

Chapel Lane, Widnes Hearing Statement

Taylor Wimpey UK Limited

22 May 2026

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1.0 Introduction

- 1.1 This Planning Hearing Statement (“Statement”) has been prepared by Lichfields on behalf of Taylor Wimpey UK Limited (“the Appellants”) in respect of their S.78 of the Town and Country Planning Act 1990 (as amended) Appeal (Reference: APP/6007472) for their site at Chapel Lane, Widnes (“the Site”), which was submitted on 31st March 2026. The content of this Hearing Statement has been prepared to supplement the content of the Statement of Case following the Planning Inspectorate’s decision to determine this Appeal by way of a Hearing rather than an Inquiry as requested by the Appellant.

Purpose and Scope of this Statement

- 1.2 As a part of the Statement of Case, the Appellant explained its view that Knowsley Council's ("the Council") Reasons for Refusal [RfR] (CD 5) was unfounded and required detailed examination by way of cross-examination. As such, the Appellant requested that the appeal be dealt with via the Inquiry procedure. By contrast, the Council’s position was that the appeal should be determined via written representations or a hearing (CD-S 3). PINS determined that the appeal should follow the Hearing procedure because ‘*much of the evidence will need to be tested*’ (CD-S 4).
- 1.3 Subsequent to that decision, the Appellant again requested an Inquiry (CD-S 5) due to the significant level of public interest generated by the application and the site’s significant long-term role in meeting housing needs across Halton. However, correspondence from the Planning Inspectorate on 11th May 2026 reaffirmed that the Appeal would be determined via a Hearing.
- 1.4 As a part of these discussions, it was agreed by PINS that the Appellant would have until 25th May 2026 to provide the additional evidence that was intended to form the Proofs of Evidence [PoE] for an Inquiry. A Planning Hearing Statement (this Statement) and a Transport Hearing Statement have been prepared as additional evidence to support the Appeal. They should be read alongside the Appellant’s Statement of Case [SoC] (CD-S 6).
- 1.5 This Statement articulates the Appellant's case, confirming that the principle of development on the Site is acceptable in planning terms; the development will not give rise to any unacceptable impact on highway safety; that the Appeal should be allowed, and planning permission be granted for the development. For the sake of brevity, this Statement will draw up on, and cross-reference, the Appellant's SoC (CD-S 6), where appropriate.
- 1.6 In addition, this Statement (CD-S 1) should be read alongside the supporting Transport Hearing Statement (CD-S 2), prepared by SLR. The Appellant has updated the Core Documents List to reflect the submission of this Statement and the Transport Hearing Statement.

Background to the Appeal

- 1.7 The Inspector's attention is drawn to Sections 2.0 and 3.0 of the Appellant's SoC (CD-S 6), which sets out the background to this Appeal, including the site location, planning history, planning background and the Appeal proposals. These are not repeated here.

Costs Application

- 1.8 Further to the submission of the Appeal, the Appellant confirms that it intends to make an application for a full award of costs against Knowsley Council. The Appellant will submit this costs application in accordance with the Planning Inspectorate Costs Application Form (Annex 1) and supporting Planning Practice Guidance [PPG].

Statement Structure

- 1.9 This Statement is structured as follows
- Section 2.0 sets out the key issues for consideration in this Appeal;
 - Section 3.0 sets out the relevant policies contained within the Knowsley Development Plan and the NPPF;
 - Section 4.0 provides a summary of the other material considerations relevant to this Appeal;
 - Section 5.0 details the Council's reason for refusal and how the Appellant's evidence demonstrates that the Appeal proposals would not result in any unacceptable impacts on highway safety;
 - Section 6.0 provides the Appellant's overall assessment of the Planning Balance

2.0 Key Issues

- 2.1 As set out in detail in the SoC (CD-S 6), planning permission was refused for a single reason, contrary to the planning officer's recommendation and in circumstances where there was no objection from the highway authority.
- 2.2 The single RfR of the planning application provided by the Local Authority was as follows:
'The proposed development would have an unacceptable impact on highway safety contrary to Policies CS2, CS7 and CS19 in the Core Strategy and the National Planning Policy Framework'
- 2.3 As the application was refused against Officer Recommendation, the Appellant has not been provided with any rationale to justify the Council's reason for refusal.
- 2.4 In light of the RfR, the issue raised by the Appeal is:
- 1 Whether the proposed development would have an unacceptable impact on highway safety contrary to the provisions of Policies CS2, CS7 and CS19 and the NPPF.
- 2.5 As set out in detail in the SoC (CD-S 6), the proposed development requires a cross-boundary permission with only the access arrangements from Chapel Lane being determined by Knowsley. This approach was discussed and agreed with Knowsley Council and Halton Borough Council in advance of the submission of the application and reflected in the description of development. The application for the majority of the development which lies in Halton has a resolution to approve and a formal decision notice is expected imminently.

