



// 32 Bowring Park Road

Planning Statement

October 2016

Contents

- 1.0 Introduction
- 2.0 Site and Surroundings
- 3.0 Proposal
- 4.0 Planning Policy
- 5.0 Planning Considerations
- 6.0 Summary and Conclusion

1.0 Introduction

- 1.1 This application seeks planning permission and advertisement consent for a micro service station for Electric Vehicles which will support a large format digital advertising display. The proposal is a unique concept which will be part funded by the income derived from advertising on the site.
- 1.2 The proposal for a micro service station for Electric Vehicles (EV's) seeks to provide the infrastructure to support the rapid growth in EV's set to take place over the next decade. As this is still a fledgling industry it requires an entrepreneurial approach towards the provision of services in order to encourage growth and meet future demand. By partnering the proposal with an advertising platform it will ensure that running costs can be subsidised for the first five years of operation and that the display can be used to publicise the project.
- 1.3 Whilst this is in many ways a unique proposal, the use of the site in planning terms will not change materially, as it is currently operating as a car wash under the Sui Generis use class and was previously in use as a petrol filling station (PFS) with ancillary retail kiosk and totem signage. The access to the site will remain the same and it is envisaged that the car washing service will continue to operate in the short term. As such the key planning considerations relate to the visual impact of the proposal and associated signage, along with the road safety implications of the advertising.
- 1.4 In this regard the proposal would represent a significant investment in the site, which would in turn lead to a significant visual improvement, without restricting the amenities enjoyed by neighbouring properties. The proposed digital display has been assessed by a qualified road safety specialist and has been deemed appropriate for the location, providing appropriate restrictions are in place over its operation.
- 1.5 This statement considers these matters and other material considerations in greater detail as well as assessing the proposal against the relevant policies of the development plan.

2.0 Site and Surroundings

- 2.1 The application site consists of a former Petrol Filling Station (PFS) now in use as a hand car wash. Typical of a PFS, it has a large forecourt area served by a small retail area to the rear of the site. As a whole the site suffers from a lack of investment and has a poor boundary treatment with the only recognisable landscaping being the untended area at the front of the site, where one leg of an overhead gantry sign is also located.
- 2.2 The site is located on Bowring Park Road at the end of the M62 Motorway where it meets the local road network entering Liverpool from the east of the City, and has a vehicular access from the westbound carriageway. Vehicles exiting the site do so from the secondary access to the rear of the site, which is shared with the adjacent car park for the Rocket Public House.
- 2.3 The surrounding area is mixed in character but dominated by the road and rail transport infrastructure. The southern boundary to the site is bounded by a rail line which runs local services, whilst the A5080 Bowring Park Road crosses over the rail line and runs along the northern boundary of the site. To the west of the site is the car park to The Rocket Public House which is a local landmark.
- 2.4 On the opposite side of the rail line (to the south) is the Liverpool Naval Club, which sits within a predominantly residential area. On the opposite side of the dual carriageway (to the north) there is more residential development, with Broad Green Hospital beyond this.
- 2.5 Approximately 200m west of the site Bowring Park Road meets Queen's Drive which is the Liverpool Ring Road. There is a small parade of shops on the opposite side of Queen's Drive which serve the local area. The nearest railway station to the site is Broad Green, which is located approximately 300m to the east.

Planning History

- 2.6 There has been no recent planning history on the site, with the existing use falling within the same use class as the long established PFS. The records on the Council's online planning register are incomplete in terms of dates and detail, but the following provides an indication of when the use was established:
 - // L247332 - To install 4000 gallon underground storage tank at existing petrol filling station – Feb 1978
 - // B28970 To convert petrol filling station to self service operation including erection of extension to canopy and installation of new pumps to replace those existing – Approved 1970
 - // B27023 - To erect lubrication bay after re-siting of existing sales office store and toilet block and to lay out forecourt with landscaped area and parking spaces for four cars at petrol filling station (Alternative to B 25434 Refused) – Approved 1969
 - // B23823 – proposed petrol filling station – no record of date or decision

