

4th December 2023
Delivered by email

Kevin Foster
Planning Manager
Knowsley Metropolitan Borough Council
Municipal Buildings
Huyton
L36 9UX

Dear Kevin,

ENABLING WORKS PLANNING APPLICATION RELATING TO THE PROPOSED HUYTON MIXED USE COMMERCIAL DISTRICT

On behalf of Genr8 Kajima Regeneration Limited ("the Applicant"), we are pleased to submit a full application for enabling works at the Huyton Mixed Use Commercial District ("HMCD") ("the Site") in order to facilitate a mixed-use development which will be anchored by a new Council HQ with complementing opportunities for a hotel, office space, co-working centre, and residential accommodation.

The proposed enabling works, including demolition, land reprofiling and remediation, would prepare the Site for construction and help expedite delivery. Separating out the enabling works reinforces the project's feasibility, demonstrates ongoing progress to project stakeholders, and underscores the Applicant's commitment to achieving the project's desired outcomes. Delivery of enabling works will be pivotal in supporting the Applicant's case when seeking future grant funding opportunities to unlock the Site's full potential. Furthermore, this application will support negotiations with third parties, including those with land interests on-site, such as several telecommunications providers.

This covering letter provides a detailed description of the proposed enabling works and an analysis of these works against policies of the adopted development plan, namely the Knowsley Local Plan Core Strategy (adopted in January 2016) and saved policies of the Unitary Development Plan (adopted June 2006), along with any other material planning considerations.

The application has been submitted to the Knowsley Council ('the Council') via the Planning Portal with the requisite fee of £2028.00.

Supporting Documents

The application is supported by a suite of technical reports and drawings which are listed in **Appendix 1** of this cover letter.

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The Site and Surrounding Land

The Site

The Site extends to approximately 2.9 ha of land situated to the southeast of Archway Road within Huyton town centre, Knowsley, Merseyside. The Site is primarily characterised by the presence of office buildings and hardstanding functioning as car parks and with occasional pockets of shrubbery and scattered groups of trees. The office buildings include the eight storey Municipal Building, adjacent 'Computer Centre' and Huyton Library. A notable feature of the Site is the Huyton Civic Memorial (non-listed).

