



ROMAN SUMMER



PLANNING STATEMENT

DYE HOUSE, LIVERPOOL ROAD, PRESCOT

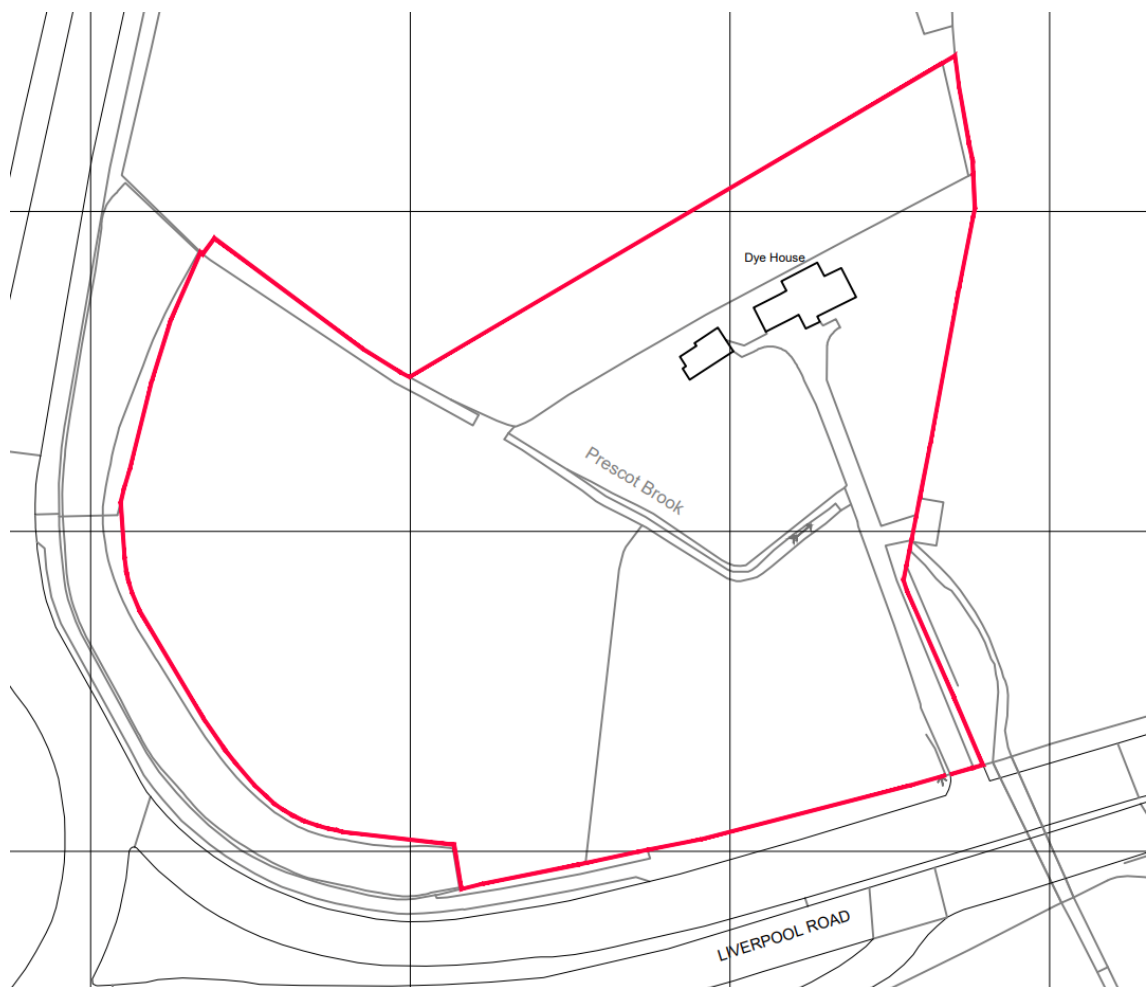
JULY 2023

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Appendix 1 – Local Community Consultation

1.0 Introduction

- 1.1 This Planning Statement supports an application submitted by Group D Developments Ltd and Mr. Thomas Alan Rose that seeks full planning permission for the demolition of Dye House and associated brick outhouse, off Liverpool Road, Prescot, and the erection of 45 affordable dwellings (21 houses and 24 apartments), with associated private and communal gardens, car parking, vehicular manoeuvring space, bin and cycle stores, a foul water pumping station, a sub-station, and hard and soft landscaping, to be accessed by via the access road to the north as approved under application 19/00684/FUL (currently under construction by Taylor Wimpey), with a separate pedestrian and emergency-only access via Liverpool Road. The application site area is marked in red below.



- I.2 The application site forms part of an allocated Sustainable Urban Extension in the adopted Knowsley Local Plan, and in those terms it is clearly deemed appropriate for housing development.
- I.3 The application proposal has been developed in conjunction with Knowsley Metropolitan Borough Council ('KMBC') Officers, statutory consultees and other key stakeholders, and has been the subject of a proportionate local community consultation exercise.
- I.4 In formulating this application, regard has been given to the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, which confirms that planning decisions should be taken on the basis of policies of the development plan, unless other material considerations dictate otherwise. In this Planning Statement we explain why we consider the application is overwhelmingly consistent with the principal policies of the development plan, having regard to the fact that certain policies are out of date.

Application Content

- I.5 A comprehensive set of drawings and documents are submitted to support the application, based on pre-application feedback provide by the Council. This documentation should be considered together, to provide a rounded, informed and comprehensive assessment of the proposal. The application comprises:
- Application forms and certificates;
 - Drawings as listed in the submitted Drawing Register (Group D Architects);
 - This Planning Statement (Roman Summer Associates Ltd);
 - Design and Access Statement (Group D Architects);
 - Social Value Strategy (Fusion);
 - Flood Risk Sequential Test (Group D) [to be read alongside associated commentary in Section 5.0 of this Planning Statement];
 - Desk Study Ground Report (Betts Geo);

- Arboricultural Implications Assessment (Mulberry);
- Arboricultural Method Statement (Mulberry);
- Transport Statement (Curtins) – to be read alongside :
 - Drawing : 05001 P01 – Swept Path Analysis 11.2m Refuse
 - Drawing : 05002 P01 – Swept Path Analysis 10m Rigid
- Preliminary Ecological Appraisal Report (Collington Winter Environmental);
- Preliminary Screening Assessment and Appropriate Assessment (Collington Winter Environmental);
- Bat Survey Report (Collington Winter Environmental);
- Flood Risk Assessment (Betts Hydro);
- Drainage Strategy (Shape Consulting)
- Historic Building Record (Archaeological Research Services);
- Air Quality Impact Assessment (Professional Consult);
- Energy and Sustainability Statement (Base Energy);
- Noise Assessment (Professional Consult).

1.6 The remainder of this Planning Statement is structured as below :

- Section 2.0 describes the site, surroundings, recent planning history and proposed development;
- Section 3.0 summarises our pre-application discussions with the LPA and the community consultation exercise carried out by the Applicant;

- Section 4.0 summarises national and local planning policies relevant to the application;
- Section 5.0 assesses the proposed development against planning policy and addresses other material considerations;
- Section 6.0 sets out our conclusions.

2.0 Description of the Site and Proposal

The Site and Context

- 2.1 The application site is 1.09 ha, located off Liverpool Road, Prescott.



- 2.2 The site is accessible by a range of sustainable transport modes and is in easy walking and cycling distance of Prescott Town Centre which is located approximately 0.5km to the east of the site. Prescott Town Centre offers extensive services and amenities including restaurants, cafes, medical centres, banks, a pharmacy, an optician, a Post Office and a travel agents. There are also a range of shops within Prescott Shopping Centre, located approximately 0.7km to the south east of the site; and Cables Retail Park which is located approximately 0.9km to the south east of the site and includes a Tesco Extra supermarket with petrol station, an M&S Food Hall, Argos, Mothercare, Next and Boots. There are also several places of worship, a library and civic hall. Prescott Office and Business Park is located approximately 1km to the south of the site and offer a range of employment opportunities.
- 2.3 Liverpool Road provides a strong link directly onto the strategic road network (M57 and M62) which provide links to Manchester and Liverpool. Wide pavements with dropped kerbs and street lamps run along Liverpool Road providing excellent pedestrian access between the site and Prescott Town Centre.
- 2.4 The site is well served by the existing public transport network, with bus stops located directly adjacent to the site on Liverpool Road providing frequent services to Liverpool, Kirkby, St Helens and the surrounding areas.
- 2.5 Prescott Train Station is located approximately 1.4km to the south east of the site providing regular connections to Liverpool Lime Street with an average journey time of 22 minutes and Wigan North Western with an average journey time of 27 minutes.
- 2.6 The site is currently occupied by Dye House and an associated brick outbuilding. Dye House is a somewhat nondescript 1970s dwelling (see photograph below) sat in spacious grounds that compromise a mix of relatively flat garden / paddock and trees (certain of which are subject of a blanket Tree Preservation Order).



- 2.7 Whilst the site is largely undeveloped, it forms a small part of an allocated Sustainable Urban Extension (SUE) deemed suitable for housing. The majority of the SUE is already the subject of planning permission for 227 market dwellings approved under application 19/00684/FUL. That scheme is currently being built out by Taylor Wimpey and the Dye House site can be seen in the context of that wider scheme on the plan extract on the following page.

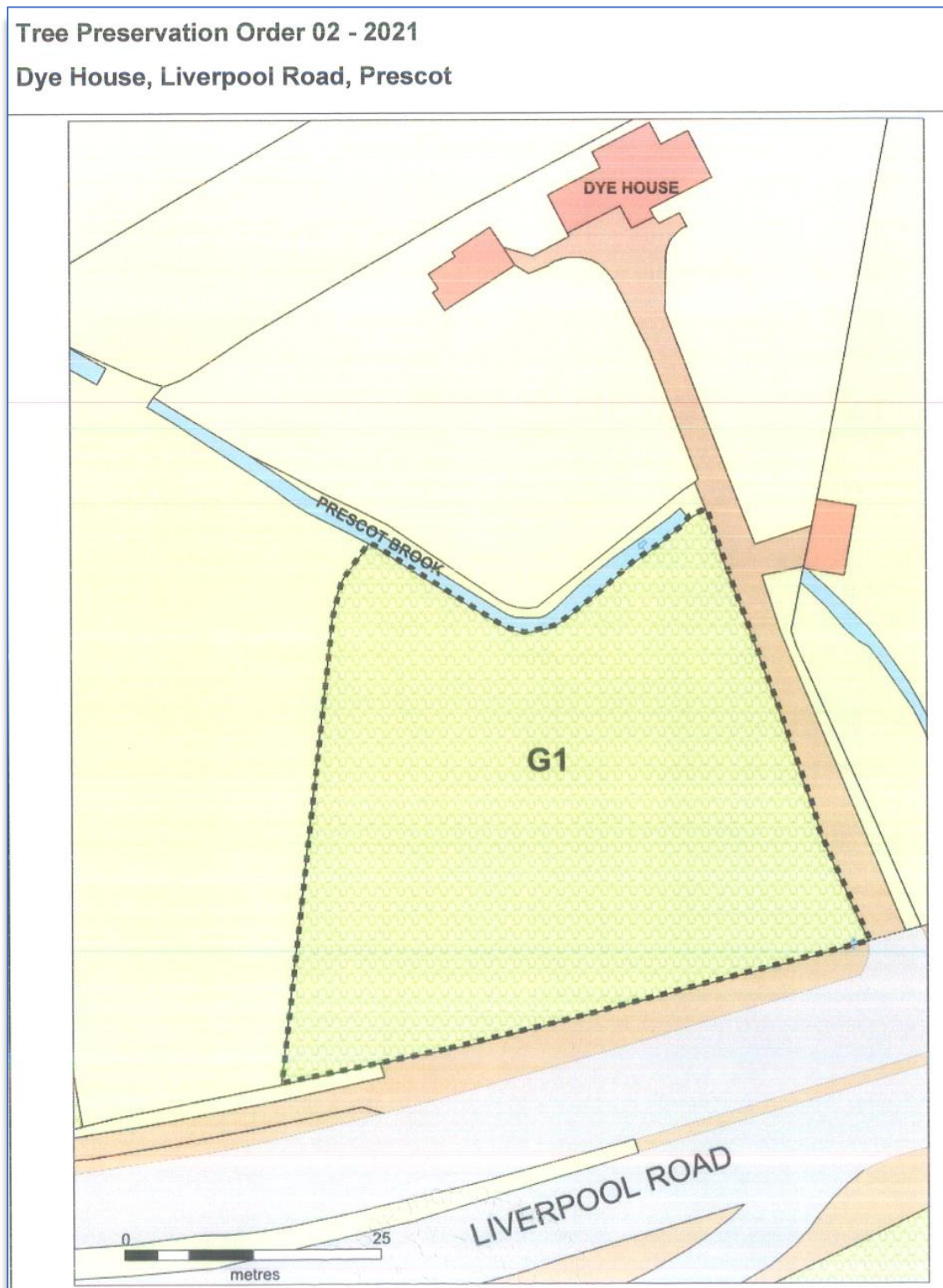
Dye House application site shown in context with approved Taylor Wimpey scheme:



- 2.8 The site is located largely in Flood Zone 1, where a low probability of flooding is anticipated. However, Preston Brook runs diagonally through the site (Zone 3), and there is a moderate area of Flood Zone 2 that flanks the brook on its north and east sides (as noted on the aerial image below).



2.9 Since March 2021, a blanket TPO has been in place on part of the site (see extract below).



The Proposal

- 2.10 This full planning application promotes the demolition of Dye House and its associated brick outbuilding, and the erection of 45 affordable dwellings - 21 houses and 24 apartments (the latter in two blocks – Block A and Block B – see site plan below). The development will provide 16 one-bedroom apartments, 8 two-bedroom apartments, 5 two-bedroom houses and 16 three-bedroom houses.



- 2.11 All of the new homes will be affordable.
- 2.12 All homes meet the National Space Standards.
- 2.13 All homes will achieve the standards prescribed by Homes England and will offer high levels of energy efficiency, ensuring low running costs for future occupants.
- 2.14 All of the new build housing has been designed to achieve Building Regulations M1 standard.
- 2.15 The houses will be served by private gardens, and the apartments by communal open space.
- 2.16 It is understood that KMBC's usual standard is that private gardens should have depths of 10 metres. Due to site constraints, the site does not allow for all gardens to have depths of 10 metres. However, section 3.46 of the 'New residential development' SPD confirms that :

'if a dwelling has a particularly large side garden the size of the rear garden may be reduced.'

