



Planning and Regeneration Statement



On behalf of:

Derwent Development Management Ltd

In respect of:

Huyton Trade Park,
Wilson Road
Huyton
L36 6JG

Date:

October 2022

Reference:

MA/DDML/008-06/R001

1.0 Executive Summary

1.1 This Planning Statement has been prepared by ATP on behalf of DDML in support of a planning application submitted (as landowner) to meet market requirements to deliver modern multi-let industrial units to meet the needs of ingoing tenants for employment use. Full details of the proposal are set out in the accompanying Design and Access Statement. The proposals can however be summarised and broken down as follows:

- 2 no. blocks for employment uses;
- Envisaged to support 24 no. employment units;
- Units ranging from 115m² – 1048m²;
- Overall floorspace of 7740m²;
- 177 parking spaces (including accessible provision and larger spaces);
- Cycle and motorcycle parking;
- Space for turning movements and deliveries;
- No adverse impact on other tenants; and
- Other associated works.

1.2 The application site is located south of Wilson Road and comprises an area of tired employment buildings and underused land. In addition to the dilapidated buildings, there are considerable areas of hard standing and a grassed area close to the entrance.

1.3 The residual areas to the west and east provide multi-let employment accommodation owned by DDML which is well let with frequent enquiries for modern specification units. Land to the other side of Wilson Road is also in established employment use. To the rear of the development plot (south) is an area in residential use.

1.4 Through this application, it is intended that the proposed development will deliver new employment opportunities on this long-established site whilst helping to attract further investment into the Huyton area.

1.5 The proposals will help to create approximately 150 net additional jobs. Although not all the work opportunities can be expected to be felt within the immediate local community, the proposals will increase the level of employment in the area. The proposals will result in a boost of around £5.8m to the local economy per annum as a result of the new jobs created and safeguarded and additional business rates payable on the units.

1.6 The NPPF supports economic development such as these proposals, stating that '*significant weight should be place on the need to support economic growth through the planning system*'.

2.0 Background

Site Location and Description

- 2.1 The application site is located within the urban area of Huyton, circa 1200m south-east of the town centre. This is a long-established employment site with residential uses to the south. The redlined areas represents a part of the Huyton Trade Park site and can be characterised as being comprised of tired employment buildings and other land which is underused.
- 2.2 The site has a principal access from Wilson Road which is a spine road through an industrial estate that links onto the A5080 extremely close to junction 6 of the M62 which is an interchange with the M57. This is a genuinely excellent location for employment users that require good motorway connectivity.

Existing Uses

- 2.3 The application site forms part of a well-established industrial estate to the south-west of the town centre an excellent links to the strategic road network. The identified parcel includes dilapidated buildings and areas of hard standing, as well as a smaller grassed area and an area of parking.
- 2.4 Tenants are varied and have grown accustomed to associated external storage and extensive areas of ancillary staff parking.
- 2.5 The residual areas to the west and east are in the blue land and are essentially unaffected by this development. This proposal seeks to deliver new units to meet that need on an established site providing jobs and investment.
- 2.6 Subject to future market conditions and tenant requirements, DDML may consider capital investment to upgrade the premises in the blue land but this is a medium-term ambition and not a key or relevant consideration for the purposes of this application.

Locality

- 2.7 The principle of commercial development in this location is established and the employment use is recognised through the designation as an existing Primarily Industrial Area either side of Wilson Road.
- 2.8 Whilst the areas to the immediate south-west is predominantly residential in character, land to all other directions is primarily commercial and includes larger format units which support the likes of Howden and Toolstation.

Relevant Planning History

- 2.9 It is understood from review of the desktop study that the site has had long-established employment use which included principal use as a biscuit production factory (as part of a wider complex) by Huntley & Palmer as a biscuit production factory on both sides of Wilson Road. UK production wound down thereafter, with the Huyton factory closing in 1983. Please see an historic aerial photo of the site from the 1960s.



- 2.10 The factory was constructed from 1953 and opened in 1955, the bottom right photo is an archive image showing its food production use.
- 2.11 Since the 1960s photo above (top image), employment uses in this area have expanded to the north and to the south-east to a considerable degree. Through review of the 1960s aerial

photo and that of today, it is likely that the plot ratio on the DDML land has reduced but we also conclude that some original built form (i.e. former northlit buildings) remain in place.

- 2.12 Through reference to the planning file, it is clear that the majority of the existing units have the benefit of an historic flexible consent (for uses across Use Classes B1(b) and (c) as well as B2 and B8).
- 2.13 A number of consents have been achieved (in 2008 and 2012) for uses in and close to the redlined area but none have been implemented and have lapsed. One of these was for 6 smaller units and the other for three larger units- in each case the aggregate floorspace would have been in the 1700m²-2300m² range.
- 2.14 We specifically note the application from 2012 (12/00763/FUL) that secured consent for new units within a tighter area of Huyton Trade Park, thereby leaving a greater quantum of older stock for continued occupation.
- 2.15 The new units are shown on the extracted image below (from the application material) and this would have supported flexible employment uses. We note that this consent was not implemented but the principle of more intensive employment use was established.



