

# Planning Statement: Land at Penrhyn Road, Knowsley

On behalf of:  
Knowsley Redevelopments Limited

February 2022  
JWIL/DPA/U0017383



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Appendix A Site Location Plan

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## 1 INTRODUCTION

- 1.1 Gerald Eve LLP is instructed by Knowsley Redevelopments Limited (“the Applicant”) to prepare this Planning Statement in support of a full planning application for the redevelopment of land at Penrhyn Road, Knowsley Industrial Estate, L34 9HY (“the Site”) to provide 18,554sqm of industrial and logistics accommodation.
- 1.2 This application is submitted in full and the description of development (herein referred to as “the Proposal”) is as follows:

*“Full planning application for the erection of 18,554sqm (GIA) of industrial and logistics floorspace (Use Classes B2, B8 and E(g)(iii)) with ancillary offices (Use Class E(g)(i)), security gatehouse, transport office, parking and associated works.”*

- 1.3 This planning application has been submitted electronically via the Planning Portal (Planning Portal reference: PP-08803456). The Proposal is submitted in accordance with Section 70 of the Town and Country Planning Act (1990), as amended and the relevant provisions of the Town and Country Planning (Development Management Procedure) (England) Order (2015).
- 1.4 The following documents/drawings have been submitted in support of this application:

### **Statutory Application Documents**

- Planning Application Form (signed and dated)
- Land Ownership Certificates (signed and dated)
- Site Location Plan (1:1250) – Ref: P0101 Rev. A
- Design and Access Statement Rev.B (February 2022) prepared by UMC Architects

### **Drawing Pack prepared by UMC Architects**

- Proposed Site Layout (1:500) – Ref: P0102 Rev.D;
- Proposed Fence Layout (1:500) – Ref: P0103 Rev.B;
- Proposed Cycle Shelter & Waste Area Details (1:25) – Ref: P0104 Rev.B;
- Proposed Pedestrian & Cycle Routes (1:500) – Ref: P0105 Rev.B;
- Proposed External Finishes (1:500) – Ref: P0106 Rev.B;
- Proposed Gatehouse Layout & Elevations (1:50) – Ref: P0107 Rev.B;
- Proposed Warehouse Plan (1:250) – Ref: P1001 Rev.A;
- Proposed Main Office Plan (1:100) – Ref: P1002 Rev.A;
- Proposed Transport Office Plan (1:100) – Ref: P1003 Rev. A;

- Proposed Elevations (1:200) – Ref: P1004 Rev. B;
- Proposed Roof Plan (1:200) – Ref: P1005 Rev.B;
- Indicative CGIs – Ref. P3000; P3002; P3002; P3003

#### **Supporting Drawings**

- Proposed Softworks Plan prepared by FPCR – Ref. 10585-FPCR-XX-XX-DR-L-0001
- Existing Stockpiles prepared by Burrows Graham – Ref. 21065-BGL-XX-XX-DR-S-0202 Rev. P1;
- Proposed Levels prepared by Burrows Graham – Ref. 21065-BGL-XX-XX-DR-S-0200 Rev.P3;
- Proposed Earthworks Volumes prepared by Burrows Graham – Ref. 21065-BGL-XX-XX-DR-A-0201 Rev. P2;
- Vehicle Swept Path Analysis prepared by Burrows Graham – Ref. 21065-BGL-XX-XX-SK-S-0001 Rev. P6;
- Site Access General Arrangement prepared by Burrows Graham – Ref. 21065-BGL-XX-XX-SK-S-0003 Rev.P4;

#### **Supporting Documents**

- Planning Statement (February 2022) prepared by Gerald Eve LLP (Ref. U0017383);
- Economic Impact Statement (February 2022) prepared by Amion Consulting;
- Social Value Strategy (4 November 2021) prepared by Fusion 21 (Ref. 14730)
- Energy Report (November 2021) prepared by Halligan Consulting Engineers (Ref. B3575/ER/AC Rev.B)
- Transport Assessment prepared by Apex Transport Planning (Ref. C21054/TA01);
- Framework Travel Plan prepared by Apex Transport Planning (Ref. C21054/TP01);
- Air Quality Assessment (January 2022) prepared by Air & Acoustic Consultants (Ref. 100457);
- Flood Risk Assessment and Drainage Strategy (25 January 2022) prepared by Burrows Graham (Ref. 21065-BGL-XX-XX-RP-D-00001 Version 2);
- External Lighting Proposals (January 2022) prepared by Halligan Consulting Engineers (Ref. B3575/MG/EXT Rev.B);
- External Lighting Layout (January 2022) prepared by Halligan Consulting Engineers (Ref. B3575/P/100 Rev.P4);
- Arboricultural Assessment (February 2022) prepared by FPCR;
- Ecological Appraisal (February 2022) prepared by FPCR;

- Letter from FPCR outlining Biodiversity Net Gain Assessment (dated 09 February 2022);
- Site Investigation Report (January 2022) prepared by G&J Geo-environmental Consultants Ltd (Ref. GJ224);

1.5 The statutory application fee in this instance is £51,011, which has been paid in full via the Planning Portal.

1.6 This Planning Statement provides a summary of the Site and the development proposals before analysing the key planning matters and setting out the planning justification for this proposal. The remainder of this Statement is set out in the following Sections:

- Background to the Proposal;
- Planning history for the Site;
- Summary of the Pre-Application process, key issues and changes to the Proposal;
- Description of the Proposed Development;
- Summary of the Relevant Planning Policy Framework;
- Analysis of the Key Planning Issues;
- Draft S106 Heads of Terms;
- Concluding Remarks

## 2 BACKGROUND

- 2.1 This Section sets out the background and context to this current full planning application, in terms of the Applicant's capabilities, the Site characteristics and the associated planning strategy for the Site and a brief overview of key stages of work undertaken to date.

### The Applicant

- 2.2 Knowsley Redevelopments Limited is a special purpose vehicle set up by Corbally Group alongside Graftongate, as development partner, a well-established UK-based commercial developer and investor with a strong track record in delivering industrial and logistics developments nationally. As the Proposal is submitted in full, it is the Applicant's intention to deliver the development at the earliest opportunity following the grant of planning permission.

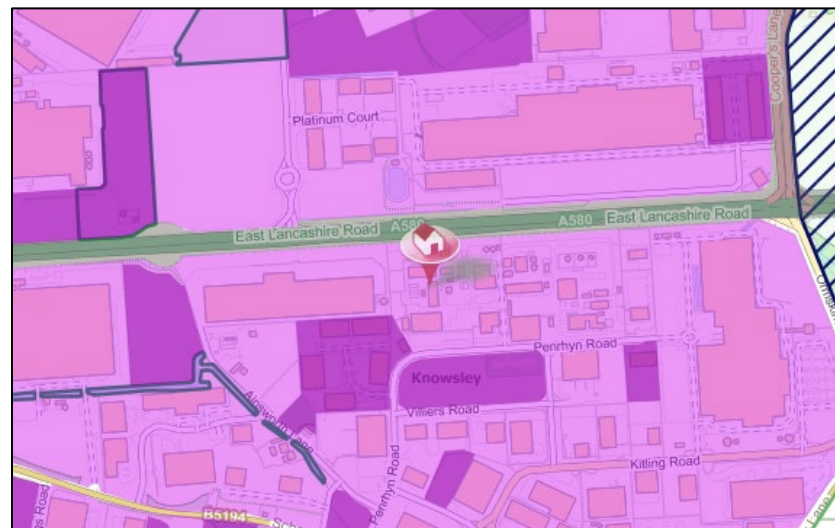
### The Site

- 2.3 The Site measures approximately 3.8ha in area and is generally rectangular in shape, comprising previously developed land which historically accommodated the former Contract Chemicals manufacturing site. The former chemicals plant has since ceased operation and the Site is now cleared of all previous buildings.
- 2.4 The Site is situated within the Knowsley Business Park and is situated immediately south of the A580 (East Lancashire Road) which separates the Site from the wider Knowsley Business Park and Knowsley Industrial Estate to the north. Existing industrial premises adjoin the Site to the east and west and an undeveloped parcel of land lies to the south of the Site beyond which is further employment premises. The Site's context is very much a central location within a long-established industrial and manufacturing location.
- 2.5 A copy of the Site Location Plan is attached at **Appendix A** for ease of reference.
- 2.6 The Site can be accessed off Junction 4 of the M57 motorway from the west, or by Ormskirk Road or the B5202 from the east. The Site is well-positioned in terms of access to public transport. Kitling Road bus stop is within walking distance of the Site and provides bus services throughout Knowsley Industrial Park and to Knowsley. Further bus stops on School Lane (400m south of the Site) operate additional bus services to Huyton, and services to Kirkby, Woolfall Heath and Liverpool is provided via the Caddick Road bus stop.

- 2.7 The Site has good access to Knowsley's cycle network, with a signed route approximately 950m to the west of the Site along Ribblers Lane and a shared use path along the East Lancashire Road and Coopers Lane to the north. Both vehicular and pedestrian access is directly off Penrhyn Road.
- 2.8 An existing river culvert runs under the northern part of the Site, which has 'main river' status as defined by the Environment Agency (EA). Pre-application discussions have been held with the EA in this regard and no works are proposed that would adversely affect the culvert. The Site is also situated within Flood Zone 1 as defined by the EA's Flood Map for Planning (lowest Risk). The Site's northern boundary comprises a thin buffer of trees, which offer some visual screening between the Site and the A580 to the north. However, the context of the Site overall is characterised by an industrialised environment with very few environmental sensitivities or constraints to redevelopment.

