

**Full planning application for the alteration,
extension and refurbishment of an existing
waste management facility**

Planning Statement

**Acornfield Road/Bradman Road, Knowsley
Industrial Park**

On behalf of Stericycle.

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Contents.

1.	Introduction.....	1
2.	The Application Site	3
3.	Proposed Development.....	4
4.	Planning History	7
5.	Planning Policy Framework.....	8
6.	Planning Assessment.....	15
7.	Summary and Conclusions	22

1. Introduction

- 1.1. This Planning Statement accompanies a full planning application which is submitted on behalf of Stericycle ("the Applicant") in respect of the alteration and extension of an existing waste management facility on the corner of Acornfield Road and Bradman Road on the Knowsley Industrial Park ("the application site").
- 1.2. In summary, the application seeks full planning permission for a development comprising the following elements:
- Increasing throughput of waste treatment from 22,000 tonnes per annum (tpa) to circa 50,000 tpa;
 - Addition of staff parking adjacent to Bradman Road and reconfiguration of existing onsite car parking;
 - Reinstating an existing vehicular access to the facility from the Bradman Road entrance and side access road (this will be one way and for <3.5t vehicles only);
 - Refurbishment of the building to include upgrades to the building façade, new windows, roller shutter doors, etc;
 - Grading of site yard to provide level access within the site;
 - Modest extension to the northern elevation of the building and addition of a canopy to the loading bays; and
 - Alterations to the roof structure to accommodate new plant within the building.
- 1.3. A full description of the development proposals which sets out the various aspects of the scheme can be found in Section 3 of this Statement.

The Purpose and Content of the Planning Statement

- 1.4. This Planning Statement provides a summary overview of the application proposals and identifies the Planning Policy Framework within which it should normally be considered.
- 1.5. The structure of the Planning Statement takes the following form:
- **Section 2** describes the application site and the surrounding area;
 - **Section 3** provides a full description of the development proposals;
 - **Section 4** outlines the relevant planning history of the site;
 - **Section 5** sets out the relevant planning policy context applicable to the application proposals;
 - **Section 6** undertakes a planning assessment of the proposals;

- **Section 7** provides a summary and overall conclusion.

Other Supporting Documents and Drawings

1.6. In addition to this Planning Statement, the application is supported by a number of other documents including:

- Air Quality and Odour Assessment;
- Design and Access Statement;
- Noise Assessment;
- Statement of Pre-Application Engagement;
- Transport Statement; and
- A drawing package comprising a Site Location Plan, Site Layout Plan, Elevations, Floorplans and Roof Plan.

Pre-Application Discussions

1.7. The Applicants have been engaged in pre-application discussions with Knowsley Council ("the WPA") prior to the submission of the planning application and further details can be found in Statement of Pre-Application Engagement submitted as part of the planning application. Similarly, details can be found therein of the Screening Opinion submitted prior to the submission of the planning application.

2. The Application Site

- 2.1. The application site is approximately 1.42 hectares in size located on the Knowsley Industrial Park which is the principal industrial estate within the Borough. It is the largest industrial area in the Liverpool City Region and is a key driver of the local and sub-regional economy. The Knowsley Industrial Park is well related to the highway network with good access to the A580 and the M57, M6 and M62 motorways. The site is located within the administrative area of Knowsley Metropolitan Borough Council.
- 2.2. The site itself is located on the corner of Bradman Road and Acornfield Road and has a lawful use as a waste management facility – see Section 4 for further details. The site is comprised by a building of three sections – East, Central and West. The East and Central sections are of a similar brick built appearance with pitched roof design while the West section is a two-storey 1970s flat roofed design. Within the site is a service yard and parking area for staff vehicles. The surrounding area is comprised by a variety of industrial units of different ages, scale and appearance.
- 2.3. Vehicular access to the site is of Acornfield Road and there is another vehicular access to the site off of Bradman Road but is currently not in use.
- 2.4. The majority of the site is located within Flood Zone 1 with a small part along the northern boundary and north-western corner of the site located within Flood Zone 2.
- 2.5. The application site is not subject to any statutory landscape or ecological designations.
- 2.6. There are no Public Rights of Way running through or alongside the application site but there are footpaths for pedestrians on either side of the estate roads in the industrial park.
- 2.7. There are no designated heritage assets within or adjacent to the site and nor does the site fall within or in close proximity to a Conservation Area.