- 2.16 More recent applications on the wider estate have included proposals to widen the use of buildings to facilitate occupier requirements for employment generating uses.

3.0 Planning Policy Framework

3.1 This section identifies the key policy framework from the Development Plan, national policy and other local level guidance. These represent material considerations to be afforded weight in the s38(6) planning balance exercise. The key DPDs relating to the proposals comprise:

- Knowsley Local Plan Core Strategy (January 2016);
- Merseyside and Halton Joint Waste Local Plan (2013); and
- Saved policies from Knowsley Replacement UDP (adopted 2006, savings direction from 2009 as amended by adoption of Core Strategy).

Local Plan Core Strategy (adopted January 2016)

3.2 Alongside the UDP saved policies, the Core Strategy is a key strategic policy document. It sets out a framework to guide location and levels of development up to 2028 as well as setting out principles that will shape change. In the context of this proposal the key policies comprise:

- Policy CS2
- Policy CS4
- Policy CS19
- Policy CS22
- Policy CS24

3.3 It is highlighted at Strategic Objective 1 that it will be crucial to meet requirements for employment and investment, aligned to national guidance which clarifies that sustainable growth should give priority to the use of accessible previously developed land

3.4 Policy CS2 is an overarching policy concerned with Development Principles. It provides high-level support for (amongst other things):

- Promoting sustainable economic development;
- Meeting business needs and improving productivity;
- Supporting low-carbon development that seeks to minimise energy use;
- Supporting development that is sustainably located and achieves modal choice;
- Schemes that maximise the regeneration of PDL land in the urban area; and
- Consider and mitigate planning impacts.

3.5 Policy CS4 is concerned with economic development and provides a positively worded framework for the delivery of employment uses which are sustainably located and contribute to Plan-led employment needs. Policy CS4 goes on to mention opportunities to secure local regenerative benefits, which is ultimately taken forward in the "Social Value" SPD.

- 3.6 Policy CS19 is concerned with Design Quality and provides a positively worded framework for the delivery of new uses which are well-considered and respond positively to a very detailed criteria-driven approach (constructed of three main topic areas and additional sub-criteria).
- 3.7 Topic area 2 is concerned with general amenity and seeks to ensure that new development would mitigate potential adverse impacts to neighbouring land and also provide end uses where the risk of crime is limited.
- 3.8 Topic area 3 is concerned with climate change mitigation and seeks to promote energy efficient development and the use of low carbon technologies. It also seeks to ensure that new development considers matters relating to:
- Biodiversity;
 - Flood risk; and
 - Waste minimisation.
- 3.9 The ambitions set out in other policies (such as Policy CS2 and CS19) in terms of tackling climate change are addressed in some detail by Policy CS22 which is concerned with Sustainable and Low Carbon Development.
- 3.10 Policy CS24 is concerned with water management and encourages the use of sustainable urban drainage and other measures to reduce flooding and run-off.

Merseyside and Halton Joint Waste Local Plan (MHJWLP)

- 3.11 This MHJWLP document provides considerable advice and policy guidance in terms of waste management proposals and provides two policies (WM8 and WM9) which provides specific objectives and recommendations in terms of how other development proposals should consider the management of waste created on-site.
- 3.12 These policies state:

Policy WM 8 Waste Prevention and Resource Management

"Any development involving demolition and/or construction must implement measures to achieve the efficient use of resources, taking particular account of:

- *Construction and demolition methods that minimise waste production and encourage re-use and recycling materials, as far as practicable on-site;*
- *Designing out waste by using design principles and construction methods that prevent and minimise the use of resources and make provision for the use of high-quality building materials made from recycled and secondary sources;*
- *Use of waste audits or site waste management plans (SWMP), where applicable, to monitor waste*

minimisation, recycling, management and disposal.

Evidence demonstrating how this will be achieved must be submitted with proposals of this type.

