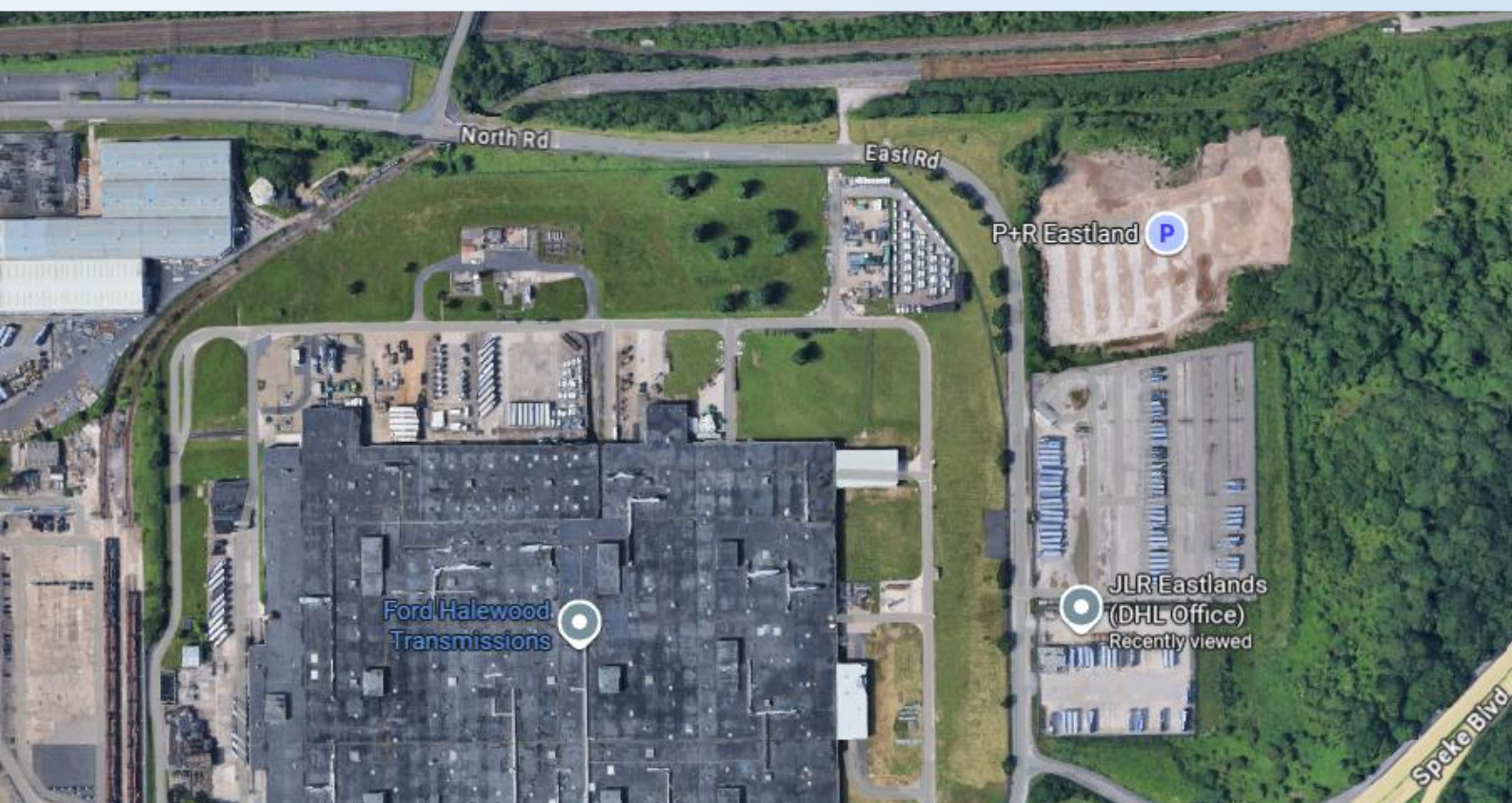




JLR Halewood

EASTLANDS CAR PARK

Planning Statement





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EASTLANDS CAR PARK

Planning Statement

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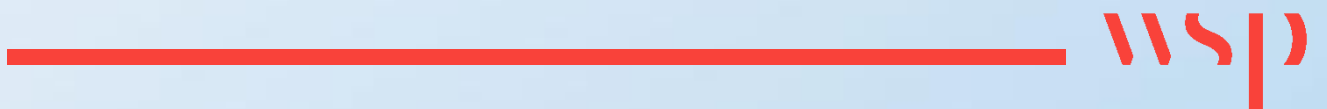
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1

INTRODUCTION



1 INTRODUCTION

- 1.1.1. WSP has prepared this Planning Statement on behalf of JLR (the applicant) in support of a full planning application for construction of a car park at JLR Halewood, Eastlands (the site). The car park will be the storage of production vehicles, including Work in Progress (WIP) vehicles and Final Vehicle Distribution (FVD). FVD, or 'batch and hold parking', is where launch vehicles are stored for the first six weeks of production of each new vehicle. The application has been submitted to Knowsley Council as the Local Planning Authority (LPA).
- 1.1.2. The application site is in the easternmost part of the wider JLR Halewood site, accessed from the private internal access road (North, East and South Roads).
- 1.1.3. The site benefits from temporary planning permission for a car park for period of five years, up until December 2027. Temporary staff car parking was required to provide flexibility during a broad programme of works to modernise and reorganise JLR Halewood. During this period of modernisation, the temporary car park was used to accommodate increased employee numbers and for occasional WIP vehicle storage however it has not been used for some time.
- 1.1.4. JLR now seeks to secure consent for the long-term permanent use of the site for product vehicle storage. The development will play a vital role in supporting the production of electric vehicles and driving delivery performance at JLR Halewood as set out in further detail at Sections 2.5 and 2.6.
- 1.1.5. The application is therefore seeking full planning permission for:
"Construction of a car park for product vehicle storage together with two security cabins, 3m high boundary fencing, lighting, CCTV and associated works"
- 1.1.6. The principle of the use of the site for parking is long established. This proposal introduces suitable drainage, lighting, security fencing and resurfacing of the existing hard standing to provide a permanent scheme at the site.
- 1.1.7. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), this Statement considers the proposal against the relevant national and local policies and any other material considerations pertinent to the assessment of the development.
- 1.1.8. This statement is accompanied by a suite of drawings and technical reports as listed within the submitted cover letter. It is demonstrated throughout this report, and the wider application submission pack, that there are no technical reasons nor any adverse impacts arising from the proposals, that should prevent the proposed development coming forward at the site.
- 1.1.9. In summary, this statement and supporting reports demonstrate that:
- The principle of development complies with national and local planning policy in which Knowsley Council are supportive of economic expansion at JLR in line with Policy CS2 and CS4.
 - The proposal is in keeping with the existing industrial site and is acceptable in design terms.
 - The proposed development will facilitate the expansion of JLR operations in a logical and sustainable location connecting to existing facilities.
 - The development will not have a severe or detrimental impact on highways with no changes proposed to the existing highways.
 - 10% Biodiversity Net Gain (BNG) will be delivered through an off-site financial contribution.
 - The technical reports submitted conclude the site and proposed development is acceptable.

