



JLR Halewood

External Plant Replacement

Planning, Design & Access Statement

June 2025

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JLR

PLANNING, DESIGN & ACCESS STATEMENT

External Plant Replacement, Halewood

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External Plant Replacement, Halewood

WSP

8 First Street
Manchester
M15 4RP

Phone: +44 161 200 5000

[WSP.com](https://www.wsp.com)

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Signature			
Checked by	April Keefe	April Keefe	April Keefe
Signature			
Authorised by	Daniel Jackson	Daniel Jackson	Daniel Jackson
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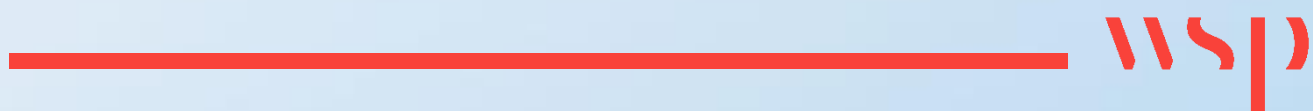
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1

INTRODUCTION

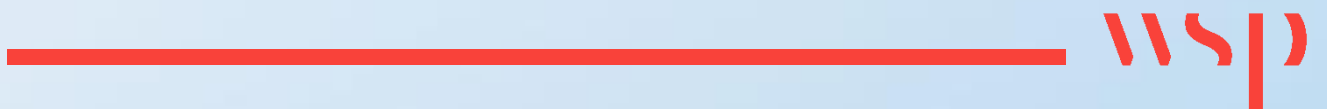


1 INTRODUCTION

- 1.1.1. This Planning Design and Access Statement has been prepared by WSP on behalf of JLR (the applicant) in support of a planning application submitted to Knowsley Council for external plant at the Halewood factory, Liverpool.
- 1.1.2. The proposed development replaces plant that is nearing its end of life. A Regenerative Thermal Oxidization (RTO) unit will be replaced on the roof and an incinerator will be relocated from inside the factory to the roof.
- 1.1.3. Both items of plant are responsible for abating exhaust gases before they are released to the atmosphere in line with JLR's environmental permitting.
- 1.1.4. Both elements are critical for JLR operations, supporting existing paint shop operations. Due to increased internal space demands, it is proposed that the incinerator be relocated to the factory roof, with a separate platform erected to support a new RTO (see section 3 for further details).
- 1.1.5. This application is therefore seeking planning permission for the:
- “Erection and replacement of 1No. Regenerative Thermal Oxidizer (RTO), and 1No. Incinerator, together with other associated works”*
- 1.1.6. The purpose of this statement is to demonstrate that the development complies with the relevant policies in the development plan, having regard to any other material planning considerations.
- 1.1.7. In summary, this statement demonstrates 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 paint shop operations in a logical and sustainable location adjacent to existing operations;
 - The development will not have a severe or detrimental impact on highways, with no changes proposed to the existing highways;
 - The technical reports submitted conclude the site and proposed development is acceptable.
- 1.1.8. The following documents have been prepared and submitted in support of this application:
- Completed and signed application form and certificates;
 - Existing and proposed drawings, including a site location plan; and
 - This Planning, Design and Access Statement, prepared by WSP.
- 1.1.9. This Planning Statement concludes that planning permission should be granted as the application complies with all relevant aspects of the development plan, the NPPF, and all other material considerations.