### Allocations

- 2.9 As noted above, the Site is located within the Knowsley Business Park and is allocated as a 'Primarily Industrial Area' according to the Council's interactive Local Plan Policies Map (extract at Figure 1 below).



- 2.10 The allocation at Knowsley Business Park is controlled by the Council's local plan policies (as set out at Section 6 of this Statement, which indicates that typical employment uses within Use Classes B2, B8 and E(g) (formerly Use Class B1) are acceptable in principle.

#### Work to Date

- 2.11 Given the scale of development, extensive work has been undertaken prior to the submission of this full planning application. Key stages include the requisite screening exercise in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations"), and entering into formal pre-application discussions with the Council, stakeholders and the public.
- 2.12 The EIA Regulations set out the circumstances where a development proposal would require an Environmental Impact Assessment (EIA) by statute. The EIA Regulations stipulate that EIA is mandatory for development appearing in Schedule 1 and for projects appearing in Schedule 2 that are likely to give rise to significant effects on the environment.
- 2.13 In order to assess whether a Schedule 2 project is likely to give rise to significant effects, it must be screened if (a) it is located within a "sensitive area" (defined as Areas of Special Scientific Interest, Areas of Outstanding Natural Beauty, National Parks, World Heritage Sites, Special Protection Areas and Special Areas of Conservation) or (b) if it exceeds the applicable thresholds in the Schedule (which primarily relate to the scale of the proposed development).
- 2.14 The Proposal does not fit within the list of developments in Schedule 1 and the Site is not located within a "sensitive area" as defined by Schedule 2(a). However, the Proposal does fall under the definition of 'Industrial Estate Development', as set out under Class 10(a) of Schedule 2, and exceeds the applicable threshold (i.e. the area of development exceeds 0.5ha). As such, the Proposal triggers the need to assess whether it is likely to give rise to significant effects on the environment.
- 2.15 A Screening request was sent to the Council on 22 September 2021, and the Council issued its Screening Opinion on 2 November 2021 concluding that the Proposal would not constitute EIA development and that it is not necessary to prepare and submit an Environmental Statement in support of this outline planning application.
- 2.16 The Applicant also submitted a formal request for the Council's pre-application advice on 18 February 2021, and formal written advice was received from the Council on 14 April 2021. The

Council's advice broadly supported the principle of redevelopment but indicated several topics areas that would need to be robustly addressed as part of the planning application, particularly impacts of development on the highway network. Further detail is provided in Section 3.

- 2.17 Additional pre-application work was carried out with Fusion21, the Council's social value partner, in order to prepare a draft social value strategy to support the planning application.
- 2.18 In preparing the planning application, the Applicant has received numerous expressions of interest both from manufacturing and logistics operators. The Proposal has therefore been designed with the opportunity to meet the demands of a range of occupiers and it is expected that there will be strong demand for the location as the project progresses. .

#### **Timescales and Delivery**

- 2.19 Subject to the grant of planning permission, the Applicant aims to commence work on Site in 2022. It is anticipated that any further detail required by planning conditions will be submitted during this period.
- 2.20 The Applicant is committed to delivering the proposed industrial and logistics unit as soon as possible in order to bring the Site back into active use and to satisfy continued strong demand in the sector. The demand for industrial and logistics floorspace remains resilient.

### 3 PLANNING HISTORY

- 3.1 A search of the Council's online planning register has revealed an extensive planning history associated with the Site. Planning decisions generally relate to minor works associated with the Site's former use as a chemical manufacturing facility.
- 3.2 The full planning history of the Site is attached to this Planning Statement at **Appendix B**, however a brief summary of the some of the most relevant decision at the Site are provided below.
- 3.3 Planning permission was granted on 26 July 1977 for a speciality chemical complex (reference: 74/02508/HIST). It is understood that this is the planning permission that established the Site's lawful use. Since then, a number of applications have been approved for various extensions and associated buildings, although none are considered to be directly relevant or comparable to the current Proposal.
- 3.4 Most recently, the Applicant submitted an EIA Screening Opinion (reference: 21/00761/SO) relating to this current proposal, and the Council confirmed that an Environmental Impact Assessment would not be required for the proposed scale and nature of development of 02 November 2021.

## 4 PRE-APPLICATION

4.1 Prior to the submission of this planning application, a request for the Council's formal pre-application advice was submitted in February 2021 and the Council issued its formal advice on 14 April 2021.

4.2 The written pre-application advice covered a variety of matters, including the following key considerations:

- Principle of Development
- Highways
- Environmental Considerations

### *Principle of Development*

4.3 The principle of development is clearly established by the Site's allocation as a Primary Industrial Area. The Council confirmed that the proposed development is acceptable in terms of land use principles.

### *Highways*

4.4 The Council indicated that a future planning application would need to ensure that sufficient parking and turning facilities were provided in accordance with the relevant supplementary planning document (Ensuring a Choice of Travel). The submission of fewer parking spaces than the maximum standards set out within the SPD would require justification.

4.5 The Council set out the expected scope of a Transport Assessment that would be needed to support a planning application. Further discussions were held between the Applicant's transport consultant (Apex) and the Council's Highways officers to agree the specific requirements for the submitted transport assessment, including requisite survey data and junction analysis.

4.6 The Council also provided advice on the proposed site access from Penrhyn Road and it was recommended that a 6m radii for access to the car parking area, and a 15m radii for industrial vehicle access would be required.

- 4.7 Overall, while a suite of technical information is required to provide sufficient evidence that the Site can operate safely from a highways perspective, no fundamental concerns were raised by the Council during pre-application discussions.

#### *Design & Layout*

- 4.8 The Council provided initial comments relating to design and layout matters, including stating its support for the retention and/or enhancement of a planting area to the Site's frontage along Penrhyn Road.
- 4.9 The proposed materials and finishes were confirmed to be acceptable subject to the submission of precise details.

#### *Environmental Considerations*

- 4.10 The Council confirmed that a Phase I and II Site Investigation would be required due to the previous use of the Site as a chemical manufacturing facility. A Site Investigation Report has been completed and is submitted in support of this current planning application.
- 4.11 As expected for this scale and nature of development, the Council confirmed that an Air Quality Assessment would be required.
- 4.12 The Council did not raise any environmental considerations that would raise significant concerns regarding the grant of planning permission and the submitted suite of technical documents is considered sufficient to address all environmental matters for redeveloping the Site.

#### **Public Engagement**

- 4.13 Due to the Site's central location within a well-established industrial estate, there are no immediate sensitive or residential neighbouring uses to the Site. As such, the Applicant agreed with the Council that a full public consultation exercise would not be necessary, and the submission of a standalone Statement of Community Involvement was not required.
- 4.14 The Applicant did however notify neighbouring occupiers of the proposed development prior to submitting this application. A mailshot was issued to 21 addresses within the immediate vicinity of the Site. The letter set out a description of the proposed development, including a copy of an initial indicative layout plan and provided contact details for any queries and/or comments to be sent to.
- 4.15 No comments or questions were received prior to the submission of this planning application.

## 5 PROPOSED DEVELOPMENT

- 5.1 This Section provides details of the proposed development. The description of development for which planning permission is sought is:

*“Full planning application for the erection of 18,554sqm (GIA) of industrial and logistics floorspace (Use Classes B2/B8 and E(g)(iii) with ancillary offices (Use Class E(g)(i)), security gatehouse, transport office, parking and associated works”.*

- 5.2 The proposed development is shown on the submitted Site Layout Plan (reference: P0102 Rev.D). In summary, the Proposal comprises the following details (all floor areas are provided as Gross Internal Areas (GIA) unless otherwise stated):

- 17,159sqm Warehouse;
- 903sqm Office
- 465sqm Transport Office
- 28sqm Gatehouse
- 3no. Level Access Doors
- 18 Loading Doors
- Maximum of 46 HGV Parking Spaces
- Maximum of 232 Car Parking Spaces (including 8 accessible spaces).

### Scale, Layout and Appearance

- 5.3 The proposed unit will comprise a standard base specification in line with the design features identified within the Design and Access Statement prepared by UMC Architects. The Unit will measure 169m in length, 116m in width with a maximum ridge height of 18.9m. The Unit will accommodate a total of 18,554sqm (GIA) of floorspace, including Use Class B2 (General Industrial) and/or B8 (Storage and Distribution) with ancillary offices (Use Class E(g)(iii)). The design is typical of a standard industrial warehouse unit within similar locations.
- 5.4 The proposed layout reflects the Site's rectangular shape, with the proposed warehouse (also rectangular) taking the same orientation as the wider site boundary. The proposed transport office protrudes the northern elevation in between the two sections of Dock Leveller Doors. An area of parking is proposed directly south of the warehouse, with dedicated HGV parking and loading areas to the north of the warehouse, accessed directly off Penrhyn Road with the internal road running along the eastern perimeter.

