

15 June 2022
L220615 – EIA Screening Letter

The Savills logo consists of the word "savills" in a lowercase, red, sans-serif font, positioned on a yellow rectangular background.

Planning Department
Knowsley Metropolitan Borough Council
Municipal Buildings
Huyton
L36 9UX

Francesca Opoku-Gyamfi
E: francesca.opokugyamfi@savills.com
DL: +44 (0) 7870 981665

Belvedere
12 Booth Street
Manchester M2 4AW
T: +44 (0) 161 236 8644
savills.com

Dear Sir or Madam,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017
REQUEST FOR AN ENVIRONMENTAL SCREENING OPINION
PROPOSED INDUSTRIAL & LOGISTICS DEVELOPMENT (CLASS B2 & B8) WITH ANCILLARY
OFFICES, INCLUDING PROVISION OF REVISED ACCESS ARRANGEMENTS FROM NORTH PERIMETER
ROAD AND ALL ASSOCIATED WORKS AND LANDSCAPING.
NORTH PERIMETER ROAD, KNOWSLEY INDUSTRIAL PARK, LIVERPOOL, MERSEYSIDE
KIER PROPERTY LIMITED**

We write to seek a formal opinion from Knowsley Metropolitan Borough Council (the '**Council**') acting as the Local Planning Authority ('**LPA**') under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('**the 2017 Regulations**'), in order to determine whether the proposed development of the Land at North Perimeter Road, Knowsley Industrial Park represent Environmental Impact Assessment ('**EIA**') development.

In accordance with Regulation 6 of the 2017 Regulations, this screening request includes:

- A plan sufficient to identify the land;
- A description of the development, including the physical characteristics and location of the proposal;
- A description of the aspects of the environment likely to be significantly affected by the development; and
- A description of any likely significant effects of the proposed development.

The Proposed Development

The proposal seeks full planning permission for the development of land off North Perimeter Road, adjacent to Acorn Farm, to accommodate approximately 26,245 sq. m (282,000 sq. ft) of industrial and logistics floorspace, arranged as four units of varying sizes. The application also seeks permission for landscaping, access, parking, servicing and all associated works.

The layout of the proposed development is provisionally illustrated on Drawing Ref: 7621-SMR-04-GF-DR-A-2004-S3-P04 – 'Proposed Site Plan'.

Pre-application discussions with Knowsley Council are ongoing, with discussions to date reflecting the fact that the Site is allocated for employment uses and that adjacent uses need to be sensitively considered as part of the development proposals.

The Environmental Impact Assessment Regulations 2017

The 2017 Regulations set out two categories of development, which are contained within Schedules 1 and 2. Proposals for development that fall within Schedule 2 is discretionary. The proposed development is best defined as falling within Category 10(a): Industrial estate development projects.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



Descriptions of development and applicable thresholds and criteria for the purposes of the definition of Schedule 2 development are set out in Schedule 2 of the 2017 Regulations, which states that industrial estate development projects must be in excess of five hectares to classify as Schedule 2 development. Given that the area of the site is approximately 11.5 ha, it follows that the proposed development is classified as Schedule 2 development. This however does not necessarily mean that the proposal is development which requires the submission of an Environmental Statement.

The Planning Practice Guidance (**'the Guidance'**) states that only a very small proportion of Schedule 2 development will require an EIA, however that each proposal must be assessed on its merits and it should not be presumed that developments above the indicative thresholds should always be subject to assessment or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location.

When screening Schedule 2 projects, the LPA must take account of the selection criteria in Schedule 3 of 2017 Regulations. It is acknowledged that not all of the criteria within Schedule 3 will be relevant to every development proposal. Once the LPA has completed the screening exercise, it must provide a screening opinion, indicating either that an EIA is required (a 'positive screening opinion') or is not required (a 'negative screening opinion').

Schedule 3 Assessment Criteria

Schedule 3 of the 2017 Regulations identifies specific selection for screening Schedule 2 development. These are as follows:

1. Characteristics of development;
2. Location of development; and
3. Types and characteristics of the potential impact

Below, we consider the proposed development against each of the criteria within Schedule 3.

Characteristics of Development

As set out above, the proposal comprises approximately 26,245 sq. m (282,000 sq. ft) of Class B2/B8 floorspace across a total of four units along with areas of hardstanding, attenuation lagoons, parking spaces, landscaping, planting of new trees and revised access arrangements.

The units will be designed to the highest modern standards for industrial and logistics warehousing, with the applicant aiming for BREEAM 'excellent' accreditation, EPC-A rating and incorporating the most sustainable specification of development for both staff and visitors.

The application site forms the northern extremity of Knowsley Industrial Estate and is within a Primary Industrial Area, as per the Local Plan Policies Map. The surrounding land uses to the south of the Site are exclusively large-scale commercial and industrial uses common to industrial estates. As such the development of the Site for employment purposes has already been identified by the LPA as being appropriate for this Site and it is not considered that any significant environmental impacts will arise as a result of the cumulative development of land for employment purposes.

The proposal will not produce excessive quantities of waste during the demolition, construction and operational phases. As stated above, the proposed development is in accordance with the Local Plan, which is also a prevalent land use within the immediate area.

The Applicant will employ tried and tested methods to control waste production to maximise the potential reuse of any demolition water during the development phase. Likewise, any waste generated during development will either be disposed of at a licenced disposal location or recycled in a sustainable manner. Neither of the processes that may generate waste will have significant environmental effects. Pollution and noise can be

appropriately managed through both the construction and operational phases through the imposition of appropriate planning conditions (for example, a Demolition and Construction Management Plan will ensure impacts on all receptors are minimised).