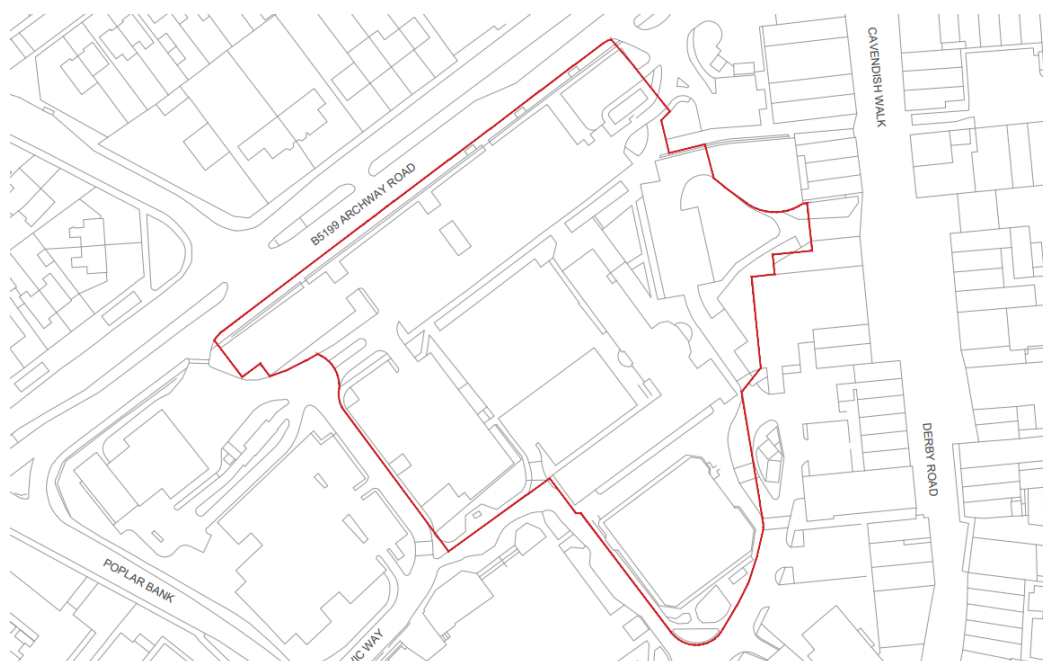


Figure 1.1: Location Plan outlining the extent of the Site in red, encompassing much of Huyton's civic core.

The topography of the Site exhibits a gradual slope, descending from higher ground in the southeast to lower ground in the northwest, encompassing both car parking zones and landscaped areas.

The Site lies entirely within Flood Zone 1, indicating low risk of fluvial-related flooding. There are no designated ecological sites covering the Site or within the immediate vicinity. The Site also contains no designated or non-designated heritage assets.

Surroundings

The surrounding area features a range of land uses and typologies. To the north and west, residential properties and associated gardens predominate. A Conservation Area centred on St Michaels Church is located within proximity of the Site toward the northeast. To the east is Huyton's main retail core including a large Asda supermarket. There are further civic and office buildings to the south and west in addition to a large bingo hall.

Huyton railway station is some 100m to the south west of the Site providing direct links to destinations including Liverpool, Manchester, Wigan and Blackpool including local destinations. Junction 5 of the M62 motorway is located approx. 2.5km south of the Site, whilst Liverpool Road (A57) located 1.5km to the north provides access to the M57 motorway.

Planning History

There is extensive planning history associated with the Site, with numerous minor planning applications securing alterations to existing and former office buildings. The more notable applications, in addition to key applications on surrounding land are set out within **Appendix 2** of this letter. None are deemed to be of significant relevance to the Proposed Development, nonetheless highlight a history of redevelopment within Huyton town centre.

Consultation and Engagement

Local Planning Authority

The Applicant has sought to engage with the Local Planning Authority throughout the months preceding submission of this planning application. The project programme and scope have been discussed with Kevin Foster, Group Planning Manager, who has agreed the validation requirements of the application and provided initial feedback with respect to the nature of the proposed enabling works, the format of the application and the key planning considerations concerning the site.

This pre-application advice has been taken into account in the preparation of the application, whilst the following covering letter provides a detailed analysis of the impacts of the proposed development and any mitigation required in order to accord with the Knowsley Local Plan Core Strategy and saved policies of the Unitary Development Plan. The Applicant remains committed to ongoing engagement with the LPA as the Huyton Mixed Use Commercial District scheme progresses.

Community and Stakeholders

The Applicant and Knowsley Council within its capacity as landowner will carry out the works in a phased, controlled manner, to minimise disruption to both local residents, businesses, workers and visitors to Huyton. Any necessary car park closures will be clearly signposted and communicated in advance, online through Knowsley News and the Council's established social media accounts (LinkedIn, Instagram, Facebook and X), the Council's internal communication channels as well as printed banners around the affected site. All communications will advise of the proposed closures, timescales and where alternative parking is available.

In addition, targeted communications will be shared with local residents who are in close proximity to the Site and local businesses surrounding the site to confirm what works are taking place and when, as well as highlighting that the works are part of the Council's development plans for the area which aim to bring improved facilities and footfall.

Proposed Development

The description of development ("Proposed Development") is as follows:

"Enabling and engineering works comprising demolition of the Municipal Building and Computer Building; existing car parks and hardstanding, removal of trees, ground reprofiling and remediation, installation and diversion of below ground infrastructure, formation of a temporary car park, installation of security hoarding and associated works".

