



Mr. A. Hunt (Planning)
Knowsley Council
Yorkon Building
Archway Road
Huyton
L36 9FB

Our Ref: RG/RG/G267/L001
Date: 15th February 2024

Dear Andrew

APPLICATION REF: 21/00744/FUL
KIRKBY VALLEY GOLF COURSE, INGOE LANE / VALLEY ROAD, KIRKBY

I write with reference to the above planning application and in response to the recent consultation comments below:

- Comments of Mr. Towers of the Council's Environmental Sustainability team in respect of the LVIA and landscaping matters (dated 15th January 2024)
- Comments from Environmental Health in respect of the submitted Construction Method Statement (CMS) and other matters (dated 16th January 2024)

Air Quality and Noise

The EHO comments raised a number of points, certain of which related to the submitted Noise and Air Quality Assessments. Both of those documents have since been adjusted to respond to the comments, and those were issued to the LPA on 22nd January 2024. The changes / updates made were identified in **red text**.

In specific response to the queries in respect of the **AQA**, I would respond as below (your colleague's query in *red italics*, and our response beneath):

Clarification on the actual amount of material to be imported is required. Previously within the Design and Access statement it was quoted that 350,000m³ of material was required, however the Air Quality report details that 475,000m³ of material is to be imported.

475,000m³ is the correct importation amount. Reference to 350,000 cubic metres is incorrect in that it reflects the scheme details as originally submitted, and not the revised details as submitted in July 2023. The author of those comments appears to have read the original DAS (by RGP Architects) that was superseded by an entirely different DAS (by Brock Carmichael Architects) in July 2023.



How has the tonnage figure of 1,000,000 used within the construction impact assessment been derived? As previously stated, within section 1.1.3 of the report it states 475,000m³ of material is to be imported, which equates to 1,677,744 tonnes of material. This will have an impact on the risk rating used within the assessment.

Tonnage is an unreliable metric. For example, dry peat may be 0.9 tonnes per cubic metre, whilst wet clay may be 1.4 tonnes per cubic metre. 475,000 cubic metres x 1.4 would yield 525,000 tonnes.

Please provide clarification on the calculation of the number of trips (65 HGV trips)? The construction management plan and the noise assessment identify the proposed works being undertaken within phases, in which there is the potential that the importation of material occurs within phase 2a (16 weeks) and phase 2b (30 months). Information is required as to how much material will be imported within each phase to accurately determine the number of trips – if all the materials is proposed to be imported within phase 2a then this could equate to potentially over 4000 HGVs a week (one-way trip), if the material is spread over the two phases (34 months) this equates to approximately 450 HGVs a week (one-way trips). This is a substantial increase in vehicle movements within the area which could have a detrimental impact on the air quality.

The developer has calculated that 70% of the importation will fall into phase 2b (the new 9 hole course and driving range area) and 30% of the importation will fall into phase 2a (works within the existing golf course). Each trip averages 9 cubic metres, and therefore:

Phase 2a= 15,750 cubic metres over 24 months

525 trips per month

131 trips per week

27 trips per day

Phase 2b= 36,750 cubic metres over 24 months

1,225 trips per month

306 trips per week

61 trips per day

Refer to phasing details / diagrams in the revised CMS.

The assessment details the movement of the HGVs from the M57 then on to the A506. Confirmation is required as to the source of the imported material to determine the direction of the HGV vehicle movements, due to the large quantities to be imported and the proximity of the potential sources of material that exist within proximity to the development area.

It is reasonably anticipated that most of the imported material will be transported via the M57, but - as current donor sites are as yet unknown – that is a best estimate.



The proposed mitigation measures detailed within the construction phase (section 6) are acceptable, however vehicle movements on the site should be 5mph, consistent with what is stated within the noise impact assessment report.

This speed limit is agreed / confirmed.

In respect of **NOISE**, the EHO queried:

Construction hours stated within the noise report in section 2.2.3 and 4.2.6 differ. Construction hours for the development are that of the proposed construction hours condition, Monday to Friday 08:00 to 18:00 and Saturday 08:00 to 13:00.

