



PLANNING APPLICATION FOR THE DEVELOPMENT OF A FOOD WASTE

TRANSFER BUILDING

AT

HUYTON WASTE TRANSFER STATION,

ELLIS ASHTON STREET,

HUYTON, L36 6BJ

PLANNING STATEMENT

February 2025

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Executive Summary:

The proposed development of a food waste transfer building at the Huyton Waste Transfer Station aligns with both national and local policy objectives, offering significant benefits in terms of sustainable waste management and environmental protection.

National Policy Alignment: Compliance with the Environment Act 2021: The proposal supports the statutory mandate for local authorities to implement separate weekly food waste collections by March 2026. This facility will enable the efficient collection and transfer of segregated food waste, contributing to national efforts to reduce landfill waste and greenhouse gas emissions.

Advancement of the Circular Economy: The development aligns with the Government's Resources and Waste Strategy for England, which aims to maximize resource use and minimize waste. By facilitating the recycling and processing of food waste, the proposal supports the transition towards a circular economy and drives waste management up the waste hierarchy.

National Planning Policy Framework (NPPF) Compliance: The proposal is consistent with the NPPF's emphasis on sustainable development. It supports economic growth by creating local jobs and enhancing the waste management infrastructure, while also ensuring that environmental impacts are minimized.

Local Policy Alignment:

Merseyside & Halton Waste Local Plan: The development is in accordance with local policies that promote sustainable waste management. It utilizes an existing waste management site, thereby minimizing environmental impact and supporting the efficient use of resources.

Knowsley Local Plan: The site is designated for industrial use, making it a suitable location for the proposed development. The project supports local objectives to enhance waste management infrastructure and improve recycling rates.

Environmental and Community Benefits: The facility will enhance local waste management capabilities, contributing to improved recycling rates and reduced landfill dependency. It

incorporates measures to minimize odour and environmental impact, ensuring compliance with local environmental policies such as Local Plan Policy EQ5 on air quality.

Design and Operational Considerations: Sustainable Design: The building will be prefabricated, allowing for potential reuse, and will feature materials that complement the existing site and local environment. The design minimizes visual impact and integrates seamlessly with existing infrastructure.

Environmental Controls: The facility will operate under existing environmental permits, with measures in place to control odour, dust, and vermin. Daily inspections and the use of fast-acting roller shutter doors will ensure efficient waste handling and minimal environmental impact.

Conclusion: The proposed food waste transfer building represents a strategic enhancement of the region's waste management infrastructure, aligning with both national and local policy objectives. It supports the transition to a more sustainable and efficient waste management system, contributing to environmental protection and economic growth. The development's alignment with the NPPF's presumption in favor of sustainable development further underscores its importance and the need for timely approval.

1. Introduction

- 1.1 This Planning Statement accompanies a planning application, submitted by Veolia ES Merseyside & Halton Ltd ('Veolia') on behalf of Merseyside Waste Disposal Authority (MWDA) in respect to the development of a 25m x 20m food waste transfer building for the collection and transfer of source segregated food waste ("the application site").
- 1.2 This Statement provides an overview of the application proposal and identifies the Planning Policy Framework within which it should be considered. The following are enclosed -
- Site Location Plan: VES_TD_TYSE_300_012
 - Proposed Site LayoutProposed Elevations
 - Proposed Elevations: Tentiq (3D image)
 - Odour Assessment - Redmore Environmental
 - Proposed Drainage Strategy - AWP Drawing Ref: HUT - AWP - 00 - ZZ - DR - C - 3000
 - PHASE 1: Desk Top Study - Arc Environmental
 - Copy of Pre- application letter and FAQ's

2. The Applicant

- 2.1 Veolia operates a long term contract with the applicant, Merseyside Waste Disposal Authority (MWDA) which commenced operations in 2009. MWDA is made up of the five metropolitan districts of Liverpool, Sefton, Knowsley, St Helens and Wirral with the additional partner of Halton Borough Council, a unitary authority to the east of Merseyside. The Merseyside and Halton region consists of both urban and rural areas requiring an integrated waste management contract suitable for all districts. The contract includes the operation of 16 Household Waste Recycling Centres, four Waste Transfer Stations and two Materials Recovery Facilities that serve a population of 1.5million.
- 2.2 Veolia UK Ltd is a global company that uses its expertise to help cities and industries to manage, optimise and make the most of their resources. The company provides an array of solutions related to water, energy and materials – with a focus on waste recovery – to

promote the transition towards a circular economy. Veolia is the number one waste service provider in the UK and currently provides services to around 130 Local Authorities representing over a third of the UK population. The UK leader in environmental solutions, Veolia provides a comprehensive range of waste, water and energy management services designed to build the circular economy and preserve scarce raw materials. Further information on the applicant can be found here: <https://www.veolia.co.uk/>