- 2.17 That said, where 10 metre depths have not been achievable for every, those nominally reduced depths are compensated by a significantly increased width. In some cases, this results in a garden which is more than double the area for gardens as required by policy. In summary :
- 14 of the 21 houses have gardens with depths 10m or greater.
 - 5 of the 21 houses have gardens that are 8.8m or greater. Their width is sufficient as to offset the deficit in depth, as below :
 - Plot 33: 125sqm
 - Plot 34: 91sqm
 - Plot 35: 98sqm
 - Plot 36: 106sqm
 - Plot 43: 52sqm
 - 2 of the 21 houses have gardens that are 5m and 7.5m deep. However, their widths (15m and 11m) create overall areas greater or equal to a conventional 10m x 5m garden:

- Plot 44: 87sqm
- Plot 45: 120sqm

- 2.18 As demonstrated above, all gardens throughout the development have areas which are at least equal to, or in many cases significantly greater than the policy requirement of 50 sqm.
- 2.19 In respect of amenity space for the two apartment blocks, Block A provides a total of 584sqm, and Block B provides a total of 126 sqm of external amenity space.
- 2.20 KMBC policy requires a total of 480sqm to serve these two apartment blocks. The total external amenity provided is 710 sqm, which represents a 48% betterment upon policy guidance.
- 2.21 Furthermore, some apartments will benefit from private amenity spaces, ranging from 8 sqm to 20 sqm.
- 2.22 In addition to that, an 8m zone either side of the brook will be kept clear of development for maintenance purposes as required by the EA. We see this as a special 'green' feature of the development, and the EA has confirmed that it welcomes any development which promotes public access to such areas and encourages the public / residents use of this space.
- 2.23 All of that said, the scheme provides more than ample amenity space for residents of the proposal.
- 2.24 The proposed houses will be of a traditional design but with a bold, contemporary aesthetic and high quality materiality, reflecting and responding to (but not mimicking) the best of local distinctiveness. The design offers an architectural response that both respects and enhances the character of the area.
- 2.25 The composition of the elevations has been informed by the local context, with proportions taking cues from the more architecturally successful local vernacular, and steering away from those less successful.

- 2.26 We suggest that new housing should favour larger windows that allowing more natural daylight, in turn improving the quality of internal spaces for residents. This is reflected in the design.
- 2.27 The dominant material used in the local area is facing brick, and to reflect that the scheme uses brick as its dominant material. Soldier coursing has been used throughout the house types and apartment elevations, as subtle references to the local vernacular. Local examples show use of creative brickwork patterns, such as protruding quoins. This scheme references this by introducing elements of protruding header courses of brickwork which also aid in breaking up expanses of brickwork.
- 2.28 These homes will be a far cry from the typical inflexible 'house types' so often and inappropriately imposed on our townscapes / landscapes by housebuilders. The proposed houses are bespoke and unique to this site and its context. The architect has been influenced by the surrounding context, but at the same time, this is not an attempt to simply replicate other properties, but to introduce a new, sensitive, high quality layer into the local context.
- 2.29 A total of 71 car parking spaces are to be provided, together with vehicular manoeuvring space, bin and cycle stores, and hard and soft landscaping.
- 2.30 A foul pumping station is also proposed, as too is a sub-station.
- 2.31 The development will be accessed principally via the access approved under application 19/00684/FUL (currently under construction by Taylor Wimpey), with a pedestrian and emergency-only access provided via Liverpool Road
- 2.32 The Design and Access Statement explains the rationale for the site layout and the principle of following the contours of the site, with development focused on the western and eastern sides of the site, and landscaping responding to landscape impact concerns previously expressed.

2.33 In order to accommodate the development, a small number of trees will require certain works or complete removal. These trees are identified in red on the plan extract below, and it will be seen that these are all within the internal confines of the site. Retention of these trees would have a fundamental impact on the viability and deliverability of the development.

	Trees to be retained		Trees to be removed	
	With No Impact	With detailed construction	Due to Condition	Due to Development
Tree No.	T2, T3, T4, T5, T9, T10, G2, G3 (2 trees) & G9	G1, G5, G6, G7 & G8 (1 Tree)	N/A	T1, T6, T7, T8, G3 (1 tree), G4 & G8 (2 trees)

2.23 The trees to be removed have been referenced as below in the tree-related documentation submitted in support of the application (prepared by Mulberry) :

- T1 (Category B)
- T6 (Category B)
- T7 (Category A)
- T8 (Category A)
- G3 (1 tree) (Category B)
- G4 (7 trees - Category A – C)
- G8 (2 trees) (Category B)

TOTAL TREES TO BE REMOVED = 14

2.24 Based on the total site area of 11,383 sqm, the extent of external amenity / green space is 5,720 sqm. That equates to 50% of the site area.

Proposed tree removals identified in red :



2.25 In respect of refuse storage and waste management, all houses are to be provided with space to accommodate three wheelie bins. All houses will have dedicated areas within their demise for the storage of bins. Storage areas will be out of sight of the highway, typically behind garden fences. No residents of the proposed houses are required to travel any further than 10 metres with their bins for collection.

2.26 Block A is to be provided with two bin stores, while Block B requires one bin store. Each will be easily accessible to residents as well as collection crews. They are to be timber clad, nestled within landscaping and well ventilated, located away from primary street scenes, reducing their prominence within the development. All bin stores have been sized as to ensure adequate storage of Eurobins in line with local authority requirements.

3.0 Pre-Application Discussions and Community Consultation

- 3.1 The proposal has been subjected to a series of helpful and detailed pre-application discussions with KMBC over the course of over a year, and the scheme has been shaped to respond positively to that advice.
- 3.2 The proposal was initially presented to the LPA as a scheme of 49 units, made up of 33 houses (9 x 3 bed; 24 x 2 bed) and 16 1 x bed apartments. It has subsequently evolved (reduced) in response to detailed comments about design and layout, including consideration of the implications for trees, providing correct interface distances, and incorporating an 8 metre buffer zone to either side of the brook, free from private gardens and car parking areas.
- 3.3 In terms of the principle of development, the LPA has acknowledged from the outset that the site falls within the 'Land Bounded by the A58' Sustainable Urban Extension as set out in Core Strategy Policy SUE1, which allocates it for residential. That said, the starting point is that the proposal for residential use is acceptable in principle.
- 3.4 Discussions have been held concerning the merits (or otherwise) of dwellings adjacent to Liverpool Road fronting onto it, both to address and acknowledge Liverpool Road, and secondly to protect the rear gardens from noise. This matter has been given careful consideration, but for various reasons – including site levels and the fact that the land fronting Liverpool Road is heavily treed and falls outside the ownership of the applicant - it is not feasible or practical to provide an arrangement that fronts onto the main road. Furthermore, ongoing noise-related advice confirms that, with the correct boundary treatment, the amenity of gardens alongside the main road will be acceptable.
- 3.5 There has been considerable discussion concerning trees throughout the pre-application process. While the loss of mature trees is regrettable, the LPA and its tree officer have adopted a pragmatic stance concerning the limited loss of certain 'internal' trees to facilitate a viable and deliverable housing scheme (in line with the site's allocation for housing), but at the same time have been clear that most of the trees – including those along the main frontages – must be retained.

- 3.6 This tree-related advice has been reflected in the scheme details, and we suggest strikes a sensible balance between protecting the best trees, providing new trees and other planting, while enabling the site to come forward viably to deliver the correct and proportionate extent and type of houses in accordance with the site allocation.
- 3.7 Discussions have also been held in respect of those parts of the site that lie within Flood Zones 2 and 3, and separate discussions have been held with the Environment Agency (EA) and the Local Lead Flood Authority (LLFA). It has been agreed that the application must be accompanied by both sequential and exceptions testing, and the scope of the sequential exercise has been discussed and agreed (as set out in Section 5.0 of this Statement and the separate Sequential Test document prepared by Group D).
- 3.8 The pre-application advice drew attention to the site's location within a coal mining area, and – in archaeological terms – drew attention to three non-designated heritage assets recorded on the Merseyside Historic Environment Record within the proposed development site - ie the former site of a dye house, a possibly 18th century building (MME15266); former site of Brook Farm, a mid-19th century building (MME6117); and Dye House, a possibly 18th century building (MME6118).
- 3.9 The scope of documents required to support the application has also been confirmed, and all of those have accordingly been provided (as listed in Section 1.0 of this Statement).

Local Community Engagement

- 3.10 In August 2022, the applicant posted a letter to 26 houses on the southern side of Liverpool Road, the occupants of which are considered most likely to be affected / influenced by the development. That letter explained the proposal and invited comment. It was supported by a pack of drawings, including a site layout and CGI images of the proposed house types. That letter and pack, and the list of addresses served notice are provided at *Appendix 1* of this Statement.
- 3.11 At the date of submitting this application (July 2023), none of the above parties have contacted us, provided any comments or raised any queries or concerns about the proposal.

4.0 Overview of Planning Policy

- 4.1 This section summarises the planning policy context against which the application falls to be considered. These policy strands will then be considered further in Section 4.0 of this Statement. Before consideration of Development Plan policies, we first summarise the strategic policies set out at national level.

National Planning Policy Framework (NPPF)

- 4.2 The NPPF was first published in 2012. It was revised in 2019, and again in July 2021.

Achieving Sustainable Development

- 4.3 Paragraph 8 explains that achieving ‘sustainable development’ means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).
- 4.4 Paragraph 10 reinforces this by confirming that, at the heart of the Framework, is a presumption in favour of sustainable development, while paragraph 11 states that LPAs should apply this presumption. For decision-taking this means:
- approving development proposals that accord with an up-to-date development plan without delay.
- 4.5 Paragraph 12 states that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan, permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Decision Making

- 4.6 Paragraph 38 states that local planning authorities should approach decisions on proposed development ‘in a positive and creative way’.

Delivering a Sufficient Supply of Homes

- 4.7 Chapter 5 is dedicated to ‘delivering a sufficient supply of homes’. Paragraph 60 echoes the former NPPF in stating that :

‘To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed ...’

- 4.8 §73 states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).

Promoting Healthy and Safe Communities

- 4.9 §92 states that planning decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
 - c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible
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green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

4.10 §93 states that, to provide the social, recreational and cultural facilities and services the community needs, planning decisions should, *inter alia* :

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

4.11 §98 states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

4.12 §100 states that planning decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way network.

Promoting Sustainable Transport

4.13 §104 states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;

- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
 - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
- 4.14 §105 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- 4.15 §110 states that, in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 4.16 §111 states 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”.

4.17 §112 states that applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

4.18 §113 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Making Efficient Use of Land and Achieving Appropriate Densities

4.19 §119 states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

4.20 §120 states that planning decisions should, *inter alia*, encourage multiple benefits from both urban and rural land, including through taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside.

- 4.21 §124 states that planning decisions should support development that makes efficient use of land, taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.

Achieving Well Designed Places

- 4.22 §126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.23 §130 states that planning decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 4.24 §131 states that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments.
- 4.25 §132 states that design quality should be considered throughout the evolution and assessment of individual proposals.
- 4.26 §134 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
 - b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 4.27 §152 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 4.28 §159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 4.29 §169 states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
- a) take account of advice from the lead local flood authority;
 - b) have appropriate proposed minimum operational standards;
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d) where possible, provide multifunctional benefits.

Conserving and Enhancing the Natural Environment

- 4.30 §174 states that planning decisions should contribute to and enhance the natural and local environment by, *inter alia* :
- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.

- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures

4.31 The July 2021 version of the Framework introduced changes to the former §175, which is now §180. This states that, when determining planning applications, local planning authorities should apply, *inter alia*, the following principles:

- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

4.32 The amendment to former para 175(d) (now para 180(d) of the NPPF 2021) now requires opportunities to incorporate biodiversity improvements in and around development, rather than optional.

Ground Conditions and Pollution

4.33 §183 states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

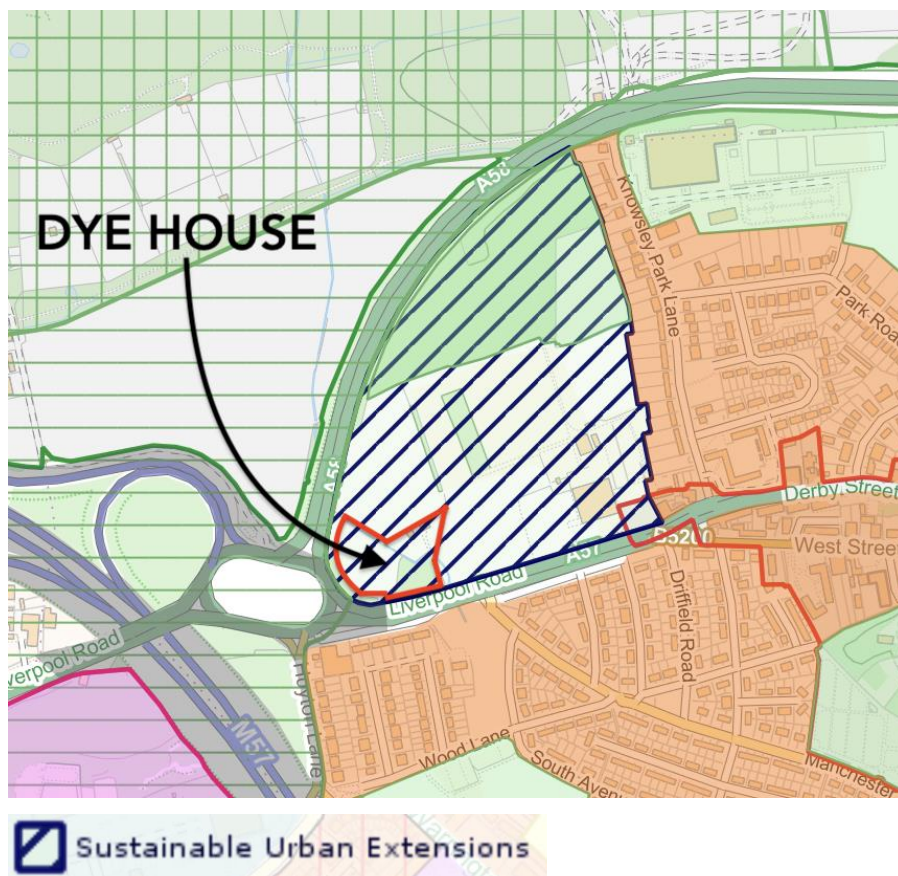
4.34 §185 states that decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

National Design Guide

- 4.35 The National Design Guide was published in October 2019, and revised in January 2021.
- 4.36 This explains (at §8) that the underlying purpose for design quality and the quality of new development at all scales is to create well-designed and well-built places that benefit people and communities.
- 4.37 §21 suggests that a well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings. It comes about through making the right choices at all levels, including:
- the layout;
 - the form and scale of buildings;
 - their appearance;
 - landscape;
 - materials; and
 - their detailing.
- 4.38 §39 states that well-designed places are based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design; integrated into their surroundings so they relate well to them; influenced by and influence their context positively; and responsive to local history, culture and heritage.
- 4.39 §42 reiterates that well-designed development proposals are shaped by an understanding of the context that identifies opportunities for design, as well as constraints upon it. It suggests that this should be proportionate to the nature, size and sensitivity of the site and proposal.
- 4.40 §44 states that :
- ‘... well-designed places do not need to copy their surroundings in every way. It is appropriate to introduce elements that reflect how we live today, to include innovation or change such as increased densities, and to incorporate new sustainable features or systems.’
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The Development Plan

- 4.41 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.
- 4.42 For the purposes of this planning application, the adopted development plan currently comprises the Knowsley Local Plan: Core Strategy (adopted in January 2016) and saved policies of Knowsley Replacement Unitary Development Plan (UDP). The Joint Merseyside and Halton Waste Local Plan was adopted in 2013 also forms part of the development plan.
- 4.43 As the Policies Map extract below confirms, the site is allocated for residential development as part of a larger Sustainable Urban Extension (SUE) within the Knowsley Local Plan Core Strategy. The intent of the SUEs is to meet the borough's development requirements up to 2028.