3.0 The Development Plan

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 [PCPA] and Section 70(2) of the Town and Country Planning Act 1990 [TCPA], require that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts and that the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise. This, in effect, requires that a balancing exercise is undertaken to determine whether the conditions presented by each case warrant whether an application should be permitted or refused.

3.2 For the purposes of determining the appeal, the Development Plan comprises:

- Knowsley Local Plan Core Strategy (2016) (CD 14)
- Saved policies from the Knowsley Unitary Development Plan (2009) (CD 15)
- Merseyside and Halton Joint Waste Local Plan (2013) (CD 16)

Most Important Policies

3.3 As detailed in Section 4 of the SoC (CD-S 6), in light of the specific policies mentioned in the RfF, it is considered that the most important policies for the determination of this appeal are policies CS2, CS7 and CS19.

3.4 Policy CS2 (Development Principles) of the Knowsley Local Plan Core Strategy states that new development in Knowsley will be expected to support 5 development principles related to economic development, climate change, reducing the need to travel, the environment and making efficient use of resources. With regard to highway matters, Principle 3 seeks to reduce the need to travel and increase accessibility this principle is sought to be achieved through the following means:

- a *“Selecting locations that reduce the need to travel, especially by car, and enable people as far as possible to meet their needs locally;*
- b *Assisting the Council in achieving a shift towards more sustainable modes of transport for people, goods and freight;*
- c *Encouraging safe and sustainable access for all, particularly by promoting the use of public transport, walking and cycling between homes and employment; and (my emphasis).*
- d *Supporting the provision and retention of shared space, community facilities and other local services (such as local shops, health facilities, education provision, meeting places, sports venues, cultural buildings, public houses and places of worship).”*

3.5 As set out in the draft Planning SoCG (CD-S 7), the Appellant considers that only Principle 3 Part C is relevant to the RfR.

3.6 Core Strategy Policy CS19 (Design Quality and Accessibility in New Development) states that to enhance the local distinctiveness, identity and accessibility of places, new development within Knowsley will be expected to:

“e) Provide safe, secure and convenient routes for movement (including signage), with priority for walking, cycling and public transport, to meet the access needs of all users, particularly pedestrians, cyclists, less mobile people and the elderly”.

3.7 As set out in the draft Planning SoCG (CD-S 7), the Appellant considers that only Part 1(e) of the Policy is relevant to the RfR. While Core Strategy Policy CS7 (Transport Networks) is cited in the RfR, the Appellant does not consider it to contain any policy relevant to the Council's RfR as set out in the draft Planning SoCG (CD-S 7). Part (2) of CS7 provides that new development will be required to be located to prioritise accessibility and sustainable modes of travel, but none relate to highway safety. For completeness, Policy CS7 Part 2 is set out in full below (but subject to the reservation expressed above that it does not appear to set any policy standards in respect of highway safety):

3.8 New development will be required to be:

- a *“Located and designed to prioritise accessibility and sustainable modes of travel through a choice of walking, cycling, public transport, and incorporate access for private vehicles. Where deficiencies are identified, developer contributions will be required to improve the accessibility of the location;*
- b *Located and designed to ensure that larger scale proposals (attracting a lot of visitors, customers and/or employees) are located in the most accessible locations;*
- c *Where subject to a planning application, accompanied (except in the case of smaller scale proposals) by Transport Assessments and/or Travel Plans;*
- d *In compliance with adopted cycle, car, disables and service vehicle parking standards for different types and scales of new development;*
- e *Inclusive of measures that will mitigate carbon emissions and improve air quality where appropriate; and*
- f *Consistent with safeguarding arrangements that secure the operational integrity and safety of Liverpool John Lennon Airport.”*

3.9 Through the draft Planning SoCG (CD-S 7) with Knowsley, the Appellant has sought to refine the specific elements of Policies CS2 and CS19 which relate to highways safety and the Council's RfR. Although the RfR mentions Policy CS7, we do not consider that it is relevant to the RfR.