3. Site and Surrounding Area

3.1 The proposed facility will be located at the rear (south- east corner) of the existing Waste Transfer Station (WTS) yard area; the overall development area is approximately 500 square metres . The waste transfer station has operated at the site since the mid-1980s and includes a weighbridge, staff welfare and administration buildings, all of which would be utilised in the operation of the food waste facility. The site is bordered to the north by Ellis Ashton Street and industrial units directly opposite the site entrance. Logwood Mill Brook runs along the eastern boundary of the site flowing in a southerly direction, beyond the Brook is located the M57; to the south of the site are industrial works; to the west is Link Road and industrial units. The Huyton Waste Transfer Station has operated as a Waste Transfer Station since the mid-1980s. The Household Waste Recycling Centre (HWRC) was once housed at this site until the development of the HWRC off Wilson Road in 2012.

3.2 Planning History

98/00012/APP: Huyton Waste Transfer Station, Ellis Ashton Street, Knowsley, Huyton, Merseyside - Improved waste transfer and waste reception facilities. Planning permission granted 02/04/1998.1

3.3 Pre-app Consultation

A pre-application enquiry was submitted to Knowsley Council by the MWDA and a response received, 12 November 2024. The comments of which have been taken into account in preparing this application.

Additionally, the applicants are undertaking a letter drop (with FAQ's) to local residents and

businesses, and MWDA are to brief Ward Councillors on the proposal. A dedicated webpage with FAQs on the proposal has been set up and within the letter there is a link to the webpage where neighbours can raise any questions or concerns they may have. A copy of the pre-application letter and FAQ's accompanied this application.

4.0 Proposed Development

- 4.1 The purpose of the Proposed Development is principally to provide a new, modern Food Waste Transfer building. The Site has been used for waste management purposes for several decades. The proposal would provide a modern, purpose-built building that would provide a fully enclosed area for the future collection of segregated food waste for bulking prior to onward transfer to other facilities for further processing and recycling. All waste reception and bulking operations will be undertaken within a completely enclosed building fitted with fast-acting roller shutter doors. The pitched roof building would have a footprint of some 25m x 20m x 6.2m (h) to the eaves. This would have three fast acting roller shutter doors to enclose the operations.
- 4.2 The driver behind this proposal is to accommodate ongoing changes in waste regulations and management practices driven by the Waste and Resource Strategy, permitting rules and the efficient operation of the waste collection/treatment network to deliver our client's requirements. Simpler Recycling & The Environment Act has introduced the statutory mandate for Local Authorities (LA) to collect food waste separately on a weekly basis and will need to implement weekly separate food waste collections by 31 March 2026. This waste is currently within the residual waste, which is collected fortnightly.
- 4.3 There would be no significant change to the waste streams that the facility handles, simply improvements to the continuing process of waste collection and transfer to and from the facility. It would form part of the region's wider infrastructure upgrades to improve the segregation and efficiency of waste flows and will include provision for food waste management when the legislation comes in.

Design Principles

The final design and finish of the facility will be in keeping with the existing buildings and structures present at the site. The nature of the structure to be used in the operation of the facility is prefabricated and can be readily disassembled and reused. This would allow the reuse of the building elsewhere within MWDA's estate (subject to planning consent) should a change in the nature and operation of food waste operation be deemed necessary in the future.

The materials, including colour, will be complementary to the wider site and local environment to reduce and seek to avoid any potential visual impact. However, given the proposed size and location of the facility it is not considered that the building will have an impact on the visual impact of the area. The proposed locations have been chosen with consideration to the visual impact on the site. There are no proposals to modify the internal road layout, site entrances or other such works.

