



UNIT 32-34, CAPITOL TRADING PARK,
KIRKBY BANK LANE, KIRKBY INDUSTRIAL PARK, L33 7SY

PLANNING STATEMENT

Including Flood Risk Assessment

on behalf of
OEG TRAINING

DECEMBER 2025

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Version	Date	Reason for revision
01	27/10/2025	First issue
02	04/11/2025	Amendments following client comments
03	06/11/2025	Minor amendments
04	08/12/2025	Minor amendments re: validation

1. Introduction

- 1.1 This Planning Statement is submitted in connection with a planning application for full planning permission for the *'Change of use to a training centre (Use Class F1(a)) and siting of storage container and electric vehicle charging point and layout of car park'*. No external alterations to the building are involved with the proposal.
- 1.2 The Statement considers the key local planning policies relevant to the site and the development. It provides an assessment of the development against the policy requirements and puts forward any material considerations that are also relevant to the application.
- 1.3 According to the GOV.UK site, 'flood map for planning', the car park lies in Flood Zone 2 (see Appendix A). As such, an assessment of flood risk, proportionate to the site and the proposal, is included within this Statement.
- 1.4 The application property is located within the Primarily Industrial Area (Kirkby Industrial Estate) on the Local Plan policies map. It is not located within a Conservation Area and no other similar statutory designations apply to the application site.
- 1.5 The planning application package includes the following material:
- Completed householder planning application form and Certificate of Ownership,
 - Drawings including:
 - 416-001 Rev A – Existing site plan and location plan
 - 416-002 Rev A – Existing ground floor plan
 - 416-003 Rev A – Existing elevations
 - 416-004 Rev A – Proposed site plan
 - 416-005 Rev A – Proposed ground floor plan
 - 416-006 Rev A - Proposed elevations,
 - 416-007 Rev A – Proposed container details,
 - Planning Statement including Flood Risk Assessment, and
 - Statutory fee for a full planning application.

2. The Proposal

- 2.1 The proposal seeks to change the use of an existing unit at the Capitol Trading Park to a training centre (Use Class F1(a)) and the siting of a storage container. The unit has an established use for general industrial (Use Class B2), storage and distribution (Use Class B8) and business (Use Class E(g)(i-iii)) which was previously Use Class B1. The use of the unit as a training centre would be considered a material change of use and therefore planning permission is required.
- 2.2 OEG Training, based in Bootle, is a specialist provider of safety and competence training for the Wind Energy sector, both within the UK and internationally. In response to growing industry demand for a skilled workforce, OEG Training is planning to expand beyond its current facility to meet both external and internal training needs. This includes supporting workforce development across sister companies within the OEG Group and broadening the course portfolio to include new training disciplines.
- 2.3 OEG Training has established strong and successful partnerships with key organisations including the Department for Work and Pensions, ReAct Funding for Training (Careers Wales), Trade Skills Ltd, and is currently in active discussions with the Liverpool City Region Combined Authority regarding the Adult Skills Fund. These collaborations aim to deliver targeted upskilling and retraining initiatives that support the local workforce and create clear pathways into the rapidly growing renewable energy sector.
- 2.4 The skills gap in the renewables sector has been highlighted in the RUK – Wind Industry Skills Intelligence Report (June 2025), which states:
- "There is significant potential for wind energy to continue delivering a substantial skills and jobs dividend for the UK as part of its clean energy transition. To meet minimum government targets, 75,000 workers will be needed in offshore wind and 19,000 in onshore wind by 2030. More ambitious plans could require over 94,000 offshore wind workers to deliver 52GW by 2030, with an additional 10,000 jobs possible through strategic supply chain growth."*
- 2.5 Across the UK, and particularly in the Northwest of England, there is a widely acknowledged skills gap, especially in industries transitioning from traditional manufacturing and maritime expertise to renewable energy. Industry leaders are calling for urgent reskilling and skills transfer to meet the demands of this evolving landscape.
- 2.6 A highly skilled and knowledgeable workforce is essential to attracting renewable-focused companies to the region. With the Celtic Sea emerging as a key area for development, the availability of specialised training is a critical factor in regional competitiveness. OEG Training is already delivering this mandatory training and is committed to expanding its footprint in the Northwest supporting not only the reskilling of the current workforce but also preparing the next generation through strategic partnerships with local colleges and universities.
- 2.7 By aligning educational pathways with industry needs, OEG Training ensures students are equipped with the skills required to contribute locally, reducing reliance on transient workforces and strengthening the region's position in the UK's renewable energy future.