- 4.44 By way of context for this application, §2.12 of the Core Strategy highlights that the average household size in Knowsley is comparatively large with a high proportion containing dependent children and lone parent families, while §2.13 confirms that :

‘Although house prices are generally comparatively low within Knowsley, housing affordability is an issue as average salaries of residents are also low. Since the ‘credit crunch’ of 2008, the affordability issue has been exacerbated for those seeking to become homeowners, by the difficulty of obtaining suitable finance and mortgages.’

- 4.45 §2.14 adds that shortages remain in some areas for some housing types, sizes and tenures, meaning the housing market in Knowsley remains unbalanced. It states that particular shortages exist for larger, executive market homes, and for smaller one-and two-bedroom units in the affordable housing sector. This is reflected in Strategic Objective 2 ‘Well-Balanced Housing Market’ :

‘To promote a **well-balanced housing market** throughout Knowsley by providing a sufficient quantity and mix of high quality sustainable housing in appropriate locations to meet needs and demand (including for market, affordable and supported housing).’

- 4.46 CS Policy SUE1 ‘Sustainable Urban Extensions and Safeguarded Land’ refers to this particular SUE as ‘Land bounded by A58, Prescott’.

- 4.47 CS_Policy SUE2 ‘Sustainable Urban Extensions – Development Principles’ sets out how the principles will be applied. The policy states that all SUE development must (in no order of priority):

- a) deliver sustainable development;
- b) demonstrate a comprehensive approach to the development of the relevant Sustainable Urban Extension and to infrastructure provision;
- c) be of a high design quality which enhances local distinctiveness and identity (incorporating localised design features where appropriate) and provides high levels of physical and visual integration and connectivity with adjacent urban development;

- d) be carried out in accordance with the development principles and using any appropriate development assessment tools as required by Policy CS2: Development Principles;
- e) deliver development (including the principal uses defined in Policy SUE1: Sustainable Urban Extensions) which will help to meet borough-wide and local needs;
- f) include appropriate provision for public open space (POS), walking and cycling routes as part of the Green Infrastructure network integrating with existing POS, recreational assets and areas of ecological value;
- g) provide good transport linkages within the relevant Sustainable Urban Extension and with surrounding areas;
- h) Protect or enhance historic and architectural assets where appropriate;
- i) Address flood risk by locating development in areas of low probability of flooding and including flood mitigation measures where necessary; and
- j) Provide a clearly defined edge to the developed area.

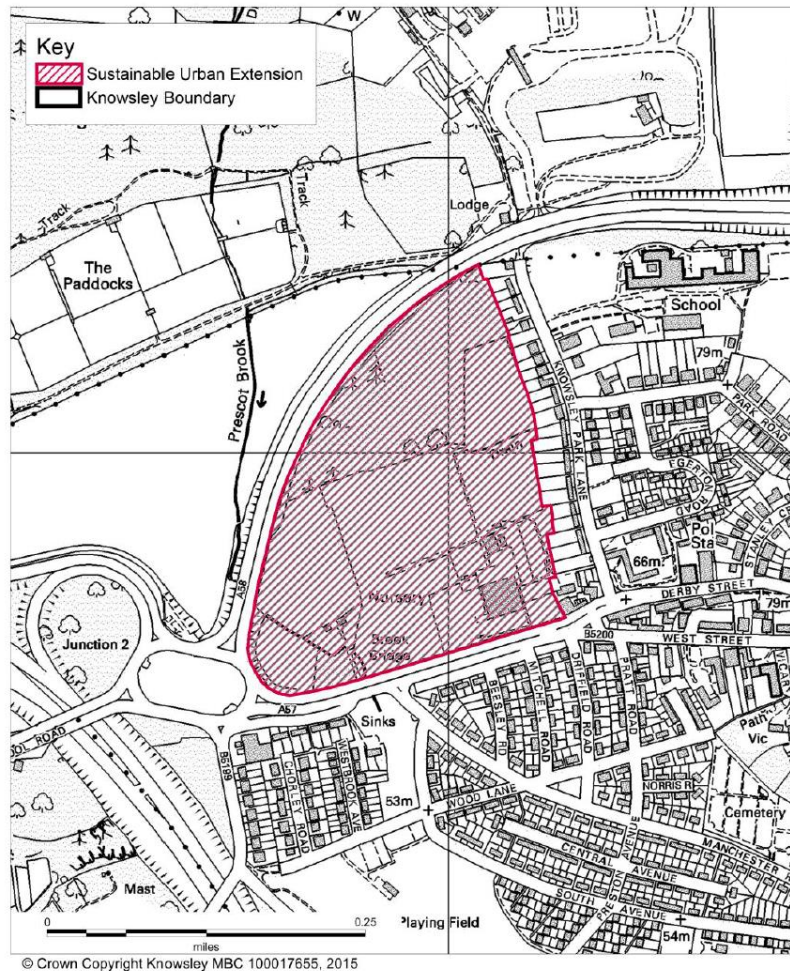
4.48 Under the heading 'Site-specific Requirements', part 2 of the policy refers to indicative considerations applicable to the sustainable development of each SUE, with cross reference to the Allocation Profile at Appendix E of the CS (reproduced below).

4.49 CS Policy SDI - Sustainable development reflects NPPF advice by confirming that, when considering development proposals, a positive approach will be taken, which reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It states that work will be undertaken pro-actively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. It states that planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise.

4.50 CS Policy CSI – Spatial Strategy for Knowsley states that the spatial development of Knowsley to 2028 will be achieved by, *inter alia*, releasing land to form the allocated Sustainable Urban Extensions in order to help meet needs for housing and employment development.

Allocation Profile for SUE :

Site Name	Land bounded by A58, Prescott
Gross Site Size	14.39 hectares
Primary proposed use(s)	Residential
Notional Capacity	133 dwellings



Key Site Constraints and Opportunities

- The south eastern corner of the site falls within the Prescott Conservation Area
- The northern element of the site is identified as outdoor sporting provision

- 4.51 CS Policy CS2 - Development Principles explains that all development is expected to support 5 key 'Principles', as below :

Principle 1: Promote sustainable economic development, tackle the causes of deprivation and disadvantage and narrow the gap between the richest and poorest neighbourhoods by, inter alia, meeting needs for new housing.

Principle 2: Reduce carbon emissions and adapt to the effects of climate change by, inter alia, contributing to reductions in carbon dioxide emissions; adapting to future changes to national targets for carbon dioxide and other greenhouse gas emissions; identifying and applying measures offering effective mitigation and adaptation to likely environmental, social and economic impacts of climate change; and meeting appropriate minimum standards for sustainability.

Principle 3: Reduce the need to travel and increase accessibility by, inter alia, selecting locations that reduce the need to travel, especially by car, and enable people as far as possible to meet their needs locally; and encouraging safe and sustainable access for all, particularly by promoting the use of public transport, walking and cycling between homes and employment; and supporting the provision and retention of shared space.

Principle 4: Recognise environmental limits, protect and enhance environmental assets, enhance local character and promote quality of place by, inter alia, promoting good quality design and ensuring that development respects its setting.

Principle 5: Make the most efficient use of available resources and infrastructure by prioritising locations consistent with the spatial strategy.

- 4.52 CS Policy CS3 – Housing, Supply, Delivery and Distribution confirms (at part 1) that provision will be made for 8,100 new dwellings to be delivered in Knowsley between 2010 and 2028. It highlights that this is a minimum net figure (not a maximum figure or upper ceiling). Part of that will clearly be delivered by SUEs such as the application site. Under the heading 'Housing Sizes, Tenures and Density', it is suggested that the tenure, type and size of new housing delivered in Knowsley will support the re-balancing of the housing market to better meet housing needs and demands arising in Knowsley. It states that applications for new residential
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development must demonstrate how they contribute to this re-balancing. Part 5 of the policy makes it clear that densities of a minimum of 30 dwellings per hectare will be required.

- 4.53 CS Policy CS7 - Transport Networks requires (at part 2) that new development will be required to be 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, and must be in compliance with adopted cycle, car, disabled and service vehicle parking standards .
- 4.54 CS Policy CS8 – Green Infrastructure seeks (*inter alia*) to deliver more attractive and cleaner residential neighbourhoods.
- 4.55 CS Policy CS15 – Delivering Affordable Homes states that there must be at least 25% affordable housing on sites identified as Sustainable Urban Extensions.
- 4.56 CS Policy CS17 – Housing Sizes and Design Standards states that an appropriate mix of dwelling sizes will be sought across the borough, having regard to evidence of local housing needs and the monitoring of housing completions as set out in Table 8.1 (reproduced below).

Housing Type/Size	1-bedroom	2-bedroom	3-bedroom	4-bedroom plus
Market Housing	10%	30%	40%	20%
Affordable Housing – Social Rented	20%	50%	20%	10%
Affordable Housing – Intermediate	20%	70%	10%	0%
<i>Provision of new bungalows is also required across all housing types and sizes</i>				

- 4.57 Part 2 of the policy confirms that developments of 15 dwellings or more must demonstrate how the scheme contributes to the re-balancing of Knowsley's housing market in terms of the size of dwellings provided.

- 4.58 Part 4 of the policy states that all new residential development will be encouraged to comply with the following design standards (or equivalent replacement standard):
- a) Building for Life standards;
 - b) Lifetime Homes design criteria; and
 - c) Specific design and sustainability guidance in Policy CS19: Design Quality and Accessibility in New Development, Policy CS22: Sustainable and Low Carbon Development and relevant Supplementary Planning Documents
- 4.59 CS Policy CS19 - Design Quality and Accessibility in New Development states that, to enhance the local distinctiveness, identity and accessibility of places, new development will be expected to:
- a) Respond to and integrate positive characteristics of immediate surroundings, including local materials, scale, mass, form, layout, alignment and density of the existing built environment;
 - b) Complement and enhance (where possible), existing landscape, topography, Green Infrastructure; and features of local importance and historic interest;
 - c) Consider provision of landmark buildings and additional detailing at and adjacent to main gateways, movement corridors, town centres and strategic regeneration opportunities;
 - d) Create spaces and places as a focal point, accommodating social interaction and active lifestyles, including provision and integration of high quality public realm and open spaces, public art (as appropriate); and landscaping which promotes biodiversity and integrates existing local habitats;
 - 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;
 - f) Integrate effectively with existing development and link to existing shopping and service provision; and
 - g) Demonstrate community engagement during the design phase of major development proposals.
 - h) Avoid unacceptable impacts on existing residents, business occupiers, and future occupiers;
 - i) Minimise crime, fear of crime and anti-social behaviour, including good levels of natural surveillance and security; and
 - j) Accommodate future maintenance and long term management requirements.

- 4.60 CS Policy CS20 - Managing the Boroughs Historic Environment states that development proposals in Knowsley should preserve or enhance the borough's historic and architectural assets, including Listed Buildings, Conservation Areas, Historic Parks and Gardens and archaeological remains, together with other local areas, buildings and structures of historic importance.
- 4.61 CS Policy CS21 'Greenspaces and Trees' states that the Council will encourage proposals for new development to incorporate:
- a) Retention of existing trees, woodland, vegetation and other habitat features which offer a positive contribution to the local environment in terms of visual amenity, recreation value or biodiversity/wildlife interest;
 - b) Appropriate planting of trees, other soft landscaping and installation of habitat features for the benefit of biodiversity; and
 - c) Adequate replacement provision where tree loss is unavoidable, comprising two additional trees for every tree lost and taking account of species and size.
- 4.62 CS Policy CS22 'Sustainable and Low Carbon Development' states that new development will be required to meet high standards of sustainable design and construction and minimise carbon emissions. This should be achieved by:
- a) Designing new buildings for flexible uses throughout their lifetime;
 - b) Avoiding the creation of adverse local climate conditions by using natural systems to avoid internal overheating and excessive heat generation;
 - c) Ensuring developments are comfortable and safe for users;
 - d) Making the most effective and sustainable use of water, aggregates and other resources;
 - e) Limiting energy use by incorporating high standards of insulation, heat retention, natural ventilation and passive solar techniques;
 - f) Landscaping (including measures such as green walls or roofs) to create shelter and reduce any heat island effect;
 - g) Using sustainable materials from local suppliers where possible;
 - h) Supplying energy efficiently and incorporating decentralised energy systems, using renewable and low carbon energy where feasible;

i) Managing flood risk, including through the use of Sustainable Drainage Systems (SuDS) and flood resilient design for infrastructure and property

4.63 CS Policy CS24 - Managing Flood Risk states that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted. New development should preferably be located in areas of low probability of flooding. New development in areas of medium or high flood risk will only be permitted if evidence has been submitted demonstrating that the development could not be practicably located in an area of lower flood risk and if applicable the 'exception test' has been complied with, in accordance with national guidance.

4.64 The policy also states that all development which is within or otherwise affects an area of flood risk or is larger than one hectare in size shall be accompanied by a site-specific Flood Risk Assessment (FRA). New development shall include flood mitigation measures, where necessary, to manage flood risk associated with or caused by the development.

4.65 CS Policy CS27 – Planning for and Paying for New infrastructure states that new development will be expected (where necessary given the scale and nature of the proposal) to:

- a) Demonstrate compliance with Local Plan policies which specifically require developer contributions;
- b) Provide additional on-site or directly ancillary infrastructure as required to make the development acceptable in planning terms. This may include in-kind provision of infrastructure and/or financial contributions; and
- c) Provide financial contributions towards the provision of strategic infrastructure to support local communities together with borough-wide and other strategic development requirements. Such contributions may be secured through set charges or infrastructure tariffs to be introduced by the Council in other Local Plan documents and/or a Community Infrastructure Levy Charging Schedule, as appropriate.