4.4 Need for the Development

The Environment Act 2021 in England introduced several important changes to waste management and recycling practices. The key points related to recycling and food waste collection are: -

By 31st March 2026 Local Authorities will be required to collect all six recyclable waste streams (excluding plastic film) from all households. Local authorities must collect food waste weekly (except where a transitional arrangement applies and affected local authorities will have a later implementation date set in regulations). These measures are part of a broader strategy to improve recycling rates and reduce waste. They are expected to contribute to England's efforts to combat climate change and improve resource efficiency. The Act requires all local authorities in England to offer the food waste collection service to all households, including flats. The aim is to reduce the amount of food waste going to landfills, which contributes to greenhouse gas emissions. Collected food waste can be used for composting or to generate energy through anaerobic digestion.

4.5 Simpler Recycling:

The Act aims to make recycling easier and more consistent across England. It introduces a standard set of materials that all local authorities must collect for recycling. This includes paper, card, food, plastic, glass and metal from all households. The goal is to reduce confusion about what can be recycled and increase recycling rates.

Simpler Recycling aims to increase recycling rates by a number of measures, including the expansion to the range of materials collected at the kerbside. Simpler Recycling can work towards a reduction in the volume of residual waste, cut carbon emissions and help to deliver a zero waste and net zero carbon Liverpool City Region by 2040. At present MWDA does not operate dedicated food waste bulking areas and new facilities are required to meet the requirements of the Simpler Recycling reforms. To enable this, MWDA has identified locations within its estate portfolio on which to develop small scale food waste handling facilities. The proposed development will be part of a Merseyside wide solution for food waste and will see the development of similar developments across several of MWDA's facilities. Given the location and current use of the site as a Waste Transfer Station,, this facility is seen as a suitable location for the proposed development. The site benefits from an existing waste use, established infrastructure to enable the proposed development (existing hardstanding, drainage etc) along with good transport links to the wider highway network for both the delivery and onward transportation of bulked material.

4.6 Waste delivery/reception, bulking and offload process

There would be a maximum of 2 vehicles tipping at a time and it is anticipated that there would be a maximum of 30 loads per day with an input of around 2.3 tonnes per load. The food waste stream is currently collected within the residual waste stream and is already accepted at the site. Therefore once the service is introduced it is anticipated that there would be no discernible long term impact upon traffic numbers, as the food waste tonnage is removed from the residual stream.

Operations are based on taking 10 minutes for vehicles to tip their waste and have their back and wheels washed down/disinfected. Loading out is expected to take 20 minutes for a sealed, dedicated food waste artic with an estimated 25 tonne payload. No food waste will

remain in the building overnight and the building will be washed down and disinfected daily.

No change to the existing operational hours is proposed.

5.0 Environmental Considerations

Operations at the existing WTS and HWRC are included in the Environmental Permitting (England and Wales) Regulations (2016) and subsequent amendments. As such, the facility operates in accordance with an Environmental Permit issued by the EA (ref: EEP3695SH). Additionally, the site operates with an odour management Plan The OMP addresses the Environment Agency's general requirements for OMPs as part of the permitting process, as described in Environment Agency Technical Guidance Note H4 . This requires compliance with specific conditions and operating procedures in order to prevent odour pollution beyond the boundary of the site. The proposed food waste handling facility will be authorised under the existing Environmental Permit and therefore the same conditions of operation with respect to odour control will apply.

Odour & Dust

- 5.1 The proposal includes for a separate enclosed building to accommodate changes in regulations that mean segregated food waste collections will be required for households within the district. Food waste would be tipped into a reception bay, before being promptly loaded into a dedicated sealed container/trailer within the sealed part of the building. It is anticipated that given the volume of waste, this would be removed from the site to the appropriate treatment facility on a daily basis. This will ensure the efficient turnaround of the waste stream, to further reduce potential for any malodours.
- 5.2 This includes a daily inspection of the site to ensure adequate controls are in place with respect to odour, dust and vermin. In addition to the prompt turnaround of waste to and from the site, and the fitment, use and regular maintenance of fast acting rapid-rise doors, a number of control measures will be employed to ensure any prospect for odour is minimised. All unloading, storage and loading of this waste stream would take place within the building. The use of odour abatement sprays will be employed if required. No vehicles loaded with

waste materials shall be parked outside the waste transfer building overnight and all vehicles transporting waste materials either to or from the site shall be fully enclosed or sheeted.