Planning Policy Assessment

3.10 The Council's RfR alleges that the Appeal scheme would have an unacceptable impact on highway safety contrary to three stated policies from the Knowsley Local Plan and the NPPF. All three stated policies contain a number of strands and we have sought to refine the specific element of the policies relating to highway safety through the draft Planning SoCG (CD-S 7). For the purposes of this planning policy assessment, we have only focused on the elements of the policies which relate to specifically to highway safety.

3.11 Policy CS2 (Principle 3, Part C) seeks to encourage safe and sustainable access for all particularly by promoting the use of public transport, walking and cycling between homes and employment. As set out in detail in the Transport Assessment (CD 17), TAA (CD 6) the

accompanying Road Safety Audit (CD-S 8) and the Transport Hearing Statement (CD-S 2), the Appeal scheme has been designed to encourage safe and sustainable access for all. Connectivity by non-car modes of transport in a safe manner has been central to the evolution of the design for the scheme and the provision of five access points to the appeal site will ensure safe and suitable conditions for walking, wheeling and cycling. The Appeal proposals are supported by a Highways Safety Risk Assessment [SRA] of the accesses (CD-S 9) which confirms that the introduction of the proposed additional movements within the assessment area would not give rise to any unacceptable highway safety risks. Subject to the implementation of proportionate mitigation measures, which are proposed to be secured through appropriate conditions and obligations, the Assessment concludes that the residual risk is low and acceptable in highway safety terms.

- 3.12 Policy CS7 (Part 1 (d) and Part 2 (a, b and c)) provides that development which enhances road safety will be supported. It also states that new development will be required to prioritise accessibility and sustainable modes of travel. The Appellant has demonstrated through its Transport Assessment (CD 17), TAA (CD 6) and Transport Hearing Statement (CD-S 2) that the proposed access arrangements are safe and suitable and achieve and exceed relevant visibility standards without the need for traffic calming measures. However, it has been agreed with Knowsley Council officers that submission and approval of a scheme of traffic calming measures on Chapel Lane would be secured by condition. The purpose of traffic calming is to improve the environment for future residents so as to encourage active travel.
- 3.13 An indicative traffic calming scheme was submitted with the application in the TAA (CD 6) (drawing Ref: 216175-PD-102-B) (CD 7) and subject to multiple discussions with Highway Officers at both Councils. The final traffic calming scheme would be subject to approval by Knowsley Council prior to occupation, the approved scheme of works will then be implemented in accordance with an agreed delivery programme. As has been demonstrated in the Transport Assessment (CD 17), the TAA (CD 6) and the Transport Hearing Statement (CD-S 2), the site is located in a sustainable location and the ability to access the site from various locations by sustainable modes of travel is a key benefit of the site.
- 3.14 Policy CS19 (Part 1 (e)) states that new development is expected to provide safe, secure and convenient routes for movement with priority for walking, cycling and public transport to meet the access needs of all users. The Knowsley Officer's Report to Committee (CD 2) acknowledges that the proposed development will increase pedestrian and cyclist demand along Chapel Lane but with traffic calming measures incorporated within the scheme '*would make the use of Chapel Lane more attractive to pedestrians and cyclists*' (Para 9.24). As acknowledged by the Officer's Report, the development also proposes to use Sandy Lane as an active travel corridor for pedestrians and cyclists to travel between the site and Cronton Village. The development will secure environmentally friendly lighting, the clearance of vegetation and minor resurfacing/drainage works which all enhance the attractions of this route to the public. The final details of these works would be subject to approval by the local planning authority prior to the construction of the first dwelling. The approved scheme shall then be implemented in full prior to the occupation of the 50th dwelling.

- 3.15 The RfR cites the NPPF as a whole without specifying the relevant paragraphs relating to highway safety. As set out in the draft Planning SoCG (CD-S 7), paragraphs 115 (part d), 116, 117 and 118 are the most relevant to the RfR. Through the Transport Assessment (CD 17), the Transport Assessment Addendum (CD 6) and accompanying Road Safety Audit (CD-S 8) and the Transport Hearing Statement (CD-S 2), it has been demonstrated that: the proposed development will not have a significant impact on the surrounding transport network; it would not have any unacceptable impact on highway safety; it will minimise the scope for conflict between pedestrians, cyclists and vehicles; and, the development will be supported by a Travel Plan (secured by Condition to the Halton permission). As such, it is considered that the proposed development accords with the provisions of the NPPF relevant to the Council's RfR.
- 3.16 The Appellant's position is that the Appeal scheme will not give rise to any unacceptable safety impacts. Insofar as relevant to the Council's RfR, the Appeal scheme accords with policies CS2, CS7 and CS19. This accords with the advice in the Officer's Report to Committee (CD 2, Para 9.40) which concluded that the development was acceptable in highway and transport terms and would comply with Policies CS7 and CS19 and the relevant sections of the NPPF. Policy CS2 was not referred to in the Officer's Report with regard to Highways Safety, rather it was only assessed in the report with regard to residential amenity which the Officer considered the proposals complied with.