- // C32131 - Redevelopment of existing petrol filling station to self service operation with canopy car wash shop with store of ice and toilet block - no record of date or decision
- // C18118 - Erection of a petrol service station on the site after demolition of the existing buildings which comprise a dwellinghouse betting office and boarding kennels (Outline application Article 5(2) G D O 1963) – Refuse 1964
- // C14764 (1) To establish petrol service station on site at present occupied by boarding kennels shop and dwellinghouse (2) To provide two points of vehicular access to Bowring Park Road (Outline application Article 5(2) GDO 1950) refuse 1961
- // C7760 - To develop a portion of the curtilage as a petrol filling station (Outline application Article 5(2)) – Refuse 1955
- // C25246 – Erection of dwelling house – no record of date or decision

2.7 The land has been in use for vehicle servicing since at least 1970. As such the proposal would not be a departure from the historic use of the site, which would also be associated with illuminated signage. It is also worth noting that there have not been any proposals to redevelop the site for over 40 years and as such it is likely to stay in its current state if the proposal is not allowed to progress.

3.0 Proposal

- 3.1 The proposal seeks to develop a new concept for a micro service station for Electric Vehicles (EV's) which will be supported and cross subsidised by a digital advertising display. The proposal would be the first development of this type in the world and would represent an innovative approach towards regenerating a contaminated piece of land which is constrained by its location and subject to a high degree of disturbance in terms of noise and air quality.

Background

- 3.2 The proposal site was firstly identified as having potential for supporting advertising due to the location adjacent to the A5080 at the end of the M62. Options were initially explored for delivering a portrait style advertisement similar to that seen on the flyover approximately 300m east of the site. However, no suitable location could be found on the site without conflicting with existing structures, including the gantry signage at the front of the site. In addition to this, following the development of the portrait signage on the flyover, the demand for this format of advertisement in this location had already been catered for. As such, alternative options were explored, including the potential to deliver a landscape format of advertising towards the rear of the site, where it would not conflict with the gantry signage and would not compete with the existing advertising offer in the area.
- 3.3 This necessitated a complete rethink of the site as it was recognised that the existing built development would need to be reconsidered. Following a review of potential uses, it was agreed that the existing and former uses of the site were perhaps the most appropriate for the location. The question of what this type of use would look like in the future, led to the concept of an EV service station. Unlike with traditional refuelling stops, there is an extended waiting time for EV's which although decreasing is still a minimum of 30 minutes for a full charge. This extended waiting time has highlighted a gap in the provision of supporting infrastructure for the EV revolution that is currently taking place in the automotive industry. What started off as an advertising led project, has now become innovation led, and will be pump primed by the income from advertising.
- 3.4 The proposal represents an exciting new area of development and could be replicated elsewhere around the world if this flagship location can be established.

Design

- 3.5 The proposal has been designed by Wildstone Studio, a collective of designers and structural engineers who have developed their reputation based on premium end bespoke digital advertising structures.
- 3.6 In this instance, the supporting structure for the proposed advertisement will be a series of interlocking shipping containers. The containers provide a low cost solid structure that will not require substantial foundations and as such will not require the removal of the underground tanks associated with the PFS. Whilst in this regard they could be termed as "temporary" structures, they are hard wearing and typically have a lifespan of over 15 years. The use of shipping containers in architecture has expanded greatly over the last few years with many examples of

innovative uses ranging from housing and workspaces to entire shopping malls (e.g. Boxpark, Shoreditch). Added to this, the choice of shipping containers for the site provides a ready association with the location, being at the entrance to Liverpool, a major port with commercial docks and large container terminals. Specifically, the design intent is to reuse the actual containers used to ship Electric Vehicles into the country.