- 2.8 OEG is a trusted leader in energy solutions, delivering mission-critical infrastructure, advanced technologies, and integrated services to the global energy industry. Since its founding in 1973, it has grown through strategic acquisitions and organic expansion to become a vital partner in energy project delivery worldwide.
- 2.9 Its expertise spans above-water, on-water, and subsea applications, supporting energy production across electricity, gas, and oil. From offshore logistics and bespoke equipment to full-scope integrated services, OEG enable efficient development, construction, operations, maintenance, and decommissioning of energy assets.
- 2.10 OEG's journey has been shaped by the integration of some of the industry's most innovative companies. Collectively, it has contributed to 97% of global wind farm developments, an achievement that underscores its commitment to driving project efficiency and reducing interface risk for their clients.
- 2.11 The proposed expansion to be located at the application site will offer a comprehensive range of accredited training programmes, including:
- GWO (Global Wind Organisation)
 - IRATA (Industrial Rope Access Trade Association)
 - City & Guilds (Confined Space)
 - iCATS (Industrial Coating Applicator Training Scheme)
 - STCW (Standards of Training, Certification and Watchkeeping)
- 2.12 These programmes are recognised both nationally and internationally, ensuring high standards of training delivery.
- 2.13 Due to the specialised nature of the training, the facility must meet specific criteria, including:
- Minimum internal ceiling height of 8 metres to accommodate working-at-height and rope access training.
 - A pool and HUET (Helicopter Underwater Escape Training) module to support mandatory training for both Renewables and Oil & Gas sectors.
 - Indoor training capability to ensure year-round delivery unaffected by weather conditions.
- 2.14 Currently, the nearest facilities offering HUET are located in Fleetwood (Lancashire) and Hull (East Yorkshire), which presents logistical challenges for local trainees.
- 2.15 The new facility will also support training in:
- Electrical, hydraulic, and mechanical systems
 - Bolt tightening
 - Protective coatings
 - Lift and crane operation and maintenance
- 2.16 This will establish a comprehensive "one-stop shop" for green energy safety and technical training.

2.17 OEG Training anticipates creating; 5 full-time equivalent (FTE) roles and 10 contracted positions. The facility is expected to initially have 20-30 delegates per week, through a mix of 1-5 day courses. It is proposed to operate:

- Monday to Friday - 07:30-18:00.
- Saturday – 07:30-17:00
- Bank Holiday – 07:30-18:00
- Sunday – closed

2.18 A storage container measuring 6.096m (20ft) in length, 2.44m (8ft) in width and 2.59 (8ft, 6 inches) in height is to be located within one of the loading bays.

2.19 27no. car parking bays are to be delineated in the existing communal parking areas. Two of these will be disabled parking bays and one bay will have an electric vehicle charging point. 2 motorcycle parking spaces are provided as well as cycle parking for 6no. cycles. A service and delivery zone is provided adjacent to the bay to Unit 34. Pedestrian routes are to be painted within the car park area to delineate safe corridors for staff and visitors from the car park to the building.