Summary

- 3.17 The most important policies for the purposes of this Appeal comprise Policies CS2, CS7 and CS19 of Knowsley's Core Strategy and the relevant provisions of the NPPF.
- 3.18 As set out in the SoC (CD-S 6), the Appeal proposals are in accordance with all of the relevant environmental and technical development management policies that are set out within the Development Plan that are considered relevant to the Appeal this is mirrored in the Officer's report as set out in the draft Planning SoCG (CD-S 7). The Council's Officer Report concluded that the scheme would not give rise to any unacceptable safety impacts and the Council's own Highway Officers were satisfied with the development proposals.
- 3.19 The Council has not substantiated their RfR with any technical evidence to support their RfR. In the absence of any evidence to support the Council's allegation of unacceptable safety impacts, the Appeal should be allowed.

4.0 Other Material Considerations

- 4.1 In addition to the Development Plan, there are other material considerations that are relevant to the appeal, including the policies contained in the Halton Delivery and Allocations Local Plan [DALP], the NPPF and the benefits associated with the delivery of the Appeal Proposals.

Halton Delivery and Allocations Local Plan (DALP)

- 4.2 The DALP was adopted in 2022 (CD-S 10). It identified a number of sites to be released from the Green Belt to meet identified housing needs. As set out in the SoC (CD-S 6) Policy RD1 of Halton's DALP allocated sites W4 and W5 for residential development of up to 432 dwellings. The wider site is comprised in those allocations and is allocated for residential development to meet Halton's housing needs.
- 4.3 DALP Policy RD1 provides as follows:
- 1 *For the avoidance of doubt, the housing sites allocated in this plan are not granted Permission in Principle.*
 - 2 *The following Strategic Housing Locations and the Residential Allocations, as identified on the Policies Map, will assist in the delivery of the requirements set out in Policy CS(R)3.*
 - 3 *Residential development on Green Belt sites, or former Green Belt sites allocated in this Plan, (GBM notation) will need to provide appropriate mitigation for the loss of Green Belt land in line with NPPF requirements.*
- 4.4 The requirements of DALP Policy CS(R)3 relate to housing mix and density only.
- 4.5 The supporting policy text for DALP Policy RD1 states '*It should be noted that whilst an allocation establishes the principle of a particular land use, sites will still have to be subject to a detailed planning application. Planning applications on allocated sites will be assessed against the policies in this document, any saved development plan policies and other material planning considerations.*' [Paragraph 9.4]
- 4.6 Policy RD1 does not contain any specific requirements with regard to vehicular and pedestrian access points to sites W4 and W5.
- 4.7 In terms of policies relating to highways and highway safety, Policy C1 (Transport Network and Accessibility) sets out that the Council will support development that does not have an unacceptable impact on highway safety or that gives rise to residual cumulative impacts on the road network that are severe. The Council will support development that provides well laid out road design and where appropriate incorporate highway safety measures such as traffic calming schemes.
- 4.8 The planning application was subject to significant discussion with Halton and Knowsley's Highway Officers during the determination process. Halton's Highway Officers were satisfied that the proposed development was acceptable and accorded with the provisions of Policy C1 (CD 12).

NPPF

- 4.9 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate, and necessary to do so.
- 4.10 The latest version of the NPPF was published in December 2024 (updated version in February 2025) and sets out the Government's planning policies for England and how these are expected to be applied. The Government has recently undertaken a consultation on a revised draft of the NPPF (the consultation closed on 10th March 2026). Limited weight can be afforded to the draft NPPF at this early stage, but it does set out the Government's intentions in terms of a direction of travel.
- 4.11 As such, the NPPF is a material consideration in the determination of this Appeal. A consideration of the Appeal proposals' conformity with the NPPF is set out in detail within Section 3 of this Hearing Statement. However, in summary, the Appellant considers that the Appeal proposals would constitute sustainable development in accordance with paragraphs 7 and 8 of the NPPF and are in fully accordance with all sections promoting sustainable and safe modes of travel.