- 3.7 These containers would be fabricated off site and brought in separate pieces to site where they will be assembled and placed on footings. Each container would be powder coated in black, which will provide a high quality finish with low maintenance requirements.
- 3.8 The glazed entrance to the building and punctured windows on the main façade will be framed by extrusions of Corten steel. The large glazed entrance and ground floor windows will present an active frontage onto the forecourt whilst proposed digital display will further animate this façade at a higher level and will present an attractive image of the site to passing vehicles. The display has been sized and positioned to fit the proportions of the proposed building and form part of the overall design concept for the site. It is envisaged that the operators of the EV charging points would retain the use of the display either in part, or at all times, depending on whether a single brand seeks to locate here.
- 3.9 The internal areas have been designed to accommodate a coffee shop at ground floor, with a family area on the first floor and business lounge on the second floor. Toilet facilities have been provided throughout and are stacked above one another for efficiency. The internal arrangements are illustrative and may be subject to change once an end user has been established. At the rear of the building there is a terrace at the upper level which provides some outdoor seating for when the weather allows.
- 3.10 Externally, the “forecourt” has been rearranged to suit an EV charging station, which has slightly different requirements to a traditional PFS. As waiting times tend to be longer (minimum 20 minutes) there is a requirement for vehicles to park up, which is more efficiently achieved through a linear row of parking spaces. The PFS canopy has therefore been removed and replaced with a canopy along the back edge of the site. The canopy will be finished in Corten steel and will be a design feature in its own right, as well as providing shelter and shade. The large surface area of the canopy and openness of the site provides a superb opportunity for supporting solar panels which would feed energy back into the grid. It is not envisaged that the charging points would be directly connected to the solar panels as this would not provide a large enough and regular enough power supply. However, by providing energy back to the grid, the energy requirement for the site will be offset and the landowner will benefit from the feed in tariff, thereby also offsetting some of the costs associated with the site.
- 3.11 The open part of the site will be hard landscaped with no alterations proposed to the entrance or egress, given they have proven adequate to serve the site for many years. The boundary treatment to the site will incorporate new low level soft landscaping which will be specified in detail post planning.
- 3.12 CGI's of the proposal in situ are included throughout the Design and Access Statement and demonstrate the significant improvement that this proposal could make to what is an unattractive site with little development potential for other uses. The proposal is original, iconic and appropriate for the location.

Service Station Operation

- 3.13 Vehicles entering the site will park up at the designated charging points, which will also act as general parking for those wishing to visit the café or have their car washed. In this regard it is proposed to continue the existing car wash facility on the site, with storage provided for their equipment within the main building.
- 3.14 The proposed ground floor café would be open to use by the public, with access restricted to the upper floors to those using the charging facility. This will be managed on site via the issuing of an access code. In addition to this, it would be possible to offer exclusive access to owners of certain vehicles via their electronic key fob. This would ensure that the use of the lounges on the first and second storey is controlled and that people can enjoy a relatively quiet and private space while they wait for their vehicle to charge.

Display Specifications and Operational Controls

- 3.15 The proposed digital display would measure 14m x 3.5m and would be accompanied by a small digital logo box measuring 1.62m x 0.39m.
- 3.16 The digital display will be a low energy LED product which will be controlled to display static sequential images only (i.e. no moving images or flashing lights) on a maximum rotation of six adverts per minute. The changeover between adverts will take place with an instant merge between adverts in line with best practice for minimising the risk of driver distraction.
- 3.17 The brightness of the display would be fully controllable and can be reduced to within 1% of its maximum output (50cd/sqm). It is proposed that in this location the signs should have a maximum luminance that does not exceed 300cd/sqm at night. This is in line with the guidance set out in the Institute of Lighting Professionals Technical Note 5 (Brightness for Illuminated Advertisements). The screen will be controlled by light sensors and a content management system to vary the brightness of the screen according to the brightness of day. The light sensors will ensure that the level of luminance of the advertisements is sensitive to the change in daylight from sunrise to sunset and from summer to winter. The proposal will not therefore cause any glare, which could distract drivers, or cause excessive light into neighbouring windows.
- 3.18 The performance and quality of LED products has increased dramatically over the past few years which has led a revolution in their use for all types of displays ranging from televisions, computer screens and tablets to outdoor media. The reason for this is their durability and reliability alongside their low energy consumption. The use within outdoor media also means that vehicle trips can be dramatically reduced, as there is no need to regularly visit the site to repost adverts. In this regard, the operator controls the screen remotely by broadband links. Following any failure in the display it will revert to a black screen.
- 3.19 There would also be an opportunity to agree to emergency use of the display should there ever be a requirement to get rapid information out to the public for safety reasons (e.g. disaster response) or in response to a particular event. This in particular would be a valuable resource to the City.