- 1.1.10. On this basis, and in accordance with the NPPF presumption in favour of sustainable development, the application should be supported and approved without delay.

1.2 PLANNING STATEMENT STRUCTURE

- 1.2.1. This Planning Statement is structured as follows:

- Section 2 describes the application site, its surroundings and the local context relevant to the application
- Section 3 describes the proposed development
- Section 4 identifies the relevant planning policy and legislative framework relevant to the determination of this planning application
- Section 5 assesses the material planning considerations associated with this application
- Section 6 sets out the conclusion.

2 CONTEXT

- 2.1.1. This section provides a description of the site and sets out the relevant planning history.

2.2 SITE AND SURROUNDING AREA

- 2.2.1. JLR Halewood Plant is located on the southern boundary of Knowsley Council, within Halewood South Ward.
- 2.2.2. The site comprises a broadly rectangular parcel, immediately east of the private internal link road as seen at Figure 2-1. The site comprises two car parks, north and south, divided by a secure fence. There are man-made bunds within the site boundary which include a bund in the north-west corner, along the eastern boundary and along the centre fenceline which divides the two car parks. The site has temporary planning consent for a staff car park, for period of five years, up until December 2027 (planning reference: 22/00575/FUL) which has been partially built out to provide 1,278 spaces (380 spaces in the north car park and 898 spaces in the south car park).
- 2.2.3. The site extends further east than the temporary consent to allow the maximum reuse of earth on site, creating a slope of topsoil from the proposed car park down to existing ground levels to the east.
- 2.2.4. To the north of the site is the railway line, to the east is undeveloped scrub, and to the south is the HGV park (Planning Permission ref: 17/00506/FUL).
- 2.2.5. The closest residential properties are on Aldersgate Drive, approximately 218m north-west of the site. Aldersgate Drive is separated from the site by a four-track railway and a significant landscape buffer.
- 2.2.6. The site area extends approximately 5.12 ha.
- 2.2.7. Access to the site is provided via the existing road circulating the Halewood plant, with direct connections to the A561 Speke Boulevard and the A562 Higher Road via Old Hutte Lane.
- 2.2.8. The site lies within Flood Zone 1, classified as very low risk in terms of risk of flooding from rivers and seas. The Environment Agency Surface Water Flood Risk maps indicates that most of the site is also at low risk of surface water flooding.



Figure 2-1 – Google Earth Image showing the site boundary in red

2.3 ALLOCATIONS AND DESIGNATIONS

2.3.1. The site benefits from the following employment policy allocations:

- Primarily Industrial Area – Local Plan Core Strategy Policy CS4, UDP Policy EC3 – the policy supports the delivery and retention of B1, B2 and B8 uses.
- Land for Employment Development - Local Plan Core Strategy Policy CS4, UDP Policy EC2 – the policy directly supports the principle of new development to assist the continued operation of existing employment sites through 164 hectares of employment land. The site is identified as a key employment site which forms an essential part of the borough's overall employment land supply.

2.3.2. To the east of the site is the Crab Tree Rough and Hop Yard Wood, Local Wildlife Site (LWS). The LWS are shown by a green outline in Figure 2-2 below. The Primarily Industrial Area is shown in light purple, and Land for Employment Development is in dark purple.

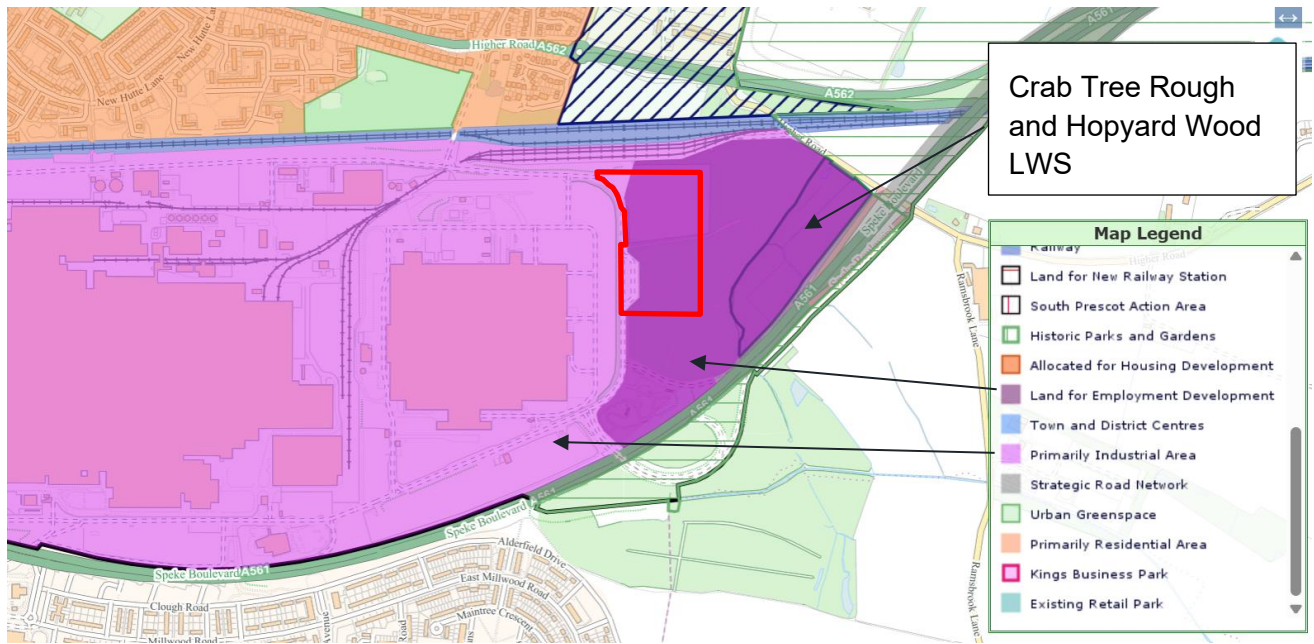


Figure 2-2 – Local Plan Policies Map (Excerpt: Knowsley Policies Map)

2.4 PLANNING HISTORY

- 2.4.1. The table below contains the relevant planning history of the application site.
- 2.4.2. The site benefits from a live planning permission, which is for the retention of a temporary car park for a period of five years (to December 2027).
- 2.4.3. Immediately south of the application site is the Trailer Park site which was granted consent in 2016 (ref: 16/00316/FUL). The consent was subsequently varied by a non-material amendment to make amendments to the development (ref: 16/00316/NMA) and a Section 73 to remove Condition 5 which related to landscape mitigation (ref: 17/00506/FUL). The reason for the Section 73 application was due to the formation of two landscape bunds to the east and south of the trailer park (ref: 17/00170/FUL) which was required to accommodate contaminated material and topsoil identified during the construction of the trailer park. As such, an alternative site for the landscape mitigation was required.