2

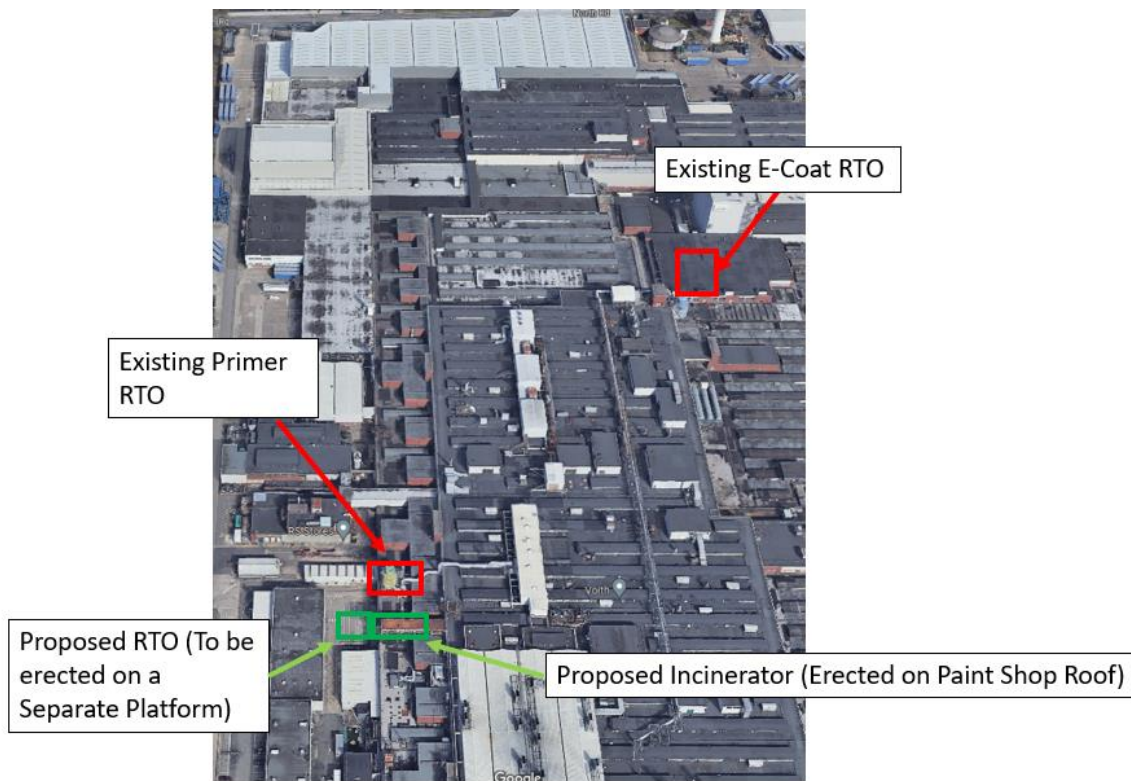
SITE AND SURROUNDINGS



2 SITE AND SURROUNDINGS

- 2.1.1. JLR Halewood is located on the southern boundary of Knowsley Council, within Halewood South Ward.
- 2.1.2. The application site extends to 1,041sqm and compromises a rectangular parcel of roof area above the existing paint shop (See Site Location Plan in Appendix A and Google Maps extract below), alongside a proposed platform that will sit adjacent. The platform will be erected above an area of existing Work-in-Progress (WIP) parking.
- 2.1.3. The closest residential properties are on Holland Road, approximately 550m north of the site. These are separated from the site by the factory, North Road, a 4-track railway and existing landscape buffers.
- 2.1.4. The Google Maps extract below shows the location of the proposed development with Holland Road in the background.

Figure 2-1 - View of the Site looking North (Source: Google Maps 2024)



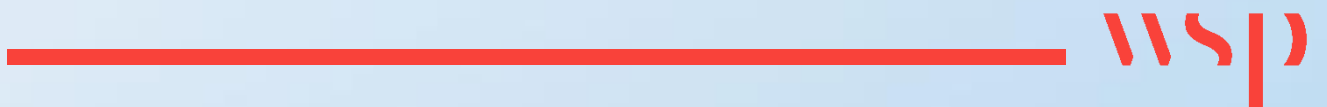
- 2.1.5. JLR Halewood is within a designated primary industrial area under saved policy EC3 of the Knowsley Replacement Unitary Development Plan whereby the council supports the delivery and retention of B1, B2 and B8 uses. The Knowsley Core Strategy further supports the site's employment status through policy CS4 which directly supports the principle of new development 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.

3

DESCRIPTION OF PROPOSALS



3 DESCRIPTION OF PROPOSALS

3.1 BACKGROUND TO THE APPLICATION

- 3.1.1. 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 Halewood currently employs 3,700 people directly, supporting a further 1,000 people indirectly through its suppliers and contractors. Approximately a third of the JLR Halewood Operations workforce live in Knowsley. This equates to around 1,200 employees.
- 3.1.2. 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 in the long-term and respond to future demands of car manufacturing.
- 3.1.3. Due to the demand for space within the existing paint shop facilities, a new solution is sought to meet the operational requirements including a new RTO and relocation of an incinerator which is currently located internally. The proposals will connect to the existing ductwork located internally.
- 3.1.4. An RTO is used for the priming of cars and is critical to the curing process. An RTO facilitates the abatement of the exhaust gases from the ovens before gases are released into the atmosphere. This process is required to mitigate any environmental impacts arising from operations on the site and is essential to allow compliance with JLR's environmental permits. JLR's existing RTO is nearing its end of life and needs to be replaced.
- 3.1.5. Likewise, the incinerator is proposed to be relocated to the north, adjacent to the proposed RTO unit, which will be constructed on a separate platform. The incinerator is essential for treating particulates, VOCs, nitrogen oxides, and carbon monoxide before these emissions are filtered and discharged through the RTO. Relocating the incinerator to the existing paint shop roof will free up valuable internal production space.