An Odour Assessment has been undertaken by Redmore Environmental in order to evaluate baseline conditions and determine the potential for effects as a result of the proposal. The risk of potential odour impact was assessed using a standard industry method. This involved consideration of a number of factors relating to the proposed development including the scale and nature of the potential emission sources, the location of the nearby receptors and the prevailing meteorological conditions.

The assessment concluded that 'Following consideration of the relevant factors, overall effects at sensitive receptor locations as a result of emissions from the development were not predicted to be significant. As such, potential odour impacts are not considered to represent a constraint to the proposals'.

Flood Risk & Surface Water Drainage

- 5.3 The site is within Flood Zone 1 and has a low probability of flooding from rivers and the sea. Most developments that are less than 1 hectare (ha) in flood zone 1 do not need a flood risk assessment (FRA) as part of the planning application.

A proposed drainage strategy accompanies the application. Following initial investigations, there are two potential options available, which provide for underground attention, with flow control to cater for 100 year + 40% climate change return period. This would limit run off rates to restriction to 2l/s with installation of a hydrobrake. The final detailed design will be subject to acceptance and approval from the LLFA, Environment Agency, Canal and Rivers Trust. It is considered that this can be controlled as necessary via a suitably worked planning condition.

Highways

- 5.4 The NPPF, paragraph 115, advises that ***'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*** It is not considered that overall there would be a discernible change to vehicle movements, with the facility being accessed directly from the principal highway network. Adequate space is available for the

turning and parking when necessary of vehicles within the site. It is not anticipated that the proposed development would have any adverse highway impacts. Knowsley Council's pre-app response confirmed that *Highways have reviewed the limited information submitted with the application and would have no objections in principle to the proposed development subject to further information.*

5.5 Site Investigations & Coal Mining Assessment

Arc Environmental Limited were instructed by Veolia to undertake a Phase 1: Desk Top Study (DTS) Report, & Coal Mining Risk Assessment Report, where it is proposed to construct the food waste building. The primary objectives of this report are to assess the geological, geotechnical, and potential ground contamination conditions on and beneath the surface of this site.

The Phase 1: DTS Report has been carried out generally in accordance with the EA (Environment Agency) guidance for Land Contamination Risk Management (LCRM: October 2020). Based on all the data reviewed, a preliminary Conceptual Site Model (CSM) has been developed to define the scope and extent of any further investigation works deemed necessary, prior to commencing with any future development works.

The conclusions have been based on a review of geological plans, historical plans and available environmental data relating to the site and nearby adjacent land and forms the basis of a preliminary risk assessment. The primary benefits of undertaking this report are as follows:

- (i) Identify the geotechnical and/or geoenvironmental characteristics of the ground in sufficient detail to quantify the ground contamination risk at the site and for the economic design of any future site / proposed development, construction or associated remedial works.
- (ii) Minimise the risk of unforeseen ground conditions which might cause increased costs and / or programme (construction) delays later.

The report also sets out a series of recommendations for Phase 2 Ground Investigation Works. It is considered that this can be controlled as necessary via a suitably worked planning condition.

5.6 Ecology

The proposed development would be sited within the existing hardstanding yard area of the waste transfer Station site, ensuring no loss of habitat. It is not considered that there would be any adverse impact upon bio-diversity through the construction or operation of the facility.

6. Assessment of Planning Policy

6.1 Section 38(6) of the Planning and Compulsory Purchase Act requires that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the statement refers to relevant national planning policy guidance and Development Plan policies that provide the planning policy framework within which this planning application should normally be considered.

6.2 In this case the development consists of the Liverpool Local Plan & Merseyside & Halton Waste Local Plan. The latest National Planning Policy Framework 2024 (NPPF) is accompanied by National Planning Practice Guidance, updated as necessary by the Government. The Waste Management Plan for England was published in 2013, followed by the National Planning Policy for Waste which was published in 2014. The Government published the Resources and Waste Strategy for England in December 2018. The Strategy sets out how the country will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. The strategy has two overarching objectives:

- To maximise the value of resource use
- To minimise waste and its impact on the environment.

6.3 National Planning Policy Framework (December 2024)

The introduction section of NPPF explains how the revised Framework sets out the

Government's planning policies for England and how these should be applied. NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. NPPF carries forward the concept of the presumption in favour of sustainable development and reaffirms that it sits at the heart of the framework. NPPF reflects the previous guidance on looking for solutions to the grant of planning permission rather than looking for problems. In terms of decision making the guidance states that:

'LPAs should approach decisions on proposed development in a positive and creative way' and that 'decision makers at every level should seek to approve applications for sustainable development where possible'.