Table 2.1 Planning History within the application site

LPA ref	Description of Development	Decision	Date
22/00575/FUL	Retention of temporary car park providing 1,589 spaces together with a security cabin, 2.4m high boundary fencing, lighting and associated works for an extended period of five years.	Granted	9 Dec 2022
19/00460/FUL	Retention of temporary car park providing 1,589 spaces together with a security cabin, 2.4m high boundary fencing, lighting and associated works for an extended period of three years	Granted	1 Oct 2019
16/00147/NMA	Non- material amendment to planning permission 16/00147/ful (construction of a temporary car park to provide 1,589 spaces together with erection of a security cabin & 2.4 metre high boundary fencing. Installation of lighting columns & associated works) to allow for the provision of an additional access point & re-configuration of internal arrangements.	Granted	4 Nov 2016
16/00147/FUL	Construction of a temporary car park to provide 1,589 spaces together with erection of a security cabin & 2.4 metre high boundary fencing. Installation of lighting columns & associated works.	Granted	22 Jun 2016
16/00135/SO	Environmental Impact Assessment screening opinion request in respect of proposed development of a temporary car park to provide 1,589 spaces and associated works up to a period of 3 years.	EIA not required	1 Apr 2016
14/00440/FUL	Construction of a temporary car park, erection of security cabin and installation of lighting	Granted	8 Aug 2014
96/00658/APP	Use of land for vehicle storage and loading for distribution	Granted	28 Feb 1997

2.5 JLR HALEWOOD AND BACKGROUND CONTEXT

REQUIREMENT FOR PRODUCTION STORAGE

- 2.5.1. The JLR Halewood Operations was first opened by the Ford Motoring Company in 1963, in which 1993 saw the Halewood press shop begin production of Jaguar body panels. JLR currently employs 3700 people directly, supporting a further 1,000 people indirectly through its suppliers and contractors. Appropriately a third of JLR Halewood Operations workforce live in Knowsley. This equates to around 1,200 employees.
- 2.5.2. The Reimagine Strategy will see JLR electrify all of its brands by 2030, with the aim of achieving carbon net zero across JLR supply chain, products, and operations by 2039. Significant investment has been made at JLR Halewood in relation to new infrastructure to support the Electrified Modular Architecture (EMA) programme, which is at the core of JLR's Reimagine Strategy.
- 2.5.3. Electrification is central to the Reimagine Strategy and Halewood has an exciting future producing ICE, PHEV and BEV models side by side before eventually becoming JLR's first all-electric production facility. This planning application will support the parallel production of electric vehicles alongside existing combustion and hybrid models.
- 2.5.4. The permanent car park will support the launch of electric vehicles at Halewood, particularly during this transitional period whilst EV, hybrid and combustion vehicles will be produced in parallel.
- 2.5.5. In addition to supporting the launch of EV vehicles, the proposal will help keep product vehicles on site. Currently WIP vehicles are stored at Halewood Operations and off-site, transported by HGV. The proposal will allow more efficient storage of production vehicles on site, reducing the need for off-site storage. The development will play a vital role in supporting the production of electric vehicles and driving delivery performance at Halewood.

STAFF AND VISITOR CAR PARKING SUPPLY

- 2.5.6. The site benefits from temporary planning consent for a car park. This was required to accommodate additional staff parking to support model launches and production of the Range Rover Evoque and Land Rover Discovery Sport. The car park enabled JLR to:
- Accommodate temporary increases in employee numbers linked to increases in production output or launch events
 - Maintain an opportunity for visitor and contractor parking at Eastlands, however this has been minimal
 - Occasional WIP vehicle storage or FVD storage which relates to the storage of launch vehicles
 - Facilitate the JLR Reimagine Strategy
- 2.5.7. The car park currently provides a total of 1,278 spaces (380 spaces in the north car park and 898 spaces in the south car park). However, the car parks haven't been used recently for staff, visitor or contractor parking for a significant period of time. Moving forwards, the site will not be used for staff or visitor car parking. This loss of available car parking has been assessed within the accompanying Transport Statement prepared by AECOM, which concludes that the existing facilities can comfortably accommodate the minimal visitor and contractor parking historically accommodated at Eastlands.

3 PROPOSED DEVELOPMENT

3.1.1. The following section sets out the details of the proposed development.

3.1.2. This application seeks permission for:

“Construction of a car park for product vehicle storage together with two security cabins, 3m high boundary fencing, lighting, CCTV and associated works”

3.1.3. Figure 3-1 below shows the site plan for the proposed development.

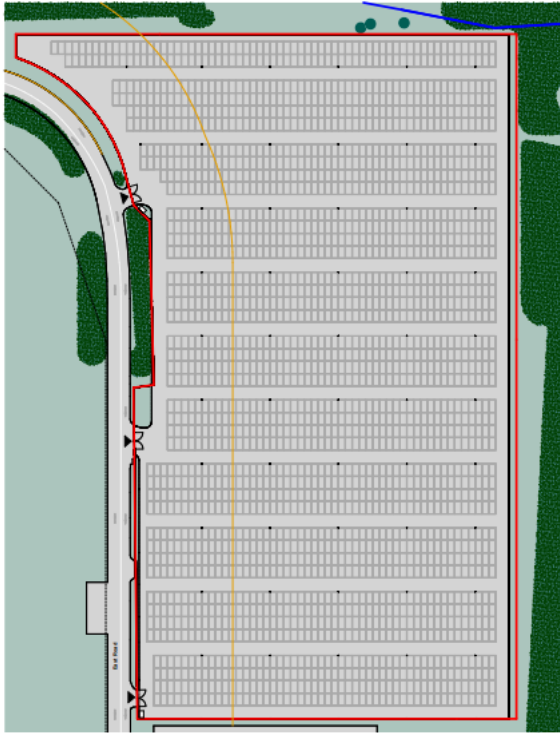


Figure 3-1 – Proposed Site Plan

3.1.4. The proposal will provide a car park for around 2,000 product vehicles. However, the development will not accommodate any staff or visitor car parking, it will be used to storage of product (WIP and FVD vehicles) only.