3.2 PROPOSED DEVELOPMENT

- 3.2.1. The application seeks permission for:
“Erection and replacement of 1No. Regenerative Thermal Oxidizer (RTO), and 1No. Incinerator, together with other associated works”
- 3.2.2. ‘Associated works’ relate to the platforms on which the external plant equipment will sit.
- 3.2.3. One platform is proposed on the roof of the existing paint shop to support the proposed incinerator. Another will be erected on an area of existing WIP car parking and will support the new RTO.

3.3 DESIGN AND ACCESS

USE

- 3.3.1. The proposed development will be used in conjunction with existing JLR paint shop operations.
- 3.3.2. The incinerator will be relocated externally to free up vital floor space internally at Halewood. The most logical solution is on the roof of the existing paint shop.
- 3.3.3. The development will replace an existing RTO which is nearing its end of life. Due to weight limitations, this has been unable to be accommodated on the existing paint shop roof. Instead, a

steel platform is proposed directly adjacent, which will be constructed above an existing area of hardstanding used for WIP car parking.

- 3.3.4. Due to existing demands for space, the development cannot be accommodated within the existing paint shop facility.
- 3.3.5. The proposed development is located directly above existing paint shop operations, providing a logical solution to the demands for space whilst connecting to existing ductwork.

AMOUNT

- 3.3.6. The planning application seeks a total floor space of 1,041sqm. Both items of plant are to be located near existing paint shop operations, making best use of existing infrastructure including historic ductwork used for the existing RTO.

LAYOUT

- 3.3.7. The proposed development will be located next to the existing RTO.
- 3.3.8. Two separate platforms are proposed. One on the roof, on which the Incinerator will sit. Due to weight restrictions, a separate steel platform will be erected for the proposed RTO above the existing hardstanding.
- 3.3.9. An external ladder is proposed on the eastern elevation of the RTO to allow for access and maintenance.
- 3.3.10. The RTO will be located directly to the south of the incinerator on a specially erected platform.

SCALE

- 3.3.11. The scale of the development is in keeping with the JLR site. It can be read in the context of the wider factory. The proposals will not be visible from nearby receptors.
- 3.3.12. The area of roof on which the incinerator is proposed sits at 8m AOD, lower than the wider JLR factory, which sits at approximately 13.3m. Additional screening is therefore provided to the east. The incinerator at its highest point measures 6.92m.
- 3.3.13. The incinerator is to be located north of the proposed RTO and in keeping with the scale of the existing RTO. The incinerator will be 27.4m in length. The incinerator will sit on a separate platform.
- 3.3.14. The RTO will sit on a specially erected steel platform. The platform will sit slightly above the existing roof ridge at 9.2m.
- 3.3.15. The RTO includes an exhaust flue, totalling an overall stack height of 22.8m. The RTO has a total length of 20m.

APPEARANCE

- 3.3.16. The removal of an existing metal canopy will be needed to facilitate the delivery of the replacement incinerator.
- 3.3.17. The erection of a separate steel platform is required to support the proposed RTO. The proposed development will be in keeping with the wider industrial nature of the JLR site.