3. The Site and its Surroundings

- 3.1 Units 32-34 are located to the south of the Capitol Trading Park (CTP) which comprises a collection of industrial, warehousing and other related commercial units within the Kirby Industrial Estate. There are approximately 22 units within the CTP which are accessed off Kirkby Bank Road and Acornfield Road. It is one of 3 units within a terrace of similar units on the south side of the CTP accessed off Acornfield Road.
- 3.2 The application property is a steel portal frame building with concrete floor, brick and insulated metal profile cladding to the elevations and insulated metal profile roof panels. It includes three large roller shutter doors as well as three pedestrian doors. There are four windows to the front elevation. It has a floor area of approx. 1,362sqm.
- 3.3 To the front of the application property is the internal access road along with communal parking for staff and visitors and three service/delivery bays. There are no delineated car parking spaces. There is a 10mph speed limit on the internal access road.
- 3.4 To the south of the application property are industrial and other commercial units and yards that front onto Yardley Road. To the north of the application property are other commercial and industrial units within the CTP.
- 3.5 The application property is within the Kirkby Industrial Estate. There are no residential properties close to it.
- 3.6 There are bus stops on Acornfield Road. These provide regular weekday and weekend services to Queen's Square Liverpool and Kirkby Bus Station (service 17A), between Page Moss and Kirkby Admin via Kirkby Industrial Estates (services 898 & 899) and a circular to and from Kirkby rail station (service 97A).

4. Planning History

4.1 From a search on the Council's planning portal the following applications relate to the Capitol Trading Park:

- 98/00312/APP: Amendment to planning permission APP/95/661 for changes to ... (no further information on the portal) – granted 20/08/1998.
- 97/00511/APP: Application to vary condition no. 11 on planning permission ... (no further information on the portal) - granted 03/12/1997.
- 97/00240/APP: Erection of 8 no. Industrial units – granted 28/08/1997.
- 95/00661/APP: Refurbishment of existing industrial premises to form B1, B2 ... (no further information on the portal) - granted 15/07/1996.

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4.2 The following recent applications relate to the use of land or buildings for a training centre/facility (Use Class F1(a)) within a Primarily Industrial Area or where there has been a restriction on the use of a building to Use Class B1 and B8 uses:

Land At Ainsworth Lane (Adjacent to Flogas), Knowsley Business Park

- 22/00412/FUL: Change of use of land to form HGV training and testing centre including the erection of 1 no. single storey building, widening of existing vehicular accesses and other associated works – granted 29 November 2022.

Earlsfield Park, land At Knowsley Lane, Knowsley, L34 4AH

- 24/00686/FUL: Variation of condition 26 attached to planning permission 20/00376/OUT (outline planning permission for 30,530 sq m of employment floor space (use class B1 / B8) - access to be considered at this stage (all other matters reserved) to allow for the extended use of unit 3 from class B1 (now class E(g) (ii) (iii)) and class B8 to include class F1 (a), training facilities – granted 13 March 2025.

5. Relevant Planning Policy

- 5.1 In making decisions on a planning application the local planning authority must have regard to the provisions of the development plan, where material to the application, unless there are material considerations that indicate otherwise (section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town & Country Planning Act 1990). The National Planning Policy Framework (NPPF) (February 2025) represents up-to-date government planning policy and is a material consideration that must be taken into account where it is relevant to a planning application. This is supplemented by the Planning Practice Guidance (PPG).

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National Planning Policy Framework (February 2025)

- 5.2 Paragraph 85 states 'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future'.
- 5.3 Paragraph 87 states 'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:
- a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);
 - b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and
 - c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience'.

Adopted development plan

- 5.4 The relevant development plan for Kirkby consists of the Knowsley Local Plan Core Strategy (2016) and the saved policies within the Knowsley Replacement Unitary Development Plan (2006). The site is located on land designated as Primarily Industrial Area (PIA) on the Local Plan policies map. The following policies are relevant to the site and proposed development:

Knowsley Local Plan Core Strategy (2016)

- SD1 - Sustainable Development
- CS1 - Spatial Strategy for Knowsley
- CS2 - Development Principles
- CS4 - Economy and Employment
- CS11 - Principal Regeneration Area - Knowsley Industrial and Business Parks
- CS19 - Design Quality and Accessibility in New Development
- CS24 - Managing Flood Risk
- CS26 - Waste Management