3. Proposed Development

- 3.1. The Applicant seeks full planning permission for a development comprising:

"Alterations and extensions to and refurbishment of an existing waste management facility to include increased throughput, reconfiguration of existing and additional car parking, change of use of west wing to waste management and other associated works and infrastructure."

- 3.2. Details of the Applicant and the main components of the proposals are described below.

Background to the Applicant

- 3.3. The Applicant is the UK's leading provider of healthcare waste services. They are part of Stericycle Inc which provides healthcare services to over half a million customers worldwide.
- 3.4. Stericycle is also known as SRCL and it has grown significantly in the UK over the past 10 years investing in an extensive network and embracing new techniques and technology to make their operation greener. It continues to grow its business and provide a range of services to a diverse group of customers within the public and private sector including NHS trusts, GPs, dentists, pharmaceutical manufacturers, private sector businesses, research companies and many more.
- 3.5. One of the services that the Applicant provides relates to clinical waste management – also referred to as healthcare and medical waste – and which requires correct identification, handling and disposal. Clinical waste management is one of their business operations and with their national network of clinical waste facilities they can process all types of healthcare waste including orange, yellow and tiger bagged waste, sharps and pharmaceutical waste and other difficult to process waste streams.

The Development Proposals

- 3.6. Principally, this planning application seeks planning permission for alterations to and extension of an existing waste management facility used as a healthcare waste treatment plant and transfer site.
- 3.7. The waste treatment activity will continue to be operated within the existing building although there are a number of associated works proposed as part of the development. These include:

Site changes

- Change of use of the west 'wing' of the building to waste management as per extant permission for the east and central sections of the site;
- Increased throughput capacity of waste treatment from 22,000tpa to circa. 50,000tpa;
- Addition of staff car parking adjacent to Bradman Road and reconfiguration of onsite car parking;
- Visitor/staff access to be provided for the new reception in the west wing of the building via Bradman Road (main entrance);

- Reinstatement of vehicular access to the facility from the Bradman Road entrance and side access road (this will be one way and for <3.5t vehicles only);
- Staff will enter from the Bradman Road entrance and exit from the Acornfield Road entrance. Commercial vehicles will use the Acornfield Road entrance only;
- Grading of the site yard to provide level access within the site;

West section of the site

- Refurbishment of the west wing to bring it back into full use. This includes upgrades to the building façade, new windows, glazing, additional doors, upgrades to roller shutter doors, internal remodelling to include a new office block and welfare facilities;

East section of the site

- Upgrades to the façade including the addition of new roller shutter doors;
- Modest extensions to the northern elevation of the building and addition of a canopy over the loading bays;
- Addition of an enclosure (incorporated into the above canopy) to house two walking floor trailers inclusive of the roller shutter doors mentioned above;
- Alteration to the roof structure on the eastern section of the building (raising it) to accommodate new plant installation internally; and
- The addition of two new stacks from the roof structure with an existing stack repositioned adjacent to the new. Two additional stacks will be provided for the new boilers.

3.8. The proposed development would employ up to 96 people at the site which includes plant, drivers, admin and management workers. This is comprised by 57 on-site and 39 off-site workers. This is total number of workers overall, not at any one time. A shift pattern will be operated at the site and will dictate the number of workers on site at any one time.

3.9. Typical shift patterns operating from the site will be:

- Office hours: 08:00–18:00
- Warehouse hours (day): 07:00–17:00
- Warehouse houses (shifts, 4no. in total): 06:00–18:00–06:00
- Visitor hours: 08:00–16:00
- Driver hours: 24hrs
- Van hours: 07:00–14:00

3.10. The layout of the development incorporates a total of 56 car parking spaces (including 3 disabled bays, 5 electric vehicle charging points for use by cars and vans and 2 motorcycle

bays). 41 number of car spaces will be provided within the reconfigured provision internal to the site and the remaining 15 spaces will be provided along Bradman Road. This represents a net increase of parking spaces of 9 parking spaces.

- 3.11. There will also be 11 loading bays for HGVs and smaller commercial vehicles and cycle storage provision for 10 bicycles will be provided on site.