3.3.18. An external ladder is proposed to allow access to the higher areas of the RTO. See elevations below.

Figure 3-1 - Existing Elevations

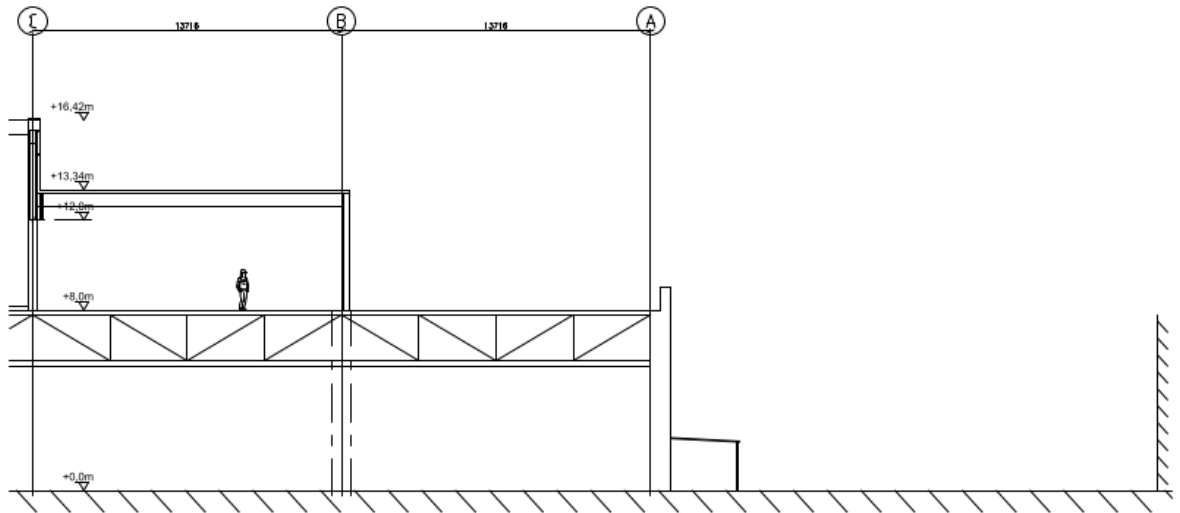
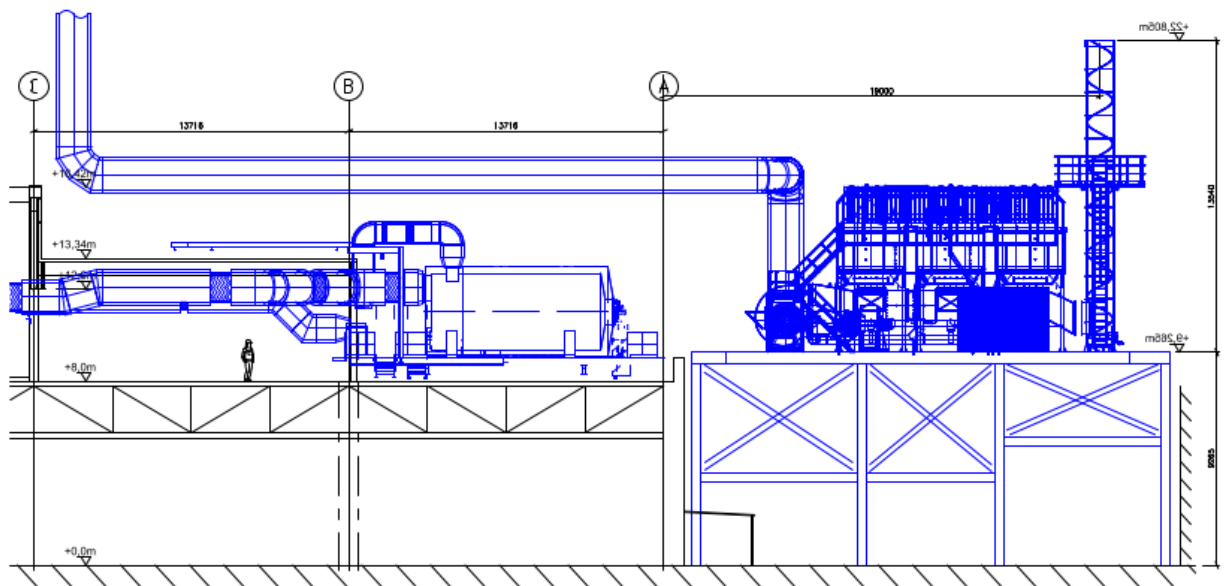


Figure 3-2 - Proposed Elevations



PARKING AND ACCESS

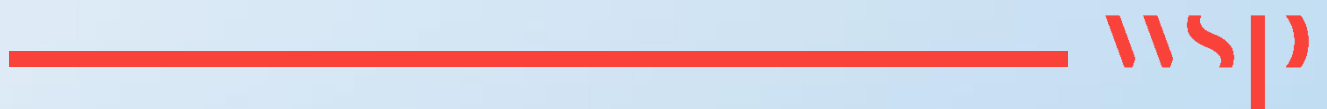
- 3.3.19. The development site can be accessed via an existing external staircase. Access is currently restricted and controlled.
- 3.3.20. The proposed development will not generate any additional demand for parking spaces on site. The existing WIP parking will remain below the proposed platform. The platform will allow sufficient clearance for existing parking beneath to be retained.
- 3.3.21. Overall, it will not have an adverse impact on parking or access.