NPPF continues the theme of contributing towards the national economy by stating amongst other things that:

'planning decisions should help create the conditions in which businesses can invest, expand and adapt, and that "significant weight" should be placed on the need to support economic growth'. It guides Local Authorities planning policies to ***"be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances"***.

The NPPF also addresses what should happen when a development proposal involves other pollution prevention regimes:

201. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.

6.4 National Planning Policy for Waste (2014)

The NPPW was published in October 2014 and sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. It goes on to say that positive planning plays a pivotal role in delivering this country's waste ambitions through *delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy and ensuring that waste*

management is considered alongside other spatial planning concerns, recognising the positive impact that waste management can make to the development of sustainable communities;

In terms of determining planning applications for waste developments, the NPPW advises that waste planning authorities should:

- *concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;*

6.5 Policy Assessment: The proposal is considered to be entirely in accordance with the sustainable development principles set out within national planning and waste policy, driving the management of waste up the waste hierarchy.

6.6 Merseyside & Halton Waste Local Plan

The proposed development has taken into consideration the adopted (July 2013) Joint Merseyside and Halton Waste Local Plan (WLP). The WLP is a strategic plan to guide future development of waste management and treatment facilities across Merseyside and Halton until 2027. While the site is not an allocated site within the WLP, it does have an existing waste use and the proposal is a continuation of the existing waste management use, with no 'change of use' proposed.

The WLP deals with the scale, location and types of facilities that will be required to meet waste management and treatment targets and identifies the most suitable sites across the Merseyside sub-region. The Plan also provides a policy framework for delivery of sustainable waste management in Merseyside and Halton.

The Authority through the WLP aims to promote sustainable waste management in accordance with the waste hierarchy, work with the Liverpool City Region and its constituent district councils to:

- Assist in the implementation of a resource recovery led strategy for sustainable waste management.
- Identify and safeguard (where appropriate) waste management sites in appropriate locations for waste purposes only.
- Contribute towards meeting the identified sub-regional waste management needs.
- Encourage good design in new development to minimise waste and promote the use of recycled materials, and to facilitate the collection and recycling of waste.
- Encourage the sustainable transport of waste and promote use of site waste management plans; and
- Ensure that waste management facilities are developed whilst minimising the impacts on the environment and communities.

The Waste Local Plan Vision:

*By 2027, the Waste Local Plan will have facilitated the **development of a network of sustainable and modern waste management facilities which serve the needs of the local communities of Merseyside and Halton, enabling them to be as sustainable and self sufficient as possible in terms of waste management.***

*The communities of Merseyside and Halton will have taken responsibility for their waste, and through effective resource management, created economic prosperity by **transforming waste into a resource and moving waste up the Waste Hierarchy.** This network of facilities will be designed and sited to avoid negative impact on health and amenity and enhance the natural and built environment, with site allocations being appropriate to the scale and type of waste management facility, and where possible enable waste management in Merseyside and Halton to support mitigation and adaptation to climate change.*

Strategic Objectives

SO1 - To plan for sufficient waste management facilities to meet Merseyside and Halton's identified waste management needs.

*SO2 - To promote waste minimisation and **optimise re-use and recycling of waste materials** for both waste specific and non-waste planning applications.*

SO3 - To encourage waste management facilities which increase re-use, recycling and value/energy recovery of all waste types, including through the use of new, effective and safe waste management technologies where appropriate, and minimise final disposal, in order to meet national targets and Merseyside and Halton's local waste targets.

SO4 - For Merseyside and Halton, as one of the North West's City Regions, to be a leader in promoting transformation of waste to resource to encourage social, economic, environmental and employment gain from sustainable waste management.

Capacity Gap Implications for LACW

2.53 However a key forthcoming issue is that it is difficult to see how individual districts can meet the national 2020 target to recycle or compost 50% of household wastes without collecting food wastes and new facilities will be needed to treat this material.

Para 4.45

Most districts have a well distributed network of HWRCs, although a number of the sites need upgrading or re-locating to maximise the role they play in re-use, recycling and recovery of waste, and/or to achieve recycling and composting targets set in the JRWMS.