Operating hours

- 3.12. The site would operate on a 24-hour basis, 7 days a week, 365 days a year.

Waste types, sources and quantities

- 3.13. The site will operate as a healthcare waste treatment plant and transfer site of packaged healthcare and related waste. The wastes will be sourced from a range of waste producing premises including public and private hospitals, doctor surgeries, health centres, dental practices and a range of other producers of similar type wastes. The majority of the waste received at the facility will be produced by the NHS.
- 3.14. The treatment facility would have an annual throughput of 40,000 tonnes per annum (tpa) of hazardous waste and 10,000 tpa of non-hazardous waste.
- 3.15. The transfer activity would involve hazardous and non-hazardous waste types that need to be sent off-site for recovery or disposal with an anticipated 15,000 tpa transferred.
- 3.16. While on-site, the waste will be handled and stored in both internal and external areas, with light compacting of waste occurring externally. The waste will be transported to and from the site, and stored both internally on-site, in fully enclosed, leak-proof containers, which will prevent the release of odours to the environment. Process residues will be stored externally in sealed walking floor trailers. All designated storage areas will have impermeable surfaces with sealed drainage, to ensure there is no release of waste to the environment.

Market for recycled wastes

- 3.17. The residual waste generated by the treatment process will be transferred off-site will primarily be sent for waste-to-energy incineration or other recovery processes. The treatment process will therefore be classified as a recovery activity and not a disposal activity in the environmental permit for the facility.
- 3.18. Wastes transferred off-site are wastes suitable for clinical waste incineration only or wastes in reusable containers which for cleaning and re-use.
- 3.19. Therefore of the total 50,000 tpa treated at the proposed facility, it is expected that 100% will be recycled/recovered during normal operating conditions¹; and of the total 15,000 tpa transferred from the site, it is expected that up to 15% will be re-used/recycled/recovered or subject to energy recovery.

¹ Alternatives may apply during contingency arrangements.

4. Planning History

- 4.1. Planning permission was granted for the existing use of the premises on 12th December 2013 (application ref: 13/00384/FUL) and comprised:

"Change of use of vacant unit (Use Class B8) to form a healthcare waste treatment and transfer operation (Use Class Sui Generis) facilitating the treatment and temporary storage of waste prior to being transferred off-site for re-cycling together with external alteration to parts of external building & associated works."

- 4.2. The planning permission was granted subject to 18no. conditions. The most relevant conditions to the pre-application advice request are:

- Condition 6 – the annual throughput of waste on the site shall not exceed 22,000 tpa;
- Condition 7 – no external plant or equipment other than that approved under the permission to be installed nor additional opening made to the building without the prior approval of the LPA;
- Condition 14 – the approved car parking, servicing and vehicle manoeuvring areas to be provided and marked out prior to the first use of the premises and thereafter retained at all times.

- 4.3. For the avoidance of doubt, the 2013 planning permission relates to the east and central sections of the building only. The west section did not form part of the planning permission, but it is understood that it has been partially used by the Applicant in connection with the lawful use of the wider site for a number of years. The proposals however seek to regularise the use of the west section.

5. Planning Policy Framework

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. The Development Plan for the areas consists of:
- Knowsley Local Plan Core Strategy 2016 (adopted January 2016);
 - Saved Policies of the Knowsley Replacement Unitary Development Plan 2006 (adopted June 2006); and
 - Merseyside and Halton Waste Local Plan (adopted July 2013).
- 5.3. The adopted Proposals Map incorporates amendments made following the adoption of the Waste Local Plan in July 2013 and the Core Strategy in 2016 and identifies that the application site is located within a 'Primary Industrial Area'.
- 5.4. Other material considerations in terms of policy and guidance includes the following national documents:
- National Planning Policy Framework (July 2021);
 - National Planning Policy for Waste (October 2014); and
 - National Planning Practice Guidance (first published March 2014)

National Planning Policy and Guidance

National Planning Policy Framework (NPPF)

- 5.5. The NPPF was revised on 20th July 2021 and replaces the previous NPPF published in March 2012, revised in July 2018 and updated in February 2019.