- 5.5 The proposed car parking arrangement shown on the site layout plan indicates adequate parking for a Use Class B2 operator, as the Council's parking standard are higher for B2 uses than B8. The final parking arrangement is likely to be influenced by the end-user and actual parking numbers may therefore be lower once the development is completed/occupied.
- 5.6 The proposed unit will be built using external materials including (but not limited to):
- Vertically laid trapezoidal profiled wall cladding in Sirius (RAL: 9006);
  - Horizontally laid half round profiled wall cladding in White (RAL: 9003);
  - Vertically laid trapezoidal profiled wall cladding in Slate Grey (RAL 7012);
  - Horizontally laid half round profiled wall cladding in Anthracite (RAL7016);
  - Horizontally laid composite microrib cladding in Anthracite (RAL 7016);
  - Thermally broken polyester powder coated aluminium windows/doors in Anthracite (RAL 7016)
  - Pre-case insulated dock pro-wall system;
  - Goosewing Grey trapezoidal roof panels (RAL 080 70 05)
- 5.7 Full details of the materials and proposed colour reference are detailed on the proposed elevations drawing (reference: P1004 Rev.B) and within the submitted Design and Access Statement.

### Access

- 5.8 The existing site access, off Penrhyn Road, will be reconfigured slightly to accommodate HGVs and commercial vehicles and provide access to the service yard area to the rear of the unit.
- 5.9 A new secondary access point, also directly off Penrhyn Road, is proposed to provide access to a car parking area to the front of the proposed unit.
- 5.10 The proposed car parking area will provide up to 232 car parking spaces, including 8 accessible spaces for disabled users and 8 electric vehicle charging points (equating to 5% of the total number of parking spaces for B8 purposes).
- 5.11 The security gatehouse will be situated to the east of the proposed unit, enabling the registration of vehicles entering and exiting the loading area to the north of the warehouse. The gatehouse will be of a typical design, details of which have been submitted with this application (reference: P0107 Rev. B).

## Landscaping

- 5.12 The existing corridor of trees across the northern boundary is to be removed with the remainder of the Site being cleared in order to facilitate the requisite site levels to accommodate the proposed unit. New landscaping is proposed to both the northern and southern boundaries, including 15 trees, as well as a variety of native shrubs and grassed area. The submitted landscape strategy (ref: 10585-FPCR-XX-XX-DR-L-0001) provides additional detail regarding the number and mix of species.

## Lighting

- 5.13 Details of the proposed lighting are provided within the External Lighting Report (prepared by Halligan) and its accompanying External Lighting drawing (reference: B3575/P/100).
- 5.14 The proposed lighting has been designed to accord with the relevant British Standards (BS5489-2020 Street Lighting) and other relevant guidance.
- 5.15 A lighting level of 50 lux is proposed at ground level to the service yard; building entrance; car parking; and access road areas. A reduced level of 20 lux and 10 lux at ground level is proposed at car parking and pavement walkways respectively.
- 5.16 The proposed lighting comprises a mixture of building and column mounted LED light fittings to achieve the levels set out above. Wall mounted luminaires are proposed at 6m, 8m or 10m AFFL. Column fittings will be mounted on 6m or 8m high columns. Local lighting bollards are proposed to enhance the lighting at the main building entrance.
- 5.17 Backlight shields are proposed on the column fittings along the tree line at the northern boundary to reduce any overspill.
- 5.18 Lighting will be controlled through a central system which will comprise a daylight sensor, time switch and a manual override. This will provide the ability to keep lights off when the Site is not in operation; however, the design also allows for operation 24 hours a day by achieving post curfew obtrusive light standards.

## 6 PLANNING POLICY

- 6.1 This Section sets out the relevant local and national planning policy context in respect of the Site and the proposed land use. In particular, it highlights any policy constraints and/or tests against which new development proposals should be considered.

### The Development Plan

- 6.2 Section 38(6) of The Planning and Compulsory Purchase Act (2004) indicates that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. In this instance, the Development Plan comprises the following documents:
- Knowsley Local Plan Core Strategy (January 2016);
  - Knowsley Replacement Unitary Development Plan (June 2006); and
  - Merseyside and Halton Joint Waste Local Plan (July 2013).
- 6.3 The Council also has a number of Supplementary Planning Documents (SPDs) that add further detail and guidance to the Development Plan policies.
- 6.4 The following adopted planning policies are considered to be particularly relevant to the proposed redevelopment of the Site:

#### *Knowsley Local Plan Core Strategy – adopted January 2016*

- Policy SD1: Sustainable Development
- Policy CS1: Spatial Strategy for Knowsley
- Policy CS2: Development principles
- Policy CS4: Economy and Employment
- Policy CS7: Transport Networks
- Policy CS11: Principal Regeneration Area – Knowsley Industrial and Business Parks
- Policy CS19: Design Quality and Accessibility in New Development
- Policy CS22: Sustainable and Low Carbon Development
- Policy CS24; Managing Flood Risk

*Knowsley Replacement Unitary Development Plan – adopted June 2006*

- Policy EC2: Sites Allocated for Employment Development
- Policy EC3: Primarily Industrial Areas
- Policy T5: Location of Major Traffic Generating New Development
- Policy T7: New Development and Walking & Cycling Route
- Policy T8: Transport Assessments
- Policy T9: Travel Plans
- Policy T10: Access for the Less Mobile
- Policy DQ2: Security in the Built Environment
- Policy ENV2: Noise and Vibration
- Policy ENV3: Light Pollution
- Policy ENV7: Flood Risk and Drainage

*Merseyside and Halton Joint Waste Local Plan – adopted July 2013*

- Policy WM0: Presumption in Favour of Sustainable Development
- Policy WM9: Sustainable Waste Management Design and Layout of New Development

6.5 A summary of some of the key policies is provided below.

6.6 **Core Strategy Policy SD1** confirms that the Council will take a positive approach in determining planning applications, reflecting the presumption in favour of sustainable development. The Council will work with applicants in a proactive manner in order to identify joint solutions to enable planning permission to be granted wherever possible. Where planning applications accord with the Local Plan policies, planning permission will be granted without delay (unless material considerations indicate otherwise).

6.7 **Core Strategy CS1** sets out the Council's priorities for spatial development. The policy places a focus on development within existing urban areas which are easily accessible from areas in need of regeneration. The policy encourages the sustainable and efficient use of land and the reuse of previously developed land. The second part of the policy lists the Council's spatial priorities, which includes (inter alia): enhancing existing employment areas and providing a suitable range of sites and premises for employment development.

6.8 **Core Strategy Policy CS2** provides a comprehensive list of development principles which new development proposals will be expected to support. There are 5 key principles identified, each with

a list of measures to assist in meeting the principles. The principles include: promoting sustainable economic development; reducing carbon emissions and adapting to climate change effects; reducing the need to travel and increasing accessibility; recognising environmental limits, protecting and enhancing assets, enhancing the local character and promoting quality of place; and making the most efficient use of available resources and infrastructure by prioritising locations consistent with the spatial strategy.

- 6.9 **Core Strategy Policy CS4** sets out the Council's strategy for employment development. Part 7 of the policy confirms that land allocated for employment development will be safeguarded from changes to other types of development, unless there is no demand for employment use on that land.
- 6.10 **Core Strategy Policy CS7** considers the Council's transport strategy and the location, design and management of new development. Efficient movement of goods will be supported in accordance with the policy, and a sustainable and integrated transport system will be used to ensure "people can get to where they need to by a choice of walking, cycling and public transport". In order to achieve the transport strategy, the policy indicates (inter alia) that development proposals will be assessed against a site's location and accessibility, a submitted transport assessment and/or travel plan, the Council's parking standards and proposed measures to mitigate carbon emissions.
- 6.11 **Core Strategy Policy CS11** supports the regeneration of Knowsley Industrial and Business Parks and encourages a mix of high quality employment development which should focus on Class E 'business' use and Classes B2 and B8. The Policy confirms that Knowsley Industrial Park is a "Priority Zone".
- 6.12 **Core Strategy Policy CS19** expects new development to [summarised]:
- a) Respond to the character of the immediate surroundings, and integrate such characteristics into the proposal;
  - b) Complement and where possible enhance the existing landscape, topography, Green Infrastructure, locally important and historically interesting features;
  - c) Consider providing landmark buildings and detailing at main gateways;
  - d) Create places and spaces as a focal point, accommodation social interaction and active lifestyles;
  - e) Provide safe, secure and convenient walking, cycling and public transport routes;
  - f) Integrate with existing development and link to existing shopping and service provision; and

- g) Demonstrate community engagement during the design phase of major development proposals
- 6.13 Part 2 of Policy CS19 requires proposals to maintain a good standard of amenity for all existing and future occupants. Part 3 sets out measures which should be implemented to address climate change, including integrating biodiversity, sustainable design principles, flood risk mitigation, waste recycling and energy and resource efficiency.
- 6.14 **Core Strategy Policy CS22** requires new development to meet high standards of sustainable design and construction. This will be achieved by meeting the list of criteria set out in the policy including, inter alia designing buildings for flexible uses throughout their lifetime, ensuring effective use of resources, limiting energy use by incorporating high standards of insulation, heat retention and natural ventilation, using locally sourced sustainable materials and managing flood risk through SUDS. Building Regulations will control development contributing towards the Government targets for carbon reduction. The Site is situated within a Priority Zone and the policy confirms that such areas will facilitate renewable and low carbon infrastructure, requiring new development to make provision for decentralized energy networks and be designed to enable future connectivity.
- 6.15 **Core Strategy Policy CS24** outlines how development will be expected to manage flood risk. Where an unacceptable risk of flooding will result from the development proposal, planning permission will not be granted. The policy directs development to areas with the lowest probability of flooding, and proposals within medium/high risk of flood areas will be required to demonstrate that the development could not be practicably located elsewhere with a lower flood risk. Flood Risk Assessments are required for proposals over 1ha. The policy states that flood mitigation measures will be required for new developments, where necessary, and such measures will be derived from the Strategic Flood Risk Assessment. Mitigation should contribute towards biodiversity (if feasible), incorporate SUDS and be maintained by the developer.
- 6.16 **UDP Policy EC3** confirms that Primarily Industrial Areas, as identified on the Proposals Map, are appropriate locations for business, general industry and storage and distribution uses. Other uses in these locations will only be permitted where particular criteria are satisfied.
- 6.17 **UDP Policy T5** requires major development to be located within safe and convenient walking distance of public transport (i.e. 400m from a bus stop and/or 800m from a rail station or Merseytram stop). Where significant freight/vehicular movements is likely to result from a development, such development have good access to the rail network or Strategic Road Network. Where a major proposal is not located within safe and convenient walking distance as noted above,

planning permission will only be granted where improvements are made to the public transport networks, and Strategic Road Network if necessary. These improvements will be required prior to the completion of development.