Policy WM 9 Sustainable Waste Management Design and Layout for New Development

"The design and layout of new built developments and uses must, where relevant, provide measures as part of their design strategy to address the following:

- 1. Facilitation of collection and storage of waste, including separated recyclable materials;*
- 2. Provide sufficient access to enable waste and recyclable materials to be easily collected and transported for treatment;*
- 3. Accommodation of home composting in dwellings with individual gardens;*
- 4. Facilitate small scale, low carbon combined heat and power in major new employment and residential schemes, where appropriate."*

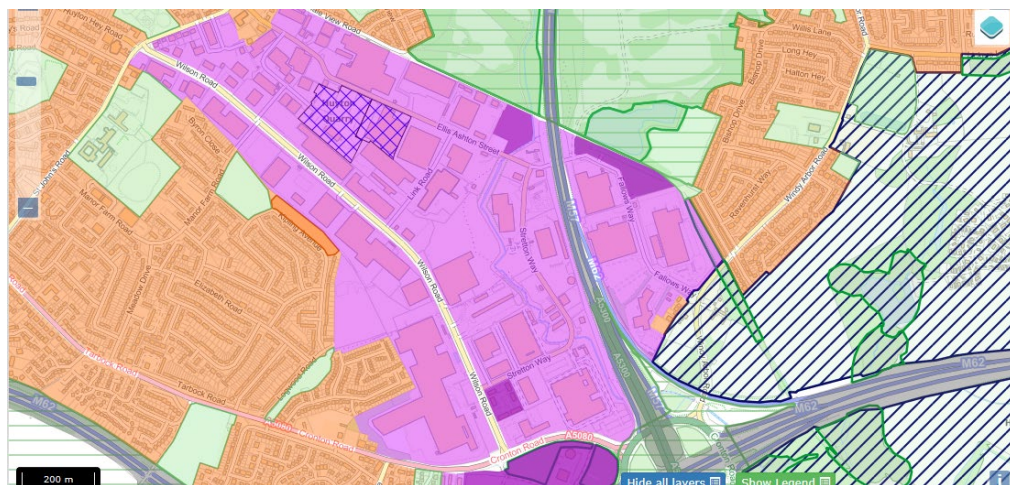
Knowsley UDP saved policies

3.13 The Knowsley Replacement UDP was adopted in June 2006. Under transitional provisions, the majority of UDP policies were "saved" by the Secretary of State in June 2009. An additional three UDP policies were replaced on adoption of the MHJWLP. A further 36 policies were deleted on adoption of the Local Plan Core Strategy.

3.14 The Local Plan Core Strategy Appendix C gives a full schedule of the 39 UDP Policies which continue to be saved. For this proposal, the **relevant** key saved policies comprise:

- Policy EC3
- Policy T5
- Policy T9

3.15 Policy EC3 is positively worded and supports new employment development within allocated areas. The subject land is part of a Primarily Industrial Area (land tinted pink).



- 3.16 In addition to the express support for traditional employment uses, the policy provides a criteria-driven framework for the consideration of other uses that could be compatible and otherwise supportable in planning terms.
- 3.17 In relation to this policy, the accompanying text at paragraphs 6.25 and 6.26 state as follows:
- "The Proposals Map designates a number of areas as Primarily Industrial Areas. These are where industrial, business or warehousing uses are the predominant existing land uses. These areas have a key role to play in providing jobs for the residents of Knowsley and of Merseyside. However, other uses can be appropriately located within these areas, provided they are complementary in scale and nature and address identified needs of the area.*
- In some cases, for example, small shops or petrol stations are needed within industrial areas to provide a local service to occupiers of the area. Other uses which can sometimes be most appropriately carried out in industrial areas include builders merchants, tyre and exhaust centres, waste transfer stations, etc. However, such uses must be well sited and designed to avoid causing harm to the environment and image of industrial areas, the processes carried out by neighbouring industrial occupiers or neighbouring non-industrial uses. Such uses are generally not appropriate for high quality B1 business parks due to the impact of noise, fumes, dust and so on but may be acceptable in industrial areas allocated for B2 or B8 uses."*
- 3.18 Policy T5 is concerned with locational sustainability for major traffic generating development, seeking proximity to public transport infrastructure and the strategic road network. The policy includes a clause which would allow major development in less sustainable locations on the basis that mitigation would be delivered to improve its sustainability credentials.
- 3.19 Policy T9 is concerned with travel planning and encourages that these be provided by major developments, especially in locations with existing air quality or congestion problems.

NPPF

- 3.20 Though not part of the statutory Development Plan, national planning policy is an important material consideration and the NPPF may supersede earlier adopted local documents where these conflict with guidance set out within the NPPF.
- 3.21 The NPPF clearly recognises the need to support sustainable economic development and gives great positive weight to these objectives. Employment proposals that encourage local employment opportunities, promote higher skilled jobs and/or allow for existing businesses to expand will be supported.
- 3.22 NPPF Paragraph 81 states that planning policies and decisions should help create conditions that businesses can invest, expand and adapt. This paragraph also states:

"...Significant weight should be placed on the need to support economic growth and productivity, taking account both local business needs and wider opportunities for development..."

- 3.23 The NPPF is based on a presumption in favour of sustainable development. Paragraph 11 describes this as the 'golden thread' running through the plan making and decision- taking process. It also confirms that where the Development Plan is absent, silent or relevant policies are out of date, planning permission should be granted unless:
- *"Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or*
 - *Specific policies in this framework indicate development should be restricted"*.