3.1.5. WIP parking is a normal and essential part of automotive production for the temporary storage of partially built vehicles.

3.1.6. The development will also not generate any additional requirements for staff or contractor parking or impact on the public highways network. Product vehicles will be driven to the car park along the internal private access road to be stored mid-production. The cars will be parked in a nose-to-tail ferry style arrangement with 6m pass lanes for vehicles, this layout is typical across the UK JLR sites. There is no requirement for dedicated pedestrian walkways within the site.

3.1.7. Two security cabins are proposed, one at the northern and southern vehicular accesses. The cabins installed under the temporary consent are proposed to be retained and reused.

3.2 BOUNDARY TREATMENTS

- 3.2.1. 3m high weldmesh anti-climb fencing is proposed, replacing the existing perimeter fencing that varies in height and quality, and does not meet JLR security requirements. A 1m high opaque fence is proposed along the eastern boundary to prevent light spill from headlights into the undeveloped area to the east. 3m security gates are proposed at each of the three vehicular accesses.
- 3.2.2. Specification sheets for the proposed boundary treatments (CLD Securus S1 High-security fencing system to LPS 1175 A1 (SR1) Issue 8 and CLD-4231) are included within the application submission. The proposed colour is green.

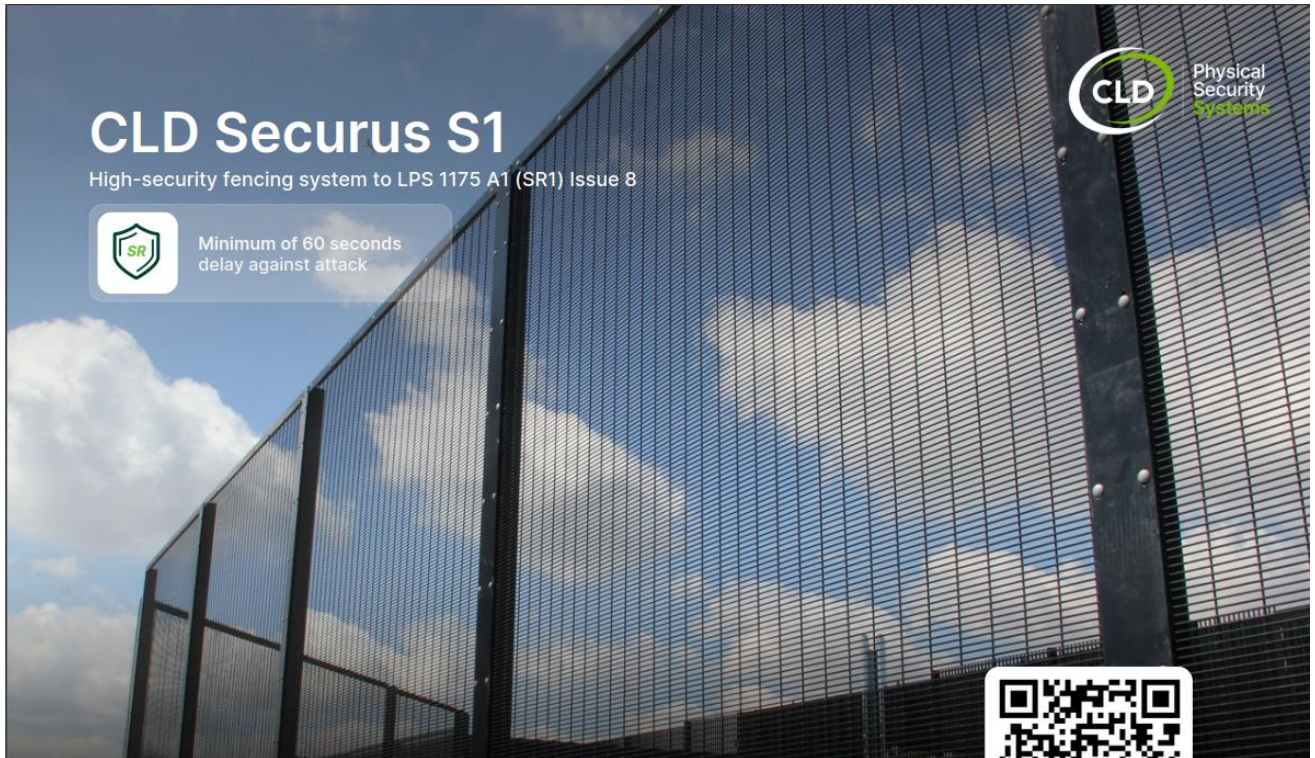


Figure 3-2, 3m high weldmesh fencing (CLD Securus S1)

3.3 CCTV AND LIGHTING

- 3.3.1. The existing columns within the southern compound of site are to be removed and replaced with a scheme that meets JLR's operational lighting requirements and lighting standards.
- 3.3.2. The proposed lighting will be column mounted at a maximum of 8m tall with 30m spacing. The lighting design has been developed to provide uniform lighting across the site whilst limiting light spill beyond the boundary to the east and south.
- 3.3.3. When the car park is not in use the lighting will be dimmed to 50%. The lighting will remain in the dimmed state throughout the hours of darkness, with enhanced illumination to the required standard only where and when activity is detected. This can be overridden to function at 100% across the whole car park in the event of emergency or security incident.
- 3.3.4. The product specifications are provided within Table C of the Lighting Impact Assessment.

- 3.3.5. CCTV security cameras are proposed around the perimeter, to be mounted on the proposed lighting columns. A plan showing the location of proposed CCTV has been prepared to accompany the planning application.

3.4 VEHICULAR ACCESS

- 3.4.1. The three existing vehicular accesses from East Road will be retained and reused. No alterations are proposed to the existing access arrangements or the local highway.