- 6.18 **UDP Policy T6** require new development proposals to provide for, or be served by, a good choice of modes of travel which is appropriate to the scale and nature of the development. Modes of travel should be safe, convenient and well-lit. Cycle parking facilities should accord with the Council's minimum standards and car parking facilities should not exceed maximum standards. The policy requires parking facilities for the less mobile, delivery and other service vehicles to be provided within the site in accordance with adopted minimum standards. Safe and convenient vehicular access should be provided to and from the highway. The policy goes on to require good provision of public transport to the site. Exceptions to the six policy criteria will be considered where the proposal will not materially increase the amount of traffic visiting the site.
- 6.19 **UDP Policy T7** requires new development to preserve and enhance (where possible) walking and cycling networks. Proposals that will block an existing right of way or a proposed walking or cycling route will require a balanced consideration.
- 6.20 **UDP Policy T8** indicates that proposals which would prejudice the function of any part of the highway networks by generating a material increase in traffic generation which would overload the network, will not be permitted unless mitigation measures are undertaken. Major traffic generating development and proposal which are likely to increase noise/air pollution will be required to be supported by a Transport Assessment.
- 6.21 **UDP Policy T9** requires a Travel Plan to be submitted alongside proposals for major traffic generating development.
- 6.22 **UDP Policy T10** states that new development proposals will need to provide adequate access for the less mobile or individuals with sensory impairments. Proposals should have adequate adaptability to meet inclusive design standards and shall accord with the Disability Discrimination Act 1995.
- 6.23 **UDP Policy DQ2** encourages developments to be designed to a good level of personal and property security. The policy lists a number of measures, including (but not limited to): visible highways, footpaths, cycle routes and parking areas; avoiding the creation of "hiding places"; provision of gates and fences; natural surveillance; avoiding long lengths of blank frontages; providing a mixture of uses to maximise surveillance. Fencing, walls, CCTV and lighting should avoid causing harm to visual amenity, amenity of occupiers or highways safety.

- 6.24 **UDP Policy ENV2** confirms that planning permission will not be granted for development that would result in an unacceptable increase in noise or vibration, or indeed where the proposed use itself would be subject to unacceptable levels from an existing source. Effective noise insulation or other mitigation may be required and secured by condition.
- 6.25 **UDP Policy ENV3** requires proposals which include external lighting to satisfy the following criteria:
- a) The lighting scheme proposed is the minimum required for security and working purposes to undertake the task;
  - b) There would be no unacceptable impact on visual amenity in the surrounding area;
  - c) The scheme will not have an unacceptable effect on road safety;
  - d) The scheme will not harm wildlife; and
  - e) There will be no unacceptable loss of residential amenity.
- 6.26 **UDP Policy EN4** notes that proposals within consultation zones around hazardous installations will be granted planning permission where there is an acceptable level of risk to occupiers, visitors or users, or the proposal includes measures to mitigate any likely risks.
- 6.27 **Waste Local Plan Policy WM0** takes a positive approach when considering applications which accord with the Waste Local Plan, stating that in such instances planning permission will be approved without delay unless material considerations indicate otherwise.
- 6.28 **Waste Local Plan Policy WM9** requires new development to facilitate the collection and storage of waste, including separating recyclable material. The policy requires sufficient access to enable waste and recycling to be collected and transported for treatment.

### Other Material Considerations

- 6.29 As noted above, the Development Plan is the starting point in the determination of planning applications, unless material considerations indicate otherwise. In this instance, the following policy-led documents are considered to be material considerations:
- National Planning Policy Framework (July 2021);
  - Ensuring a Choice of Travel Supplementary Planning Document (SPD) (September 2010)
  - Design Quality in New Development Supplementary Planning Document (SPD) (January 2016)
  - Adding Social Value to Development: Employment and Skills SPD (September 2018)

## National Planning Policy Framework

- 6.44 The Government published its revised National Planning Policy Framework (NPPF) in July 2021<sup>1</sup>. The NPPF sets out the Government's planning policies to inform all planning decisions and is a significant material consideration in the determination of planning applications. The NPPF is split into chapters covering various policy topic areas and a brief summary of the relevant chapters and specific policy tests is provided below.
- 6.45 **Chapter 2 Achieving Sustainable Development** identifies the three overarching interdependent objectives (i.e. economic, social and environmental) that should be satisfied for development to be sustainable<sup>2</sup>. Paragraph 11 is key to all planning decisions as it states that all planning "*decisions should apply a presumption in favour of sustainable development*". Importantly, for decision-taking this means "*approving development proposals that accord with an up-to-date development plan without delay...*".
- 6.46 **Chapter 4 Decision Making** provides policy objectives relating to pre-application engagement, including with local planning authorities, the community and relevant stakeholders<sup>3</sup>, before reiterating that planning decisions must be taken in accordance with the development plan, unless material considerations indicate otherwise<sup>4</sup>. Chapter 4 also provides details of the six tests for imposing planning conditions<sup>5</sup> and the three tests for imposing planning obligations<sup>6</sup> in line with the Community Infrastructure Levy Regulations (2010), as amended.
- 6.47 **Chapter 6 Building a Strong, Competitive Economy** is of particular relevance to the current proposals, as the primary objective indicates that: "[planning] *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.*"<sup>7</sup>

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<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

<sup>2</sup> NPPF Paragraph 8

<sup>3</sup> NPPF Paragraphs 39-46

<sup>4</sup> NPPF Paragraph 47

<sup>5</sup> NPPF Paragraph 56

<sup>6</sup> NPPF Paragraph 57

<sup>7</sup> NPPF Paragraph 81

6.48 Objectives are identified for planning decisions to recognise specific locational requirements of different sectors at a variety of scales and in suitably accessible locations, including the storage and distribution sector<sup>8</sup>. This approach is also well-aligned with the objectives of Chapter 11 (see below)

6.49 **Chapter 9 Promoting Sustainable Transport** requires development proposals to consider transport issues from the earliest stage so that<sup>9</sup>:

- a) *the potential impacts of development on transport networks can be addressed*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated*
- c) *opportunities to promote walking, cycling and public transport use are identified and pursued*
- d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains*
- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places*

6.50 When considering development proposals, the objectives include ensuring that safe and suitable access to a site can be achieved for all users and that any significant impacts can be adequately mitigated in a cost-effective manner<sup>10</sup>. Paragraph 111 states clearly that:

*“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”* [emphasis added]

6.51 The chapter concludes by setting out the priorities for planning applications, focusing on pedestrian and cycle movements through to the efficient delivery of goods and access for emergency services. A travel plan will be required where proposals will result in the generation of significant amounts of movement<sup>11</sup>.

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<sup>8</sup> NPPF Paragraph 83

<sup>9</sup> NPPF Paragraph 104

<sup>10</sup> NPPF Paragraph 110

<sup>11</sup> NPPF Paragraph 112-113

- 6.52 **Chapter 11 Making Effective Use of Land** provides objectives for maximising the opportunities that previously undeveloped land (as well as previously developed land) can bring. This not only includes efficient built development but incorporates net environmental gains (e.g. habitat creation and public access to rural areas) or other functions such as flood risk mitigation<sup>12</sup>.
- 6.53 The chapter sets out objectives for achieving appropriate development densities for all types of development, based on the availability of land for accommodating specific uses and other factors such as market conditions, the capacity of infrastructure and the desirability of maintaining the existing character of an area<sup>13</sup>.
- 6.54 **Chapter 12 Achieving Well-Designed Places** provides objectives for incorporating high quality design in all development proposals. The chapter advocates the use of supplementary planning documents to provide clarity about design expectations<sup>14</sup>. Paragraph 130 provides criteria against which planning decisions should be considered, which includes ensuring developments:
- a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - c) *c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
  - d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
  - e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
  - f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

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<sup>12</sup> NPPF Paragraph 119-120