- 4.66 In consideration of the saved policies of **Knowsley's Replacement Unitary Development Plan (2006)**, the following are of some relevance to this proposal.
- 4.67 Policy T7 – New Development and Walking & Cycling Routes states that new development should preserve and where possible enhance the walking and cycling network.
- 4.68 Policy DQ2 – Security in the Built Environment states that new development should be designed so as to provide good levels of personal and property security.
- 4.69 Policy DQ3 – Gateway Sites and Corridors states that new development proposals which are within or adjacent to, or visible from, any of the following road and rail routes within Knowsley should seek to enhance the visual appearance of the route. The A57 (Liverpool Road/Warrington Road) and Prescott Bypass is identified as one such corridor.
- 4.70 Policy DQ4 –Trees and Development states that proposals for new development should include appropriate planting of trees or other soft landscaping, the location and details of which should be determined as an integral part of the development, and which shall have regard to the character of the surrounding area. Developments affecting existing trees should make provision for their retention, but where the Council accepts that tree loss will be unavoidable the applicant will be required to make adequate provision for their replacement, normally including two new trees for each tree lost.
- 4.71 ENV2 – Noise and Vibration states that development that will either cause an unacceptable increase in noise or vibration levels or itself be subject to unacceptable noise or vibration from an existing source will not be permitted. Where developments are permitted, conditions may be attached to the planning permission to ensure effective noise insulation or other required mitigation measures are carried out.
- 4.72 Policy ENV5 – Contaminated Land states that new development will not be permitted if there is existing contamination on the site which could, as a result of the proposed development, place the occupiers or users of the development, ecological systems, the water environment or surrounding land uses at unacceptable risk.

Supplementary Planning Documents

- 4.73 There are a number of SPDs that provide further guidance on the interpretation of adopted local policy. The relevant SPDs are detailed below.

Ensuring a Choice of Travel SPD (2008)

- 4.74 The Ensuring a Choice of Travel SPD is intended to show how development can satisfy the requirements of accessibility policies contained within Knowsley's Development Plan. The main objective is to ensure a good choice of travel modes to all new development and assist developers in ensuring that their proposals are accessible, promote sustainable travel patterns and minimise the congestion and pollution caused by vehicles. This SPD includes the Council's parking standards at Appendix A. For C3 (Dwelling Houses) the maximum standard for 2 and 3 bedroom dwellings is 2 spaces and the maximum standard for 4+ bedroom dwellings is 3 spaces.

Trees and Development SPD (2016)

- 4.75 The Trees and Development SPD explains the Council's approach in relation to trees and development, setting out guidance relating to promoting best practice for proposals incorporating trees and landscaping within new developments; development proposals affecting existing trees, woodlands and other vegetation; requirements for detailed survey of all existing trees; and requirements for provision of replacement trees.

Design Quality in New Development SPD (2016)

- 4.76 The Design Quality in New Development SPD identifies general design principles including the movement framework, promoting a positive image, placement of buildings, density and form, landscaping and public realm, sustainable design and built heritage and conservation.

Developer Contributions SPD (2016)

- 4.77 The Developer Contributions SPD supplements the Core Strategy policies by providing detailed guidance on how developer contributions will operate in Knowsley. It provides guidance in relation to highways and transport provision, flood risk mitigation, greenspace provision, decentralised energy, education provision, health, community and leisure facilities, public realm and design and affordable housing. In relation to SUEs, the SPD states that for the five SUEs which are not subject to detailed master planning, there is likely to be a need for investment into infrastructure and utilities to ensure the sustainable delivery of these sites. The developer will be expected to work with infrastructure and utilities providers to ensure that development can be serviced and these costs should be borne as part of the overall development costs.

New Residential Development SPD (2018)

- 4.78 The New Residential Development SPD builds upon the Design Quality in New Development SPD to provide key expectations for new residential development in relation to integration with existing development, residential mix, accessibility and movement, layout, parking requirements, public realm and waste management, open space, crime, dwelling space and privacy and natural light. It is an update of the 2016 SPD to include an added requirement relating to electric vehicle charging points.

Adding Social Value to Development: Employment and Skills SPD (2018)

- 4.79 The Adding Social Value to Development: Employment and Skills SPD provides guidance on how the Council will implement the requirements of the Knowsley Local Plan by requesting that developers in the Borough prepare and implement a Social Value Strategy in a case where their scheme meets or exceeds a certain threshold. Social value is the additional economic, social and environmental benefits that can be created as part of a development.
- 4.80 For residential developments of 30+ dwellings, a Social Value Strategy for the construction phase is required which will, as a minimum, contain realistic estimates of the social value training and employment weeks that the developer, through its appointed contractor and supply chain, would envisage being created. It is, however, also noted that the Council will

take a flexible approach when negotiating the preparation of Social Value Strategies with developers. For example, it may be that a developer already has an appropriate training or local labour scheme in place meaning that a development-specific Social Value Strategy is not justified.

5.0 Planning Assessment

5.1 The key planning policy issues arising in this case are summarised in Section 3.0. The purpose of this section is to consider these further and to present the level of compliance with those policies and the benefits likely to accrue from the development. Each of the key issues will be addressed in turn, namely:

- Housing Land Supply / Need;
- Compliance with the Development Plan (and the weight to be attached to policies);
- Sustainable Development;
- Compliance with the NPPF;
- Design Quality;
- Access and Transport;
- Historic Buildings and Archaeology;
- Noise;
- Flood Risk and Drainage;
- Air Quality

HOUSING LAND SUPPLY / NEED

5.2 On 6th August 2020, the Government published its Planning White Paper, which set out radical reforms to the planning system, with the aim of creating a 'significantly simpler, faster and more predictable system.'

5.3 The reforms are being brought forward in the context of the Government's aspiration to build 300,000 homes per year - a target which has yet to be delivered. Just 241,000 new homes were built in 2019, and in its '*Housing supply: Indicators of new supply, England Statistical Release*' (published 30 September 2020), the MHCLG unsurprisingly (due to Covid) predicted a downturn in the rate of delivery in 2020 (as below).

'The number of dwellings where - according to building control figures - building work has started on site was 15,930 in April to June 2020. This is a 52 per cent decrease when compared

to last quarter and this steep fall in activity reflects UK government COVID-19 lockdown measures. It follows a recent trend of a slowdown in growth with six of the last six quarters showing a decrease.

There has been a sustained decrease in starts and more recently a steep fall in starts and completions reflecting UK government COVID-19 lockdown measures.'

- 5.4 The White Paper acknowledges that the result of long-term and persisting undersupply is that housing is becoming increasingly expensive, and that through overhauling the planning system there is an opportunity to better streamline the planning process, accelerate the delivery of new homes, and address the issue of affordability.
- 5.5 The White Paper makes clear however that 'we are cutting red tape, but not standards', highlighting that as important as it is to boost housing, it is equally vital that good design and high quality of development in the right place is secured.
- 5.6 This premise reflects the interim report prepared by the *Building Better, Building Beautiful Commission*, which strongly advocates that the housing industry achieves beautiful design and good place-making.
- 5.7 The Council's most recent Monitoring Report indicates that Knowsley's current housing land supply is comfortable, but anticipated a slow down arising from Covid. It places weight on the Council's ongoing dialogue with the promoters of the allocated SUEs and the capacity of those sites to continue to deliver sufficient housing.
- 5.8 In consideration of the provision of affordable housing to accommodate those in housing need, Knowsley's Housing Need Assessment 2021 (Arc4) indicates that, overall, the focus of development should be 2 and 3-bedroom dwellings. For affordable/social rented housing, a broad mix is needed, with over half of need being for 1 and 2-bedroom dwellings. For intermediate (affordable home ownership) strongest need is for properties with 3 or more bedrooms.

- 5.9 At §3.16, the report suggests that around 25% of households on lower quartile incomes cannot afford any tenure option/product at the current borough prices. For households on median incomes, social/affordable and lower quartile market rents are affordable, along with shared ownership at 25%. By comparison, households on median incomes cannot afford market sales at any of the price points or the majority of the intermediate tenure affordable products. §3.17 states :

‘This comparison of local incomes with the cost of local house prices and rents illustrates the affordability challenge faced by residents within the borough. It shows the particular problem faced by households who do not have either existing equity or savings.’

- 5.10 §6.10 of the report notes the current affordable target is 10% on sites in the urban area and 25% on sites identified as Sustainable Urban Extensions, but that, given the level of affordable need identified, it is recommended that the minimum affordable target is 25% and :

‘the council should seek a higher proportion of affordable housing delivery on sites, where possible, based on viability evidence.’

- 5.11 §C.16 states that analysis concludes that 6,493 households across Knowsley are in housing need and cannot afford to buy or rent at lower quartile market prices.
- 5.12 §C.22 states that analysis of the incomes of households who have formed in the past 5 years concludes that 67.62% could not afford buying or renting lower quartile (entry level) properties.
- 5.13 §C.27 (Table C7) summarises the total annual need for affordable housing across Knowsley, and establishes a gross annual need of 1,443 and - after taking into account supply - a net need of 243 affordable dwellings each year.
- 5.14 The realities of increasing unaffordability are very pressing, and particularly at a time when inflation, food, fuel and construction costs are rising, combined with the aftermath of Brexit and the ongoing crisis in Ukraine, with many predicting a worldwide recession.

5.15 This pressing need at national level was highlighted in the March 2020 study undertaken by the Affordable Housing Commission *'Making Housing Affordable Again: Rebalancing the Nation's Housing System'*. The report poses the question *'Why is housing affordability so important?'* It explains that housing unaffordability is a significant cause of many of the nation's social and economic ills. It is the lack of affordable housing that so often lies behind the problems of poverty, homelessness, debt, family breakdown, mental and physical poor health. Housing stress also has negative effects on people's life chances – as well as on local communities, the business and voluntary sector, the wider economy, and public spending. The Commission's findings show:

- Rent arrears, debt and financial exclusion are major issues for many – because struggling renters are trying unsuccessfully to pay their rents.
- Improvements in standards of living are being held back – because housing costs for increasing numbers absorb such a large amount of their income.
- Many working people are frustrated that they cannot achieve home ownership – because it is impossible for most tenants to save a deposit when rents consume so much of their income.
- There has been an increase in the number of young adults reluctantly staying with their parents – because the only housing available is in the PRS at rents they cannot afford.
- Housing Benefit costs have risen by 40% since 2001 – because rents and Housing Benefit costs per claim are higher.
- Councils in England are faced with households made homeless when their (shorthold) tenancy has been ended – because benefit reductions have meant tenants cannot afford to stay in their private rented accommodation.
- Numbers of families in highly unsatisfactory Temporary Accommodation have risen, at a cost of over £1bn per year – because those families (in work as well as with no earnings) cannot afford anywhere to live.
- Employers cannot recruit and retain the people they need, and productivity is affected – because high housing costs prevent would-be employees from moving to take up job and the workforce is displaced to a greater distance from the workplace.
- Over half of benefit claimants renting privately are in poverty – because the risk of poverty after housing costs increases substantially for those in the PRS compared with those in social housing.

- Housing inequality is a cause of inter-generational friction – because of the divide between older owners with appreciating property assets, and a younger generation of renters who must devote such a high proportion of their earnings to unaffordable rents.

5.16 We contend that, based on the above summary of both the local and national picture, the need for the extent and type of housing proposed by this application is compelling, and that delivery of good quality, carefully managed affordable accommodation is now even more important in the uncertain economic climate arising from the combination of Brexit and Covid and dramatically rising living costs.

5.17 This proposal is proportionate to the need to secure ongoing growth and meet local need for housing, and should be acknowledged as being in ‘the right place’ - ie it will form part of an established and growing sustainable residential community, where people wish to live.

5.18 Furthermore, as highlighted earlier, there is an unquestionable need to continue to bring forward affordable housing in the country. In its March 2020 study (referred to above), the Affordable Housing Commission states that :

‘Making housing affordable again must be a national priority. The Commission concludes that a rebalancing of the nation’s housing system is desperately needed: to create substantially more affordable homes for those on below average incomes; to help those who are “priced out” of homeownership; and to provide safe and decent homes for all age groups.’

5.19 This scheme will provide a meaningful contribution towards delivering much needed affordable homes in Knowsley, and we invite the LPA to attach considerable weight to this matter.

COMPLIANCE WITH THE DEVELOPMENT PLAN

- 5.20 In determining this application, regard must be had to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan.
- 5.21 As set out in Section 4.0 of this Statement, the current development plan for the purposes of this application is the Knowsley Local Plan: Core Strategy (adopted in January 2016), the saved policies of Knowsley Replacement Unitary Development Plan (UDP), and the Joint Merseyside and Halton Waste Local Plan (2013). We summarised the relevant policies in Section 4.0, and we set out below the level of compliance.
- 5.22 The starting point is that the site is allocated for housing as a quite small part of a larger Sustainable Urban Extension (SUE) as identified in the Core Strategy. The intent of the SUEs is obviously to meet the borough's development requirements up to 2028, and this proposal will play a positive part in delivering those homes.
- 5.23 In Section 4.0, we drew attention - by way of context for this application - to §2.12 of the Core Strategy, which highlights that the average household size in Knowsley is comparatively large, with a high proportion containing dependent children and lone parent families, while §2.13 confirms that :
- ‘Although house prices are generally comparatively low within Knowsley, housing affordability is an issue as average salaries of residents are also low. Since the ‘credit crunch’ of 2008, the affordability issue has been exacerbated for those seeking to become homeowners, by the difficulty of obtaining suitable finance and mortgages.’
- 5.24 The CS is now over 6 years old, and in some respects matters may have moved on. However, the above statement still holds weight when considered against the findings of the more recent Housing Need Assessment 2021 (Arc4) referred to earlier. That report identifies ‘a particular problem’ faced by households who do not have either existing equity or savings, suggesting that the council should seek a higher proportion of affordable housing delivery on sites where possible. It tells us that 6,493 households across Knowsley are in housing need and cannot afford to buy or rent at lower quartile market prices, and that 67.62% of households who have

formed in the past 5 years cannot afford buying or renting lower quartile (entry level) properties.