Conditions

- 3.20 The applicant proposes the following additional conditions to control the use of the digital display:
- // The intensity of the illumination of the signs shall not exceed 300 cd/m at night time;
 - // The sequential advertisements will not change more than once every 10 seconds;
 - // Any sequential change between advertisements will be smooth and take place over a period no greater than one second;
 - // The signs shall not display any moving, or apparently moving, images;
 - // Detailed drawings and samples of all surface materials to be submitted and approved in writing prior to construction; and
 - // A hard and soft landscaping plan to be submitted and agreed in writing prior to the commencement of development.
- 3.21 The above conditions are considered to pass the tests set out in the NPPF and have been applied successfully elsewhere.

4.0 Planning Policy

National Policy

- 4.1 The National Planning Policy Framework (NPPF) is the overarching policy framework within which local policy is formed. At the heart of the NPPF is the presumption in favour of sustainable development. In this regard there are three dimensions to sustainable development, economic, social and environmental. In terms of the economic perspective, there is a requirement to support innovation, and to identify and coordinate development requirements, including the provision of infrastructure; in terms of the social perspective there is a requirement to create a high quality environment with accessible local services; and in terms of the environmental perspective there is a requirement to minimise pollution and to mitigate climate change including moving to a low carbon economy. The proposal supports all of these core aims.
- 4.2 The NPPF attaches great importance to good quality design and requires that Local Authorities give great weight to outstanding or innovative design (Paragraph 63). Paragraph 9 of the NPPF states that pursuing sustainable development requires positive improvements be made to the built environment including, specifically, *“replacing poor design with better design”*. The proposal seeks to replace a functional and generally unattractive repurposed PFS, with a purpose built design led modern EV service station.
- 4.3 Paragraph 30 of the NPPF seeks to encourage solutions for the reduction of greenhouse gas emissions and the reduction of congestion. In this regard Local Authorities are required to support a pattern of development which *“facilitates the use of sustainable modes of transport”* and to *“develop strategies for the provision of viable infrastructure necessary to support sustainable development”*. The proposal.
- 4.4 In accordance with the NPPF advertisements are subject to control only in the interests of amenity and public safety, taking into account cumulative impacts.

Local Policy

- 4.5 The development plan for the area consists of the saved policies of the Unitary Development Plan (UDP) 2007. The plan is due to be updated, with consultations on a draft Local Plan currently underway.
- 4.6 Unitary Development Plan
- 4.7 The saved policies of the plan which are relevant to the determination of the proposal are summarised as follows:
- 4.8 Policy GEN1 (Economic Regeneration) aims to reverse decline in economic activity, through amongst other things, concentrating resources towards regeneration areas such as the eastern corridor, and encouraging small scale economic development and investment.
- 4.9 Policy HD18 (General Design Requirements) relates to general design requirements and seeks high quality development.

- 4.10 HD19 (Access for all) and HD20 (Crime Prevention) require development proposals to consider provision for disabled access and for personal safety and crime prevention in the design of all new development.
- 4.11 HD23 (New Trees and Landscaping) requires that new development provides high quality landscaping and boundary treatment.
- 4.12 UDP Policy T11 (Major Road Corridors) requires development along the City's five major road corridors to improve the image of the City for visitors, residents and potential investors. The Eastern Corridor including Edge Lane and Bowring Park Road has been defined as an Economic Regeneration Area.
- 4.13 UDP Saved Policy T6 (Cycle Parking) and T12 (Car Parking) requires new development to incorporate cycle parking facilities and to make sufficient provision for car parking to meet minimum operational needs.
- 4.14 UDP Saved Policy HD25 (Advertisements) provides guidance on assessing applications for advertisement consent. The policy recognises the importance of advertisements to the commercial character of an area, as well as the ability for advertisements to contribute to the character and appearance of an area. However, adverts which are detrimental to public safety or dominate or otherwise adversely affect the amenity of an area by virtue of their size, siting, proliferation or method of display, including illumination, will not be granted consent.
- 4.15 EP2 (Contaminated Land) requires that proposals on land which is considered to be contaminated be accompanied by a site survey detailing the likely types and degree of contamination. Proposals which are unlikely to adversely affect the development may not require a full site investigation.
- 4.16 Policy HD21 (Energy Conservation) requires developers to minimise their overall demand for energy, whilst EP16 (Renewable Energy) lends support to proposals for renewable energy providing they do not impact on neighbouring uses or sensitive areas.
- 4.17 Draft Local Plan
- 4.18 The Draft Local Plan is currently out for consultation and includes a number of policies that offer additional support to the proposal. In particular, Policy STP2 (Sustainable Growth Principles and Managing Environmental Impacts) actively promotes sustainable modes of transport including electric vehicles and vehicle charging. Similarly Policy R9 (Solar Panels) provides support for solar panels, particularly when building mounted, providing it minimizes impact on visual amenity and takes account of heritage. The policy text encourages opportunities for new development to incorporate solar energy generation arising from matching on-site electricity generation with on-site demand.