In response, the proposed working hours / hours of operation are confirmed below:

Working Hours

It is intended that the construction site will open during the following hours:

Monday – Friday	07:30 until 17:30 hrs
Saturday	07:30 until 13:00 hrs
Sunday/ Bank holidays	SITE CLOSED

Hours of operation

It is intended that the construction site will operate during the following hours of operation:

Monday – Friday	08:00 until 16:30 hrs
Saturday	08:00 until 12:30 hrs
Sunday/ Bank holidays	NO WORKING

Construction Method Statement

As noted above, a revised / updated CMS is enclosed.

In response to specific comments queries from your EHO, we respond as below:

A demolition management plan is required in relation to the demolition of the current club house.

There is, and never has been, any proposed demolition of the current clubhouse.



Section 13 – Control of Dust and Noise does not detail any controls in relation to noise. Please provide further details, for example:

- *Select the quietest plant which is appropriate for the job and ensure that it is properly maintained, particularly with respect to any noise reduction measures.*
- *Ensure that plant is operated to minimise noise, including shutting off plant when not in use, keeping covers in place, etc.*
- *Site noisy plant away from noise sensitive buildings or make use of barriers to shield such buildings.*
- *Ensure that mains power is available at the earliest opportunity where temporary generators are used overnight. In the case that temporary generators need to be used overnight then hybrid generators are the preferred choice so to prevent the potential for noise complaints.*
- *If a generator is to be used, please provide details of where generator will be placed. Consideration to house a generator in an acoustic enclosure is required if close to residential properties.*
- *Vehicles used regularly on site, for example forklift trucks / JCB's, must have white noise / broadband reversing alarms fitted.*

All of the above is agreed and confirmed.

Please provide a detailed site plan showing proposed site welfare areas, material storage areas, and areas for HGV wheel washing systems and jet wash. Due to the potential number of HGV's importing material to site is there a waiting area for HGVs if the wheel washing system is required? A banks man will be required to monitor the HGV's preparing to leave the site to ensure they use the system even when there are busy periods on site.

Please refer to pages 5, 6 and 8 of the CMS for site and compound layouts.

The use of a banks man is confirmed.

The height of the storage mounds for the stripped topsoil / subsoil is to be controlled to an acceptable height and must be dampened down to prevent dust. Please detail the height of the storage mounds.

Mounds will be approximately 8m in height.

Dust will be controlled with a water bouser or tarpaulin as necessary.



A road sweeper will be required on Saturdays during site working hours if there is dust or mud on the road.

This is agreed / confirmed.

Please provide the construction phasing plan with timescales, detailing information of the works in each phase and how much material will be imported / exported at each phase.

Please refer to page 4 of the CMS.

Please provide information of proposed piling, including any vibration monitoring to be undertaken.

There are no proposed piling works.

Please provide information on pest control measures.

A licensed pest control contractor will be appointed, secure bait traps will be placed at the perimeter of the site compound at 50m centres, rubbish will be cleared and recycled on a regular basis.

Will a neighbour letter / leaflet drop be undertaken? It is considered good practice to inform the neighbours of the intended works by way of a letter/leaflet. It needs to contain:

- a. a brief description of the intended works*
- b. the anticipated start and finish date*
- c. a site contact name and phone number in case issues arise.*

The developer and the golf club will keep an up to date website to provide up to date, real time information, and will be readily contactable by the local community if any specific queries are raised.

Site entrance boards will include contact information.



Lighting

The lighting scheme is to be reviewed in light of the change in the proposed development.