- 5.25 §2.14 of the CS highlights that shortages remain in some areas for some housing types, sizes and tenures, meaning that the housing market in Knowsley remains unbalanced. It states that particular shortages exist for larger, executive market homes, and for smaller one-and two-bedroom units in the affordable housing sector. This is reflected in Strategic Objective 2 ‘Well-Balanced Housing Market’, which promotes a well-balanced housing market by providing a sufficient quantity and mix of high quality sustainable housing in appropriate locations to meet needs and demand (including market, affordable and supported housing). This proposal will play an important role in delivering that.
- 5.26 We contend that the proposal is consistent with both CS policies SUE1 ‘Sustainable Urban Extensions and Safeguarded Land’ and SUE2 ‘Sustainable Urban Extensions – Development Principles’. The latter sets out how the principles will be applied to the SUEs. These are achieved by this proposal, in that (for reasons set out later) it is a sustainable form of development, and – when considered alongside the adjacent Taylor Wimpey development – will deliver ‘a comprehensive approach’. This proposal is of a very high design quality which enhances local distinctiveness and identity, which includes appropriate provision of public open space (POS) and good walking and cycling connectivity and wider linkages to the adjacent network. We contend that, such is its distance and lack of connectivity / intervisibility to the closest heritage assets that no impact or harm will arise to those or their settings. While parts of the site fall within higher flood risk zones, the bulk of development avoids those, and elsewhere in this Statement we explain how both the sequential and exceptions tests have been satisfied.
- 5.27 Under the heading ‘Site-specific Requirements’, part 2 of policy SUE2 refers to indicative considerations applicable to the sustainable development of each SUE, with cross reference to the Allocation Profile at Appendix E. In the case of this SUE, Appendix E (see extract below) is, we suggest, largely irrelevant to this proposal. The SUE extends far beyond this particular application site, and is to all intents and purposes the final (smallest) piece of the jigsaw, some distance from the Conservation Area and with practically no obvious connection or intervisibility. The reference to outdoor sporting provision applies to the northern part of the SUE, whereas this application site forms the south west corner of the allocation.
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Key Site Constraints and Opportunities

- The south eastern corner of the site falls within the Prescott Conservation Area
- The northern element of the site is identified as outdoor sporting provision

5.28 It is therefore our case that the application proposal is consistent with the above policies (SUE1 and SUE2).

5.29 Turning to other policies, we explain the sustainability credentials of the proposal elsewhere in this Statement, and contend that there is no conflict with CS Policy SD1 - Sustainable Development. That reflects NPPF advice by confirming that a positive approach will be taken, which reflects the presumption in favour of sustainable development. During pre-application discussions, the LPA has already a positive approach and ‘worked pro-actively’ with the applicant to find solutions. Fundamentally, this policy states that planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise. We contend that this proposal does accord with relevant policies.

5.30 The application is also consistent with CS Policy CS2 - Development Principles. Considering its 5 key ‘Principles’, the proposal will:

- Deliver a sustainable form of development, and – by providing excellent quality affordable homes at a time of sharply rising costs of living – will play a part in tackling the causes of deprivation and disadvantage [**Principle 1**]
- Be constructed to highly efficient standards to help to reduce carbon emissions and adapt to the effects of climate change [**Principle 2**]
- Reduce the need to travel and increase accessibility by utilising an allocated housing site that was selected and adopted on the basis of its accessible / sustainable location and its good public transport, walking and cycling between the new homes and local employment, shopping and other facilities [**Principle 3**].

- Enhance local character and promote quality of place through excellent quality design and landscaping, retaining the best / most prominent trees and respecting its setting **[Principle 4]**.
- Make the most efficient use of resources and infrastructure by prioritising locations consistent with the spatial strategy – namely a housing allocation that has been assessed and adopted as an ideal and sustainable location for new homes **[Principle 5]**.

- 5.31 The proposal reflects the ambition set out in CS Policy CS3 – Housing, Supply, Delivery and Distribution, which confirms (at part 1) that provision will be made for 8,100 new dwellings between 2010 and 2028. The Council is charged with ‘significantly boosting’ its housing land supply, and it is notable that the above target is a minimum figure (not a maximum figure or upper ceiling). The SUEs have clearly been identified as crucial to the achievement of the correct level and type of housing, and as such this proposal – which will complete this particular SUE - calls to be judged against that. such as the application site.
- 5.32 Under the heading ‘Housing Sizes, Tenures and Density’, the policy requires the tenure, type and size of new housing to support the re-balancing of the housing market to better meet housing needs and demands arising. It states that applications for new residential development must demonstrate how they contribute to this re-balancing. Part 5 of the policy makes it clear that densities of a minimum of 30 dwellings per hectare will be required.
- 5.33 In response to those requirements, we have set out elsewhere how this proposal responds to housing needs. As explained earlier, there is a clear and demonstrable need for affordable housing, and it is very relevant to point to the approved Taylor Wimpey scheme that is under construction on the remainder of this SUE. That scheme comprises 227 dwellings, consisting of 111 x 3 bedroom properties and 116 x 4 bedroom properties. Of particular note is that, despite the policy requirement that 25% of those units (57 in total) ought to have been affordable, not a single affordable home will be delivered by Taylor Wimpey. It would appear that a viability case supported that application to justify the deficiency, as explained in the extract below from the Committee Report that led to its approval.

9.16 The applicants have submitted a detailed report (a viability appraisal) examining the financial costs and benefits associated with the proposed development. The applicants' report shows that delivery of the affordable housing requirement would mean that the scheme is financially unviable, that is to say it would be unlikely that the applicants would undertake the development given the costs associated with its implementation (if the requirement for affordable housing was also included). The applicants' appraisal has been reviewed by the Council's independent assessors, who agree with the conclusions of the applicants' report. Consequently, in this instance, the provision of no affordable housing is acceptable and in accordance with Policy CS15 and the Developer Contributions SPD.

- 5.34 The above outcome will presumably have concerned the Council, and perhaps more specifically (and importantly) those in need of affordable housing. Our client's application calls to be considered in that context. It is delivering a 100% affordable housing scheme, which almost remedies the shortfall of 57 affordable homes that arguably ought to have been delivered by Taylor Wimpey. That said, we contend that this proposal is precisely the type of housing development that this site calls for, and – when read alongside the adjacent 100% market housing scheme – will deliver a far more mixed and balanced SUE.
- 5.35 In respect of the mix of housing, this application is promoting a balanced mix of house types and houses, namely 15 one-bedroom apartments, 9 two-bedroom apartments, 5 two-bedroom houses and 16 three-bedroom houses. The adjacent Taylor Wimpey scheme contains no apartments and no one or two bedroom homes, and as such we anticipate that the LPA will welcome accommodation of that size in order to deliver a genuine mix and choice across the SUE. Furthermore, we noted earlier that Knowsley's Housing Need Assessment 2021 (Arc4) indicates that, overall, the focus of development should be 2 and 3-bedroom dwellings. It states that, for affordable/social rented housing, a broad mix is needed, with over half of need being for 1 and 2-bedroom dwellings, and for intermediate (affordable home ownership) strongest need is for properties with 3 or more bedrooms.
- 5.36 We therefore consider the mix and type of homes promoted by this application to be wholly appropriate, addressed to actual needs, and complementary to the adjacent 100% market scheme that comprises only 3 and 4 bedroom houses.

5.37 In consideration of density, the application site is 1.09 hectares. A scheme of 45 dwellings equates to a density of 41.3 dwellings per hectare. The policy requires a density of an absolute minimum of 30 dwellings per hectare, and as such there is clearly no conflict with that part of the policy. As noted elsewhere, the Council is required to 'significantly boost' its housing supply, and NPPF is very clear on the topic of densities. For example, at §124, it states :

'Planning policies and decisions should support development that makes efficient use of land'

5.38 And at §125 :

'it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.'

'local planning authorities should refuse applications which they consider fail to make efficient use of land'

5.39 And at §130 :

'Planning policies and decisions should ensure that developments ... are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)'

5.40 Having regard to the above, it is our case that there is no conflict with CS policy CS3.

5.41 Nor is there conflict with CS Policy CS7 - Transport Networks, which requires new development to be 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, and must be in compliance with adopted cycle, car, disabled and service vehicle parking standards. The application site clearly occupies an accessible and sustainable location, and the SUE was adopted on that basis. It is well served by public transport and local shops, services and employment opportunities are located with good / reasonable walking and cycling distance.

5.42 We suggest that there is no conflict with CS Policy CS8 – Green Infrastructure, which seeks (*inter alia*) to deliver more attractive and cleaner residential neighbourhoods. We contend that the design quality is excellent. Indeed, as a bespoke and sensitive scheme, it is superior to the type of standardised house types that are so often imposed on development sites. The development will offer a green and pleasant appearance, largely hidden / softened behind the mature trees / vegetation that flank the most prominent ‘public’ facades of the site. While a modicum of tree loss will occur, this has been carefully targeted and needs to be balanced against the need to complete this SUE and ensure a viable and deliverable housing scheme. New trees and other landscaping will be put in place by way of mitigation, and a sizeable zone of green open space will be retained along the brook.

5.43 For obvious reasons, there is no conflict with CS Policy CS15 – Delivering Affordable Homes, which requires at least 25% affordable housing on sites identified as Sustainable Urban Extensions. That policy does not seek to place an upper cap on the extent of affordable housing, but simply a minimum provision. Furthermore, as noted earlier, the adjacent Taylor Wimpey development contains zero affordable housing, and this proposal – for 45 affordable units – ought to be considered in that context (given that 25% of the Taylor Wimpey scheme would equate to 57 un-delivered affordable homes).

5.44 Furthermore, the ‘Knowsley 2030 Evidence Base report’ states that :

‘Housebuilding has accelerated in recent years, but the ‘new build premium’ has increased markedly alongside this. A wide range of factors mean there is a risk that some residents can’t access the type of homes they need. **Affordability remains a major barrier for many residents in Knowsley, 33% households priced out of buying any type of property.** Current programme aims to address this through affordable housing – but local insight is telling us that **these remain unattainable for some.** Access to mortgage products is a further barrier.’

5.45 The proposal is consistent with CS Policy CS17 – Housing Sizes and Design Standards, which seeks an appropriate mix of dwelling sizes, having regard to evidence of local housing needs. Table 8.1 of the policy is reproduced below, suggesting indicative targets for different housing types. While this proposal does not reflect the table in absolute terms, it is broadly

commensurate with this, and as such we contend there is no conflict with this part of the policy.

Housing Type/Size	1-bedroom	2-bedroom	3-bedroom	4-bedroom plus
Market Housing	10%	30%	40%	20%
Affordable Housing – Social Rented	20%	50%	20%	10%
Affordable Housing – Intermediate	20%	70%	10%	0%
<i>Provision of new bungalows is also required across all housing types and sizes</i>				

- 5.46 Part 2 of the policy confirms that developments of 15 dwellings or more must demonstrate how the scheme contributes to the re-balancing of Knowsley's housing market in terms of the size of dwellings provided. We have already commented on this matter and explained how and why we consider the mix and type of proposed homes to be appropriate and will play a very important part in 're-balancing' this particular SUE (which, thus far, comprises 100% market houses, with no affordable and no smaller homes to serve the needs of smaller households).
- 5.47 Part 4 of the policy states that all new residential development will be encouraged to comply with the following design standards (or equivalent replacement standard):
- a) Building for Life standards;
 - b) Lifetime Homes design criteria; and
 - c) Specific design and sustainability guidance in Policy CS19: Design Quality and Accessibility in New Development, Policy CS22: Sustainable and Low Carbon Development and relevant Supplementary Planning Documents
- 5.48 The proposal is consistent with the aims and objectives of CS Policy CS19 - Design Quality and Accessibility in New Development. This seeks to enhance local distinctiveness, identity and accessibility of places. In this regard, we point to the excellent design quality and materiality of the proposed homes, designed in contemporary fashion, but reflecting traditional

domestic character and style. The scheme design and layout (shaped to reflect very helpful dialogue and advice from the LPA over the course of the past year) responds to and integrates with its immediate surroundings, including its use of local materials, scale, mass, form, layout, alignment and density. We suggest that it will complement the adjacent Taylor Wimpey development and the immediate context, and will in many respects remain largely 'hidden' behind the mature trees that flank the site. A detailed landscaping scheme has been presented, which will play a part in promoting biodiversity and integrating with existing local habitats. The scheme will provide safe, secure and convenient routes for movement, and – via its main vehicular access – will integrate effectively with the adjacent Taylor Wimpey development, with convenient links to existing shopping and service provision.

- 5.49 There is no conflict with CS Policy CS20 - Managing the Borough's Historic Environment, in that – while there are heritage assets (including a Conservation Area) in relatively close proximity, those are at such distance and lacking a direct interface and intervisibility that no harm to those assets or their settings will arise.
- 5.50 We acknowledge that there is arguably a degree of tension with CS Policy CS21 'Greenspaces and Trees', in that the policy seeks the retention of existing trees. In order to accommodate the development and to retain its viability and deliverability, a small extent of 'internal' tree removal is necessary (13 trees in total). However, that has been minimised and the best of trees retained wherever possible. All boundary trees will be retained. Balanced against that part (c) of the policy acknowledges that there may be circumstances where tree loss is unavoidable, and in such cases it requires two trees to replace every tree lost. In this case, the submitted landscaping scheme indicates that 26 new native trees will be provided, plus other vegetation.
- 5.51 CS Policy CS22 'Sustainable and Low Carbon Development' states that new development will be required to meet high standards of sustainable design and construction and minimise carbon emissions. The proposal is consistent with this and will provide flexible homes built to high standards of energy efficiency and robustness, limiting energy use by incorporating high standards of insulation and heat retention.
- 5.52 The proposal is also consistent with CS Policy CS24 - Managing Flood Risk, which states that new development that may cause an unacceptable risk of flooding on the site or elsewhere

will not be permitted, and that new development should *preferably* be located in areas of low probability of flooding. New development in areas of medium or high flood risk will only be permitted if evidence has been submitted demonstrating that the development could not be practicably located in an area of lower flood risk and if applicable the ‘exception test’ has been complied with, in accordance with national guidance.

- 5.53 As noted in Section 2.0, parts of the site fall within Flood Zones 2 and 3. The aerial image below (left) shows that the brook itself is Zone 3, and an extent of Zone 2 along its northern and eastern flank. The site layout to the right demonstrates that the scheme has been designed and laid out such that none of the accommodation sits within those Flood Zones.



- 5.54 Notwithstanding that, the application has been subjected to both Sequential and Exceptions Testing, as explained below.

Sequential Test

- 5.55 The following text must be read alongside the separate “Sequential Test” document prepared by Group D.

5.56 Paragraph 019 of the National Planning Practice Guidance (NPPG) on Flood Risk and Coastal Change explains that the Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding.

5.57 NPPF §158 states that :

“development should not be **allocated** or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.”

5.58 Having regard to that, in opting to remove this site from the Green Belt and allocate it for housing development, it is evident that the Council (and the Inspector who endorsed the allocation) was satisfied that there were ‘no reasonably available sites’ that might accommodate the development. In that respect, we question whether it is in fact necessary or appropriate to undertake sequential testing. Notwithstanding that, we have conducted the proportionate exercise set out below.

5.59 When applying the Sequential Test, the Flood Risk and Coastal Change PPG (MHCLG, 2014) states that ‘a pragmatic approach’ on the availability of alternatives should be taken.

5.60 In applying a pragmatic approach to identifying alternative sites, the Applicant has liaised with the LPA and agreed that a proportionate and rational geographical Area of Search (AoS) in this case is to be based on an area that is 0.5 mile from the site. That AoS is marked in the accompanying Sequential Test report by Group D.

5.61 The same document identifies that the application site is 1.09 ha (2.75 acres), and as such - in order to fairly assess all land opportunities of a size which could conceivably accommodate a similar number of units to that proposed within this application, a search criteria of 2 - 3 acres in size has been used.

5.62 The document identifies various parcels of land within the AoS, and it is evident that none of those are suitable or capable of accommodating the development. Much of the land is in the Green Belt, and as such is immediately discounted. Other plots are the subject of planning permission for different use, or are already in use, or are not available, or are clearly unsuitable for housing given their configuration and access / other constraints.

