



Knowsley Metropolitan Borough Council
Development Control
Huyton Library
Civic Way
Knowsley
L36 9GD

11 May 2026

Dear Sir/Madam,

JLR HALEWOOD, NON-MATERIAL AMENDMENT (NMA) FOLLOWING GRANT OF PLANNING PERMISSION 25/00408/FUL

WSP has been instructed by JLR herein referred to as 'the Applicant' to submit a non-material amendment (NMA) application relating to planning permission 25/00408/FUL, at JLR Halewood. The requisite application forms enclosed with this submission, and the application fee of £400 (including service charge) has been paid electronically to the Planning Portal quoting Ref: *PP-14896451*.

Application 25/00408/FUL (approved September 2025), granted planning permission for the '*Erection and replacement of 1no. regenerative thermal oxidiser (RTO), and 1no. incinerator, together with other associated works*' (LPA ref. 25/00408/FUL).

Following a review of the consented scheme, JLR has identified the need for a *minor technical refinement* to the approved design. The proposal subject to this NMA involves an increase in the incinerator stack height of approximately 1.96 metres, to broadly align with the height of adjacent paint shop booth stacks.

This NMA application therefore seeks approval for a revised incinerator stack height. The increased height would assist with dispersion only and would **not result in any change** to emissions or noise levels, nor require any amendment to the site's existing Environmental Permit (A2/0703/6.4/1). The stack emission monitoring submitted with the original application remains valid and there would be no additional impact on residential amenity.

Visually, the amended stack would be read in the context of existing rooftop plant and infrastructure and would be well contained within the established industrial setting of the site.

Section 96A of the Town and Country Planning Act 1990 allows Local Planning Authorities (LPAs) to make changes to planning permissions if they are satisfied that the change is not material.

As we set out below, the amendment proposed as part of this NMA application will result in a non-material change to the approved scheme. Despite the increase in stack height by c.1.96m, no further changes are being proposed as part of this application. This application route has been

discussed and agreed with Andrew Hunt (15/04/26), Senior Planner at KMBC, to ensure it is the most appropriate procedure for securing this non-material amendment.

This covering letter is accompanied by a set of plans that meets the submission requirements for non-material amendment applications:

- Location Plan (ref. 2015893 Rev B);
- Existing Site Plan (ref. 20158931 Rev B)
- Existing Plans and Elevations (ref. 20158932 Rev B);
- Proposed Plans and Elevations (ref. 20158933 Rev C); and
- Proposed Site Plan (ref. 20158934 Rev B).

The proposed amendments are addressed in more detail within the sections below.

APPLICATION CONTEXT

JLR, Halewood employs approximately 3,700 people, in which the site has been benchmarked to be a key contributing plant to achieve the aspirations set out within JLR's 'Reimagine' strategy which promotes a sustainability-rich approach to car manufacturing. This application concerns the RTO and incinerator, which are located to the west of the JLR Halewood Complex, situated to the north of Speke Boulevard.

The approved development secured via planning permission 25/00408/FUL 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.

Due to the demand for space within the existing paint shop facilities, a new solution was sought to meet the operational requirements including a new RTO and relocation of an incinerator which was previously located internally.

An RTO is used for the priming of cars and is critical to the curing process and facilitates the abatement of the exhaust gases from the ovens before gases are released into the atmosphere.

The incinerator is essential for treating particulates, VOCs, nitrogen oxides, and carbon monoxide before these emissions are filtered and discharged through the RTO. 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.

NON-MATERIAL AMENDMENTS

Application 25/00408/FUL facilitated the replacement of 1no. RTO and 1no. incinerator at the JLR Halewood complex. This application seeks to amend the parameters set out within condition 2 attached to this application which reads:

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:-

- a. Agent Email - Emissions - (received 08/09/2025).*
- b. RTO Stack Emissions Monitoring Report 2024 - (received 16/07/2025).*
- c. Incinerator Stack Emissions Monitoring Report 2024 - (received 16/07/2025).*
- d. RTO Stack Emissions Monitoring Report 2023 - (received 16/07/2025).*

e. Incinerator Stack Emissions Monitoring Report 2023 - (received 16/07/2025).

f. Emissions summary report 2024 - (received 16/07/2025).

g. Emissions summary report 2023 - (received 16/07/2025).

h. Proposed Site Plan - (received 02/07/2025).

i. **Proposed Plans and Elevations - (received 02/07/2025).**

j. Location Plan - (received 02/07/2025).

The approved drawing attached to application 25/00408/FUL titled 'Proposed Plans and Elevations' (Ref: 20158933 Rev B) details the proposed stack height of the incinerator which was to be installed which measures 22.8m from ground level. An extract of this plan has been included below and has been submitted with this NMA application to show what was previously approved.

