and sites within relevant defined centres in respect of their availability and suitability to accommodate the proposed development (applying appropriate flexibility in assessing the merits of each opportunity). Our assessment has demonstrated that none of the identified available premises offer a suitable site to accommodate the proposed use. As such, we find that none of the identified sites identified are considered to be available and suitable to accommodate the proposal.

4.22 As a consequence, the application proposal conforms to the requirements of Policy CS4 of the Knowsley Core Strategy and paragraphs 87 and 88 of the NPPF.

³ Unit 5, Cavendish Walk (marketing particulars available here: <https://propertylink.estatesgazette.com/property-details/6817467-unit-5-cavendish-walk-huyton-liverpool-l36-9yg>).¹⁴

⁴ Unit 6-8, Cavendish Walk (marketing particulars available here: <https://propertylink.estatesgazette.com/property-details/6810335-unit-6-8-cavendish-walk-huyton-l36-9yg>).

⁵ Unit 15, Cavendish Walk (marketing particulars available here: <https://propertylink.estatesgazette.com/property-details/6817459-unit-15-cavendish-walk-huyton-liverpool-l36-9yg>).

⁶ 4-6 Eccleston Street (marketing particulars available here: <https://propertylink.estatesgazette.com/property-details/6500649-4-6-eccleston-street-prescot>).

5 Summary and Conclusions

5.1 This planning application is for the following development:

‘Change of use of part of the first floor of the Stockbridge Centre from educational administrative use associated with Knowsley Community College (Use Class F1(a)) to office use (Use Class E(g(i))).’

5.2 The application is to enable the St Helens and Knowsley Teaching Hospitals NHS Trust to move into part of the first floor of the main building on the Stockbridge Campus. The building has been in educational use for more than a decade, and the site has been in administrative use (ancillary to the wider education use of the building as a whole) since construction.

5.3 This Planning Statement has confirmed that the proposed land use is consistent with the requirements of the Development Plan and the NPPF.

5.4 As part of their wider Estates strategy, the Trust had sought to identify alternative office accommodation within Knowsley in collaboration with the Knowsley Strategic Estates Group (SEG).

5.5 We have reviewed the alternative office locations identified by the SEG, and have identified a further number of potential sites within nearby town centres based on our review of online property sources. Based on this review, we do not believe that there is any sequentially preferable site that is both available and suitable to accommodate the application proposal. As a result, the application is consistent with the sequential test as articulated by Policy CS4 of the Knowsley Core Strategy and paragraphs 87 and 88 of the NPPF.

5.6 In addition, we reiterate that the applicant is very supportive of the NHS Trust occupying floorspace in Knowsley Community College’s Stockbridge Campus, which will also form assist in the wider collaboration between the organisations within respective healthcare and education fields.

5.7 The application proposal supports the continued use of existing office accommodation to the benefit of two public sector organisations, and generates a revenue stream that helps to support the College.

5.8 In conclusion, we consider the proposed development should be approved in accordance with the development plan. We respectfully request that the application is determined in spirit of paragraph 96 of the NPPF which requires local planning authorities to work proactively and positively with promoters, delivery partners and statutory bodies to ensure faster delivery of public service infrastructure.

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