Saved policies within the Knowsley Replacement Unitary Development Plan (2006)

- EC3 - Primarily Industrial Areas

5.5 The following guidance is also relevant:

- Ensuring a Choice of Travel Supplementary Planning Document (2010)

5.6 There is no neighbourhood plan in force for the area.

6. Policy Assessment

6.1 This section assesses the proposal against the relevant policies within the adopted development plan.

Principle of development

6.2 Core Strategy policy **CS1** provides the principles for the borough's spatial development and highlights the development priorities and areas which will be of strategic importance over the period up to 2028 and beyond. The borough's spatial development is to be achieved through focusing development within the existing urban area and maximising its contribution to the development of the Liverpool City Region and key sub-regional projects. Knowsley Industrial Park is identified as one of the borough principal regeneration areas. A key spatial development priority is enhancing existing employment areas and providing a suitable range of sites and premises for new employment development.

6.3 Core Strategy policy **CS2** establishes the principles for sustainable development in Knowsley. Of particular relevance is promoting sustainable economic development through improving business productivity and employment levels and reducing economic, education and other social inequalities between Knowsley and other parts of the UK.

6.4 In terms of the overall development strategy for the borough, Core Strategy policy **CS4(1)** states that planning will be used to (inter alia):

- Support sustainable economic growth and meet the development needs of established and emerging employment sectors, including the Liverpool City Region key economic sectors.
- Address skills and educational barriers to employment.
- Provide sufficient land to meet employment development needs to 2028.

6.5 Part 7 of policy **CS4** states that land which is currently in use or allocated for employment development will be safeguarded from changes to other types of development, except where:

- there is no current or likely future demand for employment uses on the land or,
- where other uses would bring wider, regeneration, environmental and amenity benefits.

6.6 The Reasoned Justification (RJ) to the policy states, 'Knowsley's economy is inextricably linked with that of the wider Liverpool City Region, with the borough's large employment areas providing thousands of jobs for residents of Knowsley and of adjoining boroughs'. It goes on to state, the Liverpool City Region Local Enterprise Partnership (LEP) has identified four key sectors that have potential to create new jobs and new opportunities. One of these sectors is the Low Carbon Economy with job creation and growth through new opportunities in the low carbon sector including: renewable energy generation. The RJ states that Knowsley Industrial Park is home to a growing nucleus of businesses in renewable energy and environmental technologies and has the potential to be a 'Green Energy Hub'.

- 6.7 The RJ also states that the Council's Economic Regeneration Strategy identifies that, in addition to supporting the growth of business and job opportunities, it is crucially important to provide policy interventions which help Knowsley residents to access the job opportunities which exist. This includes 'implementing initiatives which provide training and support attainment levels of residents'.
- 6.8 The Liverpool City Region Green Jobs & Skills Plan (2022) references that the Offshore Wind Industry Council produced UK sector employment forecasts based on an estimated investment of £60.8bn over the period 2021-26. This is estimated to have the effect of increasing the current sector workforce of 26,093 by 43,755 to a total of 69,848 in 2026. The model also provides a regional forecast for the Offshore wind sector employment for the northwest being 7% of the national sector growth. Around a fifth of these jobs might be expected in LCR or around 600 new jobs by 2026.
- 6.9 The Liverpool City Region Long-Term Skills Plan (September 2024) recognises there are a range of emergent green jobs and skills opportunities coming forward in the City Region, which includes amongst others offshore wind energy (Liverpool Bay). The skills needed are broadly understood and there are a range of training facilities in place across colleges, training providers and universities but there is a need for employers and providers of training to continue to engage in detail about needs and opportunities to ensure that skills supply can be provided in due course. We have a number of important employer insights into Green Skills in the future skills part of the LSIP report and evidence base.
- 6.10 A central focus of the Long-Term Skills Plan (September 2024) is to ensure that workforce skills align with high-demand sectors such as health, green technology, and life sciences, driving sustainable economic growth within the region. Through partnerships with local businesses and educational institutions, the plan seeks to meet industry demands for specific skills, fostering job creation and building economic resilience across Liverpool City Region.
- 6.11 The Knowsley 2030 Strategy recognises that there remains a skills shortfall particularly when compared to national skills levels. The Strategy requires the Council to work with all stakeholders to provide tailored business, employment and skills support to ensure more residents will have the relevant skills to secure the job opportunities in Knowsley, the Liverpool City Region and beyond.
- 6.12 Saved UDP Policy **EC4** states that proposals for development for uses other than Business (Class B1)¹; General Industry (Class B2); and Storage and Distribution (Class B8) uses in Primarily Industrial Areas will only be permitted where they would:
- Be complementary to and compatible with the surrounding employment uses;
 - Be consistent with any approved regeneration strategy for the area;
 - Preserve or enhance the image of the industrial area; and
 - Avoid causing an unacceptable loss of land available for industrial development.