Other Guidance

Adding Social Value to Development: Employment and Skills SPD

- 3.24 The "Social Value" SPD was adopted in September 2018. In terms of social value assessment, it provides considerable additional clarity to the objectives espoused in the Local Plan Core Strategy with a particular focus upon the component parts of Policy CS4.
- 3.25 The SPD confirms that the requirement for social value strategies will be imposed upon commercial proposals for major development (as defined within the DMPO).
- 3.26 The SPD provides commentary in respect of the scope of coverage that would be sought with reference to the consideration of Social Value and the range of measures that are anticipated.

4 Development Proposals

- 4.1 The development proposal seeks full planning permission to redevelop an area of existing tired buildings and other land to provide modern format flexible employment units. These are designed to meet multi-let employment requirements from light industry and general industry through to logistics.



- 4.2 These proposals deliver the opportunity for economic development on this established site for a scheme which reflects market signals. Early engagement with market advisers has resulted in a scheme that is deliverable and maximises opportunity for early investment. This will ensure the delivery of 24 units across 2 blocks for flexible employment uses including B2/B8 and light industry (Class E g iii). Site access will utilise the two existing junctions.
- 4.3 These new units would range from 115m²–1048m² individually, delivering 7740m² flexible employment floorspace with space available for turning and parking. By consequence of the clearance of the existing 5317m² built form, the net additional floorspace will be 2423m². Details of parking layout and provision in terms of cycle and EV parking meet applicable local standards.
- 4.4 Whilst the scheme delivers additional floorspace and investment, this is very strongly aligned to what would have been permitted in floorspace terms in 2012. In addition, it is broadly consistent with the historic use of the site and represents a positive use of an accessible brownfield site in the urban area.

- 4.5 It is also clear that the new facilities will be a qualitative improvement both in terms of the buildings themselves but also through better facilities for staff including cycle shelters and external seating and other amenities where feasible.
- 4.6 Full details of the proposal with regard to use, amount, layout, scale, appearance, and access are set out in the accompanying Design and Access Statement. The proposals can however be summarised and broken down as follows:
- 2 no. blocks for employment uses;
 - Envisaged to support 24 no. employment units;
 - Units ranging from 115m² – 1048m²;
 - Overall floorspace of 7740m²;
 - 177 parking spaces (including accessible provision and larger spaces);
 - Cycle and motorcycle parking;
 - Space for turning movements and deliveries;
 - No adverse impact on other tenants; and
 - Other associated works.
- 4.7 The site was put into employment use after the Second World War and had been occupied by Huntley and Palmer from 1955 until closure in 1983. At point of peak occupation by Huntley & Palmer, the site was very intensively used in terms of built form and we understand would have supported circa 900 jobs that were crucial to the economy of the local area.
- 4.8 The buildings which currently occupy the Huyton Trade Park site are of mixed quality, and those proposed for clearance and replacement are in very poor condition and well beyond their economic life. They need to be replaced to respond to latent demand for good quality space in this location. There is strong market demand and this character of use is approved.
- 4.9 Careful consideration has been given to the siting of proposed units and uses, servicing arrangements and car parking. This has sought to minimise adverse impact in terms of noise nuisance or light spillage to protect residential amenity. DDML has also sought to ensure that opportunity has been taken to minimise energy use and support low carbon technologies. The scheme provides cycle parking and infrastructure for EV charging.
- 4.10 The application seeks to accelerate delivery of employment uses upon a highly established employment site which has the benefit of a Development Plan allocation. Indeed, the wider site has had a Development Plan allocation for an extended period and prior to that the site formed part of a biscuit factory complex on both side of Wilson Road that at its peak would have supported 900 jobs.

5.0 Assessment of Development

- 5.1 This chapter assesses the proposal's compliance with relevant Development Plan policy and should be read alongside the accompanying drawings.
- 5.2 The buildings which currently occupy the Huyton Trade Park site are of mixed quality, and those proposed for clearance and replacement are in very poor condition and well beyond their economic life. They need to be replaced to respond to strong latent demand for good quality space in this location.
- 5.3 The site has been in employment use since the 1950s and by the 1960s the site was much more intensively used (in terms of built form and number of jobs hosted) than is now the case, or would be the case post-consent. The site formed part of a biscuit factory complex on both side of Wilson Road that at its peak would have supported 900 jobs. The development proposes modern format flexible employment units designed to meet multi-let employment demand for light industry and general industry through to logistics.
- 5.4 Whilst the scheme delivers additional floorspace and investment, this is entirely consistent with the historic use of the site and its Development Plan designation. It also represents a positive use of an accessible brownfield site in the urban area. Given the proximity of other uses in the urban area, the scheme has had regard to amenity considerations which is reflected in the scheme design.
- 5.5 Given the above, the following are considered relevant in the assessment of the scheme:
- The Principle of Development;
 - Amenity Implications;
 - Transport Implications;
 - Regeneration; and
 - Other Matters