- 5.63 The outcome of the exercise demonstrates – having regard to the search criterion agreed with the LPA – that there are no alternative sites that might accommodate the proposal. The Sequential Test is therefore satisfied.

Exceptions Test

- 5.64 Part 2 of the Exceptions Test requires the Applicant to present evidence of wider sustainability benefits to the community.
- 5.65 In this regard, we suggest that the sustainability benefits of the proposal are self evident and compelling.
- 5.66 The proposal seeks to much needed, high quality affordable homes on a site that has been removed from the Green Belt and allocated for housing. The provision of housing of the right mix, type and quality goes to the heart of any happy and healthy society, and we have presented evidence elsewhere of a real need and demand for affordable housing in Knowsley.
- 5.67 We therefore conclude that, whilst we are less than convinced the test is necessary given the circumstances of this case (as explained earlier), Part 2 of the Exceptions Test is satisfied, in that there are clear and obvious wider sustainability benefits to the community that will be delivered by this project.
- 5.68 Part 1 of the Exceptions Test relates to the technical approach and details to ensure that the development will be resilient to flooding, and in that regard we refer the reader to the associated information provided by Betts Hydro and Shape Engineering.
- 5.69 Having regard to the above, we contend that the proposal is consistent with CS Policy CS24.
- 5.70 Finally (in respect of the CS), there is no conflict with Policy CS27 – Planning for and Paying for New Infrastructure. This states that new development will be expected (where necessary given the scale and nature of the proposal) to demonstrate compliance with Local Plan policies which specifically require developer contributions; to provide additional on-site or directly

ancillary infrastructure as required to make the development acceptable in planning terms; and provide financial contributions towards the provision of strategic infrastructure to support local communities together with borough-wide and other strategic development requirements.

- 5.71 During the course of pre-application discussions, the LPA has provided details of likely S106 requests, and we anticipate that these will be discussed further during the course of the planning application.
- 5.72 Turning to consideration of the saved policies of **Knowsley's Replacement Unitary Development Plan (2006)**, there is no conflict with Policy T7 – New Development and Walking & Cycling Routes in that the site is accessible to both of those modes of transport and very well connected (hence its release from the Green Belt and allocation for housing).
- 5.73 The scheme is responsive to the requirements of Policy DQ2 – Security in the Built Environment in that it has been designed so as to provide good levels of personal and property security.
- 5.74 It is consistent with Policy DQ3 – Gateway Sites and Corridor, which requires developments proposals within, adjacent to, or visible from, a principal 'corridor' (in this case the A57) to be of appropriate quality and character so as not to harm the appearance of the corridor. In this case, the scheme is of excellent design quality and will be largely hidden / softened behind the boundary wall, mature trees and other vegetation, such that – when viewed from the outside public realm – there will be negligible impact on the 'corridor'.
- 5.75 The application complies with Policy DQ4 –Trees and Development, in it will introduce include appropriate planting and retains the majority of existing trees, whilst making provision for the limited unavoidable tree loss on the basis of two new trees for each tree lost.
- 5.76 Finally, the proposal complies with UDP Policy ENV5 – Contaminated Land. This states that new development will not be permitted if there is existing contamination which could place occupiers, ecological systems, the water environment or surrounding land uses at unacceptable risk. The application is supported by a Desk Study Ground report (Betts Geo),

which highlights that the earliest available map of the site is the 1850 map which shows Dye House, the north section of Brook Farm and gardens, with a well and Prescott Brook shown.

- 5.77 No further major changes occur until the 1891 map, when an additional building appears immediately to the west of Dye House. Neither the well nor Brook Farm are shown, seemingly replaced with woodland.
- 5.78 No further major changes occur beyond that date.
- 5.79 The report confirms that the site lies within a low-risk area of radon, where less than 1% of homes are estimated to be above the action level, based on the BRE 211 guidance.
- 5.80 The report's qualitative risk assessment indicates that a generally Low – Moderate (Localised) risk for contamination and ground gas exists on the site. That said, site investigations will be required to confirm the risk potential and any design remedial actions (if / where necessary).
- 5.81 The report includes a Coal Mining Risk Assessment, which reveals a generally high risk for unrecorded shallow workings / seams and shafts. Site investigations are therefore required to confirm the risk potential and any necessary design remedial actions.
- 5.82 In terms of Geotechnical Risk Items, the report highlights :
- Possible service easements – liaison with utility providers is advised;
 - Potential foundations from its former use.
 - High potential shallow mine workings, with voids and bell pits / shafts;
 - Near-surface coal likely to be encountered in deep excavations.
 - The former well (a probable shaft).
- 5.83 The report sets out a proposed scope for ground investigations based on the potential risks. This includes :
- Rotary coal mining investigation under coal authority licence comprising 15 open hole boreholes;

- 6 window sample boreholes;
- 6 ground gas monitoring visits over 3 months at varying barometric pressures;
- 1 day trial pitting targeting buildings and achieving site spread;
- 20 soil samples taken for chemical assessment for soil cart-off - depending on ground conditions encountered this should include testing (topsoil, made ground and natural) to benchmark contamination levels across the site and allow for cart-off assessment;
- 3 samples taken from Prescott Brook (upstream, midstream & downstream) for a standard suite of contaminants.
- Geotechnical analysis if clay strata is encountered for tree heave protection and concrete design classification (anticipated).

5.84 The report suggests that the scope of such works should be agreed with the Local Authority prior to the intrusive ground investigation, which we anticipate will be governed by condition.

5.85 Having regard to the above assessment, we contend that the application is consistent with all relevant policies of the adopted Development Plan, and – in the absence of material considerations that suggest otherwise – the application calls to be supported and approved.

SUSTAINABLE DEVELOPMENT

5.86 The promotion and encouragement of sustainable development goes to the heart of the NPPF, and this is reflected in associated policies of the development plan that lend support to sustainable forms of development.

5.87 In the simplest of terms, a viable, bespoke, high quality, affordable housing development is being promoted on an allocated housing site, at time of great economic uncertainty arising from the aftermath of both Covid and Brexit; the ongoing conflict in Ukraine; rising inflation; rising construction costs; rising food and cost of living prices; a general acceptance that the country urgently needs to build more houses to cater for its needs; a gloomy economic outlook and predictions of a looming global recession. The scheme will make effective and efficient use of an accessible site, creating an attractive residential environment with open space provision that will help to build the community in a balanced and sustainable fashion.

5.88 The NPPF explains that achieving 'sustainable development' means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).

5.89 Paragraph 10 states that, at the heart of the Framework, is a presumption in favour of sustainable development, while paragraph 11 states that LPAs should apply this presumption. For decision-taking this means:

'approving development proposals that accord with an up-to-date development plan without delay.'

5.90 We consider each of the three core strands / roles relating to sustainable development below.

Economic Benefits

5.91 In terms of its **economic** role, the proposal will assist in supporting sustainable growth, through the provision of quality new homes and contributing to the growth and evolution of this part of Knowsley.

5.92 The site is recognised as forming part of a sustainable location, with existing infrastructure and facilities in the local area readily capable of accommodating the proposed development. The development therefore presents an opportunity to provide modest scale growth in an appropriate (allocated) location, and address the balance in how this is directed across the District. The scheme will bring various economic benefits, including a boost to the local economy, and new / sustained local jobs throughout the construction phase.

5.93 The proposal will therefore contribute to the growth objectives for Knowsley and its overall vitality and viability. This will in turn increase spending power within the local area, where there is good accessibility, and will contribute to the long-term maintenance of shops, services and other facilities on offer.

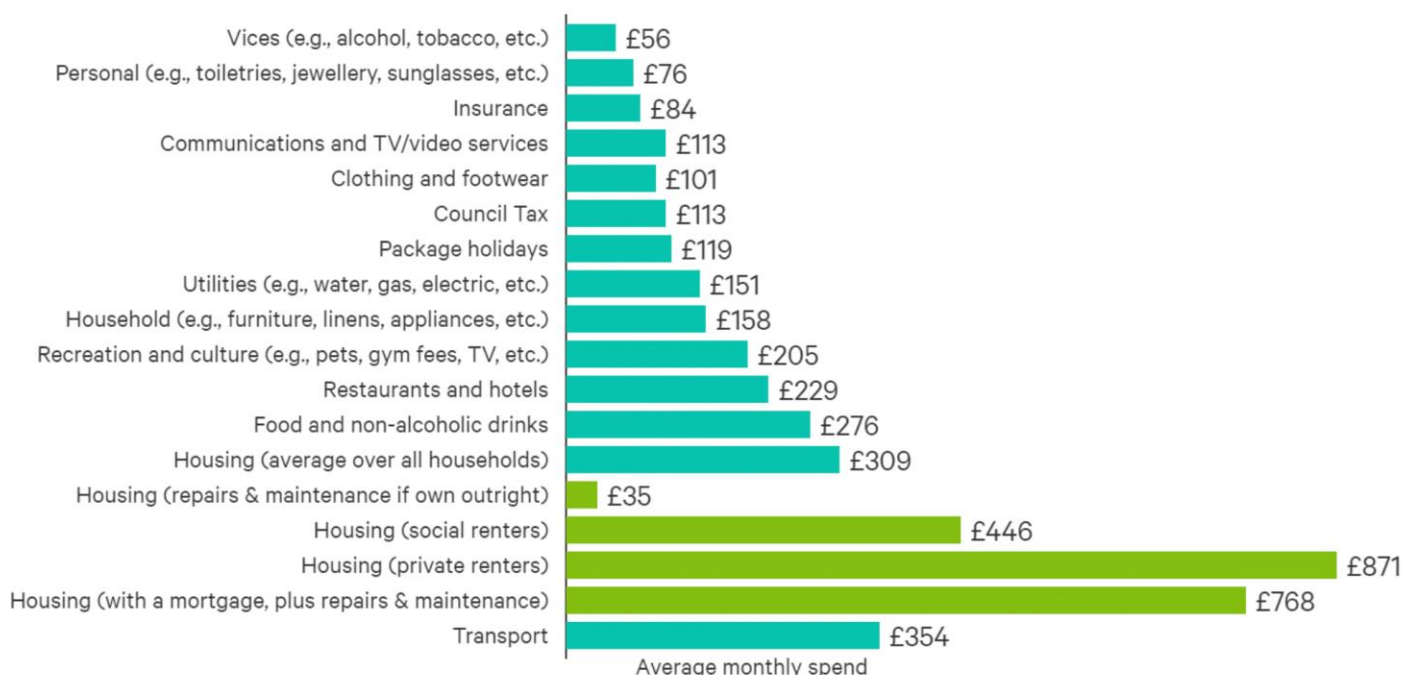
5.94 The application scheme will draw upon local labour for the construction of the new homes. Some of those jobs will be located on the site itself, whilst others will be based in the wider

Knowsley area, with some further afield within the construction supply chain. The jobs will vary in type, from elementary occupations (e.g. site labourers) to professional and higher skilled technical occupations (e.g. project managers and site surveyors).

- 5.95 Based on the mix and type of accommodation proposed, we anticipate that the proposal will accommodate a 'population' of around 80 people.
- 5.96 According to the 2020 Living Costs and Food Survey from the Office of National Statistics (ONS), UK households spent an average of £588 per week (£2,548 a month) to cover living expenses including housing, food, clothes and transport. The average UK household spends £3,312 a year on groceries and non-alcoholic drinks at home. Another £484 is spent on alcohol (mostly wine) for consumption at home. Eating and drinking out consumes a further £2,132 from our household budgets.
- 5.97 The table below breaks down those costs, and includes additional items such as 'vices', holidays, leisure and recreation (such as gym memberships) and more besides.

Average Monthly Household Spending UK

for the largest 14 budget categories



Source: ONS Family Spending in the UK April 2019 to March 2020

- 5.98 Each household created on the application site would be expected to spend a significant proportion of their household income in the Knowsley area. Taking the above £588 per week (£2,548 a month) as a proxy (to cover living expenses including housing, food, clothes and transport), and reducing it by 60% (to reflect the fact that wages are generally lower in Knowsley; that a proportion of the homes are small; and that those living in affordable accommodation do not have high disposable incomes), that suggests an annual injection in the region of £980,000 arising from the proposal. That figure excludes items such as dining out and spending on leisure activities, which will inject further cash into the local economy.
- 5.99 We accept that not all residents will be new to the Borough, but regardless of the precise spending figure, it is evident that it will be substantial when considered on a year by year basis.
- 5.100 Much of that will inevitably be spent in local shops and on local services. This in turn will have positive knock on effects for employment in the local area, helping to sustain local shops, supporting the supply chain of firms benefiting from household expenditure, and consequently the spending of salaries of those employed as a result of spending by new residents.

- 5.101 Furthermore, it is reasonable to assume that there would be benefits to the suppliers and fitters of fixtures and fittings for new homes.
- 5.102 On the above basis, there can be no question that this scheme will deliver economic benefits to Knowsley. Those are real and positive economic benefits.

Social Benefits

- 5.103 **Socially**, the proposal will address the need for more quality affordable housing in Knowsley and 'boosting significantly' its supply.
- 5.104 The provision of sufficient good quality housing goes to the heart of a good and strong society, and is undoubtedly an important social benefit.
- 5.105 The NPPF makes it clear that planning should be a proactive process to deliver the homes the country needs. Paragraph 38 states that local planning authorities should approach decisions on proposed development 'in a positive and creative way', while paragraph 60 states that :

'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed ...'

- 5.106 Of relevance to this application, paragraph 69 highlights that small and medium sized sites (such as this) can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.
- 5.107 The social dimension (and associated benefits) of striving to deliver the right type and mix of homes, in the right locations where people wish to live, is self evident. We highlighted this at the outset of this section of our Statement. We drew attention to the recent (March 2020) study undertaken by the Affordable Housing Commission 'Making Housing Affordable Again: Rebalancing the Nation's Housing System', which explains that housing unaffordability is a significant cause of many of the nation's social and economic ills. It suggests that the lack of affordable housing lies behind the problems of poverty, homelessness, debt, family breakdown, mental and physical poor health. It highlights that housing stress has negative effects on

people's life chances – as well as on local communities, the business and voluntary sector, the wider economy, and public spending.

5.108 As we rehearsed previously, the Core Strategy, which highlights that '**housing affordability is an issue ... the affordability issue has been exacerbated** for those seeking to become homeowners, by the difficulty of obtaining suitable finance and mortgages.' The more recent Housing Need Assessment 2021 (Arc4) identifies '**a particular problem**' faced by households who do not have either existing equity or savings, suggesting that the council should seek a higher proportion of affordable housing delivery on sites where possible. It tells us that 6,493 households across Knowsley are in housing need and cannot afford to buy or rent at lower quartile market prices, and that 67.62% of households who have formed in the past 5 years cannot afford buying or renting lower quartile (entry level) properties.

