

December 2021

DESIGN AND ACCESS STATEMENT

for the

SITE AT

KNOWSLEY RECYCLING DEPOT

KNOWSLEY INDUSTRIAL ESTATE, LIVERPOOL, L33 7TQ



Prepared for

MULBERRY WASTE LIMITED

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1. INTRODUCTION

- 1.2 Mulberry Waste Ltd, (MWL) has been operating at the Knowsley Depot since 2013, located on the Knowsley Industrial Estate. (see Figure 1). The site operates as a waste treatment, recycling and transfer station and is permitted to accept a wide range of hazardous and non-hazardous wastes. The site is regulated under environmental permit number is ZP3439RM by the Environment Agency.



Figure 1: Knowsley Waste Depot

- 1.3 In 2018 the site suffered a fire and as a result the previous building was damaged. MWL proposes to rebuild the fire damage building in the same location.
- 1.4 Additional waste storage lean-to structures are proposed to protect waste storage areas from the elements in line with best environmental practice.
- 1.5 A modular mess room and offices are planned at the northern most point of the site, all this is illustrated on figure 2 (Proposed site Plan)
- 1.6 All tanks except two are to be removed



Figure 2: Proposed Site Plan

- 1.7 The proposal includes installation of turnkey waste processing and recycling equipment that meets the latest specifications and meets “best available technology”.
- 1.8 The recycling equipment is designed to reduce electronic equipment (i.e. monitors and TV’s) down to their smallest fractions ready for separation into the individual fractions, glass, Polly Methyl Methacrylate (PMMA), metal (ferrous and non ferrous), circuit boards and plastics.
- 1.9 The equipment has full abatement to protect against the release of environmental pollutants inside the process and multi stage filtration removes these pollutants. Emissions from the equipment will be regulated by the Environment Agency.
- 1.10 The waste processing area will be under cover, sealed and bunded to prevent uncontrolled liquids leaving the area.
- 1.11 The site has a discharge consent to sewer regulated by United Utilities.

2. SITE CONTEXT

2.1 Location and Surroundings

2.1.1 The site is located on an established industrial estate.

2.1.2 There are no schools or hospitals within 500 m of the site.

2.2 Economic

2.2.1 The Knowsley Industrial estate is a large area and is part of the Knowsley industrial estate Employment Areas and Sites. The site and surrounding units are protected for employment uses including business, general industrial or storage and distribution (Use Classes B1, B2 and B8).

2.2.2 The development is expected to increase employment at the site by 12 full-time or part-time employees (as the operations develop).

2.2.3 There are a number of other hazardous waste depots on the Industrial Estate, as well as large industrial chemical manufacturers.

2.3 Planning Policy

2.3.1 MWL has been operational as a waste recycling depot on the estate since 2015. The site existed as a waste recycling facility for many years before that with various owners, including Slicker Recycling.

2.3.2 Policy G17 – Design Criteria for Development - requires, among other things, development to be well related to neighbouring buildings and the locality in terms of size, scale and intensity, and that the development should not prejudice highway safety, pedestrian safety, or the free flow of traffic.

2.3.3 In terms of the design, it is considered that the proposed waste operations would have a limited effect on the surrounding area given the size and scale of the existing site and the nature, scale and variety of other existing industrial buildings in the surrounding area. The proposed building materials used in any modification to existing buildings will match the surrounding buildings.

2.3.4 Regarding potential impact of the business on traffic generation at the premises and on surrounding public highways, MWL Knowsley Recycling Depot is an established business and, it is considered that any associated increase in vehicle movements would be minimal, if at all greater than in previous years, which would not be on a scale to impact adversely on

highway safety and capacity in the immediate vicinity of the site. There are no restrictions on vehicle movements or production output at the industrial estate and therefore traffic levels could vary at any time depending on the market activity or the nature of businesses within each unit. A one-way site traffic system is in place to prevent a build-up of delivery vehicles on the busier of the two roads, and prevent turning on the site. See Figure 3 which illustrates the site vehicle tracking.