Introduction

- 5.6. The introduction section of the NPPF explains how the Framework sets out the Government's planning policies for England and how these should be applied [paragraph 1]. It reiterates that Planning Law requires applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise [2]. The Framework is to be read as a whole including its footnotes and annexes [3] and in conjunction with the Government's planning policy for waste [4]. When making decisions on application for these types of development, regard should also be had to policies in the Framework, where relevant. The introductory chapter also explains that other statements of Government Policy may be material when deciding applications, such as relevant Ministerial Statements [6].

Achieving Sustainable Development

- 5.7. The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development [7]. Achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental) and that these are interdependent and need to be pursued in mutually supportive ways [8]. These are not criteria against which every decision can or should be judged [9]. It goes on to state that planning decisions should play an active role in guiding development towards sustainable solutions but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 5.8. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development [10].

The Presumption in favour of Sustainable Development

- 5.9. Decision should apply a presumption in favour of sustainable development and for decision-making Paragraph 11 states:

"11.....

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Decision Making

- 5.10. Local Planning Authorities (LPA's) should approach decisions on proposed development in a positive and creative way and that decision makers at every level should seek to approve applications for sustainable development where possible [38].

Building a strong, competitive economy

- 5.11. Planning decisions should help create the conditions in which businesses can invest, expand and adapt, and that "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 [81].

Promoting Sustainable Transport

- 5.12. Various transport related objectives are identified, including amongst other things, addressing potential impacts on transport networks [104]. Development should only be

prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe [111].

Making Effective Use of Land

- 5.13. Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions [119]. It goes on to say the decision should promote and support the development of under-utilised land and buildings [120d].

Meeting the challenge of climate change, flooding and coastal change

- 5.14. The planning system should help to, inter alia, encourage the reuse of existing resources including the conversion of existing buildings [152].
- 5.15. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk and where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere [159].
- 5.16. When determining any planning applications, LPA's should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment [167]. Footnote 55 advises that a site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3 and in the case of Flood Zone 1 where, inter alia, the site is 1 hectare or more in size. Applications for some minor development and change of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessment [168].

National Planning Policy for Waste (NPPW)

- 5.17. The NPPW was published in October 2014 and replaces the guidance previously set out in Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10), which was saved following the publication of the original NPPF in March 2012.
- 5.18. It explains that the Waste Management Plan for England (published by DEFRA, December 2013) sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. It goes on to say that positive planning plays a pivotal role in delivering this country's waste ambitions through [1]:
- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy (see below image);



- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle;
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

5.19. In terms of determining planning applications for waste developments, the NPPW advises that waste planning authorities should [7]:

- only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need;
- recognise that proposals for waste management facilities such as incinerators that cut across up-to-date Local Plans reflecting the vision and aspiration of local communities can give rise to justifiable frustration, and expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy;
- consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies;
- ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located;
- concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;
- ensure that land raising or landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards through the application of appropriate conditions where necessary.

5.20. As noted above, regard should be given to the criteria set out in Appendix B of the NPPW in decision-making to test the suitability of sites. These include:

- protection of water quality and resources and flood risk management

- land instability
- landscape and visual impacts
- nature conservation
- conserving the historic environment
- traffic and access
- air emissions, including dust
- odour considerations
- vermin and birds
- noise, light and vibration
- litter
- potential land use conflict

The Development Plan

Knowsley Local Plan Core Strategy

- 5.21. The Knowsley Local Plan Core Strategy ("the Core Strategy") was adopted in January 2016 and sets the strategic framework for the growth and development of Knowsley for the plan period up to 2028. It sets out how and where new development and regeneration should take place to promote, guide and manage the future development of the Borough.
- 5.22. **Policy CS26 (Waste Management)** advises that the Council will promote sustainable forms of waste management in accordance with the waste hierarchy. It will work to, inter alia, identify and safeguard waste management site in appropriate locations.
- 5.23. Furthermore, the following policies will also be relevant to consideration of the planning application:
- **CS2 – Development Principles**
 - **CS4 – Economy and Employment**
 - **CS7 – Transport Networks**
 - **CS11 – Principal Regeneration Area – Knowsley Industrial and Business Parks**
 - **CS19 – Design Quality and Accessibility in New Development**
 - **CS24 – Managing Flood Risk**
- 5.24. The above policies will be considered as part of the planning assessment of the proposals in Section 6 of this Statement.