5.0 Planning Considerations

5.1 The key planning considerations in relation to this proposal can be considered as follows:

- // Principle of proposed use;
- // Design, size and scale;
- // Trip generation, access, parking and servicing;
- // Impact on local amenity;
- // Advertising assessment;
- // Ground conditions;
- // Landscaping;
- // Sustainability.

5.2 Each of the above are considered in relation to national and local policy as set out in the previous chapter.

Principle of proposed use

5.3 The proposed use is to all intents and purposes a continuation of the established use of the site for vehicle servicing. There is no specific policy in the adopted UDP in relation to this type of use, but it is noted that emerging the development plan Policy STP2 provides active support to encouraging electric vehicles.

5.4 The provision of EV charging points is supported by the NPPF in so far as it is recognised that support infrastructure is required to support sustainable development. A Ministerial announcement was made on 3 January 2011 which encouraged EV charging infrastructure in new development, signalling the intention to support EV's by introducing permitted development rights for EV charging points. Further to this, the Government has set up the Office for Low Emissions Vehicles (OLEV) as a cross departmental team supporting the early market for Ultra Low Emissions Vehicles (ULEV's) and as recently as this month (October 2016) the Government announced a major £35 million package to boost the uptake of ultra-low emission cars and scooters. The fresh funding commitment will see thousands more electric vehicle chargepoints installed on streets and at workplaces across the UK – after the number of new ultra low emission vehicles registered rose by 250% in just 2 years.

5.5 This initiative follows a DfT survey on public attitudes towards electric vehicles (September 2016) which cited the number one factor that would prevent someone from buying an EV is recharging (45%), with the lack of availability of charging points the key factor within this.

5.6 Electric vehicles remove localised pollutants which can cause serious public health issues, and produce less CO₂ thereby mitigating the effects of global warming. In addition to these benefits, the proposal will provide investment in the area and will support an emerging economy.

- 5.7 The development of support facilities will provide additional encouragement towards EV ownership and will create a mini ecosystem, with the advertising providing the initial investment, the EV charging points and car wash/valet providing customers, and the coffee shop and car wash/valet providing local employment opportunities, and a tenant with an onsite presence.
- 5.8 The advertising element of the proposal is appropriately located in accordance with the guidance in the NPPG which states that advertising would be likely to be acceptable on commercial or industrial sites in major cities next to major roads. There is already a precedent for large format digital advertising on this route into the city and the proposal is of sufficient distance away and of sufficiently different character not to lead to an overproliferation.
- 5.9 As set out above the proposal supports the three pillars of sustainable development and as such should be supported in principle. The location of the site at a prominent point at the entrance to the city also provides the perfect platform to promote Liverpool as a progressive City and to promote the use of EV's in general.

Design, Size and Siting

- 5.10 The NPPF attaches great importance to good quality design and requires that Local Authorities give great weight to outstanding or innovative design (Paragraph 63). The location on a key entrance to Liverpool presents an opportunity to create a place marker and add value to the townscape. The design of the proposal is bespoke and has taken great care to enhance the site.
- 5.11 The design response is considered to be proportionate to the site, transforming what is an unattractive semi derelict use to a modern and vibrant flagship development. The use of shipping containers is now well established as a building material with examples of high quality uses provided within the Design and Access Statement. Moving the canopy to the rear boundary opens the site up and creates a welcoming entrance forecourt. The proposal has been designed to meet all aspects of UDP Policy HD18, HD19 and HD20.
- 5.12 The NPPG advises:
- "The design process often continues after the granting of permission. If the local authority feels that detailed design issues are central to the acceptability of a scheme, they may wish to use conditions to require these to be approved at a later date". (NPPG Para 38)*
- 5.13 Whilst a sufficient level of detail has already been provided in the application, the applicant would be accepting of conditions requiring further information (e.g. submission of materials) to ensure that it will be properly implemented and the vision for the site is achieved.