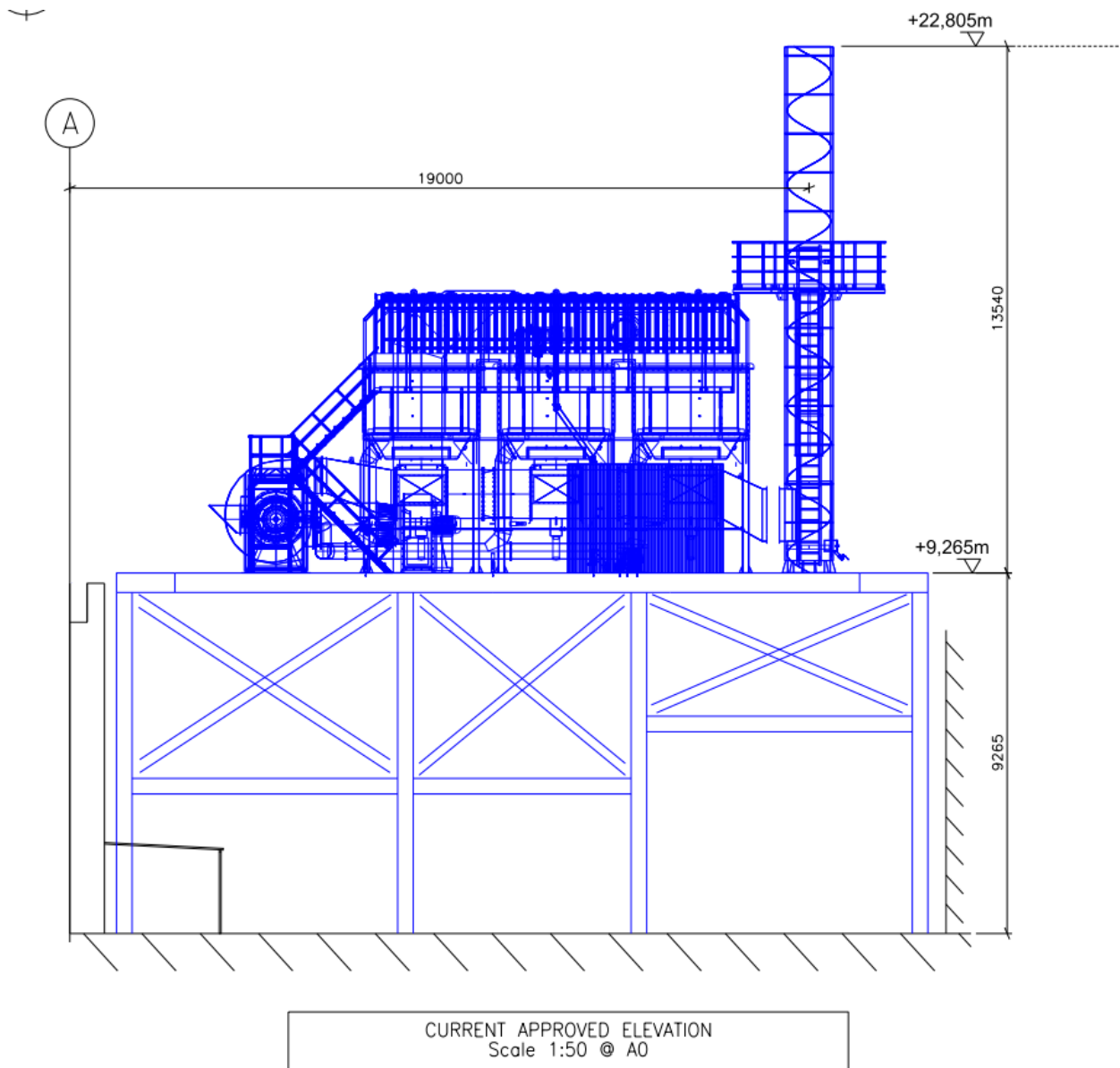


Figure 1: Approved Proposed Elevation (25/00408/FUL)

This application seeks to amend the height of the proposed incinerator stack associated with the approved application 25/00408/FUL. The proposal seeks to increase the stack height of the incinerator by c. 1.96m, increasing the overall height of the stack (taken from roof level) from 13.54m to 15.5m. Overall from ground level the proposed development will now measure 24.76m.

An updated 'proposed plans and elevations' drawing (Ref: 20158933C_001) has been submitted with this application, demonstrating the comparison between the approved incinerator elevation and the new proposed incinerator stack height. The plan, as detailed in Figure 2, illustrates the new proposed stack height.