The Benefits of the Appeal Proposal

- 4.12 The economic, social and environmental benefits associated with the Appeal proposals fall to be weighed in favour of the appeal.
- 4.13 A summary of how the proposed development constitutes sustainable development and the benefits associated with it is set out below. The Appellant has quantified the economic benefits associated with the Appeal proposals using Lichfields' eValue framework.

Economic Impacts and Benefits

- 4.14 As set out in the Planning Statement, the Appeal proposals will ensure that a number of economic benefits are unlocked through the delivery of the Chapel Lane residential development.
- 4.15 The proposed development will bring a number of economic benefits in terms of job creation and increased expenditure on the local economy. This includes but is not limited to:
- Construction employment for the proposed development has been estimated based on a construction cost of approx. £41 million, based on standard building costs for residential development using the BCIS Comprehensive Building Price Book. The total construction cost has been divided by the average total purchases of goods, materials and services per construction employee in the North West. Therefore, approximately 104 temporary construction jobs would be created by the development.
 - National construction firms use a combination of their own permanent workforce and local contractors on projects, with a proportion of construction workers drawn locally. Based on experience elsewhere, it is reasonable to expect that a proportion of the construction jobs created by the proposed development will be taken up by the local workforce. In addition, it is also likely that some businesses in the local area, (as well as

the North West economy generally), would benefit from the trade linkages that would be established to construct the proposed development. This means that further indirect jobs would be supported locally from suppliers of construction materials and equipment. Local businesses would also benefit to some extent from temporary increases in expenditure as a result of the direct and indirect employment effects of the construction phase (e.g. construction workers visiting local shops and other facilities).

- An estimated £16 million Annual Gross Value Added to be created during construction;
- Once the dwellings are occupied, residents will require decorators, plumbers, gardeners and other such services. Residents moving to the development from outside the local area will also create additional demand for facilities such as shops, restaurants etc., resulting in additional local economic benefits. As a result, an estimated £4.7 million net additional expenditure based on the total annual expenditure arising from new residents, of which a significant proportion could be retained locally; and,
- Housing supply can play a key role in the flexibility of the local labour market, which itself is an important component in local economic competitiveness. This is because a shortage of housing, or a lack of affordability, can act as a barrier to accessing employment opportunities. It can also result in long-distance commuting and unsustainable travel patterns. The proposed development would contribute to the market and affordable housing needs of Halton, helping to support sustainable access to local employment opportunities in both Boroughs.

4.16 The above economic benefits are considered to be a benefit to both Knowsley and Halton boroughs given the cross-boundary nature of the proposals.

Social Benefits

4.17 The Appeal proposals would facilitate access to a residential site that will provide up to 350 new dwellings and policy compliant affordable housing provision (20%) to ensure sustainable patterns of growth and development in Widnes. The new homes will be highly energy efficient, include measures such as EV chargers and other sustainability measures such as solar panels and possibly air source heat pumps.

4.18 Taylor Wimpey is committed to submitting a reserved matters application to Halton as soon as possible for the residential element of the scheme and will deliver a mixture of dwelling types and sizes to reflect local housing requirements and local planning policy.

4.19 The latest affordability ratio in Halton is 5.24 times average earnings, therefore the provision of high-quality affordable housing will help to alleviate this issue in the Borough and assist with the affordable housing waiting list. It is also worth noting that the new homes will not just benefit people from Halton but given the proximity of Knowsley, perspective residents may also come from Knowsley, therefore creating churn in the housing market area.

4.20 The proposed development in Halton will provide numerous health benefits, providing opportunities for social interaction between new residents and encouraging healthy, active lifestyles. The proposed open spaces successfully extend the existing network in the area, and open spaces within the site will be accessible to the public, adding to the recreational and natural features available in the area.

- 4.21 Extensive areas of Public Open Space across the site will provide opportunity for informal recreation and play and further support and enable healthy lifestyles for new and existing residents.