5.109 It is therefore clear that, not only does Knowsley need to continue to build houses on a general level and '**boost significantly**' its housing supply at a time of economic uncertainty, but there is an imperative to provide more affordable homes in the right places, where people wish to live. We suggest that the need to provide affordable housing on this site is even more compelling given that the remainder of the SUE will accommodate only market housing, and as such this proposal will provide the correct 'balance' in respect of overall housing provision across the SUE.

Environmental Benefits

5.110 In considering **environmental** benefits, the NPPF confirms that, to achieve sustainable development, economic, social and environmental "*objectives*" should be sought :

'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).'

5.111 This requires '*net gains*' across each objective, and as such it is important to explain the '*net gain*' in environmental terms.

- 5.112 During the formulation of the scheme design and layout, due regard has been paid to the site's context and appearance, and the policies in place that emphasise the need to deliver good quality urban design and architecture.
- 5.113 Such issues, together with an explanation of the rationale behind the layout is contained in the Design & Access Statement.
- 5.114 In view of its allocation for housing, the site calls to be sustainably and efficiently used.
- 5.115 There will be environmental benefits delivered by this proposal. 45 well designed homes will be created, adding to the mix of architectural styles and house types in the locality. While most of the existing trees will be retained, a small number require removal in order to accommodate a viable and deliverable scheme. All mature boundary trees will remain, and new trees and other planting will be selected not only for its visual 'softening' appearance, but also to enhance its contribution to biodiversity.
- 5.116 The intention is that the new homes will contribute to local character, adding visual interest and reflecting local distinctiveness. In these regards, the proposal will be designed to reflect and respond to well to the townscape / streetscape, and presents an appropriate, thoughtful and respectful design solution in terms of its scale, siting, massing, and its relationship with the existing settlement and spaces.
- 5.117 The 'hard' (built) elements of the scheme will also reflect ecological advice (see separate report), including provision for bat and bird boxes, and trees and other species will be selected to maximise their contribution towards biodiversity and greening the environment.
- 5.118 The application is also supported by an Energy Assessment prepared by Base. This concludes that the incorporation of sustainable design and construction methods, energy and water saving measures, sustainable transport methods, waste reduction techniques and measures to enhance the ecological value of the site, a good quality and sustainable development will result in an energy efficient and sustainable form of development.
- 5.119 Overall, therefore, we contend that the proposal represents sustainable development, which will contribute **economically, socially and environmentally**.
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- 5.120 We therefore anticipate that this application will be welcomed by the Council in respect of its deliverance of sustainable development and much needed, excellent quality affordable homes.

COMPLIANCE WITH NPPF

- 5.121 The NPPF is an important material consideration.
- 5.122 Fundamentally, it promotes sustainable development. It seeks to 'significantly boost' housing supply, and recognises how important small and medium sized windfall sites are in delivering this.
- 5.123 We addressed the sustainability credentials of the scheme above, and concluded that the proposal represents sustainable development in economic, social and environmental terms. We will therefore say nothing further in respect of the sustainability support provided for this application by the NPPF.
- 5.124 The application is also consistent with the remainder of the NPPF. It will create good quality affordable housing on an accessible, sustainably located, allocated site. The proposal reflects policies designed to build communities, delivering a complementary mix of affordable homes, and good quality open space designed to be used by the whole community. This will have positive implications for the social, cultural and economic well-being of the area.
- 5.125 The proposed development will help to deliver the housing objectives set out in the NPPF, which confirms that a key aim of the Government is to ensure that everybody has the opportunity of living in a decent home, which they can afford, in a community where they want to live.
- 5.126 The NPPF also promotes good design, beautiful environments and tree-lined streets, and suggests this is fundamental to the creation of sustainable, mixed communities. It encourages developers to make effective and efficient use of land and existing infrastructure.

- 5.127 As noted earlier, Paragraph 69 notes that small and medium sized sites – such as this - can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.
- 5.128 The proposal is also consistent with §92. It promotes a healthy, inclusive and safe place which – through well designed and laid out housing and quality open space provision – will encourage social interaction and provide opportunities for meetings between people who might not otherwise come into contact with each other. It will be safe and accessible, and will facilitate community cohesion through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space. It will enable and support healthy lifestyles through the provision of safe and accessible green infrastructure, play facilities, and a layout that encourages walking and cycling.
- 5.129 The application is also consistent with §93 in that it plans positively for the provision and use of quality shared open community space. By the same token, it accords with §98 and its encouragement of a network of high quality open spaces and opportunities for physical activity, which are important for the health, well-being and nature.
- 5.130 As report in the Transport Statement, there is no conflict with §104. Transport issues have been carefully considered, including opportunities to in an accessible, sustainable location which offers a genuine choice of transport modes. The site access points (for both vehicles and pedestrians / cyclists (including those reliant on wheelchairs and pushing prams) will provide safe and convenient access to all users, reflecting §110.
- 5.131 §111 states 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. The Transport Statement demonstrates that the impacts will not be severe.
- 5.132 For the reasons stated above, there is no conflict with §112. The scheme has been designed insofar as possible to give priority first to pedestrian and cycle movements, and the open space provision has been formulated to address the needs of people with disabilities and reduced mobility. The scheme will create a safe, secure and attractive environment, which looks to minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary
-

street clutter, and respond to local character. It will allow for the efficient delivery of goods, and access by service and emergency vehicles, and will facilitate charging of plug-in and other ultra-low emission vehicles.

- 5.133 In respect of ‘Making Efficient Use of Land and Achieving Appropriate Densities’, the scheme has been formulated with regard to the requirement at §119 states that promotes the effective use of land in meeting the need for homes, while balanced against the safeguarding of the environment.
- 5.134 The application responds to §124 by taking into account the need for different types of housing, the desirability of maintaining an area’s prevailing character and setting, and the importance of securing a well-designed, attractive and healthy place.
- 5.135 Likewise, the scheme reflects §125 by creating a beautiful and sustainable place. This paragraph indicates that it is especially important to avoid homes being built at low densities, and to ensure that developments make optimal use of the potential of each site. It states that policies should optimise the use of land, and should include the use of minimum density standards for locations that are well served by public transport, and that such standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. It adds that applications should be refused if they fail to make efficient use of land.
- 5.136 Under the heading ‘Achieving Well Designed Places’, §126 seeks the creation of high quality, beautiful and sustainable buildings and places, and suggests that this is fundamental to what the planning and development process should achieve. It states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. The application seeks to respond to this.
- 5.137 The Design and Access Statement explains the design philosophy and rationale, which responds positively to §130, which looks to ensure that developments will function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, sympathetic to local character and history, including the surrounding built environment and landscape setting. In this regard, we note that the NPPF does not seek to prevent or discourage ‘appropriate innovation or change’.

- 5.138 Under the heading ‘Meeting the Challenge of Climate Change, Flooding and Coastal Change’, §152 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. In response to this, the application is supported by an Energy Assessment, which concludes that the incorporation of sustainable design and construction methods, energy and water saving measures, sustainable transport methods, waste reduction techniques and measures to enhance the ecological value of the site, a good quality and sustainable development will result in an energy efficient and sustainable form of development.
- 5.139 There is consistency with §159, which states that development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). The application is supported by a Flood Risk Assessment and technical drainage information, and – elsewhere in this Statement – we have undertake both Sequential and Exceptions Testing.
- 5.140 The Flood Risk Assessment and Drainage Strategy reflect Framework §169, which states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 5.141 The revised July 2021 version of the Framework introduced changes to what is now §180. This states that, if significant harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. It also states that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.
- 5.142 The application is supported by a *Preliminary Ecological Assessment*. This concludes that, aside from moderate potential for bats, no protected species is likely to be harmed as a result of the development. The report recommends that bat and bird boxes are placed on the new buildings and retained trees, and suggests the planting of linear features such as hedgerows and trees between garden plots where possible, the inclusion of ‘hedgehog highways’ to facilitate movement across the site.

- 5.143 The application is also supported by a *Habitats Regulations Preliminary Screening Assessment and Appropriate Assessment*. This considers potential impacts on the Mersey Estuary SPA, acknowledging that an increase in visitor pressure, specifically users of the footpaths on the north shore, can disturb nesting birds in the area.
- 5.144 The Assessment notes that the proposed development is located 9.5 km from the designated site, and therefore it is unlikely that large numbers of residents would drive to the designated site. It notes that much closer areas of open space are present associated with Browns Field, Prescott (approximately 190 m south of the site) and The Fishing Pond at Carr Lane Woods (located approximately 450 m south of the site).
- 5.145 To mitigate for any potential recreational impacts to the European Site, it is suggested that access to the European Site will be discouraged through the provision of information packs to inform residents of the presence and importance of designated sites nearby, and how the residents can protect them, including a “responsible user code”. Measures may include encouraging dogs to be kept on a lead in and near to the designated site, and /or walk-in areas that are away from the north shore. A map showing alternative recreational opportunities in the vicinity of the site could be provided and included in the sales pack.
- 5.146 After considering all potential direct and indirect impacts of the proposed development and consideration of appropriate mitigation, the Assessment concludes that the works will not significantly impact on the Mersey Estuary SPA and Ramsar.
- 5.147 On the above basis, we contend that there is no inconsistency with §180 of the Framework.
- 5.148 In considering ‘Ground Conditions and Pollution’, there is no conflict with §183 or §185 of the Framework. The application is supported by a Ground report which concludes that ... the land is not contaminated and there are no risks arising from land instability. We anticipate that, in the event of approval, a condition will be attached requiring the carrying out of further site investigations and appropriate reporting to / approval by the LPA in conjunction with its Contaminated Land team.
- 5.149 Having regard to the above assessment, this application is consistent with all of the Framework’s key policy aims and objectives. In the absence of an up to date, reliable
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development plan, that level of compliance should carry considerable weight, and lends further support to approval of the application.

DESIGN QUALITY

5.150 The Design & Access Statement (produced by Group D Architects) reinforces the extent of attention that has been paid to design and layout. The proposal reflects local character and distinctiveness, but at the same time introduces new layering and adds to diversity, using good quality, robust materials.

5.151 Here we refer to the **National Design Guide**. This explains that the underlying purpose for design quality and the quality of new development at all scales is to create well-designed and well-built places that benefit people and communities. It suggests that a well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings. It comes about through making the right choices at all levels, including:

- the layout;
- the form and scale of buildings;
- their appearance;
- landscape;
- materials; and
- their detailing.

5.152 It states that well-designed places are:

- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
- integrated into their surroundings so they relate well to them;
- influenced by and influence their context positively; and
- responsive to local history, culture and heritage.

5.149 It reiterates that well-designed development proposals are shaped by an understanding of the context that identifies opportunities for design, as well as constraints upon it, and states that:

‘... well-designed places do not need to copy their surroundings in every way. It is appropriate to introduce elements that reflect how we live today, to include innovation or change such as increased densities, and to incorporate new sustainable features or systems.’

- 5.150 We see no conflict with any of the above policy objectives of the design guide. The local area contains a variety of house types, sizes, styles, ages, heights and materials, and an array of boundary treatments. The design details have been influenced by that mixed context and design-related guidance at both national and local levels. As evidenced by this Planning Statement, the DAS, the landscape masterplan and the application drawings, the scheme is based on a sound understanding of the features of the site and the surrounding context, including a proportionate baseline assessment that formed the design starting point and has helped to influence the indicative design and layout.
- 5.151 However, the National Design Guide also makes it clear that applicants and their architects do not need to copy their surroundings in every way, and that it is perfectly appropriate to introduce elements that reflect how we live today, innovation and change.
- 5.152 We suggest that a good deal of weight ought to be attached to the scheme’s excellent design quality in the assessment and determination of this application.

ACCESS AND TRANSPORT

- 5.153 The site is located in an accessible location on the edge of the built up. Its locational sustainability led to its release from the Green Belt and its allocation for housing development. The submitted Transport Statement (by Curtins) confirms that :
- the scheme accords with local and national policy to site development adjacent to good transport linkages and other attractions to minimise trips and share trip movements.
 - The site occupies an accessible and sustainable location.
 - The proposed access, manoeuvring and parking layout accords with good practice.
 - Traffic flows have been assessed for up to date levels, and no road capacity issues arise based on a robust view of the flows.

- No capacity or inefficiency / safety issues are expected to arise with the proposal or site layout.
- As such, the scheme would have little or no impact on the local network

5.154 It is therefore considered that there are no reasons why the scheme should not be approved from a transportation point of view.

HISTORIC BUILDINGS AND ARCHAEOLOGY

5.155 The application is supported by a Historic Building Record report prepared Archaeological Services Ltd.

5.156 The report explains that the former Dye House and Outbuilding likely originated between the late 18th to early 19th century, first appearing clearly on mapping from the mid-19th century. The on-site recording determined that the former Dye House has been entirely rebuilt as a residential property around the mid-20th century, with no surviving historic fabric. The small outbuilding comprises a multi-functional structure, built as ancillary to the original Dye House to support its needs. The extant fabric suggests that the building was substantially remodelled in the late 19th century. It had functioned as a heated washroom, with a chimney stack that served a copper or wash boiler that is no longer present. The outbuilding features an earth closet privy with mucking out space to the west, and an animal accommodation, likely a small pig sty, with a log store over.

5.157 At Appendix 6, the report includes a comprehensive Written Scheme of Investigation (WSI) for Archaeological Strip/Map/Recording and Level 2 Historic Building Recording. This confirms that the site is considered to have potential to host buried archaeological remains, and as such an archaeological evaluation is required in line with NPPF :

“...Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation” (para 194).

- 5.158 The scope of the WSI is to evaluate the impact of the development proposal by Level 2 Historic Building Recording of the two standing structures, followed by strip/map/recording of the footprint of both the Dye Works and Brook Farm, with sufficient coverage of the curtilage to identify any unmapped outbuildings or sub-surface features.
- 5.159 The aim of archaeological evaluation is to determine the presence or absence of archaeological remains that may be affected by the proposed development, and where possible to establish their significance. Specifically, to investigate and record the potential of any buried remains that may be related to the former Dye Works and Brook Farm.
- 5.160 The objectives of excavation are to investigate all archaeological remains within the extent of excavation in order to:
- excavate, sample, record and interpret all archaeological features and deposits found;
 - recover artefacts and ecofacts to evidence the character, nature and function of the remains and provide datable materials to aid in establishing their chronological sequence and the processes of archaeological deposition;
 - establish the significance of the archaeological remains;
 - interpret and understand the evidence in relation to the surrounding landscape and within a wider regional and national context.
- 5.161 The buildings will be subject to historic building recording before demolition and then the areas will be the subject of archaeological evaluation by means of open area excavation. MEAS's archaeologist will be consulted on the results of the strip prior to commencing investigations, and a decision will be made whether to proceed as an evaluation or undertake full evaluation.
- 5.162 We understand that the above report has been shared with MEAS and that its findings have been endorsed, and as such there is no above or below ground heritage or archaeological reason to resist this application.