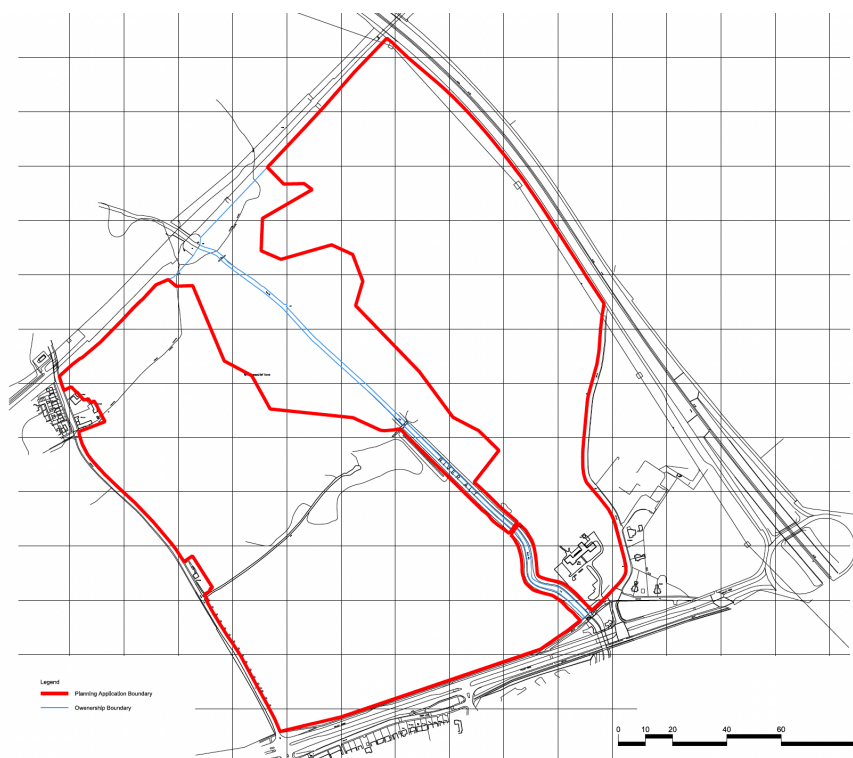
We suggest / request that a condition be attached that requires the submission and approval of a detailed external lighting scheme before any external lighting is installed.

Contaminated Land

The River Alt was realigned and there is a landfill on site (assumedly associated with some earthworks). The development will require a full contaminated land condition with gas monitoring within the location of the proposed buildings. The material proposed to be brought on to site will need to be from a reputable civils supplier. All material must be suitable for reuse and in line with current waste legislation.

There is no work close to the river, aside from the erection of a small footbridge to enable golfers to access the course (the details of which were submitted with the original application details).

Beyond that, there are no proposed works near the water course (refer to the red line boundary which confirm this point – see extract below).





All materials on site are either purchased landscape products (sand, topsoil, gravel etc) or imported soils under the DoWCoP scheme operated by Claire.

Our Response to landscape-related comments of Mr. Towers of the Council's Environmental Sustainability team (dated 15th January 2024)

First, in response to comments nos. 3 to 14, the LVIA has been comprehensively updated / adjusted.

Turning to other comments:

It appears that two redlines have been used to support the planning application.

This is not correct. There has always been a single red line boundary that covers the entire golf course, albeit – in November 2023 – the red line was reduced in extent to omit land close to the River Alt, on the basis that no works are proposed in that area and hence there is no purpose in including that land within the red line. That zone of land is now (since November 2023) shown correctly within the blue line, but no works are proposed anywhere within that blue line.

It appears that some of the drawings within the Landscape Plan, Hard Landscape Plan and Tree Planting Plan suites are missing, which is preventing being able to comment fully.

It is unclear why those drawings (all of which were submitted) have not be sighted, but in the interests of comprehensiveness the full pack of landscape / course works drawings is enclosed with this letter (including updates / adjustments of certain drawings in response to specific comments made, as below).

Further some of the legends are hard to read, for example on the landscape plan the full shape of the hatch is not visible in the Legend, so its hard to see which the legend is referring to on the plan.

Hatches have now been amended for clarity.

Plant species have been provided on the landscape plans key, with the exception of along the frontage, appears suitable for the areas they are indicated. However, no specific detail has been provided for planting sizes, mix percentages or densities. A detailed planting schedule is to be provided which clearly states proposed specification details so this can be reviewed, and confidence given that the tree replacement meets the required 2 for 1 ratio.

Detailed planting information (plants sizes, quantities, densities) are included in planting schedules (drawing refs: G935 126 Tree Planting Schedule for trees and G935 317 Planting Schedule for shrubs, hedges, marginals/aquatics and seed mixes).



Parking and adventure golf ornamental planting (along the frontage) has its own planting plan (ref: G935 140) and planting schedule (ref: G935 141).

Specification details for topsoil, planting methods, amelioration (for example mycorrhizal root powder and slow release fertiliser tablets), tree protection (spiral guards etc) has not been provided but would be useful to give confidence that the planting will be carried out to a required standard and the maintenance has been considered to ensure it establishes well.

Extra information has been provided in the enclosed planting details, and notes covering the issues – see drawing refs: G935 235 Planting Notes & Details, G935 241 Planting Details 1, and G935 242 Planting Details 2.

The tree mulch depth needs to be 75mm at least.

Agreed. The tree mulch depth in the planting detail has been amended accordingly (see drawing ref: G935 242 Planting Details 2).

