

205 Stockport Road,
Altrincham,
Manchester,
WA15 7SW

Knowsley Metropolitan Borough Council,
Planning Services - Knowsley Council,
Municipal Buildings,
Huyton,
Knowsley,
L36 9UX

Sent via the Planning Portal only

20th November 2025

Dear Sir/Madam,

Land at Page Moss, Liverpool Road, Huyton, L36 3YD

Hayley Knight Planning Limited, on behalf of Iduna Evci Asset Co 1 Limited (BE.EV), hereby apply to Knowsley Metropolitan Borough Council for the provision of a substation, associated bollards and two lighting columns to support a scheme for 6 no. electric vehicle charging spaces at the retail area car park off Page Moss, Liverpool Road, Huyton.

This planning application comprises of the following documents, as submitted on the Planning Portal (reference PP-14500409):

- Application form;
- Site location plan, reference 596-728-3.0.001 revision P2;
- Existing Site Plan, reference 596-728-3.0.002 revision P2;
- Existing Elevation A Plan, reference 596-728-3.0.003 revision P2;
- Proposed Site Plan, reference 596-728-3.1.001 revision P2;
- Proposed Elevation A Plan, reference 596-728-3.2.001 revision P2;
- Kempower Charger Details Plan, reference 596-728-3.6.001 revision P2;
- Power Bank and Feeder Pillar Details Plan, reference 596-728-3.6.002 revision P2;
- Substation Details Type A Plan, reference 596-728-3.6.003a revision P2; and
- Lighting and Signage Details Plan, reference 596-728-3.6.004 revision P2.

These documents should be read alongside this submission letter, which sets out the planning considerations associated with the proposals.

The requisite fee of £298.00 has been paid directly through the Planning Portal.



07989 327 331
hayley@hkplanning.ltd
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The Applicant

Be.EV is a national, public electric vehicle (EV) charging provider that is creating a fair, future-proof infrastructure legacy to sustainably accelerate the UK's EV revolution across the country. Backed by £110 million from Octopus Energy Generation, one of Europe's largest renewable energy investors, Be.EV works closely with public and private sector organisations to make electric vehicle use accessible to every community. Their mission is to work in close collaboration with their partners on their journey to electrification by creating bespoke, design-led and fully funded EV charging solutions that add value to organisations and delight EV drivers.

Be.EV currently maintain the largest network of public EV chargers in Greater Manchester and are rapidly expanding their national footprint. Their mission is to listen to their customers: this means putting the right chargers in the right places and maintaining their impressive 99.6% uptime record. The employee-owned company's membership scheme has 25,000+ members who get discounted charging rates alongside pay-as-you-go drivers.

Be.EV currently operates a national network of close to 300 live charges with an additional 1,000+ chargers in the current pipeline.

The proposed Ultra Rapid charger can, depending on the vehicle, charge a vehicle up to 80% of its capacity within 15-20 minutes.

Be.EV have a rigorous maintenance schedule to ensure that 99.6% of their chargers are available for use at any given time. In order to maintain these levels availability BE.EV have a 24 hour, 7 days a week, help desk for service users, and service level agreements with suppliers to ensure any payment issues are resolved within 24 hours, and any electrical issues are resolved in 4 hours.

The Site

The Site comprises of 406 square metres of an existing car park that forms part of the Page Moss Retail Park off Liverpool Road in Huyton. The Site is currently occupied by 10 no. existing standard parking bays in one row of the existing car park, and an area of hardstanding to the rear of the parking bays that forms part of the car park manoeuvring area. Two existing lighting columns are located to the head of the existing parking bays.

Wider Site Context

The wider site comprises of the car park for the Page Moss District Centre which is occupied by Lidl, Costa Coffee, Domino's Pizza and McDonalds. This car park provides approximately 120 no. spaces.

The bays subject of this application are located in the row on the eastern side of the car park. The main entrance and exit for the retail park is located to the south of the Retail Park, between Costa Coffee and the McDonalds.

Planning Context and Constraints

The Site is located wholly within the Page Moss District Centre and North Huyton Action Area as identified on the Local Plan Policies Map.