DRAINAGE

- 3.3.22. No foul drainage is proposed. The drainage of rainwater from the roof will be through external downpipes that will discharge into the existing drainage network.

4

PLANNING POLICY



PLANNING POLICY

3.4 PLANNING POLICY CONTEXT

3.4.1. In the context of this application, planning policy operates at two levels:

- **National:** The Government produces national policy in the form of the National Planning Policy Framework ('NPPF') (2021) and the supporting National Planning Policy Guidance ('PPG'); and
- **Local:** The Knowsley Local Plan Core Strategy was adopted in January 2016 to inform development through the use of detailed policies up to 2028 and beyond.

3.4.2. Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires any planning application to be determined in accordance with the development plan unless material considerations indicate otherwise.

3.5 NATIONAL PLANNING POLICY

3.5.1. The National Planning Policy Framework (NPPF) was first published in March 2012, with a number of updates issued since. However, the NPPF was revised in response to the Levelling-up and Regeneration Bill: reforms to National Planning Policy Consultation on 19th December 2023 and sets out the government's planning policies for England and how these are expected to be applied. 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 the previous NPPF (2012).

3.5.2. The NPPF (2023) emphasises the importance of sustainable development and sets out the core planning principles guided by the Government's planning policies. Under paragraph 11, development proposals that accord with the development plan should be approved without delay.

3.5.3. 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.

3.6 LOCAL PLANNING POLICY

3.6.1. The Knowsley Local Plan Core Strategy was adopted in January 2016 and includes various policies of relevance to this development.

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 amenities for all existing and future occupants of land and buildings. Development should where possible address the challenges of climate change and future changes in social, economic and environmental priorities.
- CS22 – Sustainable and Low Carbon Development: Details the high standards of sustainable design and construction required for new development, aimed at minimising carbon emissions.
- CS23 – Renewable and Low Carbon Infrastructure: Commits the council to support proposals that produce and distribute decentralised, low carbon and renewable energy provided that they do not cause significant harm to other strategic objectives.
- 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.

3.6.2. In addition, the following policies were saved from the Unitary Development Plan (adopted June 2006), and therefore 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.

3.7 OTHER MATERIAL CONSIDERATIONS

3.7.1. The following Supplementary Planning Documents (‘SPD’) are considered to be relevant to this proposal:

- Developer Contributions SPD;
- Ensuring a Choice of Travel SPD; and
- Adding Social Value to Development: Employment and Skills SPD.

3.8 EMERGING PLANNING POLICY

LIVERPOOL CITY REGION SPATIAL DEVELOPMENT STRATEGY

- 3.8.1. The emerging Liverpool City Region Spatial Development Strategy is currently out for public engagement following the publication of the draft document. The consultation period will run until 16 February 2024.
- 3.8.2. Policy LCR SP2 Strategic Employment Land Need and Distribution names the JLR site as an existing Strategic Employment Site within the region.

4

PLANNING CONSIDERATIONS



4 PLANNING CONSIDERATIONS

- 4.1.1. This section assesses the development against local and national planning policy and other material considerations. This assessment concludes that the proposal is wholly compliant with planning policy and should therefore be permitted.

4.2 PRINCIPLE OF DEVELOPMENT

- 4.2.1. The development fully accords with the site's allocation as a primary industrial area, in accordance with Core Strategy policies CS2 and CS4.
- 4.2.2. The proposal will operate under use class B2 (General Industrial) and therefore contributes towards economic development. It will support the Halewood plant in its transition to become an all-electric production facility. Policies CS2 and CS4 support such uses and seek to promote sustainable economic growth to meet the development needs of established employment sectors.
- 4.2.3. 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 continue and enhance its operations to meet current demands and ensure seamless manufacturing with zero losses.
- 4.2.4. 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.
- 4.2.5. 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.

4.3 DESIGN AND LAYOUT

- 4.3.1. The development has been designed to reflect the industrial nature of the existing site. The materials, scale, and overall design of both external plant items are wholly in keeping with the other industrial buildings within the JLR complex, taking a cohesive design approach. The development is therefore compliant with Core Strategy policy CS19. The scale of the development is in keeping with the JLR site. It will be read in the context of the wider factory.
- 4.3.2. The replacement RTO will introduce a new and more efficient RTO as the existing plant nears end-of-life. As the plant transitions to the production of electric vehicles, sustainability is at the heart of future development at JLR. The proposals are therefore in accordance with Policy CS2 (Development Principles) and Policy CS22 (Sustainable and Low Carbon Development).
- 4.3.3. Likewise, the proposed incinerator is located directly adjacent to the relocated RTO, taking advantage of existing infrastructure. The relocation of the incinerator will free up vital production space internally within the factory. The removal of the existing canopy to facilitate the proposed development is regarded to be de minimis as it is no longer fit for purpose.