Saved Policies of the Knowsley Replacement Unitary Development Plan

- 5.25. Under the transitional arrangements for moving to the Local Plan system, all but four of the 82 individual Knowsley Replacement Unitary Development Plan ("the UDP") policies were "saved" by the Secretary of State on 12th June 2009. An additional three UDP policies were replaced on adoption of the Merseyside and Halton Joint Waste Local Plan. A further 36 policies were deleted on adoption of the Core Strategy. This leaves 39 UDP Policies which continue to be saved. Appendix C of the adopted Core Strategy sets out a full schedule of which UDP Policies continue to be saved.
- 5.26. **Policy EC3 (Primarily Industrial Areas)** advise that these areas are appropriate locations for Use Classes B1, B2 and B8. Proposals for development for other uses in these areas will only be permitted where they would, inter alia, be complementary to and compatible with the surrounding employment uses.
- 5.27. The following saved policies of the UDP will be relevant to the consideration of the planning application:
- **T8 – Transport Assessments**
 - **ENV2 – Noise and Vibration**
 - **ENV3 – Light Pollution**
- 5.28. The above policies will be considered as part of the planning assessment of the proposals in Section 6 of this Statement.

Joint Waste Local Plan

- 5.29. The Joint Waste Local Plan ("the JWLP") was adopted in July 2013 and was produced as a result of collaborative working between Halton, Knowsley, Liverpool, St. Helens, Sefton and Wirral Councils. The plan covers the Liverpool City Region to provide a clear direction for future waste management development up to 2027, both in terms of site allocation and detailed development management policies.
- 5.30. **Policy WM7 (Protecting Existing Waste Management Capacity for Built Facilities and Landfill)** advises that existing operational and consented waste management sites will be expected to remain in waste management use in order to maintain essential waste management capacity.
- 5.31. It is recognised the following policies will be relevant to consideration of the planning application and will be addressed in the planning application submission:
- **WMO – Presumption in Favour of Sustainable Development**
 - **WM8 – Waste Prevention and Resource Management**
 - **WM10 – High Quality Design and Operation of Waste Management Facilities**
 - **WM11 – Sustainable Waste Transport**
 - **WM12 – Criteria for Waste Management Development**

- 5.32. The above policies will be considered as part of the planning assessment of the proposals in Section 6 of this Statement.

Emerging Knowsley Spatial Development Strategy

- 5.33. A Spatial Development Strategy ("the SDS") is currently being prepared by the Liverpool City Region Combined Authority which covers Halton, Knowsley, Liverpool, St.Helens, Sefton and Wirral. An initial issues consultation was carried out on the SDS in January 2020 with views on the proposed vision and objectives carried out between November 2020 and February 2021. Further consultation on the SDS is expect in late Summer/Autumn 2022. Given its early stage of preparation, little weight should be afforded to the emerging plan in the decision-making process.

6. Planning Assessment

- 6.1. This section of the Planning Statement sets out the main planning considerations for this application. These include the following:

Issue 1 Principle of development

Issue 2 Design and Layout

Issue 3 Highways

Issue 4 Air Quality and Odour

Issue 5 Noise

Issue 6 Amenity

Issue 7 Flood Risk and Drainage

Issue 8 Other matters

- 6.2. Some of these issues are examined in more detail in separate reports, but the purpose of this Planning Statement is to bring all the conclusions together in order to inform the overall planning assessment of the proposed development.

Issue 1 – Principle of Development

- 6.3. The starting point for the determination of any planning application is the Development Plan. The planning system is “plan led” and planning law requires that applications for planning permission must be determined in accordance with the Development Plan, unless other material indications indicate otherwise.
- 6.4. The Development Plan in the case of the proposed development comprises principally the policies of the Merseyside and Halton Waste Local Plan which was adopted July 2013 and also the relevant policies of the Knowsley Local Plan Core Strategy 2016 (adopted January 2016) and saved policies of the Knowsley Replacement Unitary Development Plan 2006 (adopted June 2006).
- 6.5. Policy CS4 of the Core Strategy sets out the overall employment and development strategy for the borough and advises at Criterion ‘1 (c)’ that planning will be used to enhance the quality and efficiency of land use within existing employment areas.
- 6.6. Policy CS26 of the Core Strategy advises that the Council will promote sustainable forms of waste management in accordance with the waste hierarchy. Criterion ‘A’ sets out that the Council will identify and safeguard (where appropriate) waste management sites in appropriate locations. The supporting text at Paragraph 10.36 indicates that the Knowsley Industrial Park as an appropriate location for such sites.
- 6.7. The Core Strategy also advises that decisions regarding planning for waste management facilities should comply with policies in the Waste Local Plan in addition to Policy CS26 [Para 10.34].