📞 07989 327 331
✉️ hayley@hkplanning.ltd
🌐 hkplanning.ltd



The Site is not subject to any typical planning constraints, albeit it is noted that the Site is only 340 metres to the east of an Air Quality Management Area (AQMA) as identified on the Department for Environment, Food and Rural Affairs (Defra) AQMA on-line mapping¹

Relevant Planning Application History

The Site has a varied planning history relating to the development of the wider retail park. The most recent changes to the Retail Park were subject to planning permission reference 13/00607/FUL which sought extensions and alterations to the larger retail unit to enable Lidl to occupy it. As part of this permission conditions (6 and 7) were attached to ensure that the parking and servicing areas were completed prior to the unit becoming operational and remain in-situ thereafter.

This approved car park layout plan did not include the provision of electric vehicle charging bays, and as such there are none on the wider site as existing.

Since the 2013 applications to accommodate Lidl, the Applicant has obtained planning permission (reference 24/00380/FUL) for 8 no. EV charging bays and associated equipment on 10th September 2024. The Site subject of this consent is located on the western most side of the Retail Park's car park.

The Proposal

The proposals comprise of the provision of a substation, associated bollards and two lighting columns to support a scheme for 6 no. electric vehicle charging spaces at the Page Moss Retail Park in Huyton. The EV bays include 1 no. fully PAS accessible bay, and 1 no. elongated bay for vans.

The permitted development rights for Electric Vehicle (EV) Upstands and the associated equipment changed on 29th May 2025 to relax the conditions and limitations for permitted development for EV charging upstands, which typically have limited planning issues. The changes in permitted development for EV upstands have been implemented in order to simplify the planning process and ensure that the EV charging network across the UK can be increased to support the transition from internal combustion engines to EVs, which is one of the Government's key objectives in achieving net zero. As a result of this change in permitted development it is considered that the charging upstands, power bank, feeder pillar and associated bollards required to support the EV charging bays at this Site benefit from permitted development under Class E, Part 2, Schedule 2, of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended, as:

- the bays, EV upstands, feeder pillar, power bank and associated bollards positioned to protect them are all located at 'ground level within a non-domestic area lawfully used for off-street parking';
- the bays, EV upstands, feeder pillar, power bank and associated bollards are all necessary for the operation of the upstands;
- the proposed upstands are less than 2.7 metres in height, see the Charger Details Plan;
- the Site is not within a designated scheduled monument, or in the curtilage of a listed building; and
- the scheme comprises of one upstand proposed for two every EV charging bays, so below the limitation

¹ [AQMA's interactive map \(defra.gov.uk\)](https://aqma.defra.gov.uk/)



of no more than one upstand per EV charging bay.

Information on the electrical charging upstands, feeder pillar, power bank and associated bollards that protect them have been included for information only.

This application is seeking for planning permission for the substation and bollards associated with it as the substation exceeds the 29 metres cubed limit for substations that support EV charging schemes, and is located within 5 metres of a highway as set out in Class E, Part 2, Schedule 2, of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended. In addition, this application is seeking planning permission for the two lighting columns that will illuminate the area of the car park where the EV charging bays are proposed. In order to ensure the safety of customers and the proposed EV charging equipment, the Applicant may mount closed circuit television and automatic number plate recognition cameras on the existing lighting post overlooking the charging bays.

Three sets of signage are located at the head of bay 1, and in-between bays 2 and 3, and bays 4 and 5, as shown on the Proposed Layout Plan. It is considered that these small signs benefit from deemed consent for forecourt signage (Class 6, Part 1, Schedule 3 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007). These signs are also shown on the submitted plans for information only.

Operational Information

The charging facility is proposed to be available 24 hours a day.

The type of EV charging equipment proposed will, depending on the vehicle, charge a vehicle up to 80% of its capacity within 15-20 minutes.

Be.EV have a regular maintenance schedule for their equipment as set out above to ensure that the proposed spaces will be available and reliable for users.

Planning Policy Context

The Local Plan for Knowsley Metropolitan Borough Council comprises of the Knowsley Local Plan Core Strategy, adopted in January 2016, and the remaining policies of the Unitary Development Plan, adopted in June 2006. This document is the Statutory Development Plan, the policies of which new development will be assessed against. In respect of the proposed development the following policies are considered to be relevant:

- Core Strategy Policy SD1 Sustainable Development;
- Core Strategy Policy CS1 Spatial Strategy for Knowsley;
- Core Strategy Policy CS2 Development Principles;
- Core Strategy Policy CS6 Town Centres and Retail Strategy;
- Core Strategy Policy CS7 Transport Networks
- Core Strategy Policy CS19 Design Quality and Accessibility in New Development;
- Core Strategy Policy CS22 Sustainable and Low Carbon Development;
- Unitary Development Plan Policy T10 Access for the Less Mobile
- Unitary Development Plan Policy DQ2 Security in the Built Environment; and



07989 327 331
hayley@hkplanning.ltd
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- Unitary Development Plan Policy ENV3 Light Pollution.