Trip generation, access, parking and servicing

- 5.14 The applicant has commissioned JMP Consultants to assess the likely trip generation and advise on access and parking requirements.

- 5.15 The trip generation calculation is based up an average waiting time of 30 minutes which is greater than that of a traditional petrol pump and therefore will result in much lower trip generation than the former use experienced.
- 5.16 As the use is similar and is well established, the access and egress have been kept the same. In order to ensure that there is no vehicle conflict at the entrance to the site, the parking spaces have been angled to direct vehicles to reverse into the space and leave in forward gear. A tracking plan has been provided to demonstrate this manoeuvre.
- 5.17 As the proposed use is Sui Generis and in common with the former use is not a destination as such, there are no applicable parking standards. Therefore, any parking provided relates to the expected operational requirements of the site. There are seven vehicles charging points in total, one of which is larger in order to accommodate a disabled space. These spaces are in effect multipurpose and could be used for general parking, albeit there will be minimum waiting times set.
- 5.18 In accordance with UDP Policy T12 two spaces have been provided for staff, which will not have minimum waiting times. There is also cycle parking provision (in accordance with UDP Policy T6), although given the location and the type of use it is expected that usage may be low. There are however alternative methods for employees to get to the site, including a nearby local rail station and regular bus services.
- 5.19 Areas have been allocated for general waste and recycling to the rear of the main building on the site, but for ease of access servicing will take place using the main forecourt. Bins will be taken the short distance from the rear of the building to the forecourt on the relevant collection days. It is expected that there will be no more than one collection per week.

Impact on local amenity

- 5.20 The character of the surrounding area is mixed, with the site and immediate surroundings being commercial and the wider area residential. Overall the area around the site is dominated by road infrastructure. As a result residential properties in the immediate vicinity suffer a great deal of noise and disruption, not to mention poor air quality. The proposal would cater for existing vehicle trips and would not generate additional noise and disturbance. The associated café and facilities would have the ability to open for 24 hours a day, subject to the operator, but this use would be well separated from residents and would not create an amenity issue. Instead it would provide a local service and would ensure that the site is well monitored and well maintained.
- 5.21 The lighting proposed for the site (including the luminance of the display) will be controlled in accordance with ILP guidance. As such there will be limited light spill and given the distance to the nearest properties there is no potential for loss of residential amenity.

Advertisement Assessment

- 5.22 In accordance with the NPPF advertisements are subject to control only in the interests of amenity and public safety.

Amenity

- 5.23 National Planning Practice Guidance (NPPG) provides the following advice in relation to amenity:
- 5.24 *"...In assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features. This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site." (Paragraph 79)*
- 5.25 The proposal site is not within a locality where there are important scenic, historic, architectural or cultural features and is within a commercial area of a major city where there are large building plots and main highways. It is therefore in principle a very well located site in amenity terms.
- 5.26 The nearest residential properties to the site are on the corner of Renville Road and Bowring Park Road. Whilst it would be possible to see the proposal from these properties, it would be an oblique view due to the orientation of the display, and will be 50m away on the opposite side of a major road where there view towards the site is already seriously compromised. Overall, the proposal sees an improvement to the site and as such visual amenity will not be harmed.

Public Safety

- 5.27 Digital advertisements are now a common sight on arterial roads in major cities and as such, are not an "unusual" distraction for drivers. Over the past five years best practice has been established in terms of the operation of these displays which has led to an established maximum level of luminance of 300cd/m² and a 10 second rate of changeover between static adverts, which is considered to be less distracting and viewed in a similar manner to traditional static or scrolling billboards. Indeed the Transport for London "Guidance and Best Practice for Roadside Digital Advertising" concludes that provided they are appropriately controlled, digital adverts are no more or less distracting than any other form of illuminated signage. In this regard it should be noted that the site is long established as a PFS (and now a car wash) and therefore has always supported illuminated advertising.
- 5.28 Nevertheless, highways specialists JMP Consultants Ltd (JMP) were commissioned to carry out a road safety assessment in order to establish the appropriateness of the site and the limits that should be placed on operation of the display. The report is informed by a site visit where a road safety specialist has driven the route and assessed the conditions on each of the approaches. The analysis from JMP confirms that the approach is relatively straight forward and that traffic is generally slow moving, as would be expected at the motorway end.
- 5.29 The accident record around the site has also been analysed as part of the safety report and comparable sites have been reviewed to inform the overall conclusions reached. The conclusion to the report is that the proposal will not impact adversely on driver distraction and does not present a risk to road safety. The accident record at the site is comparable with other roads of this type, whilst