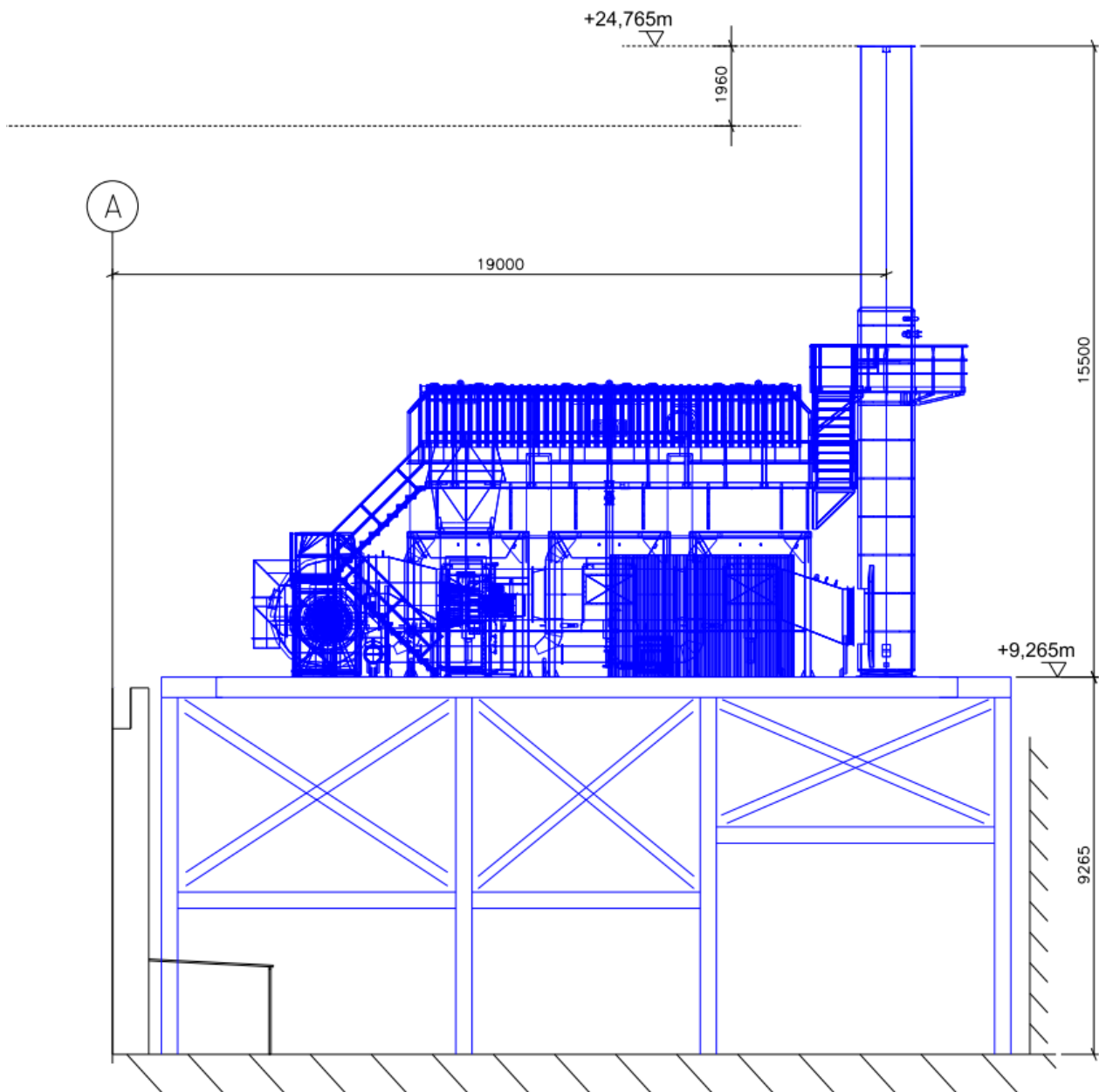


Figure 2: Proposed Incinerator Height

The proposed amendment is deemed to be non-material, as confirmed by the LPA, dated 15th April 2026, by Senior Planner, Andrew Hunt, in that the proposed changes do not materially impact the operation or visual appearance of the overall development.

PLANNING ASSESSMENT

It is generally accepted that non-material amendments are those which:

- Retain the purpose and spirit of the original consent. The proposed change in stack height will retain this.
- Would not result in any detrimental impact either visually or in loss of amenity. In terms of design, the amendments proposed are deemed to be very minor and will not affect the appearance of the site from either Speke Boulevard, or the residential properties located to the south along Clough Road. The existing scale and topography of the site, alongside additional screening from Speke Boulevard and wider factory, means the changes proposed will be de minimis in regard to the overall site appearance. The proposed amendments will therefore not cause a detrimental impact on the site's design or the amenity of the surrounding uses.
- Will not result in any significant change to the type, amount, or nature of the approved development. There is no change.
- Would not result in any materially different impacts as a result of the non-material change.
- Would not result in the interests of any third party or body who participated in or were informed of the original decision being disadvantaged in any way. The amendments do not materially alter the development so that it would require any third-party consultation or cause policy conflict; and
- Would continue to accord with planning policy.

The proposed amendment retains the purpose and intent of the original consent, does not materially alter the scale, nature or impacts of the development, and would not result in any materially different environmental, amenity or visual effects from those previously assessed. No additional third-party consultation is required, and the development would continue to accord with adopted planning policy.

In light of the above, we respectfully request that the Local Planning Authority approves this Section 96A non-material amendment application.

We look forward to receiving confirmation that this application is validated, and that the non-material amendment can be approved within the statutory 28-day period.

Yours faithfully



April Keefe
Principal Planner