The National Planning Policy Framework (December 2023), associated Planning Practice Guidance (PPG) and adopted supplementary planning guidance must also be given due weight in the planning assessment.

Planning Considerations

The proposed substation, associated bollards and two lighting columns, which are needed to support a scheme for 6 no. electric vehicle charging spaces, do not benefit from permitted development as set out in Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 2, Class E (electrical upstand for recharging vehicles). As set out above the rest of the scheme does benefit from permitted development and so details have only been provided for information. This application is therefore seeking planning permission for the proposed substation, lighting columns and associated bollards only.

It is clear from national policies and guidance that ultra low and zero emission vehicles are classed as sustainable transport modes. Opportunities for sustainable transport modes, as set out in the NPPF and PPG should be promoted as a way of addressing the challenge of climate change. Moreover the provision of more EV charging bays, that are well maintained and reliable, will help the United Kingdom make the transition from petrol and diesel vehicles to EVs, which is a pivotal to lowering the UK's emissions. The principle of the proposed development, which will provide drivers of electric vehicles a place to charge their cars, therefore fully aligns with National policies and objectives.

This application enables rapid EV charging points to be retrofitted to an Retail Park car park for the benefit of people visiting these premises as well as the local community. As the proposals will assist drivers in reducing reliance on petrol and diesel cars, the proposed development wholly complies with the policy objective set out in Policy CS22 which relates to ensuring new development is sustainable and low carbon.

The Site is located in an identified District Centre as shown on the Knowsley Local Plan Policies Map. As set out in Policy CS6 district centres are to provide a local shopping function mainly focussed on convenience shopping and services appropriate to local needs. The adjacent Domino's, Costa, Lidl and McDonalds are all within a short walking distance of the Site together with a large residential catchment. The proposals support EV charging bays which can benefit shoppers, users of the local facilities and nearby residents, where currently there is no EV charging provisions. The proposal comprises of six EV charging spaces, is therefore considered to be of an appropriate scale given the context of the Site, and therefore complies wholly with Policy CS6. It is acknowledged that the Applicant benefits from planning permission for 8 no. EV charging bays on the other side of the Retail Park car park, albeit it is not the intention of the Applicant to implement both proposals- for commercial reasons this revised proposal is the scheme that the Applicant would implement, should they obtain planning permission.

Policy CS1 of the Core Strategy sets out a spatial strategy for the District, and requires the focus of development to be in urban areas and on previously developed land as well as maintaining the existing settlement and retail centres hierarchy. The policy also requires the enhancement of district centres and the regeneration of residential neighbourhoods. The Site is located within the urban area, and on land that is previously developed. As set out



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hayley@hkplanning.ltd
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above the EV charging bay that are supported by the proposed substation and lighting columns provide a new service to the Page Moss District Centre, and is of a modest scale providing six charging bays. The scale of development is therefore considered to be appropriate for the urban area and an identified district centre. The proposals are therefore considered to comply with Policy CS1, and Policy CS7 which sets out how the Council will support a sustainable and integrated transport network.

Policy CS2 sets out the development principles over the Core Strategy period. In respect of the proposed development these include promotion of sustainable economic development ; reduction in carbon emissions and the effects of climate change; and increasing accessibility; and making an efficient use of available resources and infrastructure. The nature of the substation and lighting and the EV bays that they will support achieve these objectives as:

- The supported EV charging bays will meet a local need for vehicle charging infrastructure, particularly as EV car ownership increases and therefore ensure the local community can adapt to climate change;
- Reduce carbon emissions by enabling a more ready access to EV charging spaces for local people, and pass-by traffic;
- Provide an opportunity for local people and pass-by traffic to use sustainable modes of transport;
- The potential to reduce trips on the network, as the location of the Site enables users of the EV charging bays whilst they run errands; and
- The proposals are located in a part of the Borough where it can make use of existing utility infrastructure.