¹ Now Use Class E(g)(i-iii).

- 6.13 Although not a use that would come under the broad use class categories in the paragraph above, the proposal would bring wider regeneration, environmental and amenity benefits as summarised below.
- 6.14 The proposal seeks to use the unit as a training centre to provide skills and qualifications for the Low Carbon Economy sector, particularly in the Wind Energy industry. This is a key sector nationally and locally within the Liverpool City Region. There is a recognised shortage in skills and jobs within this sector to enable the UK and the region to deliver on the country's energy transition and green economy. As mentioned above, Knowlsey Industrial Estate is identified as a Green Energy Hub with many businesses working within the renewable energy sector. The proposed training centre will support these businesses through providing training, skills and qualifications to their workforce close to their operations thereby reducing travel/accommodation costs. The specialised nature of some of the training courses proposed means that it will also meet the needs of businesses from further afield. For example, the nearest facilities offering HUET are located in Fleetwood (Lancashire) and Hull (East Yorkshire) which are approx. 54 miles and 120 miles from the application site respectively.
- 6.15 As well as providing skills and qualifications to the existing local workforce, the proposal will also provide skills for those wish to enter employment within this growth sector. In addition, the training centre is anticipated to create 5 full-time equivalent (FTE) trainer roles and 10 contracted trainer positions. It will therefore create educational, skills and employment benefits with direct and indirect employment benefits creating jobs on site and skills to individuals to secure skilled jobs.
- 6.16 The specialised nature of the training and associated equipment means that the applicant requires specific accommodation needs. This includes equipment that enables trainees to work-at-height and as well as equipment such as cranes, frames and suspended ropes. In addition, there will be a pool with a capsule suspended over it for the HUET. The building therefore needs to have a high floor to ceiling (at least 8m) and eaves heights (at least 6m). Such buildings are not generally found outside of industrial estates or business parks.
- 6.17 The training centre, with its associated industrial equipment, plant and machinery, is compatible with the industrial character of the area. It is also complementary to the surrounding employment uses providing skills and development opportunities to the workforce within the businesses in the area. By providing training, skills and qualifications within a growth sector to the national, regional and local economy, the proposal will contribute towards strategies such as the Liverpool City Region (LCR) Green Jobs & Skills Plan (2022), the LCR Long-Term Skills Plan (September 2024) and the Knowsley 2030 Strategy.
- 6.18 The proposed use of the unit as a training centre retains the image of the Capitol Trading Park as a high quality industrial park and ensures there is no potential for a longer term vacancy which could detract from the area. The proposal involves the change of use of the building only and there are no extensions or alterations required. Should the training centre use no longer be required in this building it could clearly be used for 'traditional' employment development in the future.

6.19 Core Strategy **CS11** identifies Knowsley Industrial Park as a 'Priority Zone' to promote the production of renewable, low carbon and decentralised energy. The Reasoned Justification to the policy states the 'Delivering a New Future for Knowsley Industrial Park: Strategic Framework' document identified potential scope for Knowsley Industrial Park to become a Green Energy Park/Hub. This would support a strong renewable energy business sector within Knowsley, encourage growth of existing businesses and help attract more businesses from this sector into the borough.