- 6.8. Policy WM 7 of the Waste Local Plan advises that existing operational and consented waste management sites will be expected to remain in waste management use to maintain essential waste management capacity. The supporting text at Paragraph 5.5 explains that the majority of existing built waste management facilities are located on industrial estates, or areas where the impact on local amenity is low.
- 6.9. The application site is located on the Knowsley Industrial Park, so it is in an area identified in both the Core Strategy and Waste Local Plan expected to accommodate waste management facilities. The proposed development will also retain and enhance the use of the site for waste management purposes. The principle of the waste management use has therefore already been established at the site through the 2013 planning permission and its continued use is supported by planning policy.
- 6.10. The pre-application advice received from the Council prior to the submission of the planning application also supports the principle of the development where it was explained:

“The proposed development for a change of use of part of site to waste management and refurbishment of existing facility including increased throughput, alterations to car parking and to the building elevations would be acceptable in principle subject to the detailed planning issues...”

- 6.11. Accordingly, there would be no conflict with Policies CS4 and CS26 of the Core Strategy and WM7 of the Waste Local Plan.

Issue 2 – Design and Layout

- 6.12. The application site is located within the Knowsley industrial park bounded on two side to the north and west and estate roads to the east and south. The site is therefore confined to its corner plot. The layout and design of the proposed development has therefore been confined to the existing parameters of the site.
- 6.13. The proposals seek to bring the west section of the building into formal use for waste management purposes alongside the central and east section which already have the benefit of planning permission for such purposes. Other than some alterations to the fenestration and internal works and refurbishment to the west section, no other changes are proposed and will remain in-keeping with the industrial character of the area.
- 6.14. An extension and canopy are proposed to the northern elevation of the central and east section. These will be fairly modest additions to the building which has been designed to be in-keeping with the existing building.
- 6.15. In order to accommodate new plant within the east section of the building, part of the existing roof structure is proposed to be raised. The height of the roof will be increased by circa 3.6m bringing the ridge height to 11.95m high from the existing roof height of 8.35m. The new structure has been designed to reflect the character of the existing building and is considered an acceptable addition to the building which will remain industrial in character and have no material impact on the wider industrial estate.
- 6.16. Other works to the site such as improvements to the building façade, new windows, roller shut doors, grading of the yard, etc represent appropriate works to the existing industrial unit.

- 6.17. The various works proposed, individually and cumulatively, are therefore considered acceptable in terms of nature, scale and appearance. The resultant building and site would continue to remain of a typical industrial appearance and not out-of-character with other units on the wider industrial estate thereby respecting the character and appearance of the area.
- 6.18. Accordingly, there would be no conflict with Policies CS2 and CS19 of the Core Strategy and WM10 and WM12 of the Waste Local Plan, and the guidance set out in the Design Quality in New Development Supplementary Planning Document (January 2016).

Issue 3 – Highways

- 6.19. The planning application is accompanied by a Transport Statement (TS) which describes the existing situation in terms of the site location, accessibility by all modes and highway safety, and assesses the net traffic impact of the proposed development.
- 6.20. In respect of transport and highway matters, the TS concludes that:
- Safe and suitable access for all modes can be achieved from Acornfield Road and Bradman Road.
 - The site is in a location which provides the opportunity for journeys to be made on foot, by cycle and via public transport to the site from nearby local areas in which employees may live.
 - The forecasted parking demand can be accommodated within the site's boundary and that the internal layout can accommodate the largest vehicles associated with the scheme.
 - There will be no material impact as a result of increase in trip numbers.
- 6.21. In light of the above, it is considered that the proposed development can be comfortably accommodated within the local area and as such there should be no reason why the application cannot be considered acceptable in terms of highways and transportation.
- 6.22. Accordingly, there would be no conflict with Policies CS7 of the Core Strategy and WM11 and WM12 of the Waste Local Plan.