<sup>13</sup> NPPF Paragraph 124

<sup>14</sup> NPPF Paragraph 129

- 6.55 **Chapter 14 Meeting the Challenge of Climate Change, Flooding and Coastal Change** sets out the Government's objectives for bringing forward development that is resilient to the effects of climate change over its lifetime. Objectives include bringing forward development that can manage or balance the effects of greenhouse gas emissions and the inclusion of green infrastructure, and the use of low carbon and renewable energy wherever practicable<sup>15</sup>.
- 6.56 With regard to the risk of flood, the NPPF makes clear that new development should be directed towards land that is at lowest risk of flood. For allocated sites that have already been subject to strategic flood risk assessment as part of the local plan preparation, a site-specific flood risk assessment will still be required to demonstrate that a development proposal would not result in the increased risk of flood on site or elsewhere<sup>16</sup>.
- 6.57 **Chapter 15 Conserving and Enhancing the Natural Environment** identifies numerous criteria to be considered when determining planning applications, including (inter alia) minimising impacts on and providing net gains for biodiversity<sup>17</sup>. In this respect, the chapter provides objectives for determining planning applications by setting out principles towards identifying harm caused to biodiversity, ensuring adequate mitigation or compensation is provided, and supporting proposals that incorporate biodiversity improvements, especially where net gains are secured<sup>18</sup>.
- 6.58 The chapter concludes by setting out the Government's objectives in respect of ground conditions and pollution, particularly where remediation of the land is required or impacts in respect of air quality and noise<sup>19</sup>.
- 6.59 In summary, the NPPF provides a key policy-based framework of objectives that work towards the delivery of sustainable development in all proposals. NPPF takes a balanced approach throughout to competing demands both in terms of the site constraints to development and the opportunities that development proposals bring. This significant material consideration therefore forms an important part of the planning balance required in determining this current full planning application.

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<sup>15</sup> NPPF Paragraph 153-156

<sup>16</sup> NPPF Paragraph 167

<sup>17</sup> NPPF Paragraph 174

<sup>18</sup> NPPF Paragraph 180(d)

<sup>19</sup> NPPF Paragraph 183-188

### Ensuring a Choice of Travel Supplementary Planning Document

- 6.60 The SPD focuses on creating a safe, clean and attractive environment that is accessible to all. The document seeks to improve road safety, congestion and improve the quality of development through better use of space.
- 6.61 The document demonstrates how key policy requirements can be satisfied to ensure development proposals are accessible and promote sustainable travel patterns. The document states that the main objective of the SPD is to “*ensure a good choice of travel modes to all new development*”.

### Design Quality in New Development Supplementary Planning Document

- 6.62 Published in January 2016, the Design Quality SPD sets out the Council’s expectations for design standards of new development and provides further detail and interpretation of what is considered to be “good design” and design related policies.

### Adding Social Value to Development: Employment and Skills Supplementary Planning Document

- 6.63 This document was published in September 2018 and outlines the Council’s objective to achieve social benefits (Social value) incorporated into development opportunities.
- 6.64 The SPD provides guidance on how specific requirements will be implemented by requested developers to prepare and comply with a Social Value Strategy which identifies likely social value outcomes resulting from the proposed development. Such strategies are expected to commit to employment and training opportunities for local people; helping to develop resident workforce skills and contributing towards a route to employment for local people.

## 7 PLANNING ANALYSIS

7.1 This Section analyses the key planning matters which are relevant to the determination of this planning application, particularly those issues that were highlighted by the Council during pre-application discussions. It is therefore the intention of this Section to assess how the Proposal is supported by the planning policy framework set out in Section 6, as well as identify any conflicts with policy.

7.2 The key matters are listed below, and each are discussed in further detail in turn:

- Principle of Development
- Socio-Economic Impacts
- Transport and Highways
- Air Quality
- Flood Risk and Drainage
- Ecology
- Arboricultural and Landscape
- Energy and Sustainability

### Principle of Development

7.3 Before considering detailed policies and relevant technical matters, it is important to review the proposed development's compliance with the primary land use principles and general development objectives set by development plan policies.

7.4 The principle of industrial development at the Site has clearly been established through the previous use at the Site and its allocation within the Development Plan as a Primarily Industrial Area. Core Strategy Policy CS11 specifically supports the regeneration of the Knowsley Business Park, within which this application site is situated. The policy encourages Use Classes B2 and B8.

7.5 The objectives for employment development, set out in Policy CS4 are also addressed as follows (inter alia):

- a) The development will directly support the development needs of the logistics sector within the Liverpool City Region by contributing towards the supply of logistics accommodation to the market, leading to a uplift in gross value added as well as the anticipated creation of 10 construction jobs and 187 permanent jobs.

- b) The development will make use of a previously developed site to enhance the quality and efficiency of land use within an existing employment area.
- d) The development will provide access to employment opportunities, both temporary/construction and permanent positions through the lifetime of the development.
- e) The Applicant's Social Value Strategy aims to address skills and educational barriers to employment during construction and throughout the operational phase of development.

7.6 It is therefore considered that the principle of the development accords with the Site's allocation and Core Strategy Policies CS4 and CS11. The proposal makes a direct contribution towards the regions demand for logistics accommodation.

### Socio-Economic Impacts

7.7 Amion Consulting has prepared an Economic Impact Assessment that has been submitted in support of this application and which considers the effects of the development on matters such as job creation and investment.

7.8 The proposed development will make a positive contribution to social and economic influences that form part of the justification for this proposal and are summarised below:

#### *Construction Phase*

- Approximately £11.8 million in construction spend
- Creating approximately 10 full time equivalent jobs in construction
- Generation an estimated £4.8 million net additional GVA at the Knowsley level

#### *Operational Phase*

- Likely Gross Value Added in the region of £4.68 million per annum at Knowsley level
- An expected Business Rates income of over £0.26million per annum
- Providing an anticipated 187 net additional full time equivalent jobs

7.9 In addition to the above, Fusion 21 has prepared a Social Value Strategy in accordance with the requirements of the Adding Social Value to Development SPD. The Social Value Strategy highlights the Applicant's commitment to delivering specific measures to provide access to training opportunities.

7.10 The proposal clearly has potential to positively impact the local economy and provide training and apprenticeship opportunities.

## Transport and Highways

- 7.11 Apex Transport Planning has prepared the supporting Transport Assessment and Travel Plan documents that have been submitted in support of this planning application.
- 7.12 The Transport Assessment provides a summary of the baseline transport conditions, assesses the Site's accessibility credentials (e.g. walking, cycling, bus and rail), summarises the access-related elements of the Proposal and the sustainable transport measures to be incorporated. Fundamentally, the Transport Assessment assesses the likely trip generation and distribution that will result from the development, including an assessment of future forecasts and traffic growth scenarios.

### *Baseline Conditions*

- 7.13 Given that the former use of the Site as a chemical manufacturing facility was last known to be in operation in 2019, discussions with the local highways authority confirmed that trips associated with the previous use could be taken in consideration.
- 7.14 As part of the assessment, a survey of the existing road traffic conditions confirmed that 44 two-way vehicular movements took place on Penrhyn Road during the peak morning period, and 54 two-way movements were recorded during the afternoon peak period. For completeness, no HGV movements were recorded during the morning and a single two-way HGV trip was recorded during the afternoon peak period.
- 7.15 A review of the wider highways network has also been carried out and revealed approximately 863 two-way vehicular movements in the morning peak period and 789 two-way movements in the afternoon peak period along School Lane (B5194), to the west of Penrhyn Road. It is concluded that School Lane operates well below its maximum capacity.
- 7.16 Existing flows along School Lane to the east of the Site experience approximately 1,141 two-way vehicle trips during the morning peak and 1,126 two-way trips during the afternoon peak. These flows remain within the capacity of this section of highway.
- 7.17 A review of accident data published by the Department for Transport for the period January 2016 – December 2020 revealed that while a relatively small number of incidents have been recorded there are no defects in the existing highway layout and/or function that causes a significant highway safety concern.

### *Accessibility*

- 7.18 The Site benefits from good existing pedestrian routes and facilities within a well-established industrial area. The surrounding streets have footways on both sides of the road. Existing pedestrian routes connect the Site to residential areas, facilities and public transport stops. Street lighting is provided at intervals along all routes linking the Site.
- 7.19 The Site also has good access to Knowsley's cycle network, with a signed route approximately 950m to the west of the Site along Ribblers Land, and a shared use path along the East Lancashire Road and Coopers Lane to the north. The shared use footway/cycleway along School Lane connects the Site to the A580/A5207 junction, providing further links to Kirby and St Helens. A traffic free cycle route also connects to Craven Wood via Gellings Lane. As such, existing cycle infrastructure would be suitable for both future staff and visitors of the proposed development.
- 7.20 The nearest bus stop to the Site is at Kitling Road which provides bus services throughout Knowsley Industrial Park and to Knowsley. Further bus stops on School Lane (400m south of the Site) operate additional bus services to Huyton, and services to Kirkby, Woolfall Heath and Liverpool is provided via the Caddick Road bus stop.
- 7.21 The Site can be accessed off Junction 4 of the M57 motorway from the west, or by Ormskirk Road or the B5202 from the east.
- 7.22 The Site is clearly situated within a sustainable location and the existing network has capacity to accommodate the new development proposal.