- 6.7 **Policy Assessment:** The proposal is for a facility to increase recycling and minimise final disposal promoting the transformation of waste to resource, entirely in accordance with the Strategic Objectives of the Waste Local Plan.

The WLP policies that are relevant to the proposed development are set out in the table below. This table details each of the relevant policies within the WLP and sets out how the proposed facility subject to the pre-application advice request will accord with each of the relevant and applicable policies from the Waste Local Plan.

Waste Local Plan Policy	Development compliance
WM0 Presumption in favour of sustainable development	The Policy states that when considering waste development proposals, a positive approach will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. In line with this policy, it is considered that the proposal directly accords with sustainable development and working towards the increased sustainability and self-sufficiency in terms of waste management.
WM1 Guide to Site Prioritisation	This Policy states that developers should develop sites allocated in the Waste Local Plan in the first instance and should only consider alternatives to allocated sites if allocated sites have already been developed out or are not available for the proposed waste management operation. The proposed development, although not allocated as a preferred site for a waste management facility in the WLP, should be considered as a suitable waste management site. The site has a long-standing history of waste use and is served well by the motorway and A-Road network for both delivery and onward transport of materials. The site is wholly owned by MWDA and is allocated in the Knowsley Local Plan (2016) as a site for Primarily Industrial Action. Given the site sits within MWDA's ownership, the capital development cost will be lower than the development of an allocated site outside of MWDA's ownership. As such, MWDA considers the development site to be suitable for use as a waste management facility as it is to be developed to supplement an existing service on the site.
WM5 Areas of Search for Additional Small-scale Waste Management Operations and Re-processing sites.	Policy WM5 states that developers should seek to develop sites in the Industrial areas of North Liverpool Docks. MWDA has considered other facilities for the proposed development. Given the existing waste use of the site and the development of the proposed facility to supplement the existing operations on site, it is not considered that Policy WM5 is applicable to this development.
WM7 Protecting Existing Waste Management Capacity for Built Facilities and Landfill	This Policy requires existing and consented waste management sites to remain in waste management use to maintain essential waste management capacity. The development of the food waste facility will provide additional processing capacity for dedicated food waste handling. This will provide a long-term investment in the site and elongate the life of the facility.
WM8 Waste Prevention and Resource Management	Policy WM8 sets out how new developments must implement measures to achieve the most efficient use of resources possible. While the development of the facility is considered to be of a relatively low impact in which developing a BREEAM assessment may not be

	cost effective, the environmental impact will be assessed during development through the spirit of BREEAM. Factors required by Policy WM 8 will be considered, along with other factors and environmental and sustainability consideration from the outset of the feasibility of the development of the facility.
WM9 Sustainable Waste Management Design and Layout for New Development	In accordance with this Policy, the development will provide areas within the building for the storage and processing of waste. As with the existing facility, there will be no external storage or processing of materials. The building will be set out so that all loading and unloading of materials will be conducted within the building footprint.
WM10 High Quality Design and Operation of Waste Management Facilities	This policy stipulates that all proposals for waste management facilities should ensure that the proposed design and environmental performance does not adversely impact on the locality and achieves the best performance possible. In this respect the proposed development is in line with this policy, as: The design and appearance of the facility will be in keeping with the existing site buildings and will be complementary in its design, considering the location and visual impact on the setting within the townscape. The policy also states that: it is expected that all new waste management facilities should be achieving an "excellent" BREEAM rating or equivalent standard for industrial buildings; The difficulty with meeting BREEAM standards on a development such as this stems from the nature of the building. As an example, the guidance assumes that buildings will be either heated or cooled. This is a significant source of CO₂, and in that context energy efficiency of the building fabric is given a high level of importance. The building would be unheated and has no cooling and is consequently not designed for heat insulation. Logically that should mean that it scores top marks as it uses no energy for heating or cooling. In the BREEAM guidance, because it is not thermally insulated, it scores no marks. To achieve any form of BREEAM score for that element would mean adding thermal insulation to the building and increasing the embedded carbon content just to gain BREEAM points. That would be entirely contrary to the principles the guidance seeks to deliver. In terms of energy use in the building, the only installed facility within the building that requires power is the lighting. In the daytime light will be provided by translucent roof panels. Artificial lighting will be provided by LEDs. This approach is standard across all Veolia new builds as it provides a pleasant working environment for our teams, contributes towards a safe working environment by ensuring adequate lighting, and is cost effective because of the use of natural daylight and the low energy consumption and high reliability of LED lighting. There is no heat demand within the building.