4.4 ECOLOGY

- 4.4.1. Both of the proposed items of plant equipment are to be erected on both the existing roof space and a separate platform. As such, there will be no impact on trees or ecology; therefore, the application is subject to the de-minimums exemption in regard to Biodiversity Net Gain (BNG). This application is not subject to any BNG considerations or metrics.

4.5 HIGHWAYS

- 4.5.1. 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 highway network circulating the site, with direct connections to the A561 Speke Boulevard and the A562 Higher Road via Old Hutte Lane.
- 4.5.2. The majority of the highway network circulating the plant is privately owned by JLR. There are gates on North Road, Old Hutte Lane, and the slip roads between East Road and the A561 Speke Boulevard and South Road. Each of the gates are closed only one day per year on Christmas Day to retain its private status.
- 4.5.3. The development does not result in a net increase of employees, parking demand, parking spaces, and number or frequency of deliveries and therefore compliant with saved policy CS7 (Transport Networks).

4.6 AMENITY

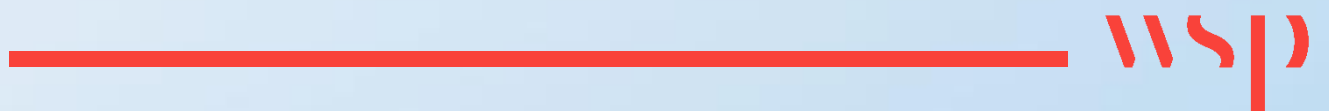
- 4.6.1. The site is approximately 550m from the nearest residential properties on Holland Road. The site is separated from these dwellings by the factory, North Road, a 4-track railway and a significant landscape buffer. Likewise, existing JLR operations sit between the proposed external plant and existing properties providing significant separation distance between the two. Further screening is provided to the north and east by significantly higher roof heights.

4.7 AIR QUALITY

- 4.7.1. Stack Emission monitoring reports have also been submitted with the application for both elements of the plant, which consist of emissions testing undertaken for both items of plant in 2023 and 2024. This includes the existing RTO located externally, and the existing incinerator which is currently located internally within the factory. The monitoring seeks to determine the release of prescribed pollutants from the plant under normal operating conditions.
- 4.7.2. The results of these tests demonstrate compliance with a set of emission limit values for prescribed pollutants as specified in the Plant's Environmental Permitting Regulations Permit, A2/0703/6.4/1. In summary, both pieces of proposed plant comply with these limitations and therefore are in accordance with saved policies of the Knowsley Unitary Development Plan (UDP) Policy CS2 (Development Principles).
- 4.7.3. The proposed development would not impact residential amenity with regard to air quality or noise and will integrate effectively within the existing development seen on site. The development proposals are therefore in accordance with saved policies of the UDP Policy ENV2 (Noise and Vibrations) and ENV3 (Light Pollution).

5

CONCLUSION



5 CONCLUSION

- 5.1.1. This Planning Design and Access Statement has been prepared to support a planning application for a new RTO and incinerator system to provide replacement plant equipment to support paint operations, located at JLR, Halewood.
- 5.1.2. The development results in improvements to the operational efficiency of the site and supports the function of the industrial use of the land, which is in accordance with the adopted Local Plan.
- 5.1.3. The replacement and relocation of the external plant has been designed to be consistent with the industrial aesthetic of the wider site and is in context with the surrounding site. The site will not be visible from residential properties which lie to the north.
- 5.1.4. As the existing equipment nears its end of life, the replacement RTO and incinerator will provide a much more effective solution to the paint shop processes.
- 5.1.5. The application submission is supported by a suite of drawings that demonstrate there are no technical issues that would result in adverse impacts. The proposal will lead to an increase in operational efficiency and allow for JLR to continue to be economically resilient in the future whilst meeting environmental standards and regulations.
- 5.1.6. 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.
- 5.1.7. This Planning Statement and all other supporting documentation demonstrate that the proposed development is compliant with local and national planning policies, and it should therefore be approved without delay.

Appendix A

SITE LOCATION PLAN





8 First Street
Manchester
M15 4RP

wsp.com

PUBLIC