### *Vehicular Movements*

- 7.23 The Transport Assessment forecasts predicted vehicular traffic movements that will be associated with the proposed development using TRICS data.
- 7.24 As this planning application seeks permission for a flexible B2/B8 use, Apex Transport Planning has forecast separate trip generations for each of these individual uses.
- 7.25 If the proposed development was occupied as a B2 (general industrial) unit, this results in a forecast of up to 52 two-way vehicle trips during the peak morning period, and up to 62 two-way trips during the evening peak period. The forecast HGV trip generation associated with a B2 use is anticipated to result in 3 two-way trips for both the morning and peak periods.

- 7.26 The operation of the proposed site as a B8 storage and distribution warehouse would result in a forecast of up to 50 two-way vehicle movements during the morning peak period and 45 two-way trips during the evening peak period. This is comparable to the B2 forecast.
- 7.27 A B8 warehouse would, understandably, generate higher HGV trips, with approximately 18 two-way trips in the morning period and 20 trips in the evening.
- 7.28 The proposed development will result in a similar level of traffic to the previous use of the Site during the peak hours. There will be some reduced movement during particular hours, and increased movements at other times of the day. Overall, the proposal is not anticipated to significantly change the vehicle movements on the surrounding highway network and it is concluded that the proposal would not have an unacceptable impact on road safety, nor a severe impact on the operation of the highway network in accordance with the NPPF.
- 7.29 Further detail on the calculation and impact of forecast vehicular trips resulting from the proposed development is set out within the submitted Transport Assessment.

#### *Detailed Access Matters*

- 7.30 It is proposed to retain access directly off Penrhyn Road, with some reconfiguration to the junction to ensure it can accommodate HGVs and service vehicles entering and exiting the Site safely. The access point has a radii of 15m on the west and east sides. The internal site road has been designed with a 7.3m wide carriageway and will run adjacent to the Site's eastern boundary, providing access to 15 car parking spaces at the entrance and to the loading area to the rear of the proposed warehouse.
- 7.31 47 HGV parking spaces are proposed, along with 18 dock loading doors and 3 level access doors, as indicated on the submitted Proposed Site Layout drawing. The loading area and HGV parking will be accessed via the service access point detailed above. A 25m turning area is proposed to the west of the service yard to ensure that all vehicles can enter and exit in a forward gear.
- 7.32 A separate, and additional, access point is proposed to the west of the Primary access, directly off Penrhyn Road, and will provide access to the car parking area to the front of the unit. The proposal includes a maximum of 232 car parking spaces, including 8 accessible spaces.
- 7.33 The proposed level of parking is considered to comply with the Council's 'Ensuring a Choice of Travel' SPD which sets out maximum parking standards. The maximum parking standards for this proposal would be 412 spaces for a Use Class B2 unit and 186 spaces for a Use Class B8 unit. A

such, the proposed maximum of 232 car parking spaces is considered to be within these maximum standards. However, pre-application discussions with the Council indicated that it would be expected for these standards to be met.

- 7.34 A proposed maximum number of parking spaces is being proposed to allow sufficient flexibility depending on whether the unit is operated under Use Class B2 or Use Class B8. Where the Site is used for B2 purposes, 232 parking spaces will be provided (representing over 60% of the Council's parking standards for B2 uses). However, should the Site be operated for storage and distribution under Use Class B8, a total of 186 parking spaces will be provided in accordance with the Council's parking standards.
- 7.35 The proposed approach to parking is considered to be an appropriate level of provision which adequately complies with the Council's parking standards and also provides sufficient space for the proposed development.
- 7.36 For the avoidance of doubt, this application includes the provision of 8 electric vehicle charging points, which represents approximately 5% of proposed B8 parking spaces. Passive provision will be secured for a further 5%.

#### *Travel Plan and Sustainability*

- 7.37 Apex Transport Planning has also prepared the Framework Travel Plan that is submitted in support of this application in accordance with Core Strategy Policy CS7 which seeks to reduce carbon emissions and improve the health and wellbeing of local people. The Framework Travel Plan sets out the proposed measures that will be adopted to encourage sustainable modes of travel.
- 7.38 As noted above, the Applicant is committed to providing 16 electric vehicle charging points to facilitate the future growth of electric vehicles.
- 7.39 The Site benefits from good access to sustainable modes of transport, including the bus stops at Kitling Road and School Lane, as well as the local pedestrian and cycle infrastructure network.
- 7.40 The key objectives of the Travel Plan are to: reduce the dependency on private cars; promote alternative travel; increase awareness of sustainable travel; constrain parking demand; comply with policies to reduce vehicle emissions and congestions; and ensure that the objectives of the Travel Plan are reflected through daily travel patterns of employees over the long term.
- 7.41 The Travel Plan objectives will be achieved by:

- Providing all new employees with Travel Information Packs containing information on walking and cycling routes, bus services, information sources and contact details for the Travel Plan Coordinator.
- Producing a Visitor Travel Leaflet with an overview of travel options and information on electric vehicle parking. This leaflet would be aimed at visitors attending the Site.
- Noticeboards with information on walking and cycling routes, bus services, rail services, car sharing information and cycle training.
- Encouraging Walking by the Travel Plan Coordinator providing advice on suitable walking routes.
- Encouraging cycling by providing safe and secure cycle parking, providing information on safe cycle routes, seeking discounts from local cycle shops.
- Encouraging public transport
- Encouraging car sharing

7.42 Further detail on how the Applicant will implement and achieve the proposed objectives is set out in detail within the submitted Framework Travel Plan.

#### *Summary of Transport and Highways*

7.43 The submitted Transport Assessment demonstrates compliance with the objectives of Core Strategy Policy CS7 and importantly concludes that the proposed development would not have an unacceptable impact on road safety and would not result in a severe impact on the operation of the highways networks in accordance with national policy.

#### **Air Quality**

7.44 Air quality matters have been assessed in full by Air & Acoustic Consultants. An Air Quality Assessment has been submitted in support of this planning application, a summary of which is provided below.

7.45 The Air Quality Assessment sets out the baseline air quality conditions at the Site, as well as the likely impacts during the construction and operation phases.

7.46 In terms of the existing conditions at the Site, the Site is not located within an Air Quality Management Area. There is a mixture of both compliance and non-compliance of the NO<sub>2</sub> annual mean objective.

7.47 During the construction phase, it is considered that a low-medium sensitivity risk is likely. The air quality impacts that are likely during the construction phase will be temporary and are typical of a development of this scale and nature. The Air Quality Assessment identifies mitigatory measures to reduce impacts as a result of fugitive dust emissions during construction. Measures include (but are not limited to):

- Avoiding roughening concrete surfaces where possible;
- Ensuring sand and aggregates are stored in bunded areas;
- Ensuring bulk cement and fine powders are delivered in enclosed tankers;
- Using water-assisted dust sweepers on the access and local roads;
- Avoiding dry sweeping of large areas;
- Recording inspections of haul routes; and
- Implementing a wheel washing system.

7.48 Where appropriate mitigation is implemented, the Air Quality Assessment predicts that the residual effects of construction dust and emissions will be “not significant”.

7.49 In terms of the ongoing operational phase, the proposed development will generate “negligible” impacts from NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The proposal will have a “negligible adverse impact” on baseline air quality concentrations at specified receptor locations. As such, the likely impacts are assessed as being “not significant”.

7.50 Overall, the Air Quality Assessment concludes that the proposed development will comply with national policy and principle 2 of Core Strategy Policy CS2 which seeks to reduce carbon emissions. As such, there is no reason on the grounds of air quality for planning permission not to be approved without delay.

### **Flood Risk and Drainage**

7.51 The Site is located entirely within Flood Zone 1 (the lowest risk of flooding) according to the Environment Agency’s Flood Map for Planning and as such development in this location is compliant with part 2) of Core Strategy Policy CS24 which directs new development to areas of low probability of flooding.

7.52 The Site area is over the threshold which requires a Flood Risk Assessment to be submitted with a planning application in accordance with Paragraph 167 and footnote 55 of the NPPF and part 3) of Core Strategy Policy CS24. Burrows Graham has prepared a Flood Risk Assessment and

Drainage Strategy in support of this planning application in compliance with the NPPF and policy CS24.

- 7.53 The submitted Flood Risk Assessment considers the risk of flooding at the Site from fluvial; tidal; ground water; surface water; sewer; and reservoir sources.
- 7.54 Burrows Graham has prepared a drainage strategy for the proposed development, which is submitted in support of this application. The proposed drainage strategy has consideration of the preferred drainage hierarchy set out within the Flood Risk and Coastal Change Guidance in PPG and Part H of the relevant Building Regulations.
- 7.55 The preference is for surface water to discharge into the ground. The ground conditions at the Site (described in further detail within the Flood Risk Assessment and Drainage Strategy document) means that infiltration could be a viable drainage strategy in the southern part of the Site. However, the northern area is underlain by clay and is unlikely to be suitable to accommodate soakaway. Furthermore, contamination may prevent infiltration from being appropriate in this instance.
- 7.56 For the avoidance of doubt soakaway testing will be undertaken during detailed Site Investigations. If infiltration is viable and appropriate, surface water runoff from the carpark will infiltrate into the ground with remaining impermeable areas discharging into the nearest watercourse (i.e. Knowsley Brook). Where infiltration is not viable, it is proposed that the entire site is discharged into Knowsley Brook.
- 7.57 Burrows Graham has considered the quality of the water runoff from the proposed development that would discharge into the Knowsley Brook watercourse. It is considered that the runoff from the Site would be classed as low risk from the car park and high risk from service yard. Drainage from the service yard is proposed to pass through a full retention separator before leaving the site.
- 7.58 The proposed development will implement sustainable drainage system (SUDs) through rain water harvesting, flow controls and underground attenuation tanks. If infiltration is appropriate in the south of the site, permeable paving may be required.
- 7.59 The Site is proposed to drain at a 50% reduction to the existing brownfield rates. In this instance, this means that surface water runoff will be restricted to 120l/s. Discussions with the Lead Local Flood Authority (LLFA) have confirmed that this approach is acceptable. To achieve this, surface water attenuation storage will be required to temporary store residual surface water for rainfall events that result in peak runoff rates over 120l/s. The attenuation storage will be designed to ensure that there is no surface water flooding on site for rainfall events up to and including the 1 in

30-year storm event. The attenuation storage will also ensure that for storm events (including the 100-year storm plus 40% allowance) there will not be a risk of flooding to properties or increased risk of flooding elsewhere.