Environmental Benefits

- 4.22 As demonstrated in the application submissions and through consultation responses received, there is no harm to the natural, built or historic environment. In particular, the Appeal proposals will facilitate access to residential development that will provide the following:
- The site will enhance existing grassland on the site and introduce compulsory planting to mitigate the loss of trees and short sections of hedgerow. The site will deliver a measurable net gain in biodiversity in line with policy as a minimum, however, documentation submitted with the planning applications demonstrates that the site could achieve in excess of 10% net gain. Based on the indicative masterplan for the site, it was calculated that a 16.42% gain could be achieved in area habitat and a 15.11% increase in linear habitat;
 - The homes provided on the site will be energy efficient and will incorporate 90% responsibly sourced materials in each dwelling;
 - The residential development will deliver improved open space and recreational routes throughout the site and to the surrounding area, including policy compliant public open space provision; and,
- 4.23 The site is sustainably located in terms of access and connectivity to local amenities and facilities by both walking and cycling, nearby bus stops and a train station allow for the opportunity to utilise sustainable methods of transport. This will encourage residents to travel by active travel means with both health benefits to residents and a reduction in emissions produced.

5.0 Reason for Refusal

5.1 The Council's only Reason for Refusal is:

"The proposed development would have an unacceptable impact on highway safety contrary to Policies CS2, CS7 and CS19 in the Core Strategy and the National Planning Policy Framework"

5.2 Section 3.0 of this Planning Hearing Statement and the SoC (CD-S 6) has set out the Appellant's review of the cited policies in detail. The Council has not provided any further detail to substantiate this reason for refusal or expanded upon how the appeal proposals are said to conflict with the policies cited in the RfR.

5.3 The planning application was supported by a detailed Transport Assessment (CD 17) and an Addendum Transport Assessment (CD 6) which provided robust evidence to demonstrate that the proposed development, served by a single access off Chapel Lane, will not give rise to any unacceptable safety rises or result in any severe cumulative residual impacts on the road network.

5.4 The Appellant has addressed the harm alleged by the Council in its RfR within the supporting Transport Hearing Statement (CD-S 2). In summary, the Transport Hearing Statement concludes that:

- Survey data collected in March 2026 and in conjunction with surveys collected in March 2022 demonstrate that traffic levels have decreased over the last 4 years by an average of 10% across a 12-hour weekday sample;
- A review of the 85th percentile speeds along Chapel Lane was conducted in March 2026 to check the information included in the planning application submission, the conclusion is that the speed related basis for the junction design remains appropriate;
- A review of traffic levels and safety across Knowsley using DfT traffic levels data and parliamentary collision data for Knowsley from 2000 to 2024 highlighted that whilst the total miles travelled by all vehicles in Knowsley has steadily increased, the collisions across Knowsley in all levels of severity have trended downwards. There is no direct correlation between traffic volumes and collision rate.
- The accompanying SRA (CD-S 9) did not identify any unacceptable safety impacts.

5.5 In light of the supporting Transport Hearing Statement (CD-S 2), it is concluded that the appeal proposed would not conflict with the relevant elements of Policy CS2, CS7 or CS19. In particular, the appeal proposals would not conflict with Policy CS2 (Principle 3, part c) as it would encourage safe and sustainable access for all to the development particularly by promoting the use of public transport, walking and cycling. Neither would the appeal proposals conflict with Policy CS7 (Part 1 (d) and Part 2 (a, b and c) as it has been demonstrated through the Transport Assessment (CD 17), the Transport Assessment Addendum (CD 6), the Highways Safety Risk Assessment (CD-S 9) and the Transport Hearing Statement (CD-S 2) that the proposals will enhance road safety and prioritise accessibility and sustainable modes of travel.

5.6 Similarly, the appellant has demonstrated that the proposals will provide safe, secure and convenient routes of movement prioritising sustainable modes of transport and met the access needs of all users in accordance with Policy CS19 (Part 1(e)).

5.7 The provisions of the NPPF are cited within the RfR without explicit reference to specific paragraphs. Through the draft Planning SoCG, the appellant has sought to refine the relevant paragraphs in light of the stated reason for refusal. However, it is considered and demonstrated through this Planning Hearing Statement and the Transport Hearing Statement that the appeal proposals accord with the relevant paragraphs from Chapter 8 (para. 96), Chapter 9 (para. 109, 115, 116, 117 and 118) and Chapter 12 (para. 135)

6.0 **Planning Balance**

Introduction

- 6.1 Section 70(2) of the Town and Country Planning Act 1990 [the 1990 Act] and 38(6) of the Planning and Compulsory Purchase Act 2004 [the 2004 Act] require that the planning application be determined in accordance with the provisions of the development plan unless material considerations indicate otherwise.