The application, for completeness, includes various works which are recognised as constituting permitted development such as the demolition existing buildings and diversion of utilities. It is also proposed to fell 11 no. individual trees and 13 no. tree groups which have been explicitly referenced given they are subject to a site-wide Tree Preservation Order (ref. No. 2 1975).

Following demolition of buildings and hardstanding as detailed within this covering letter, the Site will be remediated where necessary and levelled with crushed hardcore. Only a short intervening period is anticipated before development commences of the Huyton Mixed Use Commercial District. The enabling works would take place over a phased basis to ensure access to car parks are maintained as long as possible, meaning that hoardings will be relocated around the Site as the works progress. A separate 'Indicative Phasing Proposals and Options' document has been submitted in support of the application which sets out the most likely phasing strategies for the Proposed Development.

Analysis of Proposed Development

Section 70(2) of the Town and Country Planning Act requires that when determining applications for planning permission, local authorities must have regard to the provisions of the development plan and any other material considerations.

The key development plan concerning the Site is the Knowsley Local Plan Core Strategy ("LPCSCS") and saved policies of the Unitary Development Plan ("UDP"). There is currently no review of the LPCSCS being undertaken which has a plan period up to 2028.

Key material considerations include the National Planning Policy framework ("the Framework", September 2023) and the 'Huyton Village Masterplan' Supplementary Planning Document (adopted April 2017).

Strategic Policies and Principle of Development

Local Plan Core Strategy Policy CS1 (Spatial Strategy for Knowsley) and Policy CS2 (Development Principles) encourage appropriate regeneration and improvement initiatives, especially in areas with significant levels of deprivation. The Proposed Development is a precursor and facilitator of the Site's comprehensive redevelopment to deliver a range of economic, social and environmental benefits. The regeneration of Huyton town centre is a priority of the Council and therefore the enabling of the Site would support the strategic objectives and policies of the LPCS.

The Site lies within a designated Town and District Centre on the LPCS Policies Map which is subject principally to Policy CS6 (Town Centres and Retail Strategy). The policy outlines the overall objectives for Knowsley's centres and specifically of Huyton states that the town centre will enhance its role in *'providing comparison and convenience shopping. This will be supplemented by a complementary mix of leisure, health, residential, education, cultural, employment, service uses and complementary evening and night time uses'*. The supporting text to the policy elaborates on this point by stating that in *'order to enhance the performance, function and individuality of Knowsley's town and district centres, a varied distribution of new development is necessary to address deficiencies, support regeneration opportunities and assist improvements to existing design and layouts'*.

In addition to the above Policy CS4 (Economy and Employment) supports the planning, site assembly, and other interventions necessary to promote sustainable economic growth. Policy CS4 specifically encourages the development of mixed-use employment and residential schemes.