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6.20 The application proposes to use the site as a training centre and this is not an employment use as required under policy **CS4** and saved policy **EC4**. However, the proposed use would help to address an identified skills shortage that would bring about wider regeneration benefits. It would also have some limited amenity/environmental benefits in reducing the possibility of a long term vacancy. Given that the proposal is compatible and complementary with the industrial park and that it would not result in a permanent loss of 0.2ha of employment land, it is considered that on balance the principle of the development is acceptable and considered to comply with policies **CS4** and **EC4**. In addition, the proposal to use the unit as a training centre accords with NPPF paragraph **85** and **87**. The training centre, focused on the Wind Energy sector, will support the initiative to make the Industrial Park into a Green Energy Hub by providing training, skills and qualifications within the renewable energy sector. It therefore complies with this aspect of policy **CS11**.

Design and visual amenity

6.21 There are no proposed alterations to the elevations or roof of the building. Its appearance will remain as existing which retains its character as a modern industrial unit within the wider Industrial Estate. The siting of a storage container within one of the loading bays is considered to be appropriate to the character of the industrial estate. As it is located within the loading bays its impact on visual amenity is lessened. It is therefore considered to comply with the relevant aspects of policy **CS19**.

Residential amenity

6.22 There are no houses within close proximity of the site. The proposal will therefore not harm residential amenity.

Highways

6.23 The application site includes the trading estate's internal access road, parking area and 3no. delivery bays. The internal access road has 10mph speed limit. The proposal includes the delineation of 27no. car parking spaces within the parking area (two of which are disabled bays and one is an electric vehicle charging point), 2no. motorcycle spaces and 6no. cycle stands which are located under the roof overhang adjacent to one of the pedestrian doors. A service and delivery zone is provided adjacent to the bay to Unit 34. In addition, pedestrian walkways are to be painted within the parking area to delineate safe pedestrian routes within the site. Staff and visitors would access the unit, through existing pedestrian doors, in the same way as currently.

6.24 There is no parking standard for a training centre within the Ensuring a Choice of Travel SPD. However, 27no. car parking and 2no. motorcycle spaces are considered to be sufficient parking to accommodate the proposed use. In addition, there is some unrestricted parking on Acornfield Road that could accommodate any overspill parking should it arise. Cycle parking, showers and changing facilities within the building provides opportunities for alternate modes of travel. There is also bus stops close to the site providing opportunities to travel to and from the site by public transport.

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6.25 The change of use from a Use Class B2, B8 or E(g)(i-iii) unit to a Use Class F1(a) training centre is not considered to have an unacceptable impact on highway safety. As such it accords with policy CS19 and NPPF paragraph 116.

Biodiversity Net Gain

6.26 The proposal does not include any extensions or new development. It relates to the change of use of an existing building. It is therefore a de-minimis exemption from the requirement to provide 10% biodiversity net gain.

Waste storage

6.27 The proposal includes the incorporation of part enclosed waste storage facilities within the right hand loading bay area which is within the curtilage of the application site. This is shown on the proposed site plan. The bins can be easily accessed from within the building. The bins will be emptied as per the arrangements within the trading estate. The proposal is considered to comply with the relevant aspects of policy CS26.

Flood risk

6.28 As mentioned in Section 1, according to the GOV.UK 'flood map for planning' the car park within the application site is located within flood zone 2. According to the GOV.UK information, the flood source is a river which it is assumed to be one of the brooks/ditches to the east of Perimeter Road. However, there is no known instances of flooding in or around the application site. Footnote 63 of the NPPF states that a site specific flood risk assessment is required where the site is within flood zone 2. The following paragraphs provide an assessment of flood risk as required by the NPPF and NPPG. According to the NPPG, a flood risk assessment needs to be appropriate to the scale, nature and location of the development. The NPPG states the objectives of a site-specific flood risk assessment are to establish:

- whether a proposed development is likely to be affected by current or future flooding from any source;
- whether it will increase flood risk elsewhere;
- whether the measures proposed to deal with these effects and risks are appropriate;
- the evidence for the local planning authority to apply (if necessary) the Sequential Test, and;
- whether the development will be safe and pass the Exception Test, if applicable.