The Development Plan

- 6.2 As set out in the Draft Planning SoCG (CD-S 7), the Appellant has sought to agree that only parts of the Policy CS2 (Principle 3, Part C), and Policy CS19 (Part 1(e)) are relevant to the RfR. No elements of Policy CS7 are relevant to the RfR. Therefore, the Appeal proposals are in accordance with all of the relevant environmental and technical development management policies that are set out in the Development Plan. The Planning Officer's Committee Report (CD 2) did not identify any environmental or technical harm which was not outweighed by the benefits when the application was reported to Knowsley's Planning Committee.
- 6.3 It has been demonstrated in the original application submission to Knowsley (LPA Ref: 23/01037/OUT), Section 4.0 of this Hearing Statement and the accompanying Transport Hearing Statement (CD-S 2) that the Appeal proposals are in full accordance with the requirements of Knowsley's Development Plan that are considered relevant to the Appeal. The Appeal proposals will not give rise to an unacceptable impact on highway safety and will fully satisfy the requirements of Core Strategy Policies CS2, CS7 and CS19 listed in the Council's reasons for refusal. This is consistent with the assessment of the scheme in the Planning Officer's Committee Report which considered the principle of the accesses acceptable and safe and offered no objection to the proposed development subject to the imposition of appropriate conditions.

Other Material Considerations

Halton Delivery and Allocations Local Plan

- 6.4 In light of the cross-boundary nature of the applications, policies of the Halton Local Plan are material considerations in the determination of this appeal.
- 6.5 Halton's Development Plan comprises the Halton Delivery and Allocations Local Plan [DALP] which was adopted in March 2022 and sets out the long-term spatial vision, strategic priorities and policies for future development in Halton to 2037.
- 6.6 The proportion of the site which falls within Halton's jurisdiction forms the majority of two residential allocations (Policy RD1) within the DALP for the collective delivery of up to 432 dwellings. The policy allocating this site in the DALP does not stipulate where the allocation should be accessed from. Furthermore, Halton's Planning Officers and Highways Officers resolved to approve the development at Planning Committee on 1st September 2025. As set out in the Officer's Report (CD-S 11), it was considered that the development was in accordance with the provisions of the relevant policies in the DALP including the

Council's highways engineers being satisfied that the proposed access arrangements (i.e. the development subject to this appeal) are acceptable and in accordance with the highway safety policies contained in the DALP.

Delivery of an Allocated Site

- 6.7 The Appeal proposals would facilitate vehicular, cycle and pedestrian access through a primary and emergency access to a housing site that benefits from two residential allocations in the Halton DALP enabling the delivery of up to 350 homes. The Appeal proposals would ensure that Halton Council can achieve their spatial strategy vision of delivering at least 8,050 (net) additional dwellings (at an average of 350 dwellings each year) during their plan period (Halton DALP Policy CS(R)1, Policy CS(R)3 and Policy RD1).
- 6.8 The Appeal proposals facilitation of the delivery of the majority of two allocated sites subject to a resolution to grant is considered to hold **significant weight** in the determination of this Appeal.

Sustainable Location

- 6.9 The Appeal proposals would facilitate access to a housing site in a highly sustainable location on the edge of Widnes. As set out in the draft Highways Statement of Common Ground (CD-S 10) and the Transport Hearing Statement (CD-S 2), the wider site is approximately 3.5km northwest of Widnes town centre and is surrounded by the existing residential areas of Upton, Upton Rocks, Parklands and Hough Green. A wide range of amenities (education, healthcare, leisure, employment) surround the site as shown at figure 4-3 of the draft Highways Statement of Common Ground (CD-S 12).
- 6.10 The proposed offsite highways mitigation measures will complement the site's sustainable location and make active travel modes even more attractive for future residents. The proximity of Sandy Lane to the site significantly enhances the sustainability credentials of the site.
- 6.11 The site's highly sustainable location is further validated by the wider site's two residential allocations which went through a rigorous appraisal process which led to them being allocated in Halton's adopted DALP. The Appeal proposals will facilitate residential development in a highly sustainable location which should be afforded **significant weight**.

NPPF

- 6.12 As demonstrated in Section 4.0, the Appeal proposals have been shown to accord with the overall objectives (social, economic and environmental) of the NPPF and its highways specific requirements. As detailed below, the social, economic and environmental benefits that the approval of the access arrangements will unlock should be afforded **significant weight**.
- 6.13 The Appellant strongly considers that the development proposals accord with the Development Plan as a whole and should be allowed in accordance with paragraph 11c of the NPPF.