FLOOD RISK AND DRAINAGE

- 5.163 The application is supported by a Flood Risk Assessment prepared by Betts Hydro. This confirms that the site lies within a combination of Flood Zone 1, 2 and 3, although the vast majority of the development is within Flood Zone 1.
- 5.164 It states that the proposal should be supported by the Sequential Test, as a small portion of the development is within Flood Zone 2 (refer to earlier commentary on this matter).
- 5.165 It notes that consultations with the Environment Agency, Knowsley Metropolitan Borough Council and United Utilities have been undertaken and did not identify historical flooding of the site. Consultation with the Environment Agency has been undertaken to obtain the most up-to-date flood risk information to allow a better understanding of the potential flood risk at the site to be gained. A hydraulic modelling exercise has been undertaken to support this assessment using the existing modelling to assess in more detail the potential fluvial flood risks to the site.
- 5.166 At present, it is concluded that the site is not at risk of flooding in the 100 year return period event, but is potentially in the 100yr + CCA and 1000 year. The development proposals include a range of levels outside of the watercourse corridor resulting in the proposed development remaining dry, safe, and flood-free in all storm events including the 100yr RP + CCA design event.
- 5.167 It is noted that the proposed FFL is 53.15m AOD, which provides approximately 2.3m of freeboard from the design event.
- 5.168 The proposed scenario has been compared against the existing scenario. There is shown to be a minor increase in top water level within the main channel upstream (5mm) and downstream (7mm) of the site. This increase is reduced to the pre-development water level 100m upstream and 200m downstream of the site.
- 5.169 This FRA concludes that the development can be considered appropriate in accordance with the Planning Practice Guidance.

AIR QUALITY

- 5.170 The application is supported by an Air Quality Impact Assessment (Professional Consult), which confirms that the proposal has the potential to cause exposure of future residents to existing air quality issues, as well as adverse impacts at sensitive locations during the construction and operational phases. As such, the Air Quality Assessment has been undertaken in order to determine baseline conditions, consider location suitability for the proposed end-use and assess potential effects as a result of the scheme.
- 5.171 It notes that potential construction phase air quality impacts from fugitive dust emissions have been assessed as a result of demolition, earthworks, construction and track-out activities. It is considered that the use of good practice control measures will provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.
- 5.172 It notes that, during the operational phase of the development, there is the potential for air quality impacts as a result of traffic exhaust emissions associated with vehicles travelling to and from the site. These have been assessed using standard screening criteria. Due to the low number of vehicle trips predicted from the proposals, road traffic impacts were not predicted to be significant.
- 5.173 The potential for the exposure of future residents to elevated pollution levels has been assessed based on the results of a desk-top study. This indicated that pollutant concentrations are likely to be below the relevant criteria at the development location. As such, the site is considered suitable for the proposed use from an air quality perspective, and based on the assessment results, air quality issues are not considered a constraint to planning consent for the proposals.

6.0 Summary and Conclusions

- 6.1 In this Planning Statement, we have explained how and why we consider that the proposal complies with the relevant policies of the development plan and the NPPF. Section 38(6) of the Planning and Compensation Act requires planning decisions to be in accordance with the development plan, unless material considerations indicate otherwise.
- 6.2 This application proposes the delivery of 45 high quality affordable homes.
- 6.3 The Council's most recent Monitoring Report indicates that Knowsley's current housing land supply is comfortable, but anticipates a slow down arising from Covid. It places weight on the Council's ongoing dialogue with the promoters of the allocated Sustainable Urban Extensions (SUEs) and the capacity of those sites to continue to deliver sufficient housing.
- 6.4 The application site forms part of one such SUE and is allocated for housing development.
- 6.5 §2.13 of the Core Strategy explains that :

‘Although house prices are generally comparatively low within Knowsley, **housing affordability is an issue** as average salaries of residents are also low. Since the ‘credit crunch’ of 2008, **the affordability issue has been exacerbated** for those seeking to become homeowners, by the difficulty of obtaining suitable finance and mortgages.’

- 6.6 The CS is now over 6 years old, and in some respects matters may have moved on. However, the above statement still holds weight when considered against the findings of the more recent Housing Need Assessment 2021 (Arc4). That report identifies ‘a particular problem’ faced by households who do not have either existing equity or savings, suggesting that the council should seek a higher proportion of affordable housing delivery on sites where possible. It tells us that 6,493 households across Knowsley are in housing need and cannot afford to buy or rent at lower quartile market prices, and that 67.62% of households who have formed in the past 5 years cannot afford buying or renting lower quartile (entry level) properties.
- 6.7 §2.14 of the CS highlights that shortages remain in some areas for some housing types, sizes and tenures, meaning that the housing market in Knowsley remains unbalanced. It states that particular shortages exist for larger, executive market homes, and for smaller one-and two-bedroom units in the affordable housing sector. This is reflected in Strategic Objective 2 ‘Well-Balanced Housing Market’, which promotes a well-balanced housing market by providing a sufficient quantity and mix of high quality sustainable housing in appropriate locations to meet needs and demand (including market, affordable and supported housing). This proposal will play an important role in delivering that.
- 6.8 The Housing Need Assessment 2021 confirms that around 25% of households on lower quartile incomes cannot afford any tenure option/product at the current borough prices. For households on median incomes, social/affordable and lower quartile market rents are affordable, along with shared ownership at 25%. By comparison, households on median incomes cannot afford market sales at any of the price points or the majority of the intermediate tenure affordable products. §3.17 states :
- ‘This comparison of local incomes with the cost of local house prices and rents illustrates the affordability challenge faced by residents within the borough. It shows the particular problem faced by households who do not have either existing equity or savings.’
- 6.9 §6.10 of the report notes that the current affordable target is 10% on sites in the urban area and 25% on sites identified as Sustainable Urban Extensions, but that, given the level of affordable need identified, it is recommended that the minimum affordable target is 25% and :

‘the council should seek a higher proportion of affordable housing delivery on sites, where possible, based on viability evidence.’

6.10 §C.27 (Table C7) summarises the total annual need for affordable housing across Knowsley, and establishes a gross annual need of 1,443 and - after taking into account supply - a net need of 243 affordable dwellings each year.

6.11 The ‘Knowsley 2030 Evidence Base report’ states that :

‘Housebuilding has accelerated in recent years, but the ‘new build premium’ has increased markedly alongside this. A wide range of factors mean there is a risk that some residents can’t access the type of homes they need. Affordability remains a major barrier for many residents in Knowsley, 33% households priced out of buying any type of property. Current programme aims to address this through affordable housing – but local insight is telling us that these remain unattainable for some. Access to mortgage products is a further barrier.’

6.12 The realities of increasing unaffordability are very real and very pressing, and particularly at a time when inflation, food, fuel and construction costs are rising, combined with the aftermath of Brexit and Covid, and the economic harm arising from the ongoing crisis in Ukraine, with many predicting a worldwide recession in the near future.

6.13 There is a clear and demonstrable need for affordable housing, and it is very relevant to point to the approved Taylor Wimpey scheme that is under construction on the remainder of this SUE. That scheme comprises 227 dwellings, consisting of 111 x 3 bedroom properties and 116 x 4 bedroom properties. Of particular note is that, despite the policy requirement that 25% of those units (57 in total) ought to have been affordable, not a single affordable home will be delivered by Taylor Wimpey.

6.14 That lack of affordable housing must concern the Council, and perhaps more specifically (and importantly) those in need of affordable housing. Our client’s application calls to be considered in that context. It is delivering a 100% affordable housing scheme, which *almost* remedies the shortfall of 57 affordable homes that arguably ought to have been delivered by Taylor Wimpey. That said, we contend that this proposal is precisely the type of housing

development that this site calls for, and – when read alongside the adjacent 100% market housing scheme – will deliver a far more mixed and balanced SUE in overall terms.

- 6.15 In respect of the mix of housing, this application is promoting a balanced mix of house types and houses, namely 15 one-bedroom apartments, 9 two-bedroom apartments, 5 two-bedroom houses and 16 three-bedroom houses. The adjacent Taylor Wimpey scheme contains no apartments and no one or two bedroom homes, and as such we anticipate that the LPA will welcome accommodation of that size in order to deliver a genuine mix and choice across the SUE.
- 6.16 We therefore consider the mix and type of homes promoted by this application to be wholly appropriate, addressed to actual needs, and complementary to the adjacent 100% market scheme that comprises only 3 and 4 bedroom houses.
- 6.17 As well as complying with the Development Plan, this application addresses all of the Framework's key policy aims and objectives: good quality and sensitive / respectful design (albeit this is an outline application); making efficient use of an accessible, allocated site adjacent to a sustainable settlement; provision of good quality open space; respect for biodiversity and trees; and building the community in a sustainable, balanced fashion, the ambition being to create a well-designed, beautiful and safe place, with accessible open spaces that reflect current and future needs and support the community's health, social and cultural well-being.
- 6.18 We have also explained why, in accordance with the Framework, the development proposal constitutes 'sustainable development'. Accordingly, we anticipate that the Council will determine the application - in accordance with NPPF paragraph 38 - 'in a positive and creative way'.
- 6.19 That said, in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 and §11 of the NPPF, this planning application should be approved 'without delay'.

Appendix I

Local Community Consultation

List of addresses contacted (see also blue zone marked on aerial image)

PUBLIC CONSULTATION REGISTER

Project Name: Dye House

Address: Dye House, Liverpool Road, Prescot, L34 3LX

GDD Job No: GDD2020

Documents Issued

- 1 Public consultation letter MJ/RG/G315/L001
- 2 Dye House Public Consultation Brochure 020822

Address	Date	Method	Format	N
1 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
3 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
5 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
7 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
9 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
11 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
13 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
15 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
17 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
19 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
21 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
23 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
25 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
27 Liverpool Road, Prescot, L34 1LP	04/08/2022	Post	Hard copy print	
35 Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
37 Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
39 Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
41 Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
43 Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
45 Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
47 Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
49 Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
1 Brook Cottages, Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	
2 Brook Cottages, Liverpool Road, Prescot, L34 1NL	04/08/2022	Post	Hard copy print	



Letter and drawing pack hand-delivered to adjacent homes :



Our Ref: MJ/RG/G315/L001
Date: 31 July 2022

TO WHOM THIS CONCERNS

Dear Sir / Madam

LAND KNOWN AS DYE HOUSE, LIVERPOOL ROAD, PRESCOT, L34 3LX
A PROPOSAL FOR 45 AFFORDABLE HOMES WITH ASSOCIATED GARDENS, PARKING AND OPEN SPACE, TO BE ACCESSED VIA THE TAYLOR WIMPEY HOUSING SCHEME TO THE NORTH

We are writing to you to make you aware of the intention to submit a planning application promoting a housing development scheme on the above land.

Enclosed with this letter is a package of drawings prepared by the scheme Architect, which confirms the precise extent of the site; shows the proposed layout of the development; and provides details of the likely appearance of houses.

The application will promote a 100% affordable housing scheme, which will be operated by Livv Housing Group. Livv is an independent housing association, which provides affordable, quality homes for around 25,000 people, through over 13,000 properties in Knowsley.

The scheme you see in the enclosed pack has been formulated over the course of the past 12 months or so, and reflects helpful comments provided by the Local Planning Authority, the Environment Agency and other consultees.

As local residents, we wish to present the scheme to you at this stage, to invite your comments and any suggestions or concerns you might have before the planning application is submitted.

You will be aware that Taylor Wimpey has started to construct the 227 houses it obtained planning permission for in November 2020. Their land forms part and parcel of the same 'Sustainable Urban Extension' (SUE) as our client's land. The land is therefore allocated for housing development in Knowsley's Local Plan, and our imminent application looks to bring forward the remaining part of the SUE.

The appearance of the proposed houses will be traditional, albeit with contemporary features, built with good quality materials and to a very high standard of efficiency.

There will be 45 homes in total. 21 will be houses, and 24 will be apartments.

The houses will be provided with their own private gardens, and the apartments will be provided with communal open space.

A total of 72 car parking spaces will be provided, plus cycle parking to serve the apartments.



As noted above, the main site access will not be via Liverpool Road. Instead, traffic will enter and exit the site via the approved access road that will serve the adjacent Taylor Wimpey scheme. However, an emergency and pedestrian access will be provided onto Liverpool Road.

While a small extent of tree loss will occur, the bulk of those trees are of poor quality. The best trees will remain, including those around the site perimeter. This means that views into the development will be very restricted, such that for most of the streetscape, only glimpsed views will be occur from limited vantage points, filtered through the tree belt. This will serve to not only provide privacy for residents of the development but to also significantly limit any visual impact upon the site's existing surroundings.

A detailed landscaping scheme will be submitted with the planning application. This will include new native trees, shrubs, ground cover and other planting. **In this regard, you will see a broad swathe of open greenspace running through the site. This is the location of a brook with associated trees and habitat, which will be retained as a unique 'green' feature of the scheme.**

Part of the site falls within a Flood Zone. That does not preclude building houses, but has called for careful attention, including advice from the Environment Agency. Both a Flood Risk Assessment and drainage scheme will be provided with the application.

In terms of ecology and biodiversity, all necessary surveys have been completed, and the results of those will be provided with the application. The scheme will not cause disturbance to any protected species, and the new planting will create new and different biodiversity habitat.

The application will also be supported by other documentation, including a **detailed** Transport Statement **with** full access details, an Air Quality Assessment and a Noise Impact Assessment.

If you wish to make comment about the proposal before we submit the application, can I please ask you to write to me (the address is at the foot of the first page) or send me an email to : Richard@romansummer.com

We request that any comments be provided to us by no later than 21st August 2022.

If you wish to discuss the proposal in more detail, please feel free to phone Richard Gee on 0778 971 0352.

Yours faithfully
for Roman Summer Associates Ltd



Richard Gee
Director



Prescot Brook

The site is home to a unique asset, Prescot Brook. This offers key benefits to residents and the public alike, a feature which the development seeks to celebrate and integrate into the scheme.

The development team have approached this as such from the scheme's inception and in line with The Environment Agency's input, an 8m zone either side of the brook remains untouched, with access provided and trees and vegetation are to remain.

Landscaped buffer zone

As many existing trees as possible are to be retained, creating a landscaped buffer along Liverpool Road.

As a result, the existing street scene is to remain largely unchanged, with the ability to catch occasional glimpses of the development through the trees.

Additional planting accompanying the trees as well as across the site as a whole, makes for a valuable asset for both residents and the public.

Existing Trees Retained

The site benefits from a swathe of mature trees sitting outside of the ownership boundary. These are being retained, maintaining the same visual appearance upon the approach to Prescot from the roundabout.

Dye House

Retention of green assets



GROUP : D DEVELOPMENTS





SEP
SPECIALIST ENVIRONMENTAL PLANNING
GROUP :: D DEVELOPMENTS

Dye House
Typical Street Scene Visualisation



SEP
SPECIALIST ENVIRONMENTAL PLANNING
GROUP : D DEVELOPMENTS

Dye House
Typical Street Scene Visualisation