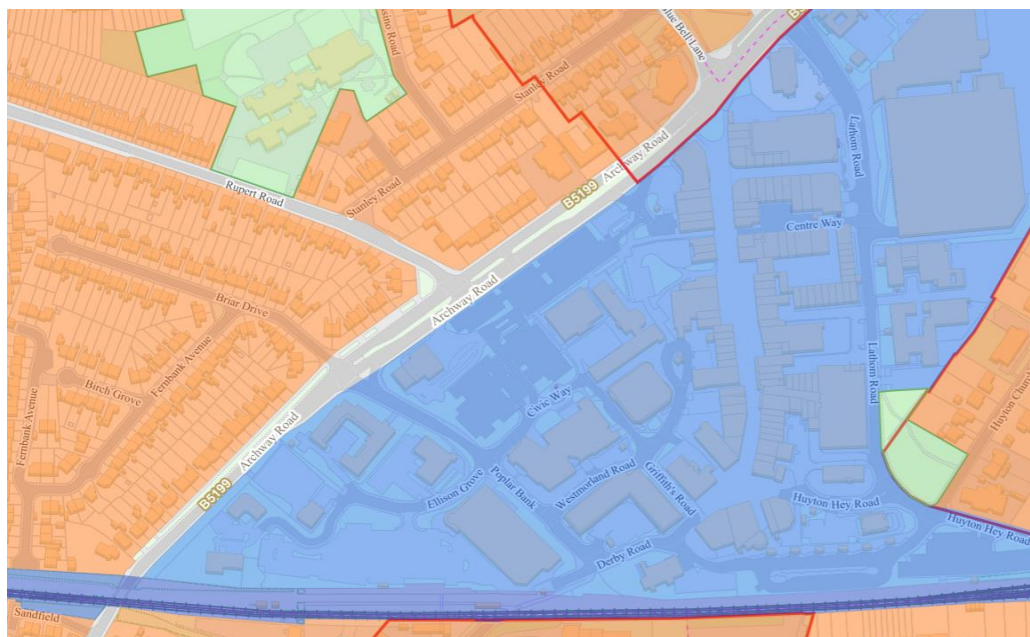


Figure 1.2: Exert of the LPCS Policies Map showing the extent of Huyton Town Centre in blue, with the application site and wider civic quarter occupying a prominent portion of the centre's core

It is within this strategic context that the Council pursued a comprehensive masterplan for the town centre which was adopted in the form of the 'Huyton Village Masterplan' Supplementary Planning Document (SPD) in April 2017. The SPD contains a specific action plan for the 'Civic Core' where development is anticipated to come forward over a 5-10 year period. The Action Plan covers much of the application Site.

A continued civic role is strongly supported within the Action Plan, which highlights the importance of public realm and permeability enhancements. The Action Plan also envisages mixed use developments and a residential offering. The 'Huyton Mixed Use Commercial District' itself will be subject to a separate planning application that will comprehensively assess the development's principles and alignment with the development plan and Huyton Village Masterplan SPD.

Nevertheless, the proposed enabling works are a precursor to the comprehensive redevelopment of the Site. Removal of existing ageing buildings and site reprofiling will create a development ready site, subsequently accelerating the delivery of new uses on Site. The enabling works are a fundamental component of the Huyton Mixed Use Commercial District's programme and will help secure a major mixed-use development and the delivery of a range of significant economic, social and environmental improvements.

It is currently programmed to submit a planning application for the new build element of the Huyton Mixed Use Commercial District in November 2023 with construction commencing in summer 2025. The enabling works themselves would roughly coincide with the submission of the main planning application meaning a minimised period of disruption for Council employees and existing land users.

The Council's Decant Strategy will ensure continued operation of the Council's services throughout the redevelopment of the Site. To support the strategy, and to determine space requirements during construction, a detailed survey of staff use of the Huyton 'Civic Campus' was undertaken in September 2022 and again in September 2023. A phased decant approach will likely be undertaken given ongoing discussions with 3rd party telecoms operators who occupy the Municipal Building. As a result, Phase 1 of the Decant Strategy is likely to focus on relocating staff from the Computer Buidling and Municipal Annex to support early demolition. During this time, the Nutgrove Villa building and Huyton Library building will be utilised to support the relocation of staff from those

buildings. The Council will continue to work with telecoms operators to obtain vacant possession of the Municipal Building. When vacant possession is obtained, working practices will once again be reviewed, and an assessment of suitable Council owned property undertaken to support Phase 2 of the decant strategy.

In summary and as discussed above, the proposed enabling works would facilitate speedy delivery of the emerging development plans for the Site and to this extent the application is considered to comply with LPCS Policies CS1, CS2, CS4 and CS6.

Ground Conditions and Drainage

The application is supported by a Phase 1 Preliminary Risk Assessment prepared by Sutcliffes in 2017 in addition to a more recent 2023 update prepared by Burro Happold. The reports collectively identify a limited risk associated with below ground contamination although note the presence of made ground given the existing and previous developments on Site. The reports recommend a detailed Phase 2 Ground Investigation, which at the time of this planning application having been submitted is nearing completion. The results of this and recommendations with respect to any necessary remedial works will be submitted to the Council in due course. In summary, however, the Site does not present any significant constraints with respect to ground conditions, geology or contamination which could in turn present a risk to the Huyton Mixed Use Commercial District. The application therefore complies with Policy ENV5 of the saved UDP.