The Principle of Development

- 5.6 The subject site is previously developed land within the urban area which has established use for employment purposes, most recently as a multi-let industrial estate. The principle of commercial development in this location is established and this is reflected in its EC3 designation which supports employment use and safeguards it from loss.
- 5.7 These proposals will ensure the delivery of 19 units (which range from 232m² – 1048m² individually) across 2 blocks for flexible employment uses including B2/B8 and light industry

(Class E g iii). These new units provide 7740m² flexible employment floorspace with parking facilities meeting applicable local standards. By consequence of the clearance of the existing 5317m² building, the net additional floorspace will be 2423m².

- 5.8 Whilst that is self-evidently an increase, in contextual terms it will remain markedly lesser than the historic use as part of a biscuit factory that would have supported circa 900 jobs (on this land and adjoining land). In essence, there have been employment generating approvals in this locality since the 1950s and what is being proposed now is no fundamental change in character from the existing and is considerably lesser than the historic use.
- 5.9 The buildings on the Huyton Trade Park site which are proposed for clearance and replacement are not capable of economic repair- they need to be replaced and there is strong market demand for good quality space which is what the applicant is proposing.
- 5.10 The proposal will deliver highly lettable modern format flexible employment units. Flexibility is provided by way of the type of users that can be supported (from light industry and general industry through to logistics) and unit typology. The scheme delivers 24 units with appropriate parking facilities, but also noting that the new facilities will be a qualitative improvement both in terms of the buildings themselves but also through better facilities for staff including cycle shelters and other amenities where feasible.

Amenity Implications

- 5.11 The application site is within the urban area and has been used for employment purposes for well over 60 years. It has the benefit of an allocation which supports its use for B1/B2/B8 purposes and the intensification of such sites is actively supported by the policy framework.
- 5.12 We are not aware of any conditional controls in terms of the use of these main buildings which would impede their operation or servicing hours. It may be the case that tenants do not utilise these units to the full extent of these permissions but of course they could do so without recourse to planning consent and no threat of enforcement under planning powers.
- 5.13 It is noted that the site includes considerable hard standing and a grassed area which are therefore largely absent of built form. This scheme does propose additional built form in those areas, but it is important to reflect that the historic use of the site comprised major factory development in this location.
- 5.14 We recognise that the south-western boundary does have some residential receptors nearby and that there is a need to consider residential amenity. Again, the historic aerial photos from

the 1960s clarify that those residential areas were in place at that time so the original context for those homes was to adjoin an industrial area.



- 5.15 The scheme design has sought to marry the need to deliver new employment floorspace with the opportunity to site new buildings and acoustic screening against these boundaries through which the scheme secures greater enclosure and can function to mitigate acoustic transfer.
- 5.16 Through informal pre-application dialogue we are aware that this is an issue which needs to be explored and justified accordingly. Given this, the applicant commissioned acoustic advice to establish whether the proposed buildings and uses would result in an acceptable noise environment for relevant residential receptors.
- 5.17 The acoustic assessment tests worst case (which in respect of operational noise would be B2 industrial use) and concludes that subject to installation of acoustic boundary fencing to the gaps between buildings on the southern edge that there would be an acceptable noise environment for B1-B8 purposes and no justification for hours controls.
- 5.18 We also confirm that the scheme will have external lighting but this will be sensitively designed and the isolux analysis demonstrates that this will not result in spillage beyond the boundary that would impede the development.

Transport Implications

- 5.19 The application site has been found to be highly accessible and acceptable in transport terms. The application is accompanied by a transport statement which confirm that there could be no clear evidence of any significant adverse impact upon the operation of the highway network that would warrant refusal.
- 5.20 It is also the case that there is a bus stop immediately outside the site on Wilson Road (and on the opposite side of the road) and it is well located on a key route close to other employment premises and in the urban area. It is a highly accessible site and there would be no credible basis to raise issue with its transport credentials or to seek related mitigations as these would be difficult to conclude as necessary.

Regeneration

- 5.21 The regeneration and economic benefits of the proposals are considered within this section of the report. For ease, these have been split into the following sub-sections and are considered in turn below;
- Economic/work benefits;
 - Local finance considerations; and,
 - Health Related Benefits

Economic/Work Benefits

- 5.22 The proposals will help to support the aims of the Local Plan and NPPF through the creation of new economic development and new employment opportunities within the proposed employment units. The scheme replaces existing buildings which are in poor condition and do not represent a credible long-term opportunity to sustain employment here.
- 5.23 Employment generation is largely dependent upon occupier business models but it is commonplace for such proposals to estimate regenerative potential by reference to benchmarked figures for job density. Job density for uses B1/B2/B8 vary significantly but we adopt a mid-point which is 1 full-time job per 40 sq m of floorspace created. We project that the development will sustain around 193 new permanent full-time jobs for the local area.
- 5.24 We do recognise that there are existing buildings in occupation which support employment and therefore not all of these jobs are net additional. However, the existing floorspace is in poor condition and it is known that the amount of employment sustained is relatively low (circa 40-50 jobs).