- 7.60 The submitted Flood Risk Assessment and Drainage Strategy demonstrates that the proposed development will not cause an unacceptable risk of flooding on the Site, or elsewhere, in accordance with part 1) of Core Strategy Policy CS24. The proposed drainage strategy and flood risk mitigation incorporates sustainable urban drainage measures to be implemented by the Applicant. As such, the proposal accords with Policy CS24 and the objectives of Paragraph 167 of the NPPF.

### Ecology

- 7.61 FPCR have prepared the submitted Ecological Appraisal.
- 7.62 There are no international statutory designated sites within 5km of the Site, nor are there any nationally designated Sites within 2km. The Site is located within a potentially relevant Impact Risk Zone for conservation, however FPCR has confirmed that impacts resulting from the proposal are unlikely given the Site's former use as a chemical manufacturing facility.
- 7.63 FPCR has identified two designated wildlife sites within 1km of the site boundary, however both of these sites are isolated, and no impacts are expected.
- 7.64 Given the previous use of the Site as a chemical manufacturing plant, the existing baseline is considered to have very limited ecological value. The Site is dominated by bare ground, with small areas of rank grassland, scrub, ephemeral/short perennial vegetations and introduced shrub which each have limited conservation value.
- 7.65 For the avoidance of doubt, no badgers, or evidence of the presence of badgers were identified during FPCR's survey.
- 7.66 No bat roosts were recorded on Site and only one tree was recorded as having low roosting bat potential. The removal of this tree will be carried out using good practice.
- 7.67 The Site is considered to have some limited value for foraging bats due to the northern area of woodland and the scrub to the southwest. However, the majority of the Site is of negligible value.
- 7.68 The woody vegetation at the Site (i.e. the woodland, scrub and trees), is assessed as being a suitable foraging and nesting habitat for breeding birds; however, no nest sites were recorded.

- 7.69 The submitted Ecological Appraisal confirms that the presence of amphibians and reptiles within the Site can be “reasonably discounted” given that there are no ponds at, or near to, the Site and the existing habitats generally have a negligible value.
- 7.70 The Appraisal concludes by recommending some specific measures (e.g. the provision of bird and bat boxes / holes where possible) to allow for biodiversity enhancements where possible.
- 7.71 In terms of assessing the biodiversity credentials of the proposed development, FPCR has prepared a letter (dated 09 February 2022) setting out the Biodiversity Net Gain (BNG) position. To summarise, the proposed development will result in the loss of approximately 5.55 habitat units (62.33%) and the loss of 0.86 hedgerow/linear units (82.95%). Whilst the percentage losses appear to be very high in this instance, the actual number of habitat and hedgerow units to be lost is relatively modest. As there are limited opportunities for further on-site intervention, it is the Applicant’s intention to agree a financial contribution with the Council towards off-site biodiversity enhancements.

#### Arboricultural and Landscape

- 7.72 FPCR has prepared the Arboricultural Assessment that has been submitted in support of this planning application.
- 7.73 In preparing the Arboricultural Assessment, FPCR has conducted a tree survey to understand the existing baseline at the Site. The tree survey confirms that there are 2 individual trees (Grey Poplar and Alder species) and 5 groups of trees situated within the Site boundary.
- 7.74 1 single tree and four groups of trees are assessed as being Category B (moderate quality), with the other individual tree and group of trees being Category C (low quality). For the avoidance of doubt, no trees within the Site are ancient or veteran trees.
- 7.75 The proposed development will result in the removal of the majority of trees on site to enable appropriate retaining structures to be constructed. To contribute towards mitigating for this loss, a landscaping plan has been submitted (reference: 10585-FPCR-XX-XX-DR-L-0001), which includes a total of 15 trees, comprising 7 no. native trees along the Penrhyn Road frontage and 8 no. new trees along the northern boundary of the Site. The replacement tree planting is supported by a comprehensive mix of shrub and understorey planting too as shown on the submitted landscape plan.

- 7.76 The landscape proposals provide as much replacement tree planting as possible within the space available, allowing for the necessary retaining structures to be provided along the norther boundary in particular. While the proposed planting does not amount to a 2:1 replacement as per part 10c of Core Strategy Policy CS21 the Applicant acknowledges a need to engage further with the Local Planning Authority to agree an appropriate off-site solution to adequately address the policy target. Such mitigation is likely to take the form of a financial contribution that also supports biodiversity enhancements (as indicated in the sub-section above).
- 7.77 Trees that are to be retained will be suitably protected with root protection areas being protected through the erection of barriers in accordance with British Standards BS5837.

### Energy and Sustainability

- 7.78 Halligan has prepared an Energy and Sustainability Statement which has been submitted in support of this full planning application and in accordance with the requirements of Core Strategy policies CS22 and CS23.
- 7.79 The statement provides detail on how the proposed development will result in an improved energy efficiency against the requirements of Building Regulations. The proposed development will result in a total saving of 106,454kwCO<sub>2</sub>/annum.
- 7.80 The use of local heat networks has been considered; however due to the specific operation and needs of the Site it is not appropriate in this instance.
- 7.81 Roof mounted photovoltaic panels and air source heat pumps are concluded as being the most viable measures in this instance.

## 8 PLANNING OBLIGATIONS – DRAFT SECTION 106 HEADS OF TERMS

- 8.1 In accordance with the Council's local validation requirements, this section has been provided in lieu of providing a draft planning agreement relating to potential planning obligations required for this full planning application.
- 8.2 Planning obligations may be secured under a legal agreement in accordance with Section 106 of the Town and Country Planning Act 1990 (as amended) where they satisfy the following tests, as set out by Regulation 122(2) of the Community Infrastructure Levy Regulations (2010), as amended, and Paragraph 57 of the NPPF, where an obligation is:
- a. Necessary to make the development acceptable in planning terms;*
  - b. Directly related to the development; and*
  - c. Fairly and reasonably related in scale and kind to the development.*
- 8.3 Working with the Council, the Applicant has identified the following potential S106 obligations that may be required to make the Proposal acceptable in planning terms:
- Off-site habitat creation/enhancements (subject to biodiversity net gain calculations)
  - Replacement tree planting (to be combined with the biodiversity contribution)
  - Social Value Strategy and Monitoring
  - Travel Plan monitoring
- 8.4 For completeness, the carrying out of works to the public highway to form the proposed access off Penrhyn Road would be secured by way of a legal agreement under Section 278 of the Highways Act (1980).

## 9 SUMMARY

- 9.1 This Planning Statement has been prepared on behalf of Knowsley Redevelopments Limited, in respect of the submitted full planning application at Penrhyn Road, comprising:

*“Full planning application for the erection of 18,554sqm (GIA) of industrial/employment floorspace (Use Classes B2, B8 and E(g)(iii)) (dual use) with ancillary offices (Use Class E(g)(i), security gatehouse, transport office, parking and associated works.”*

- 9.2 This Section provides a summary of the key matters associated with this full planning application.
- 9.3 The Site is situated within the Knowsley Business Park and is south of the A580 (East Lancashire Road). The Site is surrounded by built development with existing industrial and employment premises. Overall, the context of the Site is characterised by an industrialised environment with very few environmental sensitivities nearby
- 9.4 The Site can be accessed off Junction 4 of the M57 motorway from the west, or by Ormskirk Road or the B5202 from the east. The Site is well positioned in terms of access to public transport. Kitling Road bus stop is within walking distance of the Site and provides bus services throughout Knowsley Industrial Park and to Knowsley. Further bus stops on School Lane (400m south of the Site) operate additional bus services to Huyton, and services to Kirkby, Woolfall Heath and Liverpool is provided via the Caddick Road bus stop.
- 9.5 The Site has good access to Knowsley's cycle network, pedestrian routes and associated infrastructure.
- 9.6 The Site is located within an allocated Primarily Industrial Area where Use Classes B2 (general industry) and B8 (storage and distribution) are supported.
- 9.7 The proposed development could create approximately 187 full time equivalent jobs during the operational phase and £4.68 million per annum GVA at Knowsley level.
- 9.8 Significant technical work has been undertaken and submitted in support of this application. The submitted Transport Assessment sufficiently demonstrates that the proposal can be delivered and accommodated without causing severe harm to the safety and/or operation of the surrounding highways network.