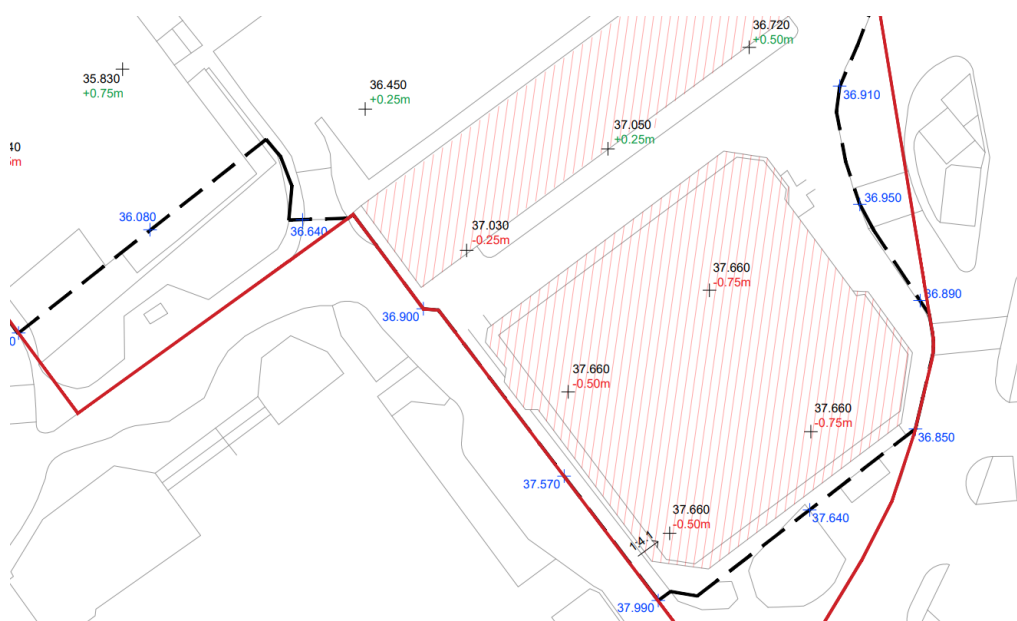


Figure 1.3: Exert of the Proposed Ground Levels Plan submitted in support of the application showing existing levels in black, proposed levels in green (raising) and red (lowering), in addition to spot levels encompassing the Site (blue)

In terms of interim drainage proposals, the Drainage Strategy submitted in support of the application highlights steps that will be taken to ensure there is no increased risk of surface water flooding. The report considers the sustainable drainage hierarchy concluding that the most feasible option for surface water discharge is into the existing public sewer system. There would also be filter drains formed in order to provide a degree of attenuation. This in addition to the reduction in area of sealed surfaces and buildings indicates that surface water run off rates and risks of standing water flooding will most likely reduce. Considering the drainage proposals are a temporary measure is considered that the applications accords with Policy CS24 of LPCS

Biodiversity and Trees

The application is supported by a Preliminary Ecological Appraisal, Bat Surveys, Biodiversity Net Gain Metric, Preliminary Arboricultural Assessment and Method Statement.

The supporting Preliminary Ecological Appraisal confirms that the Site is not subject to any ecological designations and given the distance to designated, including European sites, that is unlikely the Proposed Development would result in adverse impacts.

Existing buildings and trees have been subject to a number of bat surveys. The Municipal Building was initially assessed to have significant bat roosting potential, however subsequent detailed emergence and re-entry surveys concluded an absence of bats. No other buildings or trees within the site boundary were deemed to have roosting potential requiring further survey works or consideration of bats. Precautionary measures are however outlined within the bat reports which will be observed during the course of the proposed enabling works.