	We fully support the approach taken by the Council in attempting to drive up operational standards across the waste management industry. However, the BREEAM guidance does not specifically address waste facilities. It addresses a wide range of specific development types including schools, hospitals and even prisons, but there is no waste management specific guidance, and it is clear that it was not designed to deal with unheated industrial spaces. Consequently meeting the desired BREEAM excellent rating in this case would be almost impossible and would have the perverse outcome of increasing the embedded carbon within the building and the total energy consumption, resulting in a net increase in carbon consumption over the lifetime of the building. We consider that whilst we are unable to meet one element of policy WM10, overall the proposals are in compliance with the principle and goals of that policy.
WM11 Sustainable Waste Transport	This policy stipulates the waste transport requirements for new waste management facilities and several criteria are detailed. The proposed development will: - • Use road transport for the movement of wastes, however sustainable modes of transport will be promoted for employees and visitors such as walking, cycling and the use of public transport. • Provide mitigation for the effects of road transport on local amenity including the use of screening and insulation where possible and time tabling of main traffic movements. • Safe access to and from the public highway is ensured via an existing entrance from Ellis Ashton Street. This route will be utilised to aid in the reduction of congestion on the highway. • Reduce the impact of transport on climate change and carbon emissions by utilising new innovate methods of fuelling service vehicles and offsetting carbon impacts where possible.
WM12 Criteria for Waste Management Development	WM 12 stipulates that all proposals for new waste management development (including landfill) and alterations/amendments to existing facilities will be expected to submit a report covering the general details of the proposed development and a written assessment and mitigation of the short, medium, long-term and cumulative impacts on its neighbours and the surrounding environment. In this respect and in line with this policy, environmental surveys (including, but no limited to, ecology, traffic, among others) will be undertaken as a part of any future application for the proposed facility.
WM13 Planning Applications for New Waste Management	This policy stipulates that planning permission will only be granted for additional waste management on unallocated sites where the applicant has provided adequate written evidence.

Facilities on Unallocated Sites	This development proposal demonstrates that the site is suitable, vacant, available, promotes recycling and diverts waste streams away from landfill and as such should be considered sustainable development whereby the presumption in favour of sustainable development should be applied. Furthermore, the proposal complies with the vision and spatial strategy for the Waste Local Plan and satisfies the criteria set out in Policy WM1 and WM12
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Knowsley

Knowsley Replacement Unitary Development Plan (Saved Policies, 2006)

EC2 – Sites Allocated for Employment Development

EC3 – Primarily Industrial Areas

T7 – New Development and Walking & Cycling Routes

T8 – Transport Assessments

ENV2 – Noise and Vibration

ENV5 – Contaminated Land

Knowsley Local Plan Core Strategy (2016)

SD1- Sustainable development

CS1 – Spatial Strategy for Knowsley

CS2 - Development Principles

CS4 – Economy and Employment

CS7 - Transport Networks

CS19 – Design Quality and Accessibility in New Development

CS22 – Sustainable and Low Carbon Development

CS23 – Renewable and Low Carbon Infrastructure

CS24 - Managing Flood Risk

CS26 – Waste management

Policy Conclusions

The Planning and Compulsory Purchase Act 2004 and Town and Country Planning Act 1990 require that planning applications be determined against the policies of the Development Plan unless material considerations indicate otherwise.

This chapter demonstrates that the proposal accords with the policies of the Development Plan and other relevant policy material considerations. It has been demonstrated that the application represents sustainable development and that the presumption in favour of it should apply. In accordance with the statutory Planning Act and the presumption at 11(c) of the NPPF, planning permission should be granted without delay.

7. Summary & Conclusion

- 7.1 The primary aim in the management of waste is to ensure that it is handled, treated, and disposed of safely, cost effectively and in a manner that does not impact negatively on the environment. A further key objective is to get the most environmental benefits out of waste, improving recycling rates, and driving the treatment of waste up the waste hierarchy.
- 7.2 The proposal is considered to be compatible with the Development Plan, NPPF and National Planning Policy for Waste and in particular the presumption in favour of sustainable development. The applicant subsequently considers that the proposal accords with policies guiding development and protecting the environment.

END