The Balance

- 6.14 The Appeal relates solely to access arrangements into the wider development site for the principal vehicular access and emergency access. The access proposals will facilitate a wide range of economic, social and environmental benefits through the delivery of the majority of two allocated sites for residential development within Halton which can be afforded significant weight. Given the proximity of the site to both authorities, it is considered that the benefits will apply to both authorities as they relate to not just future residents but current neighbouring residents and expenditure in either authority.
- 6.15 The Appeal proposals (primary and emergency access) have been shown to accord with the relevant provisions of Knowsley's Development Plan and will not represent an unacceptable impact on highway safety. The Appeal proposals have also been demonstrated to not conflict with the provisions in the NPPF, nor are there any other material considerations that indicate a reason for refusal.
- 6.16 The Appeal proposals will not cause any unacceptable harm on highway safety grounds and will unlock a number of economic, social and environmental benefits associated with the delivery of residential development at the Chapel Lane site. On this basis, the Appellant strongly considers that the development proposals accord with the Development Plan as a whole and should be allowed in accordance with paragraph 11c of the NPPF and as mirrored in Knowsley Core Strategy Policy SD1.

Appendix 1 Core Document Schedule & Supplementary Documents

Table 1 Core Document and Supplementary Document Schedule

Core Document Number	Title
CD 1	Local Authority Boundaries prepared by SLR
CD 2	Knowsley Public Reports Pack Planning Committee November
CD 3	Knowsley Public Reports Pack Planning Committee October
CD 4	Knowsley Planning Committee (06/11) Minutes
CD 5	Knowsley Decision Notice (23/01037/OUT)
CD 6	Transport Assessment Addendum (December 2024) prepared by SLR
CD 7	Arboricultural Impact Assessment (July 2025) prepared by Urban Green
CD 8	Technical Advice Note prepared by Cotswold Archaeology
CD 9	Ecological Assessment (December 2024) prepared by Ecology Solutions
CD 10	Biodiversity Net Gain Assessment prepared by Ecology Solutions
CD 11	Active Travel England Planning Response (July 2023)
CD 12	Halton Highways Final Comments (21 ST August 2025)
CD 13	Knowsley Highways Final Comments (26 th September 2025)
CD 14	Knowsley Core Strategy
CD 15	Knowsley Unitary Development Plan
CD 16	Joint Merseyside and Halton Waste Local Plan
CD 17	Transport Assessment (May 2023) prepared by SLR
CD 18	Travel Plan (May 2023) prepared by SLR
CD 19	Chapel Lane, Widnes: Response to Halton BC and Knowsley Council (May 2025)
CD 20	Knowsley Draft Planning Conditions
Supplementary Core Document Number	Title
CD-S 1	Hearing Statement prepared by Lichfields
CD-S 2	Highways Hearing Statement prepared by SLR
CD-S 3	Knowsley Council's Submission on Procedure
CD-S 4	PINS email correspondence 20/04/2026
CD-S 5	Reasons for Inquiry Letter 07/05/2026

Core Document Number	Title
CD-S 6	Planning Statement of Case prepared by Lichfields
CD-S 7	Draft Planning Statement of Common Ground prepared by Lichfields
CD-S 8	Stage 1 RSA and Designers Response (08/10/2024)
CD-S 9	Highways Safety Risk Assessment prepared by AKT
CD-S 10	Halton Delivery and Allocations Plan
CD-S 11	Halton Officer's Report to Planning Committee 01/09/2025
CD-S 12	Draft Highways Statement of Common Ground to Knowsley prepared by SLR

the 1990s, the number of people in the UK who are aged 65 and over has increased by 1.5 million, and the number of people aged 75 and over has increased by 1.2 million (Office for National Statistics 2000). The number of people aged 65 and over is projected to increase to 10.5 million by 2026, and the number of people aged 75 and over to 7.5 million (Office for National Statistics 2000).

There is a growing awareness of the need to develop strategies to meet the needs of the ageing population. The Department of Health (1999) has published a strategy for ageing, which sets out the government's commitment to improve the lives of older people. The strategy is based on three main principles: (1) to ensure that older people are able to live independently and actively; (2) to ensure that older people are able to access the services and support they need; and (3) to ensure that older people are able to participate in the decisions that affect their lives.

The strategy is based on the following assumptions: (1) that older people are a diverse group with different needs and interests; (2) that older people are able to live independently and actively; (3) that older people are able to access the services and support they need; and (4) that older people are able to participate in the decisions that affect their lives. The strategy is based on the following principles: (1) to ensure that older people are able to live independently and actively; (2) to ensure that older people are able to access the services and support they need; and (3) to ensure that older people are able to participate in the decisions that affect their lives.

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