A Biodiversity Net Gain Assessment has been carried out in order to ascertain the Site's existing ecological value. National planning policy requires new development to deliver a net-gain in biodiversity and whilst a 10% requirement is yet to become statute, the applicant is committed to achieving this. Given the enabling works would result in the loss of biodiversity units without immediate replacement, and in order to cover all eventualities, a Memorandum of Understanding (separate legal agreement) is to be prepared which will ensure biodiversity units are delivered either on-site as part of the Huyton Mixed Use Commercial District or via a contribution toward off-site enhancements. In summary, and subject to the proposed mitigation the application would secure biodiversity enhancement thus accords with LPCS Policies CS2 and CS8.

With respect to trees, the dispersal of trees throughout the Site, all of which are subject to a blanket TPO means that they act as an obstacle to its comprehensive redevelopment. A concerted effort has been made to retain as many trees as possible including those of the highest quality, however it is considered necessary to remove the prominent band (Groups 17 and 18) which bisects the centre of the Site in order to make effective and efficient use of land and enhance permeability. Replacement planting will be incorporated within the Huyton Mixed Use Commercial District in addition to commitments within the abovementioned Memorandum of Understanding to ensure 2:1 tree replacement is achieved in any eventuality including the potential for both on and off-site planting. To this extent it is considered that the application complies with Policy DQ4 of the saved UDP.

Impacts on Parking

The application is supported by a Transport Statement, which primarily considers the impacts of the proposed enabling work on the availability of parking within Huyton town centre. The Proposed Development would result in the loss of five car parking areas totalling 244 spaces. The majority of these are (135 no.) are specifically dedicated for employees of the Council working within the various town centre buildings and require parking permits. There is one public short stay car park within the Site fronting Archway Road which contains 109 no. spaces.

The Transport Statement contains parking surveys conducted across the whole of Huyton town centre from 2018 and 2022. The former concluded that most of the car parks were underutilised at less than 50% of their capacities. The 2022 survey concluded peak parking capacity of 63% across the town centre.

There are six additional car parking areas within 5-minute walk of the Site totalling 676 spaces, most of which are public. The largest is the 149 space Club 3000 Bingo car park which the Council now has a 10-year lease over. This car park is significantly underutilised and in combination with other underutilised car parks provides sufficient capacity to accommodate the 244 no. displaced parking spaces on Site. Further to this, the Proposed Development features a circa. 53 no. space temporary car park on the Site of the Compute Building following its demolition to assist in mitigating impacts.

The Proposed Development would take place over a phased basis as indicated above, which means that the car parking areas will not be closed until necessary, maintaining capacity whilst other enabling activities take place elsewhere on the Site. In summary, the Proposed Development does not give rise to unacceptable impacts on highway safety or capacity individually or cumulatively. The application therefore accords with Policy CS7 of LPCS.

Visual Impact

The proposed enabling works would see the demolition of the Municipal Building and Computer Building, removal of a central band of trees and reprofiling of the Site, although the majority of existing trees which contribute to the visual amenity of the area would be retained. Works to remove areas of hardstanding utilised as car parking would be phased so as to minimise impact on the public.

The enabling works are anticipated to take place over a period of 6 months with hoarding placed around the works for interests of security/ safety but also to minimise the screen the works taking place and minimise visual impact. It is anticipated that the period between the enabling works being completed and the Site's subsequent development commencing would be around a month. The permanent level alterations are limited in magnitude comprising raising or lowering of land by no more than one meter in any given location, this would not cause the Site to appear at odds with its surroundings or unduly prominent, especially due to the Site's existing level variation.

In light of the temporary nature of the Site's post-enabling works restoration and mitigation proposals such as hoarding to screen the Site, it is not considered that there would be an adverse visual impact arising as a result of the proposed enabling works. The application therefore complies with LPCS Policies CS19 and Policy DQ1 of the saved UDP.