Issue 4 – Air Quality and Odour

- 6.23. As set out under Issue 1, it is considered that the principle of the use is acceptable in this location given the 2013 planning permission and its continued use is supported by planning policy. The location and operation of the facility is therefore compatible with neighbouring land uses. This extends to the consideration of potential impacts in terms of air quality and odour. The planning application is accompanied by an Air Quality and Odour Assessment (AQOA) to assess the impact of the proposed waste management facility.
- 6.24. In respect of air quality, the AQOA concludes that:
- The air quality impacts associated with the proposed refurbishment and improvement of the waste treatment facility have been assessed. The development proposals include

the installation of two new gas-fired steam boilers, as well as two new disinfectant lines to the existing facility;

- The assessment demonstrates that the development-generated changes in traffic volumes on the local road network will be below published screening criteria, and thus there will be no significant effects at any local roadside receptors;
- The assessment also demonstrates that the emissions of the proposed plant within the facility will not lead to any exceedances of the nitrogen dioxide and benzene air quality objectives. Furthermore, the combined effect of plant emissions and road traffic are not judged to have a significant impact on local air quality; and
- Overall, the operational air quality effects of the proposed refurbishment and improvement of the waste treatment facility are judged to be 'not significant'.

6.25. While in respect of odour:

- The odour effects of the proposed refurbishment and improvement of the waste treatment facility on nearby sensitive receptor locations has been assessed, utilising an odour risk assessment;
- The odour risk assessment has identified a potential for slight adverse odour effects at sensitive receptor locations resulting from the operation of the healthcare waste treatment facility. However, this adverse effect is experienced at just two residential properties. Furthermore, guidance considers a slight adverse odour effect to be not significant; and
- Overall, and considering the location of the receptors, within a heavily industrialised area where other significant odour sources are present, it is judged that the odour effects associated with the waste treatment facility will be not significant at nearby sensitive receptor locations.

6.26. In light of the above, it is considered that the proposed waste management facility would be operated in a way that minimises the environmental impact of the facility. There would be no adverse impact on air quality in the area and nor would the facility pose an unacceptable risk to public health or quality of life of users of other premises in the industrial estate.

6.27. Accordingly, there would be no conflict with Policies CS2 of the Core Strategy and WM12 of the Waste Local Plan.

Issue 5 – Noise

6.28. Similarly, it is considered that the operation of the proposed facility would be acceptable in terms of noise. The planning application is accompanied by a Noise Assessment which has calculated noise levels and assessed them against the requirements of BS 4142 to identify any potential adverse impacts.

6.29. The Noise Assessment concludes that:

- A noise monitoring exercise was carried out to establish the noise levels attributable to the operation of the existing plant and at the closest noise-sensitive receptors, located along Depot Road to the north.

- Noise levels associated with the existing and proposed operation of the site have been calculated, taking account of noise within the building and associated with the external vehicle movements.
- The calculated noise levels in the assessment undertaken indicate that the proposed operation of the site would continue to generate very low levels of noise at the neighbouring residential properties, which would result in no adverse effects, when assessed against other absolute noise standards.

6.30. In light of the above, it is considered that the proposed waste management facility would not give rise to any noise pollution issues or nuisances to occupiers of other units on the industrial estate.

6.31. Accordingly, there would be no conflict with Policies CS2 of the Core Strategy, ENV2 of the UDP and WM12 of the Waste Local Plan.

Issue 6 – Amenity

6.32. The proposed waste management facility has already been assessed under Issues 5 and 6 in terms of air quality, odour and noise. The proposed development has found to be acceptable in all respects without harming the amenities of occupiers of units elsewhere on the industrial estate.

6.33. The application site is located within a preferred location for this type of facility and already operates with the benefit of planning permission as a waste management facility. It is considered that the scale of the operation now proposed will continue to remain appropriate to its location and compatible with neighbouring land uses. The proposal would therefore not give rise to any pollution issues or nuisances to the detriment of others.