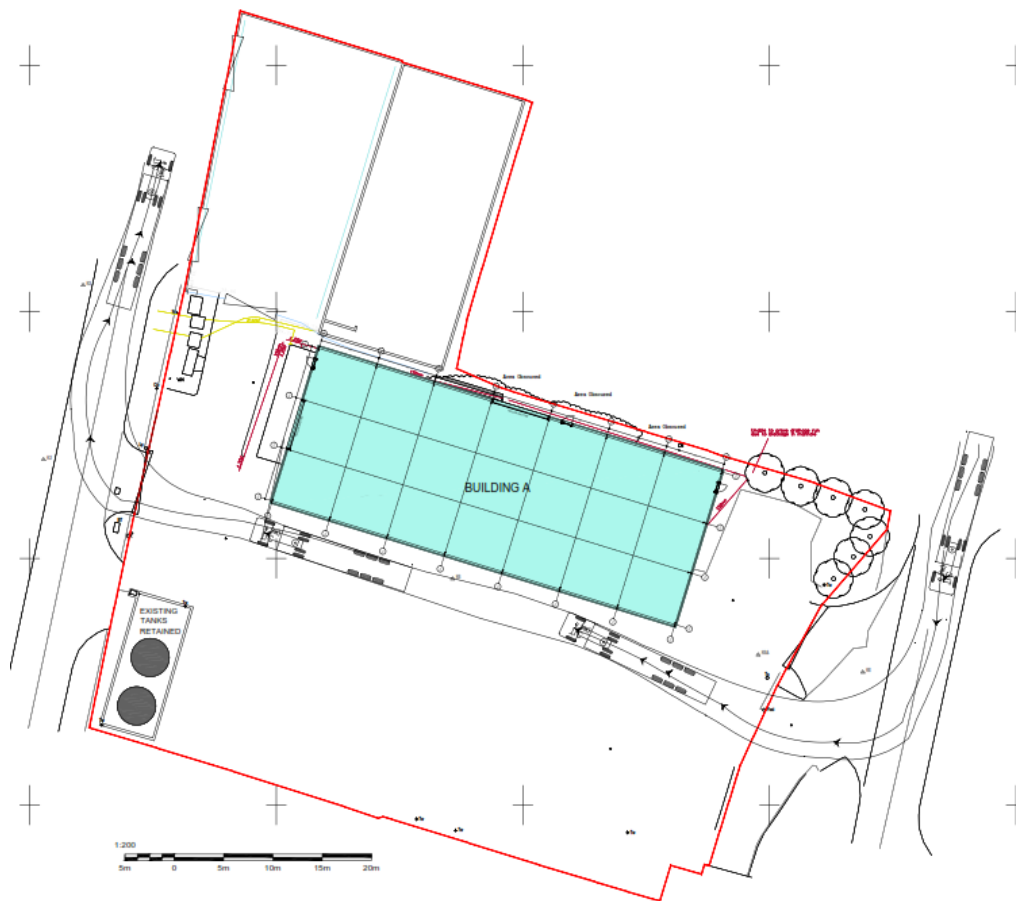


Figure 3: Site Vehicle Tracking

- 2.3.5 With regard to pollution control, paragraph 122 of the NPPF makes it clear that local planning authorities should focus on whether the development itself is an acceptable use of the land and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. The waste management recycling facility operates under an Environmental Permit and it should be assumed that the permitting regime operates effectively.
- 2.3.6 Minerals and waste issues are not covered in the Local Plan (adopted July 2015).

2.4 National Planning Policy

2.4.1 The main national planning policy guidance is set out in the National Planning Policy Framework (NPPF).

2.4.2 The adoption of the National Planning Policy Framework in March 2012 means that it is now the main national planning policy guidance influencing planning decision making and replaces a substantial number of documents previously in place. *The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied, it sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.*

2.4.3 Paragraphs 11 – 16 of the NPPF highlight the presumption in favour of sustainable development confirming that *planning law requires that applications for planning permission are determined in accordance with the development plan unless material considerations indicate otherwise.* The NPPF does not change the statutory status of the development plan as the starting point for decision making, and therefore proposed development that accords with an up to date local plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It also highlights the desirability of local planning authorities having an up to date local plan in place.

2.4.4 Importantly, Paragraph 14 of the NPPF states:

*At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*

*For **plan-making** this means that:*

Local planning authorities should positively seek opportunities to meet the development needs of their area;

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, 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.*

*For **decision-taking** this means:*

Approving development proposals that accord with the development plan without delay; and

Where the development plan is absent, silent or relevant policies are out of date, granting permission 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 the Framework indicate development should be restricted.

2.4.5 Paragraph 15 states:

Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

2.4.6 Paragraph 17 states:

Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. Among these 12 principles are that planning should:

Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs; and

Encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

2.4.7 Paragraph 19 states:

The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

2.4.8 Together Paragraphs 11 to 16 clearly spell out the Government's presumption in favour of allowing sustainable development unless the adverse impacts of doing so would be very significant.

- 2.4.9 The approval of this application would assist in meeting increased targets of recycling and reprocessing of waste, particularly hazardous waste, within Mersyside, and the surrounding areas and movement towards self-sufficiency in the Country.
- 2.4.10 Expansion of the MWL business with the addition of extra buildings on the site would provide increased capacity to process waste by re-use of land already designated as employment land in an area with pre-existing adequate infrastructure. Covered waste storage conforms to best practice of waste storage.
- 2.4.11 The approval of the proposed development would support economic development by the expansion of a successful business enabling increased capacity and creating more jobs.

National Planning Policy for Waste

- 2.4.12 This document sets out detailed waste planning policies. *All local planning authorities should have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management.*
- 2.4.13 When identifying suitable sites and areas for new or enhances waste management facilities, *waste planning authorities should: give priority to the re-use of previously-developed land, sites identified for employment uses.*
- 2.4.14 The plans at Knowsley Recycling Depot is in accordance with both of these policies.