- 9.9 The submitted Air Quality Assessment concludes that the proposed development will comply with national policy and principle 2 of Core Strategy Policy CS2 which seeks to reduce carbon emissions. As such, there is no reason on the grounds of air quality for planning permission not to be approved without delay.
- 9.10 The Site is located within Flood Zone 1 (the lowest risk of flooding) and the proposed development is not considered likely to increase the risk of flooding at the site, or elsewhere in accordance with Policy CS24. Taking the preferred drainage hierarchy into consideration, it is proposed that the Site will be drained using infiltration where possible, and by discharging into the Knowsley Brook watercourse. A full retention separator will be installed to ensure Knowsley Brook is not contaminated with contaminated water from the service yard area.
- 9.11 Sustainable Urban Drainage systems, such as rainwater harvesting, flow controls and underground attenuation tanks are also proposed.
- 9.12 The Site is proposed to drain at a 50% reduction to the existing brownfield rates. surface water attenuation storage will be required to temporary store residual surface water for rainfall events that result in peak runoff rates over 120l/s. The attenuation storage will be designed to ensure that there is no surface water flooding on site for rainfall events up to and including the 1 in 30 year storm event. The attenuation storage will also ensure that for storm events (including the 100 year storm plus 40% allowance) there will not be a risk of flooding to properties or increased risk of flooding elsewhere.
- 9.13 The proposed drainage strategy and flood risk mitigation incorporates sustainable urban drainage measures to be implemented by the Applicant. As such, the proposal accords with Policy CS24 and the objectives of Paragraph 167 of the NPPF.
- 9.14 The Site has a very limited existing ecological value, with no protected species recorded on Site. The development of the Site will result in a net biodiversity loss, due to the removal of the northern perimeter trees to enable an acceptable solution to level constraints to be brought forward.
- 9.15 To assist in mitigating the tree loss required to facilitate the proposed development, a total of 15 standard trees are proposed across the Site, as well as native scrub mix, wild flowers and grassed areas. Given the Site's location and constraints, there is limited space available to provide additional planting. As such, the proposed development does not satisfy the national policy aim to achieve a measurable net gain in biodiversity, nor the local policy requirement replacement tree planting; however, when taking a balanced approach, it is considered that the socio-economic

benefits of bringing this brownfield site back into use, combined with appropriate planning obligations to mitigate the on-site deficiencies, far outweigh the harm caused.

- 9.16 This planning application is considered to have satisfied the statutory requirement of Section 38(6) of the Planning and Compulsory Purchase Act (2004) inasmuch as it complies with the development plan when taken as a whole (i.e. the Proposal complies with the majority of strategic and detailed policies and only limited conflict exists with objectives around biodiversity and trees). Where limited conflicts with policy do occur, it is the Applicant's view that these will be adequately mitigated through the provision of appropriate planning obligations. There are no other material considerations that would outweigh the benefits of granting planning in this instance.
- 9.17 As such, it is respectfully requested that planning permission be granted in accordance with Paragraph 11 of the National Planning Policy Framework.



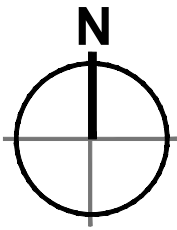
## Appendices



## Appendix A – Site Location Plan

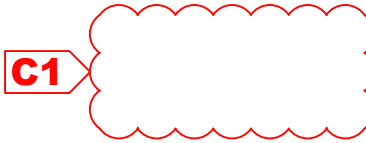


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- Dimensions are in millimeters, unless stated otherwise.
- It is the recipients responsibility to print this document to the correct scale.
- All relevant drawings and specifications should be read in conjunction with this drawing.

 - Layout to be confirmed

 - Revision reference

Key

 Planning Boundary  
9.38 Acres / 3.79 Ha

PLANNING  
THIS DRAWING IS FOR PLANNING CONSIDERATION ONLY  
AND SHOULD NOT BE USED FOR ANY OTHER PURPOSE

|     |               |     |     |          |
|-----|---------------|-----|-----|----------|
| A   | Initial Issue | CJD | LF  | 19.01.22 |
| rev | amendments    | by  | ckd | date     |

Penrhyn Road, Knowsley Business  
Park, Merseyside  
Location Plan

GRAFTONGATE



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o. +44 (0)1636 653027 e. info@umcarchitects.com

|                  |            |
|------------------|------------|
| Drawing Status:  | Planning   |
| Drawn / Checked: | CJD / LF   |
| Date:            | 19.01.2022 |
| Scale:           | 1:1250 A2  |
| Drawing no:      | Revision:  |
| 21002 P0101      | A          |



## Appendix B – Planning History

| Reference     | Summary of Development                                                                                                                                                                 | Status                         |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| 21/00761/SO   | Screening opinion for the erection of 18,554sqm of industrial/employment floorspace (use classes b2, b8 and e(g)(iii)) with ancillary offices (use class e(g)(i)) and associated works | EIA not required<br>02/11/2021 |
| 99/00694/HSC  | Knowsley business contract chemicals Penrhyn road Prescott park Merseyside - claim for deemed consent for the storage of bromine and sodium - (surrendered October 2020)               | Approved<br>24/01/2000         |
| 00/00054/LBC  | Part demolition and rebuilding of boundary wall                                                                                                                                        | Approved<br>18/05/2000         |
| 98/00560/APP  | Knowsley business Nutrasweet Kelco Penrhyn road Prescott park Merseyside - installation of 2 no. 60 tonne storage tanks and ancillary                                                  | Approved<br>05/01/1999         |
| 97/00293/APP  | Construction of vehicular access                                                                                                                                                       | Approved<br>29/07/1997         |
| 97/00066/APP  | Extensions to covered way of production building and to                                                                                                                                | Approved<br>20/04/1997         |
| 97/00049/APP  | Erection of storage building located on hardstanding currently                                                                                                                         | Approved<br>29/04/1997         |
| 74/02742/HIST | East Lancs Rd Knowsley ind park :- hoarding sign                                                                                                                                       | Approved<br>29/04/1997         |
| 97/00049/APP  | Erection of storage building located on hardstanding currently                                                                                                                         | Approved<br>29/04/1997         |
| 96/00686/APP  | Erection of 17m high reactor building and installation of associated tank farm                                                                                                         | Approved<br>12/03/1997         |
| 96/00196/APP  | Nutrasweet Kelco Ltd Penrhyn road Knowsley Merseyside - construction of acoustic barrier between existing compressor                                                                   | Approved<br>24/05/1996         |
| 95/00704/APP  | Retention of single storey building for office use                                                                                                                                     | Approved<br>02/02/1996         |

|               |                                                                                                                                               |                        |
|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| 95/00180/APP  | Erection of 800 sqm extension to existing warehouse                                                                                           | Approved<br>22/05/1995 |
| 94/00102/APP  | Construction of bunded tank farm, Access roadway and associated fluid transfer facilities for storage of bulk chemicals.                      | Approved<br>20/04/1994 |
| 74/12278/HIST | Kelco bio specialities Ltd Penrhyn road Knowsley :- erection of concrete tanks and attached out buildings for trade efficient treatment plant | Approved<br>12/02/1990 |
| 74/04975/HIST | Penrhyn road Knowsley:- erection of extension to storage warehouse                                                                            | Approved<br>27/07/1986 |
| 74/04980/HIST | Penrhyn road Knowsley :- erection of extension to office block                                                                                | Approved<br>27/06/1986 |
| 74/04985/HIST | Penrhyn Rd Knowsley :- erection of extension to technical development centre and laboratory                                                   | Approved<br>27/06/1986 |
| 74/04986/HIST | Penrhyn Rd Knowsley :- formation of pump house 2 water storage tanks drum store tank farm ext of road and landscaping                         | Approved<br>27/04/1986 |
| 74/09298/HIST | Kelco biospecialities Penrhyn road Knowsley :- erection off pallet/drum storage building                                                      | Approved<br>28/11/1985 |
| 74/08847/HIST | Erection of extension to provide lunchroom and toilets                                                                                        | Approved<br>17/05/1985 |
| 74/08560/HIST | Penrhyn Rd Knowsley ind. park Prescott :- installation of company logo sign indicating site location                                          | Approved<br>14/11/1984 |
| 74/08280/HIST | Penrhyn road Knowsley ind. est :- storage warehouse                                                                                           | Approved<br>27/04/1984 |
| 74/07412/HIST | Penrhyn Rd Knowsley ind est :- erection of new ammonium nitrate store                                                                         | Approved<br>24/02/1983 |
| 74/07413/HIST | Penrhyn Rd Knowsley ind estate :- new stores building                                                                                         | Approved<br>24/02/1983 |
| 74/07415/HIST | Penrhyn road Knowsley ind estate :- new temporary canteen building                                                                            | Approved<br>24/02/1983 |

|               |                                                                                                                                                                                  |                        |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| 74/06730/HIST | Penrhyn Rd Knowsley ind estate :- extension and modifications of existing plant producing Xantham gas continue use of existing plant existing building class 8 remains unchanged | Approved<br>30/03/1982 |
| 74/06621/HIST | Talres Penrhyn Rd Knowsley i e :- boiler house and compressor room chimney stack with workshops                                                                                  | Approved<br>04/12/1981 |
| 74/02508/HIST | Off e Lancs Rd. Knowsley ind. estate :- proposed speciality chemical complex                                                                                                     | Approved<br>26/07/1977 |
| 74/00316/HIST | News international newspapers ltd Kitling road Knowsley business park Knowsley Merseyside l34 9hn                                                                                | Approved<br>28/10/1974 |