Heritage and Archaeology

The application is supported by a Historic Environment Baseline Report which confirms that the Site does not contain any Listed Buildings and the Site is not wholly or partially within any Conservation Area. However, there are Listed Buildings and Conservation Areas within 1km of the Site centre and so as a precautionary principle it is assumed that the Council's statutory duties arising from (s66(1)) and (s72(1)) of the Planning (Conservation Areas and Listed Buildings) Act 1990 would be engaged.

Taking account of the current built environment within and adjacent to the Site, it is considered that the Proposed Development (i.e. removal of modern office buildings and reprofiling of the Site as a temporary intervention) would cause no harm to the special character of the nearby St Michael's Church Conservation Area or listed buildings therein.

The Historic Environment Baseline Report confirms there are no formally recorded archaeological remains on Site, although it is known that there were a number of former 19th and 20th century buildings which occupied the south eastern corner of the Site, any below ground remains are considered to be of low significance and would not preclude the Site's redevelopment.

Ultimately, the changes to the built environment presented by enabling works would not result in harm to the setting of any designated heritage asset, the application therefore complies with Policy CS20 of LPCS and Policies DQ5 and Policy DQ6 of the saved UDP.

Environmental Protection

The demolition works will be carried out in accordance with a detailed methodology and environmental management plan to be submitted to the Council at a later date, which will confirm the measures to be implemented in order to protect the surrounding environment and nearby residents. Best practicable means will be

observed and noise, vibration and dust for example will all be controlled in accordance with nationally prescribed standards and legislation. The demolition and enabling works will be carried out during the Council's standard hours for construction activity.

Conclusion

Taking all of the above matters into account, it is considered that the Proposed Development is in compliance with the policies of the Knowsley Local Plan Core Strategy and saved policies of the Unitary Development Plan. The enabling works would allow for the comprehensive redevelopment of the Site to be accelerated primarily by virtue of creating 'development-ready' plots. Appropriate measure will be implemented during the works to protect the surrounding environment while provision is also made to ensure that any loss of biodiversity units and trees is ultimately compensated for through the approach to the Memorandum of Understanding.

I trust that I have provided all the information necessary for you to validate and progress the application. Please do not hesitate to contact me if you have any queries or require any further information.

Yours sincerely



Steven Healey
Senior Planner

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Appendix 1: Schedule of Submission Documents

Reports and Forms		
Document Name	Reference	Author
Application form and certificate of ownership	N/A	Turley
This covering letter	N/A	Turley
Arboricultural Impact Assessment	RT-MME-161140-03	Middlemarch
Arboricultural Method Statement	RT-MME-161140-04	Middlemarch
Biodiversity Net Gain Metric		Middlemarch
Dusk Emergence & Dawn Re-entry Bat Surveys	RT-MME-161270	Middlemarch
Drainage Strategy	0051610-BHE-XX-XX-RP-C-0001	Burro Happold
Historic Environment Baseline	1025.R02	Fenix Heritage
Indicative Phasing Proposals and Options	N/A	Genr8 Kajima
Preliminary Ecological Appraisal	RT-MME-161140-01	Middlemarch
Preliminary Bat Roost Assessment	RT-MME-161140-02	Middlemarch
Phase 1 Desk Study Report Cover Pages	051610-BHE-XX-XX-RP-GE-0001	Burro Happold
Phase 1 Preliminary Risk Assessment	30104LG	Sutcliffe
Transport Statement	VN232696 Rev 3	SLR
Drawings		
Drawing Name	Reference	Author
Location Plan	M10335_0007 01	OP-EN
Existing Site Plan	M10335_0001 01	OP-EN
Topographical Plan	M10335_0006 01	OP-EN
Demolition Plan	HTC-BHE-XX-ZZ-DR-S-0001 P01	Buro Happold
Proposed Ground Levels	M10335_0003 01	OP-EN
GRP Survey, Utility Diversions & Disconnections - Telecoms	2929311-HLEA-XX-XX-DR-UE-050-6001-01	Hoare Lea
GRP Survey, Utility Diversions & Disconnections - Electricity	2929311-HLEA-XX-XX-DR-UE-050-6001-01	Hoare Lea
GRP Survey, Utility Diversions & Disconnections – Gas, Water and Unidentified Services	2929311-HLEA-XX-XX-DR-UE-050-6001-01	Hoare Lea