6.29 In relation to the latter two points above, according to NPPF paragraph 176 applications for a change of use should not be subject to the sequential test. As such, a Sequential Test to determine whether there are preferable sites elsewhere (from a flood risk perspective) is not required. As such the Exception Test is also not required.

6.30 The flood map for planning shows that the car park is within flood zone 2 and the building is in flood zone 1 (i.e., at lower risk of flooding). The flood map does not show any change in the flood zone when accounting for climate change. According to Annex 3 of the NPPF 'Flood risk vulnerability classification', car parks are considered 'less vulnerable'. A training centre is not listed within the Annex. The nearest equivalents are non-residential uses for education establishments and buildings used for non-residential institutions not included in the 'more vulnerable' class. The former is classed as 'more vulnerable' and the latter as 'less vulnerable'. In this context, an educational establishment is considered to be a school, college or university but not a training centre. Therefore, the training centre is considered a 'less vulnerable use'. Although the car park and training centre are considered 'less vulnerable', the car park would be classed as the least vulnerable of the two.

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6.31 According to the 'flood map for planning', the application site is not impacted by surface water in the 3.3% (1 in 30) or 1% (1 in 100) chance of flooding each year. However, it is impacted by surface water in the 0.1% (1 in 1,000) chance of flooding each year.

6.32 The finished floor level to the unit is approximately 130mm higher than the ground level to the car park. This is evidenced by the slight ramp up from the car park to the roller shutter doors. This will help reduce potential flooding within the unit itself. The building has access to an emergency escape route to the rear which provides egress adjacent to Unit 36. According to the flood map for planning this area is in flood zone 1 and not at risk of the 0.1% chance of surface water flooding. Therefore, in the event of flooding there is safe access and an escape route.

6.33 The proposal is for the change of use of the building only. There are no external alterations or extensions. The site comprises of the building and hardstanding for the car park. There are no permeable areas within the site. Therefore, the proposal does not lead to an increase in run-off than the existing situation. As such it is not considered to increase flood risk elsewhere.

6.34 NPPF paragraph 181 states development should only be allowed in areas at risk of flooding where, in the light of this assessment it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
 The most vulnerable development, i.e., the training centre, is located in the area of lowest risk. The car park is located in the area of higher risk.
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

The training centre includes equipment, plant and machinery that is generally considered water compatible as they are used on offshore windfarms. The modular classrooms and canteen area could be brought back into use or replaced without significant disruption.

- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

The Unit and trading estate already have a drainage system.

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- d) any residual risk can be safely managed; and

Any residual risk can be safely managed through OEG Training's risk assessments and health and safety procedures.

- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

As mentioned above there is a safe and secure escape route to an area which is not at risk of flooding.

6.35 In light of the above assessment, it is considered that the proposal does not increase the risk of flooding elsewhere. In addition, it is at low risk of flooding with the building being at lowest risk. The building, its use and contents are considered to be at lower end of the vulnerability to flooding classification. Risks can be mitigated for and there are safe and secure escape routes. The proposed development is considered to comply with NPPF paragraphs **176** and **181** and policy **CS24**.