- 5.25 Whilst it is likely to be higher in reality, we estimate the net additional jobs created will be 150 jobs full-time equivalent (estimated 225 workers with a mix of full and part-time posts).
- 5.26 As well as applying a conservative “netting off”, the analysis applies further caution by not applying the positive multiplier effects which will be had given the supportive role to the local construction industry. In addition to this, the proposed development will also help to deliver a number of temporary construction jobs.
- 5.27 Although not all work opportunities can be expected to be felt in the immediate community, the proposals will increase local employment. In addition to the B1/B2/B8 uses, there will also be employment opportunities created in service and support roles (maintenance, cleaning and security) which secures a mix of available job opportunities through the scheme.
- 5.28 As such, the proposed development, through its ability to create new jobs and attract new businesses to the area will help to deliver the objectives of achieving economic growth as supported by the NPPF.
- 5.29 The NPPF provides precise support for development that can deliver economic growth stating that *‘significant weight should be place on the need to support economic growth through the planning system’*.

Local Finance Considerations

Temporary Employment Creation

- 5.30 Figures for construction-related employment are benchmarked against contract value, typically inclusive of fit-out costs. Relying on Scottish Enterprise guidance, the average cost for capital schemes to deliver one 12 month equivalent construction job is £75,000. This has been peer-reviewed by One North East and academic Review and is seen to be cautious – as such this represents a robust approach.
- 5.31 The construction value of the development is comprised of site clearance, the new buildings, engineering works and fit-out. The contract works value has been estimated by DDML’s advisors (inclusive of tenant fit-out) at £7.5m. The upward trend in contract prices is noted so there is clear potential that the contract value could be higher thus adding in further caution.
- 5.32 In terms of the above construction value this would equate to an opportunity to generate 100 net additional construction jobs (FTE for 12 month continuous period).
- 5.33 In monetary terms, the direct economic effect of these newly created permanent jobs can be

calculated by reference to the type of employment as the average earnings varies by sector and by region. Through analysis the net additional local effects owing to wage benefits are estimated to be £3.59m during an assumed 12 month construction period.

5.34 In terms of the construction period, the calculation is:

$$\begin{array}{rcl}
 \text{Aggregate net additional jobs} & \times & \text{Average earnings (North West - Construction)}^1 \\
 100 & \times & £35,910 \\
 = & & \underline{\underline{£3.59m}} \text{ Total net additional local effects}
 \end{array}$$

Permanent Employment Creation

5.35 This next section assesses the value of the outputs set out within a previous sub-section. As the development will create 100 full time job opportunities, we calculate an estimated value that this will bring for the local economy. It is important to note that this does not include a calculation for multiplier benefits which will arise (typical figure used is a 21% multiplier).

$$\begin{array}{rcl}
 \text{Additional jobs} & \times & \text{Average annual FTE earnings (North West)}^2 \\
 150 & \times & £37,780 \\
 = & & \underline{\underline{£5.67m}} \text{ Total net additional local effects p.a}
 \end{array}$$

Business Rates Income

5.36 The proposed development will create new commercial floorspace through the mixed employment uses and these will be liable to business rates. The following calculates the rates payable for this floorspace based on the rateable value of similar commercial uses. It should be noted that these rates are those payable to the Council by occupiers of these units on the basis of a unit area charge basis and the 2022/23 49.9% small business multiplier rate.

5.37 Rateable values vary by type but for the purposes of this exercise we assume that the floorspace is split broadly 40/60 between warehousing and industrial use.

Use	Floorspace m ²	Assumed Rate payable per m ²	Rates payable
Warehouse Uses	4,645	£14.00	£65,030
Industrial Uses	3,095	£13.00	£40,145
Total	7,740		£105,175

5.38 As set out in the table above, the subsequent occupation of these units will bring £0.11m boost to the economy per annum through the generation of business rates.

¹ Source: 2021 Annual Survey of Hours and Earnings (ASHE) Table 5.7a Annual pay - For 'Construction of Buildings' North West.

² Source: 2021 Annual Survey of Hours and Earnings (ASHE) Table 5.7a Annual pay - For 'All Production Industries' North West

Permanent Economic Boost

- 5.39 Overall, taking into account the business rates and the local employment creation, the proposed development will have a boost of around £5.78m to the local economy per annum.