3.5 GROUND WORKS AND DRAINAGE

- 3.5.1. The proposal will involve clearance, excavation, levelling, and installation of hardstanding and sealed surfacing to create the permanent car park.
- 3.5.2. To create a level car park existing vegetated bunds within the site will be levelled and the earth re-used where possible. Along the eastern boundary, the earth will slope down to the existing site level. Figure 3-3 below shows the existing bunds within the site circled in red. Along the eastern boundary, topsoil on site will be reused to create a slope from the finished floor levels of the car park down to existing levels beyond the site boundary. Sections of retaining wall are proposed along the eastern, northern and western boundaries of the proposed car park.
- 3.5.3. The application is supported by earthworks drawings prepared by Ridge which provide further detail of the earthworks and retaining structures proposed.
- 3.5.4. Infiltration testing was undertaken by Beech as part of their intrusive site investigations, this confirmed that soakaways are not a viable option. Furthermore, soakaways are not suitable due to the site's historical use as a landfill. Surface water from the development site will discharge to the existing surface water drainage network in the carriageway to the west of the site, at a restricted greenfield runoff rate. Attenuation has been provided in the form of geocellular storage tanks under the proposed car park.

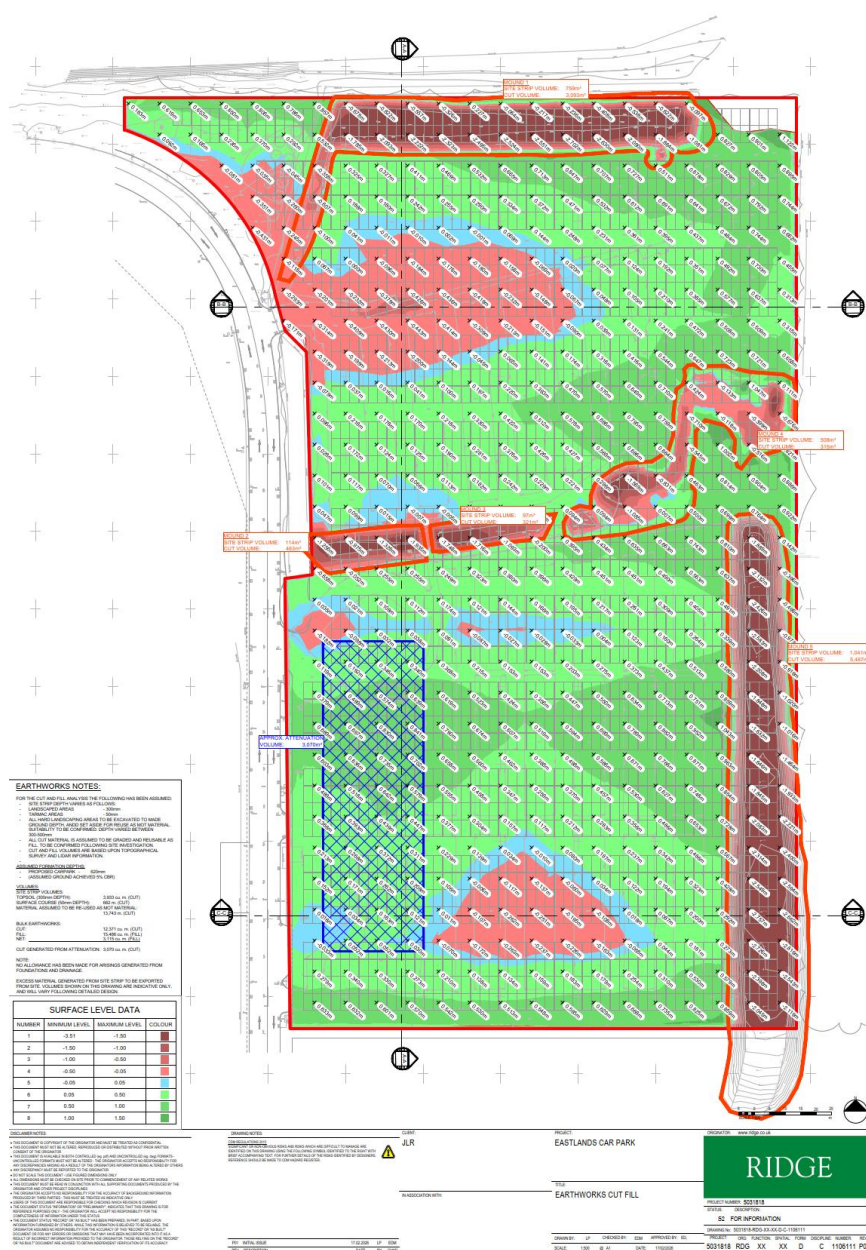


Figure 3-3 Earthworks Cut Fill Plan prepared by Ridge, included to illustrate the location of existing earth bunds circled in red.

4 PLANNING POLICY

- 4.1.1. This section identifies the planning policy of relevance to this application for planning permission.

4.2 PLANNING POLICY CONTEXT

- 4.2.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2.2. The Development Plan for Knowsley comprises:
- Knowsley Local Plan Core Strategy (January 2016)
 - Saved policies of the Unitary Development Plan (adopted June 2006)
- 4.2.3. The Revised National Planning Policy Framework ('NPPF') (2024) is also a relevant material consideration, as are other development plan supplementary planning documents (SPD).

4.3 NATIONAL PLANNING POLICY FRAMEWORK

- 4.3.1. The NPPF was revised in December 2024. Any applications made after this date are required to give material consideration to this version, even if the adopted Development Plan documents were adopted under a previous version of the NPPF.
- 4.3.2. The NPPF (2024) emphasises the importance of sustainable development and sets out the core planning principles guided by the Government's planning policies. Under paragraphs 11 and 48, development proposals that accord with the development plan should be approved without delay.
- 4.3.3. In addition, the NPPF advocates for planning policies and decisions to help create the conditions in which businesses can invest, expand, and adapt, with significant weight to be placed on the need to support economic growth and productivity.
- 4.3.4. The following areas of the NPPF are relevant to this application:
- Paragraph 8 – Sustainability objectives
 - Paragraph 11 – Sustainable development
 - Paragraph 85 – Economic growth
 - Paragraph 109 - Transport
 - Paragraph 135 – Design
 - Paragraph 181 – Flood risk
 - Paragraph 187 – Natural environment and biodiversity net gain

4.4 LOCAL PLANNING POLICY

- 4.4.1. The Knowsley Local Plan Core Strategy was adopted in January 2016. The policies most relevant to this proposal are included below.

POLICIES

- SD1 – Sustainable Development: Reflects the desire for sustainable and positive development advocated for within the NPPF.