7 Conclusion

- 7.1 The Statement has demonstrated that the proposal complies with the relevant policies within the adopted development. The proposed training centre is considered to be a compatible and complementary use within the Primarily Industrial Area. In addition, it provides significant regeneration benefits through providing skills, training and qualifications within the Low Carbon Economy and Renewable Energy Sector to the workforce and residents within the borough, the Liverpool City Region and further afield.
- 7.2 The proposal is considered to be acceptable in terms of design, residential amenity, highways and parking and waste storage. The proposal is exempt from the 10% biodiversity net gain requirement.
- 7.3 The Statement has also assessed that the site is at low risk of flooding and the proposal does not increase the risk of flooding elsewhere. Mitigation measures can reduce any residual risks and there are safe and secure escape routes to areas outside of any flood risk.
- 7.4 In line with paragraph 11 of NPPF, as the proposal accords with the relevant policies of the adopted development plan, the presumption in favour of sustainable development should be applied and it is respectfully requested that planning permission is granted for the proposed development.

Appendix A: Flood map for planning



Flood map for planning

Your reference	Location (easting/northing)	Created
Unspecified	343536/398453	27 October 2025 09:27

Your selected location is in flood zone 2, an area with a medium probability of flooding.

This means:

- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency's standing advice for carrying out a flood risk assessment (see <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice>)

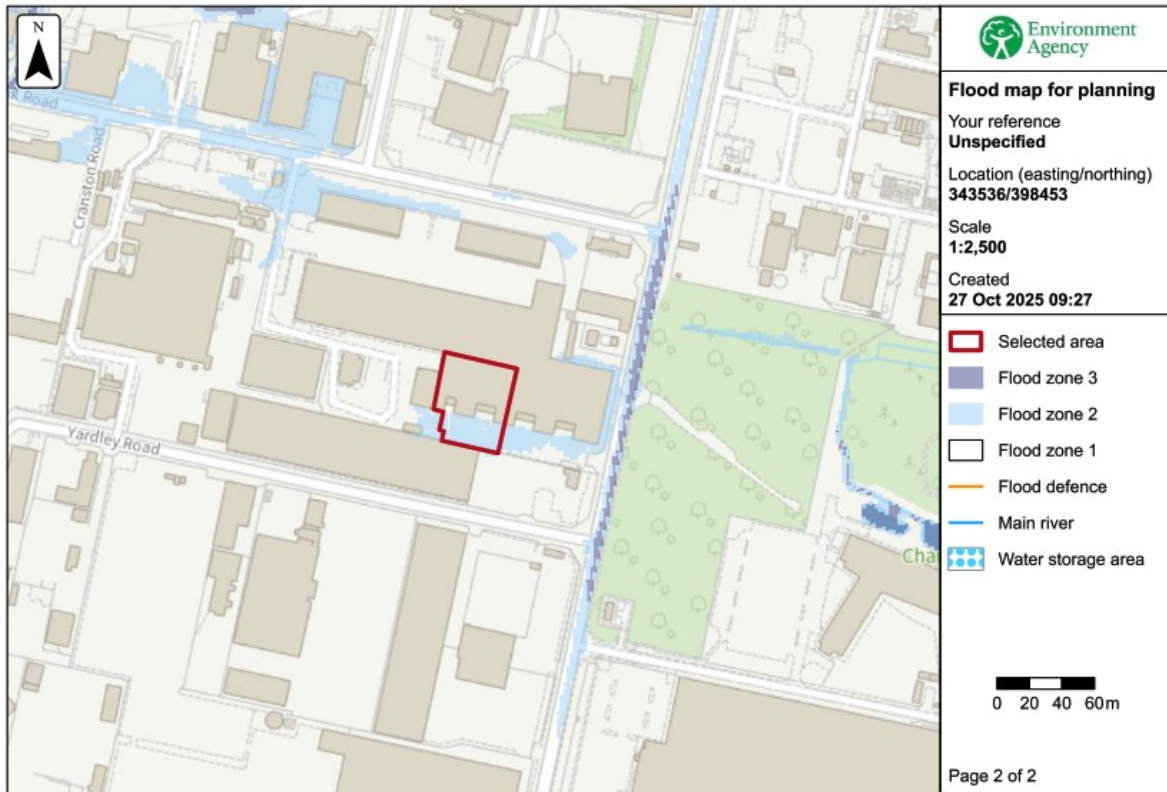
Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

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