experience elsewhere indicates that this type of advertising in this type of location does not cause an increase in the frequency or severity of accidents.

Ground Conditions

- 5.30 The former use of the site as a PFS means that it is likely to be contaminated. As such a Phase 1 site survey has been commissioned and supplements the application. The survey confirms that there is potential for soil contamination but that there will be no pathways by which the health of site users could be affected by the soil. The survey also identified Japanese knotweed at the eastern edge of the site, which will require removal.

Landscaping

- 5.31 The proposal includes a large area of hardstanding as there is a requirement for vehicle circulation across the site. Nevertheless, landscaping has been considered as part of the overall design in line with UDP Policy HD23. The existing brambles and other scrub will be removed from the site and new opportunities for planting will be explored within the areas indicated on the plans. Primarily, these opportunities relate to the boundary treatment of the site which could be vastly improved with simple planters. As the site is contaminated, this would appear to be the most appropriate landscaping solution. Details of the planting specification will be provided at conditions stage, when all other options available will be explored.

Sustainability

- 5.32 The proposal is for a commercial use which will facilitate and encourage the use of EV's. As such in principle it supports the aims of the Government and the emerging policy of the Liverpool Local Plan. Furthermore, the provision of a large area of solar panels will return renewable Energy back into the National Grid and is supported by National Policy, UDP Policy EP16 and emerging Policy R9.
- 5.33 Digital displays are continually improving their efficiency, driven by a need to reduce costs of operation and the need to replace units. Modern LED displays are low energy and operate at a small percentage of their maximum output thereby reducing the burn out of the individual diodes. Added to this, the ability to post images remotely, without the need to visit the site, dramatically cuts down on vehicle trips to the site, which traditionally would have taken place a minimum of once every two weeks.
- 5.34 Whilst clearly the proposal will have a large requirement for electricity to the site, the energy requirements have been minimised and offset in line with UDP policy HD21.

6.0 Summary and Conclusion

- 6.1 The proposal will transform a difficult site in a prominent location into an attractive, innovative flagship development. As recent surveys have shown one of the primary reasons for not owning an electric car to be the perceived lack of charging points, a highly visible EV service station on a prominent route into the City is likely to have a significant impact on attitudes towards EV ownership.
- 6.2 The proposal essentially “bolts on” to the existing use and will be a modernisation of the historic use of the site. It will represent a more efficient use of land and will provide additional services to the local area and to visitors to the city.
- 6.3 The proposal will support a number of policy aims at a National level and is supported by Liverpool’s adopted and emerging policy. In accordance with the NPPF there should be a presumption in favour of sustainable development. The proposal supports the three pillars of sustainable development as set out below and as such the presumption in favour should apply:
- // Supports innovation;
 - // Provides future infrastructure;
 - // Creates a high quality environment;
 - // Provides accessible local services;
 - // Minimises pollution; and
 - // Mitigates against climate change.
- 6.4 The site has a historic commercial use and is not under any sensitive land designation. In accordance with the advice in the NPPG the site is the ideal location for large format advertising. The proposal will not change the character of the area and the nearest residential properties are not close enough to be impacted in terms of light spill or causing any other form of harm to residential amenity.
- 6.5 A road safety assessment has been completed to support the application. It is considered that the location is appropriate for advertising and that any concerns relating to the use of a digital display can be appropriately mitigated via the conditions put forward by the applicant. Each of the proposed conditions pass the conditions test and have been have been applied successfully elsewhere.
- 6.6 In summary, the proposal does not conflict with national or local policy and should be supported.