Location of the Development

The proposed application site (**'the Site'**) measures approximately 11.5 hectares and comprises land at the northern extremity of Knowsley Business Park, bound by North Perimeter Road to the north and Depot Road to the south. The Site also lies at the boundary of the Council's administrative area, being immediately adjacent to land within the remit of West Lancashire Borough Council.

The majority of the Site is currently greenfield land, which is dissected from north-west to south-east by a tributary of the Simonswood Brook¹. To the west of the Brook the Site is predominantly made up of a woodland, as well as a haulage yard which is accessed from Depot Road. To the east of the Brook, the Site consists of agricultural fields and associated buildings, as well as a number of mature trees. Whilst the majority of the Site is located within Flood Zone 1 (lowest probability of flooding) the location of the Brook means that parts of the Site are contained within Flood Zones 2 & 3.

The Site has excellent connectivity by virtue of its close proximity to the M57 and M58 Motorways. In addition, the Council has outline plans to improve North Perimeter Road, to include pedestrian and cycle paths.

Acorn Farm lies to the south east of the Site, an urban farm, providing horse riding facilities and a café. The Site is surrounded by other industrial uses within the Knowsley Industrial Estate to the south, whilst to the north of the Site lies Bullens Farm and surrounding land in agricultural use.

Given that the Site is primarily undeveloped and contains significant green and blue infrastructure assets, a Preliminary Ecological Assessment (**'PEA'**) and Tree Survey was instructed and undertaken in order to understand the value of the Site's biodiversity. The results of those assessments provide that:

1. There are no existing records of protected and/ or notable species on the Site;
2. The PEA detailed that the Site contains a range of habitats, including grassy fields, modified grassland, scrub, mixed woodland, a stream and existing buildings.
3. There were no protected and/ or notable flora recorded on-site.
4. In relation to protected and/ or notable fauna, the Site was found to have the capacity to support amphibians (including Greater Crested Newts), birds, bats, water voles and hedgehogs. Further surveys are recommended in order to confirm the presence of any notable fauna species.
5. The Site contains 24 individual trees, 15 groups of trees and a woodland. It is to be noted that the tree survey found no trees on site were protected by Tree Preservation Orders or by virtue of being in a Conservation Area.

The Site is not located within a 'sensitive area' (as defined) and as reiterated throughout this screening request, it is allocated for primary industrial uses. The wider commercial area to the south of the Site is a part of the urban fabric of the area and co-exists with surrounding industrial areas. The proposed land is not considered to be in a location where its characteristics will have significant environmental effects.

Types and Characteristics of the Potential Impact

Given that the proposed development will take place on greenfield land which contains significant resources (including land, soil, water and biodiversity), the proposal has the potential to result in an impact on the natural environment within the area of the Site. Due to the extent of the development proposed, it is considered that there is a high probability of environmental impact as a result of the development, which will likely to result in a low level of impact.

¹ Classified as a 'Main River' by the Environment Agency.

In particular, the proposed development will result in the loss of green infrastructure, including existing trees, in order to accommodate commercial floorspace. In order to mitigate against the environmental impacts of tree loss, significant replanting of trees throughout the development site is planned, as shown on Drawing Ref: Drawing Ref: 7621-SMR-04-GF-DR-A-2004-S3-P04 – 'Proposed Site Plan'.

Whilst the loss of any trees through the development process is regrettable, tree loss in itself does not create significant environmental issues. Nevertheless, significant tree replanting forms a significant part of the development proposals. In addition, given that the existing site has the potential to accommodate a variety of fauna (such as bats, birds, water voles and hedgehogs) additional surveys are currently being undertaken in order to understand the impact (if any) of the development from that perspective. Biodiversity Net Gain will be considered as part of the application.

As the Site lies at the border of West Lancashire Borough Council, the potential for transboundary impact does exist. However, the proposed development will take place entirely within Knowsley Metropolitan Borough Council and, as a result, the only potential for transboundary impact comes as a result of residual operational impacts of the development.

The proposal will include and be supported by a range of considerations and sustainability measures to mitigate any negative environmental impacts of the development. This includes significant tree replacement, a target of BREEAM 'Excellent' accreditation and incorporating sustainable and low carbon construction practices and features throughout the development cycle.

Screening Opinion Summary

Having regard to the specific criteria within Schedule 3 of the 2017 Regulations, we summarise our assessment proposal as follows:

- 1) The nature of the development means that an impact will occur, as a result of the loss of existing green infrastructure assets. However, as discussed above, the level of that environmental impact is considered to be low, when considered against the 2017 Regulations. Specifically in relation to trees, although the proposal will result in the clearance of part of a woodland and a number of individual trees, that degree of tree loss is not considered to result in significant environmental impacts, particularly when considering that the Site is allocated for development and therefore the loss of those environmental assets have been considered by the Council at a strategic level;
- 2) The Site and its immediate surroundings are not considered to be environmentally or ecologically sensitive; and
- 3) Any impact of the development will be mitigated to ensure the impacts remain minor in terms of magnitude and complexity.

In light of the above, we recognise the loss of trees and habitat on site. However, we conclude that the proposal does not constitute EIA development as defined and the forthcoming application does not need to be supported by an Environmental Assessment.

We kindly request that the LPA therefore adopts a negative screening opinion, confirming that the proposal is Schedule 2 development which does not require an Environmental Statement. If you require any clarification or additional information, please do not hesitate to contact Brad Wiseman or Francesca Opoku-Gyamfi at these offices.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Savills", written in a cursive, stylized script.



Savills (UK) Limited
Planning