- CS1 – Spatial Strategy for Knowsley: Sets out Knowsley Council's Spatial Development Priorities and how it aims to achieve them. One such priority includes the desire to “enhance existing employment areas”.
- CS2 – Development Principles: Establishes the Council's 5 development principles and approaches to achieve them, these principles vary to address challenges including income inequality, carbon emissions, car dependency, environmental issues, and resource efficiency.
- CS4 – Economy and Employment: Lists the interventions to be used by the Council to support economic prosperity within the region.
- CS11 – Principal Regeneration Areas – Knowsley Industrial and Business Parks: Commits support towards the regeneration of Knowsley's industrial and business parks to support B1, B2 and B8 uses.
- CS19 – Design Quality and Accessibility in New Development: Explores the need for new development to enhance local distinctiveness and maintain a good standard of amenity for all existing and future occupants of land and buildings. Development should where possible aim to address the challenges of climate change and future changes in social, economic, and environmental priorities.
- CS21 – Greenspaces and Trees: requires appropriate replacement of trees at a ratio of 2:1.
- CS22 – Sustainable and Low Carbon Development: Details the high standards of sustainable design and construction required for new development, aimed at minimising carbon emissions.
- CS24 – Managing Flood Risk: Details the Council's approach towards development resulting in increased flood risk or located within areas of high flood risk.
- CS26 – Waste Management: Details the waste hierarchy and management strategy set out by the Merseyside and Halton Joint Waste Local Plan.
- CS27 – Planning and Paying for New Infrastructure: Establishes the Council's infrastructure provision principles, approach to developer contributions and economic-viability.

4.4.2. In addition, the following policies were saved from the Unitary Development Plan (adopted June 2006), and remain relevant to these proposals:

- EC2 – Sites Allocated for Employment Development: Details areas allocated for B1, B2 and B8 development including 'Eastern Compound Land, Speke Boulevard, Halewood'.
- EC3 – Primarily Industrial Areas: Explains the allocation of Primarily Industrial Areas, in which the site is included, and details that development would only be acceptable if they were complementary and compatible with existing use, consistent with the regeneration strategy, preserved the local image and avoided unacceptable loss of land for industrial development
- ENV3 – Light Pollution: Details the council's requirements for proposals involving new external lighting to minimise impacts on amenity and biodiversity.
- ENV5 – Contaminated Land: Requires development proposals where contamination is suspected to be accompanied by a Site Investigation Report and a schedule of remedial measures.
- DQ4 – Trees and Development: Requires applications to be supported by an appropriate tree survey and to provide appropriate mitigation for tree loss.

4.5 OTHER MATERIAL CONSIDERATIONS

4.5.1. The following Supplementary Planning Documents (SPDs) are considered to be relevant to this proposal:

- Developer Contributions SPD

4.6 EMERGING POLICY

SPATIAL DEVELOPMENT STRATEGY (SDS)

- 4.6.1. The emerging Liverpool City Region SDS was last consulted on between November 2023 and February 2024. Comments and feedback received have been analysed and are being considered in preparing the next draft version of the SDS.
- 4.6.2. It is anticipated that the next draft of the SDS will be published later this year. At this time the draft holds limited weight.

5 PLANNING ASSESSMENT

5.1 OVERVIEW

- 5.1.1. This section assessed the development against local and national planning policy and other material considerations as listed at Section 4. This assessment concludes that the proposal is wholly compliant with planning policy and should therefore be permitted.
- 5.1.2. The key considerations in the determination of this application are as follows:
- Principle of Development
 - Design
 - Amenity
 - Traffic and Car Parking
 - Drainage
 - Natural environment and landscaping
 - Ground Contamination

5.2 PRINCIPLE OF DEVELOPMENT

- 5.2.1. The development fully accords with the site's allocation as a primary industrial area, in accordance with Core Strategy policies CS2 and CS4 and saved policies EC2 and EC3 of the Replacement Unitary Development Plan.
- 5.2.2. The proposal will provide a long-term use for the site that has been used for temporary staff car parking since 2014. The proposed development will provide parking for around 2,000 product vehicles during the production process, which will be ancillary to the principle B2 Industrial use. The proposal will support the Halewood plant in its transition to become an all-electric production facility. Core Strategy Policies CS2 and CS4 support such uses and seek to promote sustainable economic growth to meet the development needs of established employment sectors. Core Strategy Policy CS1 identifies enhancement of existing employment areas as a priority for the Spatial Strategy for Knowsley.
- 5.2.3. JLR Halewood is recognised as a large industrial site which plays a crucial economic role within the City Region. The proposed development is necessary to ensure JLR can enhance its logistic operations to continue to meet current demands and ensure seamless manufacturing with zero losses.
- 5.2.4. The site is within a designated primary industrial area under saved Policy EC3 of the Knowsley Replacement Unitary Development Plan whereby the council supports the delivery and retention of B1, B2 and B8 uses. The Knowsley Core Strategy further supports the site's employment status through Policy CS4 which directly supports the principle of new development.
- 5.2.5. The site is identified as a key employment site which forms an essential part of the borough's overall employment land supply and therefore the principle of development is established. Whilst the development will not create any additional employment, it will enable JLR to maintain and enhance its operations at the Halewood plant, where many local residents are already employed. This will enable a continued prioritisation of staff upskilling and emphasis on ensuring a future-facing, resilient workforce.

5.3 DESIGN

- 5.3.1. This application proposes full planning permission for a product vehicle car park, replacing the existing temporary car park which is in need of improvement. The proposal will provide a surface water drainage scheme, security fencing, modern lighting and CCTV equipment that will significantly improve the quality of the existing car park and enhance the security.
- 5.3.2. The design is appropriate within an existing industrial area, and it complies with Policy CS19 of the Knowsley Core Strategy.

5.4 AMENITY

- 5.4.1. The car park would not be in close proximity to any residential properties. The closest residential properties are on Aldersgate Drive, approximately 218m north-west of the site. Aldersgate Drive is separated from the site by a four-track railway and a significant landscape buffer.

NOISE

- 5.4.2. The development proposal will involve the parking of product vehicles and so it is not anticipated to generate a significant level of noise. The development is also a significant distance away from the nearest residential property. As such, the application complies with Policy ENV2 of the Unitary Development Plan in that it would not result in any adverse impacts with regards to noise pollution.

VISUAL AMENITY

- 5.4.3. The development site is within the existing industrial area is already developed for a temporary car park. The proposed development will improve the quality of the car park through resurfacing and introducing new security measures. The site is separated from the nearest residential development by the railway line to the north and it is therefore unlikely to be any impact on visual amenity from the nearest residential receptor.