Appendix 2: Planning History

Application Reference	Submitted	Status	Description
Application Site			
23/02650/KMBC1	Nov 2023	Awaiting Determination	Education Building, Huyton Hey Road - Demolition of Existing Building
21/00606/DEMCON	Jul 2021	Prior Approval Granted Aug 21	Yorkon Building - Demolition Of A Prefabricated Office Building
20/00543/KMBC1	Sep 2020	Approved Apr 2021	The Venue - Demolition Of 'The Venue' Building And The Making Good Of Adjoining Huyton Library Elevations Together With The Construction Of A Temporary 53 Space Public Car Park And Other Associated Works
95/00664/APP	Nov 1995	Approved Jan 1996	Land Adjacent Civic Way/Poplar Bank/ Westmorland Road - Erection Of Two Storey Public Library Comprising Adult Lending
74/12402/HIST	Jan 1974	Approved Feb 1990	Land To Front Of Multi Storey Municipal Buildings Archway Road Huyton :- Improvement Of Existing Access/Parking To Civic Building And Provision Of 20 Metre Of New Carriageway
74/10953/HIST	Jan 1974	Approved Jun 1988	Land Adjacent To Municipal Buildings Archway Road :- Erection Of 3 Storey Building To Form Extension To Office Accommodation
74/08775/HIST	Jan 1974	Approved Mar 1985	Erection Of Computer Suite ~ Provision

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Surrounding Area			
23/02650/KMBC1	Sep 2023	Awaiting Decision	KMBC Council Building, Huyton Hey Road - Demolition of Existing Building
23/00075/FUL	Feb 2023	Approved Jul 2023	Land At Former Ambulance / Fire Station Huyton Lane - Erection Of 53no. Retirement Living Apartments (Use Class C3) Together With Landscaping, Car Parking And All Other Associated Works
04/01370/FUL	Dec 2004	Approved Dec 2005	Demolition Of Former Asda Store, Retention Of Basement Car Park And Erection Of 3 No. Retail Blocks (Amendment To Previously Approved Application No. 03/00289/FUL)
02/00936/FUL	Nov 2002	Approved Aug 2003	Land At Lathom Road - Erection Of 147,300sqft Retail Superstore Within Use Class A1 With Associated Car Parking, Landscaping & Highway Improvement Works
00/00211/FUL	Apr 2000	Approved Apr 2002	Land At Lathom Road - Erection Of 114,000sq Ft (60,000 Sq Ft Net) Superstore Within Use Class A1 Together With Associated Landscaping, Car Parking, New Access, Highway Improvement Works (Development Affects Public Right Of Way)
02/00031/KMBC1	Feb 2002	Approved Apr 2002	Land Bounded By Poplar Bank, Derby Road, Griffiths Road And Westmorland Road - Erection Of 3 Storey Building Incorporating Medical And Office Facilities
97/00172/APP	Apr 1997	Approved Jul 1997	Land At Poplar Bank/ Archway Road - Erection Of 44 No. Sheltered Flats With Associated Common
96/00047/APP	Feb 1996	Apr 1996	Huyton Town Centre - Layout Of Car Park Spaces, Soft Landscaping, Construction Of Low...
95/00333/APP	Jun 1995	Approved Aug 1995	Erection Of Petrol Filling Station, Associated Facilities, Car...