In respect of the design of the development, it will have a negligible impact on the existing public realm as it is replacing existing parking spaces with the substation and EV charging bays, and other associated infrastructure. The scheme has been designed to respect and integrate into the existing public realm including highways, footways and internal layout of the Retail Park car park. In addition the development subject of this application, i.e. the substation and lighting columns, comprise of standard street furniture that is typical across the UK and therefore will blend into the existing streetscene. As set out above the scale of development is modest, particularly when considered against the context of the wider Retail Park, which predominantly comprises of modern commercial buildings. The modern aesthetics of the equipment and green paint for the spaces reflects the modern character of the Page Moss Retail Park. The proposals have therefore been designed to comply with Core strategy Policy CS19.

It is noted that the proposed development will involve the loss of four parking spaces, in order to accommodate the infrastructure required to service the EV charging bays. However, the application site forms a small part of a much wider car park that serves the Page Moss Retail Park. The wider car park provides over 120 no. parking spaces for patrons of the retail park. The loss of four spaces in order to introduce EV charging bays for shoppers to use whilst they frequent the shops is not considered to have a detrimental impact on the operation of the Retail Park car park. In any case, as set out above the provision of this service complies with the Local Plan and national policy objectives, and is therefore considered to outweigh the loss of these four spaces.

Policy ENV3 of the Unitary Development Plan (UDP) seeks to ensure sufficient lighting is provided for the creation of a safe and secure environment whilst also protecting the amenity of neighbours. Policy DQ2 of the UDP also



07989 327 331
hayley@hkplanning.ltd
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sets out a requirement to ensure that security is a consideration for new development. The proposed EV charging bays are located in an existing car park for a commercial shopping area that already benefits from lighting, the scheme however proposed the removal of two existing lighting columns, and their replacement with two new lighting columns that include the mounting of CCTV and/or ANPR cameras as needed. It is therefore considered that the proposed development will not have any impact on the amenity of shoppers or neighbours, but will contribute towards the creation of a safe and secure environment. The proposals therefore comply with Policies ENV3 and DQ2.

Although the bays themselves benefit from permitted development, it should be noted that they have been designed to be useable by people of all abilities. One of the bays is fully PAS accessible to ensure it can be used by people of all abilities. The other charger bays benefit from hatching separating them to enable ease of use by people of all abilities, as well as providing gaps for the charger units. The charger units are also positioned at the same level as the parking spaces. One of the bays has been designed to be used by longer vehicles such as vans too. The development therefore benefits from inclusive design features in accordance with UDP Policy T10 and Core Strategy Policy CS19.

This development proposal is exempt from bio-diversity net gain requirements as it comprises entirely of hardstanding, which does not have an ecological value. The proposals will therefore have a negligible impact on bio-diversity.

Summary and Conclusion

This application is seeking planning permission for the provision of a substation, associated bollards and two lighting columns to support a scheme for 6 no. electric vehicle charging spaces at the retail area car park off Page Moss, Liverpool Road, Huyton. As set out in this covering letter the proposed development supports the installation of EV charging upstands and associated equipment which benefits from permitted development, and ultimately aligns with both national and local sustainable transport policies, through the expansion of a reliable network of EV charging spaces, making the use of EV more pragmatic and accessible.

The layout of the proposed development has due regard to the existing car park in the position and layout of the development. The location of the proposed substation and lighting columns (and EV charging bays as a result) complies with the policy objectives for new development as set out in the Core Strategy. The proposed development is required to support a new service for shoppers of the retail park that supports the sustainable change from petrol and diesel vehicles to EVs. The location of the proposed EV charging bays complies with the policy objectives of the Core Strategy and UDP, given the location of the Site in an identified District Centre and comprises of previously developed land. The design of the development is fairly standard, but reflects the modern Retail Park, and has been designed to assimilate into the existing streetscene.

In summary the proposals are considered to comply with national and local planning policies, and therefore it is respectfully requested that planning permission be granted expeditiously.



07989 327 331
hayley@hkplanning.ltd
hkplanning.ltd





I trust the information submitted with the application is appropriate and can be registered and validated expeditiously. If there is anything further that we can assist with, please do not hesitate to contact me.

Yours sincerely,

Hayley Knight

Director, Hayley Knight Planning Limited

Telephone: 07989 327 331

E-mail: hayley@hkplanning.ltd



 07989 327 331

 hayley@hkplanning.ltd

 hkplanning.ltd