5.5 HIGHWAYS

- 5.5.1. The application site is on land owned by JLR and within the extent of JLR, Halewood. Direct access to the site is provided via the existing private highway network circulating the site. The internal road also provides direct connections to the A561 Speke Boulevard and the A562 Higher Road via Old Hutte Lane. No changes are proposed or required to the existing highway network or the internal access road. The existing vehicular accesses serving the site will be reused.
- 5.5.2. The majority of the highway network circulating the plant is privately owned by JLR. There are gates on North Road, Old Hutte Lane, the slip roads between East Road and the A561 Speke Boulevard and South Road. Each of these gates are closed only one day per year on Christmas Day to retain its private status.
- 5.5.3. The development site currently benefits from a temporary consent for a car park which provided staff, visitor and contractor parking and occasional WIP vehicle storage. The increase in staff, visitors and contractors was for a temporary period associated with the programme of modernisation across JLR Halewood. The requirement for this parking has ceased and employee parking is accommodated within the other car parks at Halewood. This is discussed further within the accompanying Transport Statement, prepared by AECOM.

- 5.5.4. Currently a proportion of semi-finished vehicles are shuttled to an off-site storage by HGV transporters. Consolidating WIP parking on-site at Eastlands will remove these HGV transporter trips from the public highway, improving operational efficiency and reducing traffic on local roads. This rationalisation is a direct benefit of the proposal.
- 5.5.5. WIP vehicles will be driven to the site by JLR employees via the internal private roads within the wider JLR site. There will be no additional vehicle trips on public roads. As such there will be no impacts on the local highways network or junction capacity.
- 5.5.6. The development will have no impact on the local highways network, and as such, the proposal accords with Policy CS7 of the Core Strategy.

5.6 ECOLOGY AND BIODIVERSITY

- 5.6.1. A Preliminary Ecological Appraisal (PEA) and BNG report and metric have been prepared by WSP to accompany this planning application. The survey work included a desk study, UKHab Survey, protected species assessment and a Ground Level Tree Assessment (GLTA) to assess the suitability of trees for bat roosts within the site.

BIODIVERSITY NET GAIN

- 5.6.2. All the habitats present on site are to be lost to the proposed development. The majority of habitats within the site were of low ecological value and there were no irreplaceable habitats identified. On-site habitats are recorded within the accompanying BNG metric and report. JLR has committed to a minimum 10% BNG target for the Proposed Development, in line with the Environment Act 2021 (HM Government, 2021a) and Knowsley Core Strategy Policy CS8 (Green Infrastructure).
- 5.6.3. On-site habitat replacement was considered but is not feasible given the site's operational conditions. JLR need to maximise the site for parking, leaving no space for new green habitat. Therefore, in line with the mitigation hierarchy, the scheme will deliver BNG off-site on a more suitable receptor site. This approach ensures real habitat benefits (minimum +10% net gain) while allowing the Eastlands land to be put to its required industrial use.
- 5.6.4. It is anticipated that the Habitat Units required to achieve 10% net gain¹ will be secured through the purchase of units from a habitat bank. The mitigation hierarchy was followed, and further detail is provided within the BNG report.

RECOMMENDATIONS AND MITIGATION

- 5.6.5. The PEA makes recommendations to minimise impacts on habitats and protected species, to ensure Invasive Non Native Species (INNS) are not introduced into the wider habitat, and to mitigate potential impacts on the Millwood and Alderwood Local Nature Reserve (LNR) and Crab Tree Rough and Hopyard Rough LWS. The recommendations set out at Table 4.1 of the PEA, will be accommodated within the development and include:

¹ In England, a minimum 10% BNG is mandatory for major developments and small sites under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a).

- Implementing good construction practice measures
- Pre-construction hedgehog and nesting bird checks
- Avoiding work during the breeding bird season where possible

5.6.6. The application complies with Policy CS8 of the Knowsley Core Strategy and NPPF Paragraph 187.

5.7 ARBORICULTURE

5.7.1. An Arboricultural Impact Assessment (AIA) has been prepared by WSP to support this planning application. The AIA provides a Tree Retention Plan; it identifies mitigation to offset tree removal and sets out specific working methods where required.

5.7.2. The regrading and levelling of the site will require the full or part removal of five low-quality groups of scrub trees (Category C) and one moderate-quality group of willows (Category B), along with some works within the Root Protection Areas of retained trees. The low-quality self-seeded scrub has little amenity value, and its removal is considered acceptable.

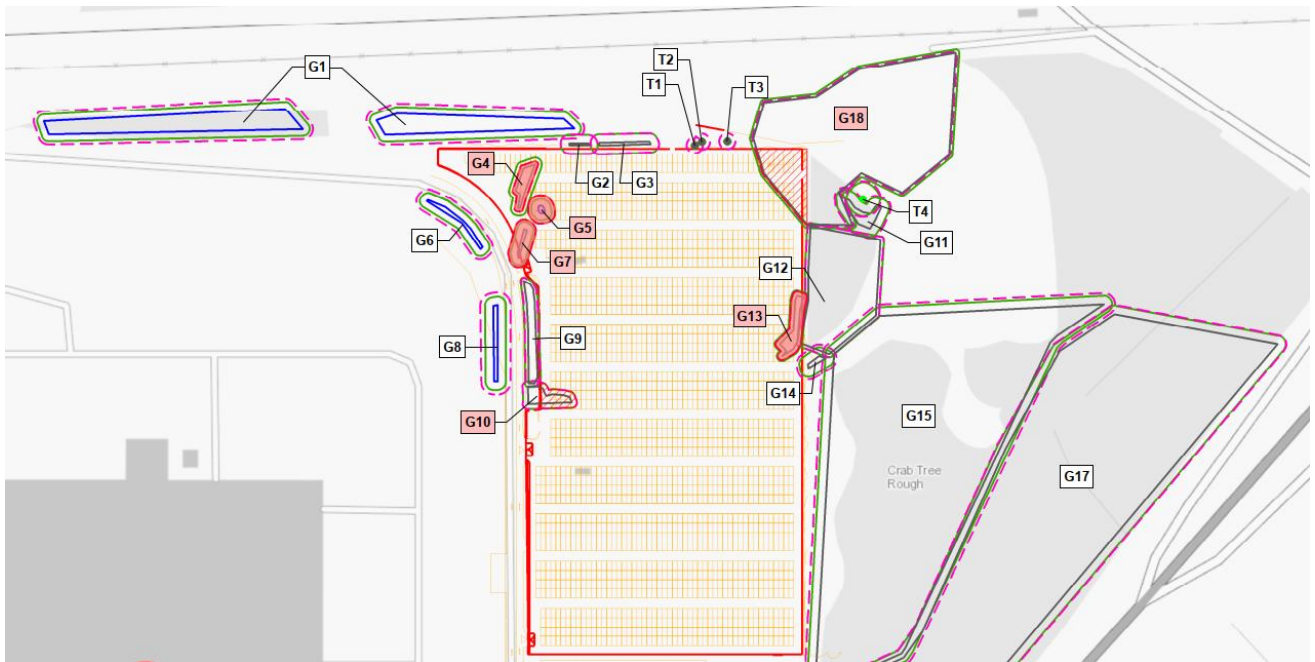


Figure 5-1. Tree Retention Plan showing tree groups proposed for removal in red shading

5.7.3. In accordance with Saved Policy DQ4 of the UDP and Policy CS21 of the Core Strategy the impacts of development on ecological habitat will be mitigated as set out within the BNG section.