6.34. Accordingly, there would be no conflict with Policies CS2 of the Core Strategy and WM12 of the Waste Local Plan.

Issue 7 – Flood Risk and Drainage

6.35. The majority of the application site is located within Flood Zone 1 with a small part of the site in the north-western corner located within Flood Zone 2. The planning application is therefore accompanied by a Flood Risk Assessment (FRA) which assess the impact of the proposed development on flood risk and sets out the existing and proposed drainage arrangements for the site.

6.36. The FRA concludes that:

- Environment Agency data has been utilised to assess the risk of flooding to the site inclusive of climate change. The data shows flooding would be contained to external and vehicular circulation areas only to the northernmost part of the site, with all existing building floor levels remaining above the predicted flood level;
- Localised depressions on the site as well as parts of the highway network is predicted to be at risk of surface water flooding, however, as with fluvial flooding, this would only affect external circulation areas of the site;

- The site is at low or negligible risk of flooding from groundwater, sewers or artificial sources;
- The proposed refurbishment of the existing drainage system would likely reduce the surface water flood risk posed to the site and also potentially improve the drain down of any fluvial flooding that could impact the site. It would also relieve known pressures on a United Utility foul sewer crossing the site, by redirecting some surface water to storm sewers, as opposed to the foul sewer as is currently the case; and
- Given the proposed site use, the nature of the flood risk and the proposed drainage improvements, no specific mitigation measures are deemed required.

6.37. In light of the above, the proposed waste management facility would not give rise to an increased risk of flooding to other premises on the industrial estate or elsewhere in the wider area.

6.38. Accordingly, there would be no conflict with Policies CS24 of the Core Strategy and WM12 of the Waste Local Plan.

Issue 8 – Other matters

6.39. The preceding issues deal with the main planning considerations relevant to the determination of the planning application. Consideration has also been given to other matters such as:

6.40. **Ecology** – in the pre-application advice received from the Council, it was confirmed that:

- The Knowsley Industrial Park is of “...very limited ecological value...” and there are no Priority Habitats in the near vicinity;
- A full ecological appraisal is unlikely to be required as part of any future proposal;
- Any works to add additional loading bays and shutters are unlikely to impact on bats; and
- The existing waste management practice means buildings are well-maintained and opportunities for other species, such as breeding birds, are not evident and do not need to be considered further.

6.41. Accordingly, the proposed development would have no adverse impact in terms of ecology and there would be no conflict with Policies CS2 of the Core Strategy and WM12 of the Waste Local Plan.

6.42. **Heritage** – in the pre-application advice received from the Council, it was confirmed that:

- There are no heritage assets recorded on the Merseyside Historic Environment Record; and
- The proposed development site is considered to have negligible archaeological potential and archaeology does not need to be considered further for this application.



- 6.43. Accordingly, the proposed development would have no adverse impact in terms of built heritage and below ground archaeology and there would be no conflict with Policies CS2 and CS20 of the Core Strategy and WM12 of the Waste Local Plan.

7. Summary and Conclusions

- 7.1. The Applicant seeks full planning permission for the alteration, extension and refurbishment of an existing waste management facility on the Knowsley Industrial Park to facilitate the enhanced operation of the facility.
- 7.2. The existing facility granted planning permission in 2013 and the principle of development is therefore already established. Its continued and efficient use is supported by planning policy in the adopted Core Strategy and the Waste Local Plan.
- 7.3. The works to the building to facilitate the enhanced operation of the facility are considered to be modest and the resultant building would remain in-keeping with the industrial character of the area. The proposed development has also been shown to be compatible with businesses in the immediate and wider area in terms of highways movements, air quality, noise and amenity.
- 7.4. The proposed development would not give rise to an increased risk of flooding to existing premises in the area or elsewhere on the wider industrial estate.
- 7.5. Furthermore, the Knowsley Industrial Park is considered to be of low ecological value and there are no built heritage or below ground archaeology interests in the area that would be affected by the proposals.
- 7.6. The proposed development therefore represents a suitable and sustainable form of development in this location and that there are compelling reasons that justify the grant of planning permission.
- 7.7. In view of the forgoing, the WPA is respectfully requested to grant planning permission for the proposed development, subject to any necessary conditions. The Applicant would welcome discussions during the consideration of the application to minimise or avoid any pre-commencement planning conditions.
- 7.8. As such, this planning application should be approved without delay.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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