The proposed trees along the site frontage are mainly small in stature (Acer Campestre), coloniser species (Betula pendula) so relatively short lived and trees which are small and have a poor structural form (sorbus aucuparia). These tree species need to be revisited, with an emphasis on Climax species trees to provide the baseline structure and the smaller trees infilling around them, as the Climax species will provide the character of the site and the frontage in the long term and need to be planned around, not used as the occasional highlight tree.

The prioritising of climax species between the holes would also benefit the setting of the golf course. On the species mix proposed it can be seen that there is only Beech (Fagus sylvatica), Pine (Pinus sylvestris) and Oak (Quercus robur) which are climax species, more varieties should be added. Further, be mindful that Salix alba will get the height, but it is relatively short lived and will require a lot of maintenance as it ages. Further, Frangula alnus is more of a larger shrub than a tree.

In response, the tree species list has been amended.

Acer campestre, Frangula alnus, Salix alba, Sorbus aucuparia have been replaced, but Betula pendula has been kept for its character in some areas, but has been reduced in number.



The information set out within the 'Details' drawings is limited; for example it is also unclear as to which planting area the typical lake edge detail is referring to and no detail is provided for the proposed planting in planters.

Extra information has now been provided in the planting details and notes (ref: G935 235 Planting Notes & Details; G935 241 Planting Details 1; amnd G935 242 Planting Details 2).

General Notes have also been added on multiple sheets to help navigate between different documents on corresponding information.

Details of fencing, gates and walls are lacking, please provide. On the associated plan it is hard to distinguish the colours of the Perimeter fence and the sports court fence, in the legend they are both salmon colour, but on the plan one is definitely red.

The colours and fencing type mentioned above indicate that the wrong drawings (previous version of the design) have been reviewed. See the correct, up to date drawing refs: G935 013 Fences and Gates and G935 143 Parking and Adventure Golf Fencing Plan (both Rev. A).

For details of fencing, walls and gates see G935_Materials Schedule_Planning App rev D.

No landscape details have been provided for the transitions between hard surfacing shown on the Hardscape Plans 2 to 5. Further information is required.

Extra information has been provided in the hardscape details (ref: G935 237 Hardscape & Cart Path Details, G935 238 Hardscape Details, G935 239 Artificial Turf Details 1, G935 240 Artificial Turf Details 2).

Consideration should be given to the inclusion of hedgerow trees within the hedgerows itself, as the visuals within the LVIA illustrate that some of the boundaries appear more open on completion. Standard tree planting within hedgerow will also provide more of an initial impact and more screening, whilst the hedgerow establishes.

In response, standard trees have been included in the hedgerow area.



With regard to the Entrance Totem Pole and wayfinding designs; what is the detail around the base? Is this to have planting as per the mock up, or grass as per the visualisation. If it is to have a maintained finish there will need to be a maintenance strip around it to help with grass cutting. Also be mindful that Corten steel will 'bleed' a rust colour on the surface surrounding it, so this just needs to be taken into account.

The totem has been removed from the application and the wayfinding signs have been repositioned where needed into planting beds to eliminate the problem of staining the pavement.

The planning application is missing information relating to the long-term management of the planting areas identified on the Landscape Plan. A landscape management and maintenance plan (LMMP) is requested in order to support the planning application. In line with Biodiversity Net Gain requirements (BNG), it is recommended that the LMMP, covers a duration of 30 years.

An Annual Maintenance Operation Matrix has been included in G935 110 Landscape Plan.

We request that the LMMP be a conditioned item due to the complexity of the ecological input. There is no good reason why these details cannot be dealt with by a suitably worded pre-commencement condition.

Summary of Enclosures

For the avoidance of doubt, enclosed with this letter is the following information, which supersedes all previous versions of the same:

- Updated Construction Method Statement (dated January 2024)
- Complete set of course works / landscaping drawings prepared by International Design Group as listed in the submitted drawing register
- Updated LVIA (Revision A) [dated 05.02.24]
- Updated Landscaping Materials Schedule (Revision D)



We would be grateful if this letter and the enclosed information be shared with your colleagues, and we trust that we have satisfactorily dealt with the points raised. If any further information, clarification or details or discussion would assist, please do not hesitate to contact me.

Yours sincerely
for Roman Summer Associates Ltd

Richard Gee
Director