5.8 DRAINAGE

5.8.1. A Flood Risk Assessment and Drainage Strategy has been prepared by Ridge.

5.8.2. Surface water from the development site will discharge to the existing surface water drainage network in the carriageway to the west of the site, at a restricted greenfield runoff rate (25.2l/s). Attenuation has been provided in the form of geocellular storage and oversized pipes. This is a significant improvement over the current temporary car park that does benefit from a surface water drainage system.

5.8.3. The sustainable drainage (SuDS) hierarchy has been followed as detailed within the FRA.

- 5.8.4. The site is at low risk of flooding from all sources.
- 5.8.5. There will be appropriate maintenance arrangements in place for the on-site drains and drainage facilities.
- 5.8.6. The application complies with policy CS24 of the Knowsley Core Strategy as the proposal will not cause unacceptable risk of flooding, and it is located in an area with the lowest probability of flooding. An FRA has been prepared in accordance with part 3 of Policy CS24 and the surface water drainage scheme has been designed to greenfield run-off rates.

5.9 GROUND CONDITIONS

- 5.9.1. Phase I and Phase II Geo-Environmental Reports have been prepared by Landwise.
- 5.9.2. The application site is known to have contaminated land present. In accordance with Policy ENV5 of the Unitary Development Plan, the application is accompanied by a site investigation report and a remediation strategy (prepared by Beech). A verification report would be produced prior to the development being brought into use and this can be secured by a suitably worded planning condition.
- 5.9.3. The site's historical contamination will be remediated and contained as part of the development, in line with Policy ENV5. Existing contaminated bund material will be capped beneath the new hardstanding, preventing pollutant pathways. This not only makes the site suitable for use but also represents a betterment by reducing any ongoing environmental risks. Additionally, the design reuses excavated soils on-site (in bunds and levelling) to minimise off-site waste disposal, consistent with the waste hierarchy (Policy CS26). By minimizing export of material, the scheme cuts down on HGV movements and associated carbon emissions
- 5.9.4. In accordance with Policy CS26 of the Core Strategy, the development seeks to minimise waste and use existing material on site wherever possible.

5.10 LIGHTING

- 5.10.1. A Baseline Survey Report and Lighting Impact Assessment including a Lighting Layout and Lux Contour Plan (appendix A of the LIA), Operational Requirements document (appendix B of the LIA) and Impact Assessment (appendix C of the LIA) have been prepared by SLR to support this planning application.
- 5.10.2. The lighting scheme has been designed with input from WSP ecologists with regards to ecological sensitivities. The Lighting Assessment concludes that there will be no increase in light spill, glare or source intensity at the ecological receptors. Instead, there will be a net improvement compared to the baseline.
- 5.10.3. The baseline assessment concluded that there are no residential receptors at risk from obtrusive lighting due to the significant distance and intervening landscape and natural screening. There will be minimal levels of light spill to the north and as such the railway line and residential receptors will not experience any adverse effect with regards to lighting.
- 5.10.4. Saved Policy ENV3 of the UDP requires external lighting to be (a) the minimum required for security and working purposes, (b) to result in no unacceptable impacts on visual amenity or (c) road safety. Lighting must not harm wildlife (d) or lead to an unacceptable loss of residential amenity. As set out



within the accompanying Lighting Impact Assessment and PEA, the lighting proposed complies with points a-e of Policy ENV3.

6 CONCLUSION

- 6.1.1. This Planning Statement has been prepared to support a full planning application for a product vehicle car park at JLR Halewood. The site has been partly built out as a temporary car park, with construction initially commencing in 2014.
- 6.1.2. The proposed development is part of a wider strategy for the Halewood site to increase the operational efficiency of the manufacturing facility, allowing the business to be economically resilient for the long-term and respond to future demands of car manufacturing. This move will support the transformation of the business with the aim to become carbon net zero across JLR's supply chain, products, and operations by 2039.
- 6.1.3. This application for a permanent car park for product storage will support JLR's Reimagine Strategy which will see parallel production of electric vehicles alongside existing combustion and hybrid models. Secondly, the proposal will allow product vehicles to remain on site and can be easily stored close to the production site. As a result, JLR will be less reliant on finding storage solutions off site. The WIP vehicles would be moved from the production plant to the site by internal roads, which is a significant operational benefit for JLR. As such, the proposal supports the industrial use of the land, in accordance with the adopted Development Plan (Local Plan Core Strategy Policy CS4, UDP Policy EC3).
- 6.1.4. This proposal will secure a permanent use for the site which will deliver benefits including improvements to the existing site conditions, including a permanent drainage scheme, new resurfacing, improved security measures, CCTV and lighting.
- 6.1.5. The site's historical contamination will be remediated and contained as part of the development. Existing contaminated bund material will be capped beneath the new hardstanding, preventing pollutant pathways. This not only makes the site suitable for use but also represents a betterment by reducing any ongoing environmental risks.
- 6.1.6. Additionally, the design reuses excavated soils on-site (in bunds and levelling) to minimise off-site waste disposal, consistent with the waste hierarchy. By minimizing export of material, the scheme cuts down on HGV movements and associated carbon emissions
- 6.1.7. The proposal will also result in fewer HGV movements currently required to distribute WIP vehicles to off-site storage locations.
- 6.1.8. The scheme will provide 10% BNG by an off-site contribution.
- 6.1.9. The application submission is supported by appropriate technical assessments which conclude that there are no technical issues that would result in adverse impacts. This is discussed further in Section 5 of this Planning Statement.
- 6.1.10. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.1.11. This Planning Statement and all other supporting documentation demonstrate that the scheme is compliant with local and national planning policies, and it should therefore be approved without delay.



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