Health Related Benefits

- 5.40 Increased employment opportunities, as in the case of the proposed development, have been found to bring significant benefits to the health of the local community. The Government White Paper highlights how increasing employment levels has a direct positive impact on health as a result of higher income levels leading to a greater accessibility to health care.
- 5.41 The proposals create increased employment opportunities, leading to growth in income and accessibility to health care. This supports two key *Corporate Strategy* ambitions to deliver:
- Good homes, green spaces, healthy places; and
 - A fair economy that works for everyone.

Other Matters

- 5.42 The sections above addressed the key points which pertain to the development proposal. The following section addresses residual matters relevant to the planning balance judgment.

Flood Risk

- 5.43 The application is accompanied by a drainage assessment which clarifies the proposed approach in terms of surface water drainage which includes appropriate attenuation.
- 5.44 Whilst the site falls on the cusp of needing a flood risk assessment by virtue of site area, for robustness one is undertaken and given the local flood risk category (flood zone 1) it is straightforward to conclude that (by accepting controls in regard to surface water drainage) that flood risk and drainage present no impediment to approval.

Landscaping and trees

- 5.45 The application is accompanied by landscape details and planting plans which clarify the proposed approach in terms of providing an effective development platform whilst softening development boundaries.
- 5.46 The submission is also accompanied by an arboricultural assessment. This describes some limited removals of trees to facilitate development, mitigated by net additional planting that provides a good quality scheme that also contributes towards wider planning objectives.

Ecology

- 5.47 The application is accompanied by a preliminary ecological appraisal (PEA) that considers the existing situation and makes recommendations. Read in tandem, they provide a sound basis to understand the contribution of the existing site in ecological terms, as well as the extent to which the scheme will address any opportunities to mitigate any harm or deliver benefits.
- 5.48 The PEA confirms that the site contains no designated or priority habitats. It also confirms that there is no evidence that the site supports any protected species.
- 5.49 Nevertheless, the PEA makes a number of recommendations which provide the opportunity to minimise the potential for harm and to implement measures which can provide beneficial ecological outcomes.
- 5.50 These recommendations include:
- Provision of bird boxes;
 - Provision of one bat feature;
 - For any trees to be removed to accommodate proposals, replacement planting comprising two additional trees for every tree lost (aligns with Policy CS21); and
 - Suitable landscaping incorporating hedgerow and tree species that provide a food or shelter resource to wildlife together with implementing a relaxed mowing regime and establishing wildflowers in these areas.
- 5.51 The PEA concludes that
- "It is considered that there would be very limited impacts on the local ecology as a result of the proposals, provided the recommendations detailed...above are followed."*

Ground Conditions

- 5.52 The application is accompanied by both a phase 1 and phase 2 ground conditions report, which establishes the current ground conditions and clarifies the proposed approach in terms of construction and any mitigation measures that could be required. In addition, groundwater and ground gas monitoring has been undertaken and analysed, which provides empirical evidence to substantiate parts of the earlier reports.
- 5.53 These reports highlight that:
- A review of the desk study information has concluded that the potential for a significant pollution linkage to be present at the site is generally low with corresponding risk to human health and the environment assessed as low to moderate.

- The risk to controlled waters from the site is considered low with no environmental remediation considered necessary at this stage.
- There are no recorded active or historic landfills within influencing distance of the site. The presence of ground gas resulting from shallow unrecorded mine workings is considered unlikely.
- In consideration of the above and the composition of any made ground, the risk to the development from ground gas is considered low.

5.54 However, it has been considered prudent to undertake ground gas monitoring, primarily for methane and carbon dioxide with associated flow rates. 3 no. monitoring surveys have been completed to date and these primarily indicate Very Low Gas Risk (CS₁). It is noted that one survey showed elevated concentrations, so on that basis (for robustness) the site should be characterised as CS₂ (Low Gas Risk).

5.55 The final report will be issued in due course and any mitigation requirements will be highlighted- on the basis of a CS₂ classification there is low risk and modest mitigation that can be provided. In turn, if the conclusion was CS₁ then this would not justify the need for any mitigation at all.

5.56 There are two recorded mine shafts in the area. It is considered prudent to complete some trial trenching to inform detailed design for future foundations, but does not impede the principle of development and can be undertaken following release of planning consent.

Energy

5.57 The applicant has commissioned a Part L Compliance Report that has consideration of LZC opportunities. This document assesses the energy demand from the scheme and establishes the potential for mitigation through energy-efficient construction and operation (including air tightness and energy efficiency) and the use of low carbon technologies where feasible or where needed to respond to the emerging policy agenda.

5.58 Whilst the existing units in this phase of Huyton Trade Park are effectively obsolete and in poor condition, these new buildings provide high-specification units to meet occupier requirements and deliver strong environmental performance.