2.5 Local Involvement

- 2.5.1 The proposed operations will generally take place within enclosed / covered industrial units, therefore the external impact of the development is considered to be low as far as nuisance to surrounding industrial operators. There will be minimal visual impact to surrounding neighbours as incorporated areas will be constructed in keeping with the existing design of the surrounding units.
- 2.5.2 Due to the location of the site it is not considered that the proposed development will impact on the local community, and as such advance community consultation has not been undertaken at this stage.
- 2.5.3 Accompanying this submission is the Merseyside Waste Local Plan BOX 1 Statement, A Transport Statement as requested by the LPA as well as a document explaining waste storage and transport containers, these are all in line with the environment agency requirements and government guidance.

2.6 Evaluation

- 2.6.1 Based on the location of the existing waste recycling depot (ie on an industrial estate, surrounded by other waste operations, chemical manufacture, away from residential receptors, and within a protected employment area), and the fact that the site is already consented for hazardous waste treatment it is logical to permit the site to continue existing waste operations with additional covered waste storage allowing greater segregation of hazardous and non-hazardous wastes, and ease congestion in the area by improving access and management of delivery vehicles.

3. DESIGN

3.1 Use

3.1.1 Existing Use

3.1.1.1 The site has been used as a hazardous and non-hazardous waste treatment facility since the 1990's, and MWL has been conducting waste operations at the site since 2015.

3.1.1.2 The site is permitted to accept a wide range of hazardous and non-hazardous wastes, and treatment activities include waste storage, shredding and separation, oil storage, blending and bulking of liquid waste and transfer of processed wastes off site for further recycling.

3.1.1.3 Areas to the south of the site include packaged waste storage at the Draw well road side and tank storage of Oils and glycol on the Stockpit Rd side.

3.1.1.4 The storage areas to the north of the site is used for storage of empty waste packaging and loads awaiting transfer off site.

3.1.2 Proposed Use

3.1.2.1 MWL proposes to replace the existing waste recycling equipment and waste recycling building A in the same location as previous.

3.1.2.2 The existing packaged waste storage area to the South East, B1, is proposed to be covered to meet environment agency best practice, (section 4 point 10, Chemical Waste - Appropriate Measures guidance doc) [Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364241/Chemical_Waste_-_Appropriate_Measures_guidance.doc) .

3.1.2.3 The tanks to the South West of site in area will be removed apart from 2 tanks that will serve as yard rain water storage tanks for testing and treatment before subsequent discharge or removal for off site processing. The remainder of the area is to be covered storage B2

3.1.2.4 The storage area to the north of the site is to have all remaining tanks removed and a covered waste storage are is to be built.

3.1.2.5 Offices, messroom and kitchen are to be located at the northern edge of the site.

3.2 Amount

3.2.1 Building A, the waste processing building, covers an area of 721 Sq.M. it measures 10.2 meters to the ridge and 8.5 meters to the eaves.

3.3 Layout

- 3.3.1 The current layout is shown on 21-647-00-02 Existing Site Plan, The proposed site layout is shown on drawing 21-647-00-03 Proposed Site Plan on topo.
- 3.3.2 The proposed development will enable increased processing efficiency, and help reduce any congestion of the surrounding industrial estate. Use of the 1 way traffic system will provide hassle free loading and off-loading whilst reducing congestion for other operators in the area.
- 3.3.4 Car parking will remain as it is currently, within the site perimeter.

3.4 Scale

- 3.4.1 The size and scale of the proposed development is not considered to pose a nuisance to surrounding residential or commercial receptors due to the proposed consolidated layout and upgrade of facilities.
- 3.4.2 The area of operations is going to remain the same.
- 3.4.3 The tank farm will be reduced in size and only 2 tanks will remain.

3.5 Appearance

- 3.5.1 The application appearance is shown on drawings
21-647-00-05 Proposed Building A Plan and Elevations
- 3.5.2 The existing transfer station is located on an industrial estate with a mix of building designs of varying ages and style.
- 3.5.3 The surrounding area is industrial and the proposed development will not be out of place on the estate.
- 3.5.10 External lighting and CCTV will be installed.

4. ACCESS

- 4.1 The site is accessed off Draw Well road and Stockpit road . A one way system will be in place and vehicles will enter from Draw Well road.

- 4.2 It is a good location for national infrastructure, positioned less than 3 miles from the M57 junction 4.

5. CONCLUSIONS

- 5.1 Permission already exists for the treatment and recycling of a wide range of hazardous and non-hazardous wastes at this waste recycling depot. The site has been used as a waste treatment facility since the 1980's, and MWL has been conducting waste transfer operations at the site since 2015.
- 5.2 The proposals are to optimise existing operations allowing a safer working area with under cover storage which meets the latest Environment Agency guidance.
- 5.3 The existing transfer station and proposed buildings are already in a location that:
- is surrounded by similar industrial, chemical and waste operations;
 - is well distanced from residential receptors;
 - is part of an employment protection zone;
 - provides good access for transport network; and
 - where waste operations are managed in accordance with an existing Environmental Permit, and where the site is, and will be fully contained in order to protect the environment from potential impacts from site operations.

LIST OF DRAWINGS

21-647-00-01 Site Location Plan

21-647-00-02 Existing Site Plan topo

21-647-00-03 Proposed Site Plan on topo

21-647-00-04 Proposed Site Plan inc vehicle tracking

21-647-00-05 Proposed Building A Plan and Elevations