5.59 In order to meet the challenging ambitions of the new Building Regulations, the scheme will seek increased fabric insulation measures as part of a strong approach that minimises net carbon demand and embraces the potential for the future use of renewable and low-carbon technologies (such as roof mounted solar PV panels).

5.60 The assessment confirms that:

"The preliminary Part L (2013 edition with 2016 amendments) energy calculations highlight that based on the proposed passive & active design measures, there is no requirement for roof mounted solar PV for purpose of meeting the Part L 2013 carbon emission targets."

5.61 However, it also confirms an intent that the buildings will be constructed to allow the future implementation of roof mounted PV panels should this be required in the future, as part of tenant fit-out or landlord works later in the life of the building. It states as follows:

"This speculative industrial development will be constructed to enable future tenants to achieve the...energy requirements of Part L2A of the...Building Regulations as well as meeting the requirements of Knowsley's Local Plan (2016).

This will be achieved by meeting and exceeding the...standards required for the building fabric, but also by constructing a shell that allows for the future installation of suitable LZCGT's as part of the consequential improvements."

5.62 This approach meets the requirements of Policy CS23: Renewable and Low Carbon Infrastructure and Regulation 25A of the Building Regulations: Consideration of high-efficiency alternative systems.

Engagement

5.63 The applicant did enter into an informal pre-application process with Council officers. This was extremely productive and positively shaped the scheme. For clarity, the applicant team is grateful to officers for their time through which we discussed key principles and received advice in terms of any detailed justification necessary to assist the determination process.

5.64 The applicant has also engaged with existing tenants prior to submitting a planning application. The applicant has also notified and engaged with elected members so that they are aware of the emerging proposal and the key points pertaining to the development, as well as encouraging them to provide their input to the developer team. Information pertaining to the circulation and content of this information is enclosed within the submitted SCI.

5.65 Initial engagement with planning officers highlighted the need for the submission to consider acoustic harm and to provide mitigation where this is justifiable and necessary. This advice was welcome. The applicant team had already commissioned acoustic advice to ascertain whether the proposal would justify the need for any mitigation measures beyond the benefits arising from the new build which will deliver better acoustic screening at the site boundaries.

- 5.66 For robustness, the acoustic assessment has suggested that acoustic fencing to parts of the southern boundary would be advantageous and this has been incorporated into the scheme.

6.0 Conclusion

- 6.1 The subject site is previously developed land within the urban area which has established use for employment purposes, most recently as a multi-let industrial estate. The principle of commercial development in this location is established and this is reflected in its EC3 designation which supports employment use and safeguards it from loss.
- 6.2 The buildings on the Huyton Trade Park site which are proposed for clearance and replacement are not capable of economic repair- they need to be replaced and there is strong market demand for good quality energy-efficient space which is what we are proposing.
- 6.3 The proposal will deliver highly lettable modern format flexible employment units with strong environmental performance. Flexibility is provided by the type of users that can be supported (from light industry and general industry through to logistics) and unit typology.
- 6.4 The scheme delivers 24 units with appropriate parking facilities, with the tenant offer which is a qualitative improvement both in terms of the buildings themselves but also through better facilities for staff including cycle shelters and other amenities where feasible.
- 6.5 Whilst the resultant 7740m² floorspace is self-evidently an increase, in contextual terms it will remain markedly lesser than the historic intensive industrial use. In essence, there have been employment generating approvals in this locality since the 1950s and what is being proposed now is no fundamental change in character from the existing and is considerably lesser than the historic use as the Huntley and Palmer biscuit factory.
- 6.6 The proposals will create circa full FTE 200 jobs which (once having regard for the existing) would generate approximately 150 net additional jobs. The proposals will result in an ongoing boost of around £5.8m to the local economy per annum as a result of the new jobs created and safeguarded and additional business rates payable on the units. In addition, there will be a temporary boost to the local economy during the construction phase, and we model that this has a value of £3.3m.
- 6.7 By reference to the Social Value Strategy approach, there are strong prospects that significant regenerative benefits can be secured by the local population which can reduce worklessness and localised deprivation.
- 6.8 This assessment has shown that the proposed use results in no material conflict with any Development Plan policy requirements. In addition, there are no conflicts arising in terms of other planning objectives related to flood risk or transport matters.

- 6.9 Paragraph 11 of the NPPF is based on a presumption in favour of sustainable development (described as the 'golden thread' running through the plan making and decision- taking process) and confirms that planning permission should be granted unless:
- *"Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or*
 - *Specific policies in this framework indicate development should be restricted".*
- 6.10 There is no evidence to suggest that the proposal would conflict with any requirements of the NPPF, and as such in the light of paragraph 11 it should be supported. Paragraph 8 then moves to create a degree of urgency in terms of the deliverability of development which is sustainable confirming that these types of development should be approved 'without delay'.